



Forest Service  
U.S. DEPARTMENT OF AGRICULTURE

Tonto National Forest

MB-R3-12-14c

November 2023

# **Final Environmental Impact Statement for the Land Management Plan**

## **Tonto National Forest**

### **Volume 3: Appendix A – Response to Comments**

**Coconino, Gila, Maricopa, Pinal, and Yavapai Counties, Arizona**



**Cover photo:** Prickly poppy, credit: Mary Lata

We make every effort to create documents that are accessible to individuals of all abilities; however, limitations with our word processing programs may prevent some parts of this document from being readable by computer-assisted reading devices. If you need assistance with any part of this document, please contact the Tonto National Forest at (602) 225-5200.

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, religion, sex, gender identity (including gender expression), sexual orientation, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity, in any program or activity conducted or funded by USDA (not all bases apply to all programs). Remedies and complaint filing deadlines vary by program or incident.

Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language, etc.) should contact the responsible Agency or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program discrimination complaint, complete the USDA Program Discrimination Complaint Form, AD 3027, found online at [How to File a Program Discrimination Complaint \(https://www.usda.gov/oascr/how-to-file-a-program-discrimination-complaint\)](https://www.usda.gov/oascr/how-to-file-a-program-discrimination-complaint) and at any USDA office or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410; (2) fax: (202) 690-7442; or (3) email: [program.intake@usda.gov](mailto:program.intake@usda.gov).

USDA is an equal opportunity provider, employer, and lender.

**Final Environmental Impact Statement  
for the Land Management Plan  
Tonto National Forest**

**Lead Agency:**

**USDA Forest Service**

**Cooperating Agencies:**

**Arizona Department of Agriculture  
Arizona Game and Fish Department**

**Responsible Official:**

**Neil Bosworth, Forest Supervisor  
Tonto National Forest  
2324 E. McDowell Rd.  
Phoenix, AZ. 85006**

**For Information Contact:**

**Tonto National Forest  
2324 E. McDowell Rd.  
Phoenix, AZ. 85006  
602-225-5200**

Page intentionally left blank

# Contents

Appendix A. Response to Comments .....	1
Introduction .....	1
Content Analysis Process.....	1
Comment Concern Statements and Responses.....	3
Access .....	3
Adaptive Management.....	4
Air .....	4
Alternatives .....	6
Apache Leap Special Management Area .....	13
Caves and Karsts.....	14
Climate Change.....	15
Comment Attachments.....	16
Cultural and Historic Resources .....	19
Designated and Recommended Research Natural Areas .....	22
Designated Wilderness.....	23
Developed Recreation .....	24
Dispersed Recreation .....	25
Dispersed Recreation - Aviation .....	28
Dispersed Recreation – E-Bikes .....	29
Eligible Wild and Scenic Rivers .....	30
Energy Production and Delivery.....	54
Fire and Fuels (Wildland Fire).....	56
Forest Closures.....	64
Forest Products.....	65
Forest Project - Salt River Horses.....	73
Forest Projects – Four Forest Restoration Initiative (4FRI).....	74
Forest Projects - Resolution Copper .....	75
Forest Projects - Travel Management .....	76
General - Comment / Opinion.....	79
General - Environmental Impact Statement.....	85
General - Forest Plan .....	88
General – National Environmental Policy Act (NEPA) .....	91
Information Request.....	92
Invasive Species.....	93
Inventoried Roadless Areas (IRAs) .....	97
Lakes and Rivers Management Area .....	100
Lands and Access.....	102
Management Areas .....	105
Mining, Minerals, and Abandoned Mines .....	107
Monitoring .....	127
Motorized Recreation.....	131
National Trails .....	141
Nonmotorized Recreation .....	152
Partnerships and Volunteers.....	153
Plan Components .....	154
Public Involvement .....	155
Rangelands, Forage, and Grazing .....	157
Recommended Botanical Areas .....	187

Recommended Wilderness.....	188
Recreation .....	214
Recreational Shooting.....	227
Riparian Areas, Seeps, Springs, and Riparian Management Zones (RMZs) .....	233
Riparian Ecological Response Units (ERUs).....	251
Roads.....	252
Rock Climbing.....	258
Saguaro Wild Burro Management Area.....	265
Salt River Horses .....	267
Scenery.....	276
Significant Caves .....	277
Socio-Economics .....	278
Soils.....	280
Special Uses .....	281
Species of Conservation Concern (SCC).....	283
Tribal Relations and Areas of Tribal Importance .....	291
Utilities.....	295
Vegetation and Ecological Response Units (ERUs) .....	296
Water-based Recreation .....	305
Watersheds and Water Resources .....	306
Wildlife Related Recreation (Hunting, Trapping, Fishing, Wildlife Viewing).....	323
Wildlife, Fish, and Plants (At-Risk Species) .....	330
List of Commenters .....	362

References for the appendices are in the Reference section of volume 2 of the environmental impact statement for the land management plan.

## Appendix A. Response to Comments

### Introduction

Appendix A is our analysis of the comments we received during the public comment period of December 13, 2019, to March 12, 2020. The analysis consists of public comments, aggregated and summarized into concerns statements, and our agency responses to the substantive comments received. We used a variety of methods to inform the public about the draft forest plan and draft environmental impact statement and the associated comment period. These included direct notifications to interested and potentially affected individuals and organizations, news releases, newsletters, social media, public meetings, partner meetings, contacts with other agencies and Tribes, publication of the notice of availability in the Federal Register on December 13, 2019, and website posting at [www.fs.usda.gov/main/tonto/landmanagement/planning](http://www.fs.usda.gov/main/tonto/landmanagement/planning). The Tonto National Forest plan revision team received over 4,000 comment letters, including form and form plus letters, of which about 181 were unique.

Individual letters are not included in this report but can be viewed online in the Content Analysis and Response Application (CARA) public reading room for this project at (<https://cara.ecosystem-management.org/Public/ReadingRoom?Project=51592>). Individual comments are also included in the administrative record for this project. A list of commenters and their letter numbers is included at the end of this appendix beginning on page 362.

### Content Analysis Process

Content analysis is a method commonly used by the Forest Service to gather information from comment letters. The content analysis process ensures that every comment was read, analyzed, and considered. Each unique letter was read and substantive formal comments<sup>1</sup> were identified and coded by resource area and concern topic. The substantive comments and their coding were entered into the Content Analysis and Response Application (CARA) database, which enabled reports to be run listing all the substantive comments by topics and concern<sup>2</sup>. Once the unique and substantially different comments had been coded, the concerns raised by different commenters on the same subject and with the same intent were grouped together. Resource specialists combined similar comments into concern statements that captured the intent of the commenter(s). These are called the “comment concern statements” and this appendix includes 366 of them. For this reason, even though not every comment is displayed in this appendix exactly as written by each respondent, each comment was considered individually.

The comment concern statements are followed by the comment responses prepared by the plan revision interdisciplinary team. This team prepared responses for each comment based on its merits, regardless of the source or whether the comment was expressed by one person or by many. Each substantive comment was considered and responded to and is available in the administrative record for this project.

In considering the comments, it is important for readers and decision makers to understand this process makes no attempt to treat input as if it were a vote. Instead, the content analysis process focuses on the

---

<sup>1</sup> Per 36 CFR 219.62, the term “substantive formal comments” is defined as: Written comments submitted to, or oral comments recorded by, the responsible official or his designee during an opportunity for public participation provided during the planning process (§§ 219.4 and 219.16), and attributed to the individual or entity providing them. Comments are considered substantive when they are within the scope of the proposal, are specific to the proposal, have a direct relationship to the proposal, and include supporting reasons for the responsible official to consider.

<sup>2</sup> These detailed reports can be found in the project record.

content of the comments and ensures that every comment is considered in the decision process. In addition, non-substantive comments can include those that are unrelated to the decision being made; already decided by law, regulation, or policy; beyond the scope of the proposal; conjectural in nature or not supported by scientific evidence; or general in nature or position.

The Tonto National Forest responded to public comments by:

- Modifying the land management plan and the alternatives in the environmental impact statement, where appropriate;
- Developing or analyzing alternatives not given detailed consideration in the draft environmental impact statement;
- Supplementing, improving, or modifying the analysis in the final environmental impact statement;
- Making factual corrections; and/or
- Explaining why the comments needed no response.



## Comment Concern Statements and Responses

Comment concern statements and responses are organized by resource and topic. Comment letter numbers are included with each comment concern statement to help the reader identify the unique commenters. The format of these comment letters is represented by XX-YY, where the “XX” represents the letter number and the “YY” represents the specific comment number contained within that letter related to the concern statement. The table identifying each commentor’s unique comment letter number can be found at the end of this volume.

### Access

**Concern Statement 1.**      *Commenter suggests ways to incorporate aviation language in the final forest plan and final environmental impact statement.*

Response:

**Comment Number(s):**

37-9

In response to your comments, changes have been made to the revised forest plan to include plan components and language that addresses recreation aviation activities while still leaving flexibility for the Forest and its partners to develop this use and management of it in the future. Specifically, in chapter 2 of the revised plan (Dispersed Recreation), the first paragraph has been changed to include “aircraft access” so that it now reads: “Dispersed recreation occurs throughout the forest, outside of developed Forest Service recreation sites, and involves activities which are not dependent upon developed facilities or sites. Examples include but are not limited to hiking, backpacking, hunting, wildlife viewing, rock climbing, off-highway vehicle use, equestrian use, mountain biking, and aircraft access.” Additionally, we have added a new desired condition that reads: Airstrips provide aviation access for dispersed recreation opportunities (revised plan, chapter 2, Dispersed Recreation). Finally, we have revised one of the management approaches to now read: “Utilize collaborative partnerships where volunteers plan, lead, and execute a majority of motorized and non-motorized trail and airstrip maintenance” (revised plan, chapter 2, Dispersed Recreation).

**Concern Statement 2.**      *Commenters suggest access is of high value and importance and the Forest Service should not do anything to restrict or change access.*

Response:

**Comment Number(s):**

6-1, 6-2, 8-1, 8-4, 12-1, 12-2, 15-1, 66-2

The plan is strategic in nature and does not specifically authorize any projects or activities. Site-specific decisions are made following project-specific proposals and analyses that comply with the forest plan, with additional opportunities for public involvement. Any actions taken based on plan direction will be analyzed at a project level per 36 CFR 251 and 36 CFR 220. “Plan components related to National Forest System lands acquisitions, disposals, and exchanges are developed along with plan components that encourage the protection of existing public access and address the acquisition of new public access

opportunities” (revised plan, chapter 1, Social, Cultural, and Economic Sustainability). While plan components do state that the Tonto will take appropriate action (such as decommissioning, closing, or converting) on at least 10 miles of trails every 5 years, it also states that the Forest will be creating new ones. As mentioned in the same section (forest plan, chapter 2, Recreation), the Tonto National Forest will be developing or modifying existing systems sustainable for motorized and nonmotorized trails to adequately provide for all user groups and reduce user conflicts.

## **Adaptive Management**

*Concern Statement 3. Commenter is concerned that the forest plan contradicts the Multiple Use Sustained Yield Act.*

Response:

**Comment Number(s):**

2922-1, 3

The Tonto National Forest followed the plan revision process per 36 CFR 219 to revise its 1985 forest plan and develop the management direction outlined in the draft forest plan. We have updated the language in the final forest plan to reflect public comments, best available scientific information, reduce redundancy, and ensure consistency. We are unsure of which standards the commenter feels are contradictory. However, the Multiple-Use Sustained-Yield Act specifies “some land will be used for less than all of the resources,” which we use as a foundation of resource management. Management Areas are defined in the forest plan as an area that “represents a management emphasis for an area or several similar areas on the landscape...that call for management that is in addition to or different than forestwide management.” In addition to forestwide management for all forest resources, we have tailored additional management direction in these management areas to better guide forest management for the Tonto National Forest's specific needs. This includes updating the monitoring section (forest plan, chapter 4, Monitoring) of the final forest plan based on feedback and discussion from the partner meeting on February 25, 2020. Forest plan effectiveness is an important part of the 2012 Planning Rule.

## **Air**

*Concern Statement 4. Commenter questions the legal obligations and practical considerations for Forest Service management of air quality in wilderness.*

Response:

**Comment Number(s):**

2816-83

The Clean Air Act states all wilderness areas 5,000 acres or greater in size in existence in 1977 are considered Class I areas. All areas designated after 1977 are Class II areas. The difference between the two is that Class I areas are protected through the Clean Air Act and Air Quality Related Values have been established for each region. The Forest Service is responsible for protecting air quality values in wilderness the same, regardless of whether they are Class I or Class II areas. It is the agency's ability to affect change, and the process that is used in Class I areas, which is different. For both Class I and II

areas, the Forest reports the results of air quality monitoring and the effects from sources outside wilderness to the State regulatory agency. This language has been updated in the air quality description.

**Concern Statement 5.**      *Commenter expresses importance of clean air for public health.*

Response:

**Comment Number(s):**

2811-11

The Multiple-Use Sustained-Yield Act mandates national forests be managed for multiple uses, which includes recreation, motorized access, wilderness area management, and ecosystems management to protect wildlife habitat. The Tonto National Forest followed the plan revision process per 36 CFR 219 to revise the 1985 forest plan and develop the management direction outlined in the final forest plan. We have updated the language in the final forest plan to reflect public comments, best available scientific information, reduce redundancy, and ensure consistency. We are unsure what plan components the commenter feels are missing in order to keep the forests and mountains clean but feel it is addressed appropriately per the 2012 Planning Rule.

**Concern Statement 6.**      *Commenters suggest edits to the air quality section of the revised forest plan.*

Response:

**Comment Number(s):**

20-1, 2816-84, 2816-85

Management approaches describe an approach or strategy to help achieve desired conditions. The intent of the management approach the commenter refers to, within the Air Quality section in chapter 2 of the forest plan, is to encourage collaboration and cooperation between stakeholders and adjacent landowners (Federal, State, and/or private) to comply with the Clean Air Act and to reduce the impacts of pollutants from within and outside the forest. In Arizona, actions affecting air quality, including permits and coordination of potential emission production actions (such as prescribed fire), are managed by the Arizona Department of Environmental Quality. Suggested language is incorporated in every alternative analyzed in the final environmental impact statement and included in the air quality section of the final forest plan. The plan component reads, “dust abatement should occur during projects where dust is a potential effect (e.g., construction and road and motorized trail improvements)” (forest plan, chapter 2, Air Quality).

## Alternatives

**Concern Statement 7.** *Commenters support alternative A because current management is still appropriate and would support current uses into the future.*

Response:

**Comment Number(s):**

7-1, 257-2, 843-1

The Multiple-Use Sustained-Yield Act mandates national forests be managed for multiple uses, which includes recreation, motorized access, wilderness area management, and ecosystems management to protect wildlife habitat. The National Forest Management Act of 1976 mandates that forest plans be revised “from time to time when the secretary finds conditions in a unit to have significantly changed, but at least every fifteen years”. The current forest plan for the Tonto National Forest was signed in 1985, which is well past the fifteen-year threshold. As part of the 2012 Planning Rule (FSH 1909.12), the Forest developed a list of “needs to change” from the current forest plan. The “needs to change” statements were published in the notice of intent on April 6, 2017, with a 45-day comment period per 36 CFR 219. During plan revision, the 2012 Planning Rule also outlines a process to identify areas on the forest to potentially identify as recommended wilderness (see appendix D of the environmental impact statement). Alternative A, the current 1985 forest plan, was not selected as the final forest plan because substantial changes have occurred in conditions and demands since the current forest plan was developed.

**Comment Number(s):**

11-1

We appreciate your support of the plan revision process per FSH 1909.12 and for expressing your views on alternative A, which reflect the 1985 Tonto Forest plan, as amended, and accounts for current laws and regulations. This alternative has not been selected as the preferred alternative because substantial changes have occurred in conditions and demands since the current forest plan was developed. The Forest developed “needs to change” statements and published them in the Federal Register on April 6, 2017, with a 45-day comment period. These “needs to change” statements identify areas where the current 1985 forest plan, alternative A, is lacking best management practices and does not incorporate changes in trends and demands on the landscape. The 2012 Planning Rule requires the inclusion of plan components, including standards or guidelines, which address social and economic sustainability, ecosystem services, and multiple uses integrated with plan components for ecological sustainability and species diversity. However, the final plan does incorporate many plan components to support motorized recreational opportunities including “motorized trails and staging areas are sustainable” and “within 10 years of plan approval, develop or modify 1 to 4 systems of sustainably designed motorized trails”. See forest plan, chapter 2, Recreation and Dispersed Recreation for additional plan direction. We encourage the commenter's participation as we move into the implementation phase of this process where opportunities exist at the project level to consider these suggestions.

**Concern Statement 8.** *Commenters support alternative B, because it best balances multiple uses and ecosystem protection including water resources and riparian areas. One commenter is concerned about included recommended wilderness in alternative B.*

Response:

**Comment Number(s):**

2966-8

Any recommended wilderness area(s) will be managed to protect the wilderness characteristics identified for each area per FSH 1909.12 - Chapter 70. A description of current uses in each recommended wilderness area from the alternatives is outlined in appendix D of the environmental impact statement, volume III. In addition, management outlined in the forest plan does not restrict hunting opportunities within recommended wilderness areas. The commentor does not specify why recommended wilderness areas negatively impact the hunting public and no alternatives in the final environmental impact statement have any restriction or impediment identified. In addition, hunting, fishing, and watchable wildlife has been identified as a key ecosystem service on the forest and the final forest plan has plan components in place to support this service for the future (forest plan, chapter 1, Key Ecosystem Services).

**Comment Number(s):**

14-1, 14-4, 21-1, 159-1, 1060-1, 1150-1, 2142-1, 2907-13

We appreciate your support of our planning efforts per 36 CFR 219. A modified alternative B was selected as the preferred alternative. As we move into forest plan monitoring (FSH 1909.12-Chapter 30) and project level plan implementation, we will be looking for partners and volunteers to help us achieve our desired conditions and would appreciate your continued support.

**Comment Number(s):**

2922-15

In addition to the required plan content, a forest plan may also include “optional plan content” (36 CFR 219.7(f)(2)), such as background information, explanatory narrative, general management principles, potential management approaches, management challenges, performance history, performance risks, contextual information, or referenced material. Optional content is not labeled or worded in a way that suggests it is a plan component and does not imply or constitute management direction, but it may help clarify plan direction and how it may be applied. A change to “other required plan content” or “optional content” does not require a plan amendment; instead, such changes may be made using an administrative correction process. An assessment of biodiversity, including stream conditions, can be found in the Final Assessment Report (Ecological Conditions, Trends, and Risks to Sustainability, volume I) along with updated information, as necessary, on the corresponding existing conditions sections of chapter 3 of the environmental impact statement. The effects of fire to vegetation communities, including those containing rare plants, is analyzed in the associated sections of in chapter 3 of the environmental impact statement. Additionally, standards and guidelines are included in the Wildlife, Fish, and Plants section (revised plan, chapter 2) aimed to avoid or mitigate adverse impacts to species and their habitat.

**Comment Number(s):**

2907-10

The environmental impact statement evaluates a range of reasonable alternatives that were developed to address the significant issues raised throughout the planning process and in response to public comment. The final environmental impact statement chapter 1 describes the issues raised, and chapter 2 describes the alternatives developed in response to the significant issues. Alternatives were developed as different methods to achieve desired conditions, which are the same for each alternative. Each alternative, including alternative C and alternative D, are selectable, in whole or in part, by the decision maker. The degree and extent to which they achieve desired conditions are analyzed in chapter 3 of the final environmental impact statement.

**Comment Number(s):**

2959-1, 2961-1

The Forest Service appreciates the time and energy spent providing comments and supporting forest projects. However, your comment is related to the Salt River Horse Management Plan, where Arizona Department of Agriculture is the decision maker. Based on public comments received through the plan revision process, a Salt River Horse Management Area was developed and will be incorporated into the preferred alternative, a modified alternative B. Furthermore, nothing in the forest plan would restrict horseback riding on the Tonto National Forest.

**Comment Number(s):**

2712-1

We appreciate your support for our planning effort. Alternative B is the proposed action, also known as the preferred alternative, and is a balance of natural forces and human influences. This alternative was developed to respond to key issues identified in the Assessment, needs to change, and public engagement. Based upon the effects of the alternatives, the forest supervisor of the Tonto National Forest may select one of the analyzed alternatives or a combination of elements from each of the alternatives. As we move into project level plan implementation, we will be looking for volunteers and partners to help us with projects to achieve our desired conditions for vegetation and would appreciate your continued support of the program.

**Comment Number(s):**

2972-19

We appreciate your support of our planning efforts per 36 CFR 219 and for expressing your views on modifying alternative B. Although these suggestions were not incorporated in the final forest plan, riparian area management is a priority on the forest and objectives and guidelines have been further clarified based on public comments. Some examples of these riparian areas, seeps, spring, wetlands, and riparian management zones plan components include the guideline for riparian management zones “in riparian management zones (RMZ), projects and management activities should be designed and implemented to maintain or restore long-term streambank stability, native vegetation, floodplain, and soil function” (RMZ-G-3, chapter 2) and the objective “Complete active and passive restoration projects on at least 125 miles of streams every 10 years to improve the ecological integrity of perennial and intermittent riparian ecosystems rated as nonfunctioning and functioning-at-risk” (RMZ-O-3, chapter 2). The suggested objective about closing vacant allotments every year as they become available is not in compliance with the Multiple-Use Sustained-Yield Act of 1960 ([16 U.S.C. 528–531](#)) and is therefore not viable. Alternative C commits to evaluating allotments as they become vacant and closing all currently vacant allotments. This distinction allows the Forest to decide best management at an allotment level and is more adaptive to trends on the landscape. As we move into forest plan monitoring (36 CFR 219.12) and

project level plan implementation, we will be looking for partners and volunteers to help us achieve our desired conditions and would appreciate your continued support.

**Comment Number(s):**

2803-1, 2932-9, 2950-1, 2951-4

We appreciate your support of our planning efforts per 36 CFR 219 and taking the time to meet with us in person. The Multiple-Use Sustained-Yield Act of 1960 ([16 U.S.C. 528–531](#)) mandates national forests be managed for multiple uses, which includes outdoor recreation, range, timber, watershed, wildlife and fish ecosystems to protect wildlife habitat. Additionally, as per the 2012 Planning Rule, the plan must provide for ecosystem services and multiple uses as described in 36 CFR 219.10, including plan components for non-motorized and motorized recreation, protection of congressionally designated wilderness areas as well as management of areas recommended for wilderness designation. The National Forest Management Act of 1976 mandates that forest plans be revised “from time to time when the secretary finds conditions in a unit to have significantly changed, but at least every fifteen years”. The current forest plan for the Tonto National Forest was signed in 1985, which is well past the fifteen-year threshold. As part of the 2012 Planning Rule (36 CFR 219), the Forest developed a list of “needs to change” from the current forest plan. The “needs to change” statements were published in the notice of intent on April 6, 2017, with a 45-day comment period per 36 CFR 219.16. We appreciate your support of the modified alternative B. As we move into forest plan monitoring (36 CFR 219.12) and project level plan implementation, we will be looking for partners and volunteers to help us achieve our desired conditions and would appreciate your continued support.

**Comment Number(s):**

2951-5

We recognize the importance of motorized recreation for many of our forest users, as that is one of our greatest uses according to the 2013 National Visitor Use Monitoring results. The dispersed recreation objectives and management approaches were updated to incorporate this emphasis. See forest plan, chapter 2, Recreation and Dispersed Recreation sections for the details.

**Concern Statement 9.**      *Commenters support alternative C, because it would be most protective of wilderness characteristics, wildlife, and ecosystems, and best address concerns related to off-highway vehicle use. Other comments oppose alternative C based on the amount of recommended wilderness allocation, which would hinder future economic and multiple use opportunities, and inhibit active restoration activities on the forest.*

Response:

**Comment Number(s):**

14-2, 76-1, 2907-12, 2936-1, 2991-8, 2991-9

We have followed the plan revision process per 36 CFR 219 and the National Environmental Policy Act (42 U.S.C. 4321 et seq.) process to develop the identified alternatives. Alternatives were developed in response to issues raised by the public throughout the planning process. All alternatives outlined in the environmental impact statement have been determined to achieve the desired conditions for each resource

and are therefore a potential viable management option. They have each been analyzed and indicate the degree to which each alternative meets those desired conditions. The responsible official may select any alternative, in whole or in part, that meets the desired conditions. The Multiple-Use Sustained-Yield Act of 1960 ([16 U.S.C. 528–531](#)) defines the management of multiples uses as “management of all the renewable surface resources of the national forest so that they are utilized in combination that will best meet the needs of the American people.” Alternative C emphasizes non-motorized recreation and passive restoration. Alternative C was not selected as the preferred alternative for the forest plan as it does not give the forest the balance of use and resource protection that alternative B does. As a result of public comment, a management area was created for the Salt River Horses to address a deviation in forest-wide management in the location the Salt Rivers Horse herd occurs. Additionally, grazing management decisions on open allotments will continue to incorporate the best scientific information. However, as the forest plan is programmatic in nature, it lacks the site-specificity that a project-level grazing allotment analysis would have. This also allows management to quickly respond to changing conditions, including drought and climate conditions, when managing grazing with the ranchers. Although this alternative was not selected as the final forest plan, components of this alternative were incorporated, such as some of the recommended wilderness areas. Based on public comments, some of the recommended wilderness areas from alternative C were incorporated into the final plan, either in whole or in part<sup>3</sup>. As we move into forest plan monitoring (36 CFR 219.12) and project-level plan implementation, we will be looking for partners and volunteers to help us achieve our desired conditions and would appreciate your continued support.

**Comment Number(s):**

2811-9

We appreciate your support of the plan revision process per 36 CFR 219 and the 2012 Planning Rule Forest Service Handbook (FSH) FSH 1909.12 and for expressing your views on alternative C. The Multiple-Use Sustained-Yield Act of 1960 ([16 U.S.C. 528–531](#)) mandates national forests be managed for multiple uses, which includes outdoor recreation, range, timber, watershed, wildlife, and fish. Additionally, as per the 2012 Planning Rule, the plan must provide for ecosystem services and multiple uses as described in 36 CFR 219.10 including plan components for non-motorized and motorized recreation, protection of congressionally designated wilderness areas as well as management of areas recommended for wilderness designation. The 2012 Planning Rule (36 CFR 219.7(c)(v)) also outlines a process to identify and evaluate areas on the forest and a determination of whether to recommend lands for wilderness designation (see appendix D of the environmental impact statement). Recommended wilderness is not managed the same as designated wilderness, which can only be designated by Congress per the Wilderness Act of 1964 ([16 U.S.C. 1131–1136](#)). Recommended wilderness management is to protect the wilderness characteristics present in the areas recommended. In addition, many of the values and resources that have been identified as important to the Native American communities with ties to the forest have been protected and are managed the same among alternatives B, C, and D following forestwide plan direction for cultural and historic resources and areas of Tribal importance (see forest plan, chapter 2 Forestwide Plan Direction). Although alternative C was not selected as the final forest plan it does not impact the commentors concern as an objective or management allocation changing by alternative. In addition, there is nothing in the plan that would prohibit or discourage projects to improve conditions on the ground as long as they complied with the standards and guidelines of the forest plan. These projects would be considered at the project level and consider site-specific conditions. As we move into forest plan monitoring (36 CFR 219.12) and project level plan implementation, we will be looking

---

<sup>3</sup> The final forest plan has the detailed list of these areas and the acres associated with them.



for partners and volunteers to help us achieve our desired conditions and would appreciate your continued support.

**Comment Number(s):**

2900-1

We appreciate your support of the plan revision process per FSH 1909.12 and for expressing your views on alternative C. The Multiple-Use Sustained-Yield Act mandates national forests be managed for multiple uses, which includes recreation, motorized access, wilderness area management, and ecosystems management to protect wildlife habitat. Additionally, as per the 2012 Planning Rule, the plan must provide for ecosystem services and multiple uses as described in 36 CFR 219.10, including plan components for non-motorized and motorized recreation, protection of congressionally designated wilderness areas as well as management of areas recommended for wilderness designation. Although alternative C was not selected as the final forest plan, it does not impact the commenters' main concerns as those items are addressed in the preferred alternative (alternative B) or are not changing by alternative. Recreation on the Tonto National Forest is growing each year and plan components were created to accommodate that use. Multiple sections in the forest plan were created to address the use, such as water-based recreation, wildlife related recreation, and recreational shooting. The Forest also created the Lakes and Rivers management area to create an area with an emphasis on managing a part of our forest to enhance recreation. Outside of the Lakes and Rivers management area, riparian areas and other natural resources are prioritized over recreation as shown by their planning components found in the final forest plan. This will help address recreation trends down the road. The 2012 Planning Rule handbook directives (1909.12 Chapter 70) also outline a process to identify areas on the forest as recommended wilderness. The forest plan, chapter 3, Recommended Wilderness section shows the areas being recommended (see appendix D of the environmental impact statement for additional information). Recommended wildernesses are not managed the same as designated wildernesses, which can only be designated by Congress per the Wilderness Act of 1964 ([16 U.S.C. 1131–1136](#)). Recommended wilderness management is to protect the wilderness characteristics present in the areas recommended. Watershed health, including available drinking water, is a key ecosystem service the Forest has committed to managing for into the future. It is part of the reason the forest was created. In addition, there is nothing in the plan that would prohibit or discourage projects to improve conditions on the ground as long as they complied with the standards and guidelines of the forest plan. These projects would be considered at the project level and consider site-specific conditions. As we move into forest plan monitoring (36 CFR 219.12) and project level plan implementation, we will be looking for partners and volunteers to help us achieve our desired conditions and would appreciate your continued support.

**Concern Statement 10.**     *Commenters support alternative D as it would provide more accessible recreation opportunities and provide more economic contributions to the counties. Other commenters are concerned with resource degradation as a result of increased access and impacts from multiple uses.*

Response:

**Comment Number(s):**

14-3, 2907-11

We appreciate your support of the plan revision process per 36 CFR 219 and FSH 1909.12 and for expressing your views on alternative D. The Multiple-Use Sustained-Yield Act mandates national forests

be managed for multiple uses, which includes recreation, motorized access, wilderness area management, and ecosystems management to protect wildlife habitat. Additionally, as per the 2012 Planning Rule, the plan must provide for ecosystem services and multiple uses as described in 36 CFR 219.10, including plan components for non-motorized and motorized recreation, protection of congressionally designated wilderness areas as well as management of areas recommended for wilderness designation. All alternatives outlined in the environmental impact statement have been determined to achieve the desired conditions for each resource and are therefore a potential viable management option. They have each been analyzed and indicate the degree to which each alternative meets those desired conditions. We have followed the plan revision process per 36 CFR 219. Once a final travel management decision has been made and a motor vehicle use map has been made available, changes to that designated system can be considered. Any changes would then need to comply with both the 2005 Travel Management Rule as well as comply with this revised forest plan. Plan components have been developed to address off-highway vehicle use on the forest. Alternative D was not selected as the final forest plan, however, there is nothing in the plan that would prohibit or discourage projects to improve conditions on the ground as long as they comply with the standards and guidelines of the forest plan. These projects would be considered at the project level and consider site-specific conditions.

**Comment Number(s):**

2991-18

We acknowledge grazing, mining, and other economic opportunities are important uses of National Forest System lands and supported in the Multiple-Use Sustained-Yield Act. The Act also states, “The establishment and maintenance of areas of wilderness are consistent with the purposes and provisions of this Act” (16 U.S.C. 529 Sec. 2). Alternatives A, B, C, and D were all analyzed and found to meet the desired conditions for recreation in varying degrees, including an economic analysis in the final environmental impact statement. We appreciate your support of the plan revision process per FSH 1909.12 and for expressing your views on alternative D. Although this alternative was not selected as the final forest plan, components of this alternative were incorporated into the preferred alternative, a modified alternative B. For example, an objective for motorized recreation was included to prioritize this popular use of the forest, which was an emphasis of alternative D (forest plan, chapter 2, Recreation).

**Comment Number(s):**

2570-3, 2925-70, 2927-1

We appreciate your support of the plan revision process, and for expressing your views on alternative D. The Multiple-Use Sustained-Yield Act mandates national forests be managed for multiple uses, which includes recreation, motorized access, wilderness area management, and ecosystems management to protect wildlife habitat. Additionally, as per the 2012 Planning Rule, the plan must provide for ecosystem services and multiple uses as described in 36 CFR 219.10, including plan components for non-motorized and motorized recreation, protection of congressionally designated wilderness areas, as well as management of areas recommended for wilderness designation. All alternatives outlined in the environmental impact statement have been determined to achieve the desired conditions for each resource and are therefore a potential viable management option. They have each been analyzed and indicate the degree to which each alternative meets those desired conditions. We have followed the plan revision process per 36 CFR 219, including FSH 1909.12 Chapter 70 that outlines the recommended wilderness process. The forest plan, chapter 3, Recommended Wilderness section includes plan direction for the areas being moved forward as recommended wilderness and the associated forest management. Alternative B was selected as the preferred alternative as it best meets the purpose and need for revising the 1985 plan and provides integrated natural resource management to support multiple uses. See chapter

3 of the final environmental impact statement to review the analysis of each resource and the alternatives. As we move into forest plan monitoring (36 CFR 219.12) and project level plan implementation, we will be looking for partners and volunteers to help us achieve our desired conditions and would appreciate your continued support.

**Concern Statement 11.**     *Commenter requests more specific information on how alternative B addresses the importance of economics.*

Response:

**Comment Number(s):**

2932-36

The language used to describe how alternative B responds to each of the listed issues has been updated based on this comment (environmental impact statement, volume 1, chapter 2), specifically recognizing the economic contributions of the forest. Additional information in chapter 2 of the final environmental impact statement for each of the three action alternatives was also changed to reflect updates based on public comments and updates to best available scientific information.

## **Apache Leap Special Management Area**

**Concern Statement 12.**     *Commenters request clarification for the Apache Leap special management area regarding roads and hunting and grazing in the environmental impact statement.*

Response:

**Comment Number(s):**

2736-16, 2921-3

In December 2017, the Tonto National Forest finalized a management plan for the Apache Leap Special Management Area, which was designated by Congress in December 2014. This management area is discussed in both the revised plan and environmental impact statement, including in chapter 3 of the revised plan that provides a management approach to utilize guidance from the Apache Leap Special Management Area management plan. The language referenced in the comment (Effects Common to all Alternatives) adequately conveys that motorized access may be restricted as a result of the Apache Leap Special Management Area management plan. We concur that grazing should be struck from the language. Hunting is still allowed within the Apache Leap Special Management Area. Hunting is managed by the Arizona Game and Fish Department.

## Caves and Karsts

**Concern Statement 13.** *Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2825-2, 3, 4

Thank you for bringing this omission to our attention. Due to a clerical error, the wording “karst features” was left out of the guideline the commenter is referring to. The text has been updated to read:

“The cultural, archaeological, geological, hydrological, paleontological, biological, recreational, and aesthetic resources associated with caves and karst features are conserved, maintained, and not degraded by visitors” (forest plan, chapter 2, Caves and Karsts).

“Salt or mineral supplements should not be placed near riparian, wetland, karst features or other areas where livestock concentrations are undesired” (forest plan, chapter 2, Rangelands, Forage, and Grazing).

“Where possible, new gate designs should allow the gate to be opened from inside the cave without the key” (forest plan, chapter 2, Caves and Karsts).

The Federal Cave Resources Protection Act (FCRPA) of 1988 prohibits the location of significant caves being shared with the general public. Thank you for identifying the omission of the word “recreational.” This desired condition has been changed to read:

“The cultural, archaeological, geological, hydrological, paleontological, biological, recreational, and aesthetic resources associated with caves and karst features are conserved, maintained, and not degraded by visitors” (forest plan, chapter 2, Caves and Karsts).

**Comment Number(s):**

2948-27

We agree with the commenter about the need to prevent the spread of white-nosed syndrome. We have edited the management approaches in the Significant Caves section of the revised plan (chapter 3) regarding white-nose syndrome and coordination with other agencies and partners to include proactive monitoring.

**Comment Number(s):**

2948-26

We have edited the guideline the commenter references to incorporate suggested edits. The revised plan directs the Forest to incorporate bat-friendly closures when necessary and to manage cave and karst features to provide habitat for cave specialists (particularly hibernacula and maternity roosts for bats). In determining the specific design features at the project level, the revised plan (chapter 3, Significant Caves) provides a management approach to work collaboratively with Bat Conservation International to develop protections for the resources, which will most likely include the use of the most current direction

from Bat Conservation International. We look forward to continuing our collaborative work to conserve vital bat habitat on the forest.

## Climate Change

**Concern Statement 14.** *Commenters do not think that climate change has been adequately addressed in the forest plan and environmental impact statement.*

Response:

**Comment Number(s):**

704-3, 803-1, 1236-1, 2970-720, 2970-729, 2986-30, 2986-31, 2986-38, 2986-39, 2986-79

To achieve ecological integrity, the 2012 Planning Rule (FSH 1909.12) emphasizes planning for resilience and managing to enhance the ability of ecosystems to adapt to change, stressors, and system drivers, including climate change. The plan has considered the potential impacts of climate change, to the degree that programmatic plan components and management approaches can or should incorporate concepts related to the issue. Most fundamentally, the plan sets forth desired conditions for vegetation that are designed to be resilient to future stressors, including climate change. The environmental impact statement incorporates climate change into the resource-specific sections similarly to how it is incorporated into the final forest plan. Additionally, the Southwestern Region has a regional climate change adaptation strategy for the southwestern United States<sup>4</sup>.

Specific plan components related to future sustainability of the forest road system and being adaptable in the face of climate change can be found in the Roads section of the final forest plan, chapter 2. They read as: “Decommission at least 100 miles of road every 5 years in order to implement the current travel management decisions; • Reconstruction and rehabilitation of existing roads should be prioritized over new construction; • New or reconstructed roads should be located outside of the riparian management zone, or other important water resources (e.g., meadows, wetlands, seeps, and springs), in order to prevent resource damage. If road construction in riparian areas is unavoidable, it should be designed and implemented to minimize effects to natural waterflow, aquatic species, channel morphology, water quality, and native riparian vegetation. The number of stream crossings should be minimized to reduce negative impacts to natural resources; • Construction of new and relocated roads should avoid areas with high mass wasting potential, (e.g., high landslide prone areas); and • Prioritize decommissioning of roads or user created routes that impact flow regimes, are redundant routes, cause mass movement of soils and sediment, are built within the riparian management zone, or have substantial negative impacts to at-risk species.”

The analysis in the final environmental impact statement addresses the impacts these plan components have on forest resources and the degree to which they help the Forest achieve desired conditions by alternative.

Climate change and carbon stocks were analyzed more specifically in the assessment document (Assessment of risks ecological conditions, trends, and risks to sustainability) published in March of

---

<sup>4</sup> USDA Forest Service. 2023. Regional climate adaptation strategy: Integrating existing tools, science, and collaborative outcomes for climate adaptation, mitigation, and socioeconomic vulnerability. Version 9. USDA Forest Service technical guide available online <[www.fs.usda.gov/main/r3/landmanagement/resourcemanagement](http://www.fs.usda.gov/main/r3/landmanagement/resourcemanagement)>. Southwestern Region, Albuquerque, NM, USA. 158 pp.

2017. The climate change chapter (chapter 9) analyzed climate change vulnerability for each of the ecological response units and the carbon stocks chapter (chapter 10) analyzed current conditions and trends of vegetation carbon, carbon emissions, and soil organic carbon. The assessment is the first phase of plan revision, and the Tonto National Forest used those findings to develop some of the desired conditions for each resource, including plan components that address climate change.

Specific standards and guidelines related to climate change can be found in the Rangelands, Forage, and Grazing (GRZ) and Watersheds and Water Resources (WAT) sections of the final forest plan. They read as “drought preparedness should be emphasized in allotment management plans and may include flexible stocking rates/livestock classes, flexible rotation schedules, and other strategies for dealing with climate variability” and “watershed condition improvement projects should be integrated with other project activities. Prioritize projects that require minimal maintenance (e.g., cost of maintenance and time required for maintenance) and improve resiliency to climate change”. There are also monitoring questions incorporated into the forest plan, chapter 4, Monitoring to help assess plan effectiveness related to stressors such as climate change.

## **Comment Attachments**

**Concern Statement 15.**     *Commenters request the attachments provided with their comment be considered.*

Response:

**Comment Number(s):**

2991-36

The Forest Service appreciates the time Gila County has spent commenting and the additional documentation on other forest projects. This is outside the scope of the plan revision process as it is specific to the Travel Management process. The forest plan, chapter 1 Introduction, outlines the connection between forest projects and management activities and the forest plan.

**Comment Number(s):**

2884-8

The Forest Service appreciates the time Sierra Club spent commenting and the additional documentation on other forest projects. This is outside the scope of the plan revision process as it is specific to the travel management environmental impact statement. The forest plan, chapter 1 Introduction, outlines the connection between Forest projects and management activities and the forest plan.

**Comment Number(s):**

79-22

The Forest Service appreciates the time you spent commenting and the additional documentation on the Arizona National Scenic Trail. Attachment B - Arizona National Scenic Trail Comprehensive Plan Scoping Comments is outside the scope of the plan revision process as it is specific to the Arizona National Scenic Trail Comprehensive Plan and not the Tonto National Forest plan. Additionally, no mention of what to do with the attachment was provided in the actual comment letter. The Forest Service is unclear about what pieces of information from this report the commentor would like considered. The forest plan, chapter 1 Introduction, outlines the connection between forest projects and management

activities and the forest plan. In addition, the forest plan, chapter 3, National Trails includes additional information about the Arizona National Scenic Trail and forest management.

**Comment Number(s):**

79-23

The Forest Service appreciates the time you spent commenting and the additional documentation on the Arizona National Scenic Trail. Attachment C - Arizona National Scenic Trail Planning Handbook is outside the scope of the plan revision process as it is specific to the Arizona National Scenic Trail and not the Tonto National Forest plan. Additionally, no mention of what to do with the attachment was provided in the actual comment letter. The Forest Service is unclear about what pieces of information from this report the commentor would like considered. The forest plan, chapter 1 Introduction, outlines the connection between forest projects and management activities and the forest plan. In addition, the forest plan, chapter 3, National Trails include additional information about the Arizona National Scenic Trail and forest management.

**Comment Number(s):**

79-24

The Forest Service appreciates the time you spent commenting and the additional documentation on the recreation opportunity spectrum. The provided attachment was used in the environmental impact statement for the recreation opportunity analysis as well as referenced in the final forest plan in relationship to the recreation opportunity spectrum. No mention of what to do with the attachment was provided in the actual comment letter. The Forest Service is unclear about what pieces of information from this report the commenter would like considered. The forest plan, chapter 2, Recreation section includes forestwide management direction relating to the recreation opportunity spectrum referenced in the attachment.

**Comment Number(s):**

2884-6, 7, 9, 10, 11, 12, 13, 14, 79-21, 2986-44, 45, 2991-34, 35

The Forest Service appreciates the time and energy spent providing comments throughout the plan revision process per 36 CFR 219. All attachments provided with comments have been reviewed and issues addressed, where appropriate. The consideration of the comments since the beginning of the Tonto National Forest plan revision process has greatly assisted in the development of alternatives analyzed in the environmental impact statement and for the development of the preferred alternative, a modified alternative B.

**Comment Number(s):**

2463-34

The provided attachment, Riparian Utilization Guidelines TNF 2002, was not considered in the final forest plan or final environmental impact statement. We do not have specific utilization standards in the forest plan or a separate riparian plan with utilization standards. The forest plan includes desired conditions, standards, and guidelines to ensure that livestock grazing does not adversely impact riparian areas on the Tonto National Forest. See the Range and Riparian sections of the forest plan (chapter 2) for all applicable standards and guidelines pertaining to livestock grazing in riparian areas. The Forest uses an adaptive management strategy to manage the rangeland resources. Allotment management plans are reviewed and revised as needed in conformance with the National Environmental Policy Act (NEPA) (40

CFR 1500) and the Rescissions Act of 1995 (Public Law 104-19) Section 504(a). In general, the Tonto manages grazing at conservative use levels. This grazing intensity (based on percent use of forage by weight) should provide for plant integrity, density, diversity, and regeneration over time. Allotment management plans involving new or modified fences, corrals, salt locations, and artificial water sources are designed to make progress towards the desired conditions in the forest plan and promote healthy soil, watershed, riparian conditions, wildlife interactions, and wildlife movement. The commenter did not include any information as to how to incorporate this attachment in the forest plan so no further detail is possible.

**Comment Number(s):**

2933-2

We appreciate the time it took to submit your comment about the 10-Year Shared Steward Challenge. Shared stewardship is an important part of the forest plan. There are two management approaches in the Forest Plan related to it. One is in the Partnerships and Volunteers section and the other is in overall Recreation (both located in chapter 2). Both of the management approaches promote shared stewardship and working more with our partners and volunteers to accomplish better work on the forest moving forward. The commenter did not specify what specifically from the attachment they wanted considered or how so the Forest Service is unable to give more specific information.

**Comment Number(s):**

2856-2

We appreciate the time it took to submit your comment about the Salt River Horses. The attached photo is a baby Salt River Horse. The final forest plan includes a management area for the Salt River Horses, see chapter 3 (Management Areas, Salt River Horse Management Area, and the corresponding analysis in the final environmental impact statement).

**Comment Number(s):**

2935-1

We appreciate your continued support of our planning efforts per 36 CFR 219 and helping to disseminate the opportunity to participate in this process.

**Comment Number(s):**

2986-46, 47, 48

The Forest Service appreciates the time Western Watershed Project spent commenting and the additional documentation on other forest projects. These are outside the scope of the plan revision process as they are specific to the Bar X project and unauthorized grazing. The forest plan, chapter 1 Introduction, outlines the connection between forest projects and management activities and the forest plan.

**Comment Number(s):**

2986-49

We appreciate your concern about the Sonoran desert tortoise. Threatened, endangered, and proposed species are managed by the U.S. Fish and Wildlife Service under the authority of the Endangered Species Act (7 U.S.C. § 136, 16 U.S.C. § 1531 et seq. PL 93-205, as amended). As such, determinations on the listing of species under the Act are outside the purview of the U.S. Forest Service and outside the scope of forest plan revision. However, the Sonoran desert tortoise (*Gopherus morafkai*) is managed under a



candidate conservation agreement (2015). In addition, the forest plan also contains plan components that help to protect the Sonoran desert tortoise. See guideline “projects and activities that may negatively impact Sonoran desert tortoises should apply mitigations from the Arizona Interagency Desert Tortoise Team’s Recommended Standard Mitigation Measures (or similar current guidance) when designing projects in desert tortoise habitat” (forest plan, chapter 2, Wildlife, Fish, Plants).

## **Cultural and Historic Resources**

**Concern Statement 16.** *Commenter is concerned about management and protection of cultural resources.*

Response:

**Comment Number(s):**

2970-633

We agree with the commenter's observation that some resources have been looted and vandalized on the Tonto. We do our best with the resources and staffing we have to protect these resources. Archaeological sites, including cliff dwellings, do degrade over time, a process considered by many Tribes to be part of the natural trajectory of these sites. For site-specific projects, we follow all applicable laws for natural resources, including cultural. The Tonto National Forest agrees that consultation with Tribes is of vital importance and will continue to meet our obligations to comply with all Federal law and policy. Further, the Forest will continue to explore opportunities to collaborate with Tribes on the management of cultural and natural resources.

**Concern Statement 17.** *Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2970-614

Although much has been learned since the Cultural Resources Assessment and Management Plan was written, it remains a valuable tool for identifying, evaluating, and managing historic properties. The Tonto National Forest recently published the Final Assessment Report of Social and Economic Conditions, Trends, and Risks to Sustainability, Volume II (2017) (found in the project record), which contains an updated overview of cultural resources and their management on the Forest. The Forest also complies with all laws, executing orders, and policies, including the National Historic Preservation Act. Appropriate project inventories and the treatment of specific historic properties will be considered on a project-by-project basis, in compliance with Section 106 of the National Historic Preservation Act, National Environmental Policy Act, and other relevant direction. The results of all cultural inventories (both those conducted under Sections 106 and 110 of the National Historic Preservation Act) continually augment the knowledge and understanding of cultural resources across the Forest.

**Comment Number(s):**

2970-619

Effects resulting from implementation of the plan are described in Cultural and Historic Resources section of the environmental impact statement (chapter 3, Environmental Effects). In chapter 1 of the environmental impact statement (Programmatic Framework of the Land Management Plan), forest plans do not authorize, fund, or carry out any project or activity. Instead, they provide a programmatic framework that guides site-specific actions that may be carried out in the future. Site-specific projects that implement the plan would follow all applicable laws, regulations, and policies. The National Historic Preservation Act does not provide absolute protection of any historic properties. It does direct Federal agencies to “take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register”. We are, however, committed to protection of cultural resources and design site-specific projects avoid or minimize damage to the extent possible. The Tonto National Forest will continue to comply with Federal law and policy guiding the protection of cultural resources, including the process detailed in 36 CFR 800 guiding consultation, identification, determination of effect, and resolution of adverse effect for all undertakings on a project-by-project basis. Standards and guidelines in the Cultural and Historic Resources section of the revised plan (chapter 2) address the commenter's concerns, including the first standard, which has been modified to clearly state: “Historic properties will be managed in accordance with the National Historic Preservation Act and other applicable laws.”

**Comment Number(s):**

2970-620

Most concerns raised by the commenter would be triggered by the implementation of site-specific projects. As stated in the Programmatic Framework of the Land Management Plan section of the environmental impact statement, forest plans do not authorize, fund, or carry out any project or activity. Instead, they provide a programmatic framework that guides site-specific actions that may be carried out in the future. Site-specific projects that implement the plan would follow all applicable laws, regulations, and policies.

For clarity, historic properties are districts, sites, buildings, structures, and objects included in or eligible for the National Register of Historic Places. The National Historic Preservation Act direct Federal agencies to “take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register”. A Traditional Cultural Property is a property that is eligible for inclusion in the National Register of Historic Places based on its associations with the cultural practices, traditions, beliefs, lifeways, arts, crafts, or social institutions of a living community. It is a historic property and treated as such under the National Historic Preservation Act, not as a different type of property. The National Historic Preservation Act only addresses historic properties and does not provide absolute protection of any historic properties. The term “cultural resources” is not defined in the National Environmental Policy Act or any other Federal law, but chapter 2360.5 of the Forest Service Manual defines cultural resource as: “An object or definite location of human activity, occupation, or use identifiable through field survey, historical documentation, or oral evidence. Cultural resources are prehistoric, historic, archaeological, or architectural sites, structures, places, or objects and traditional cultural properties. In this chapter, cultural resources include the entire spectrum of resources for which the Heritage Program is responsible from artifacts to cultural landscapes without regard to eligibility for listing on the National Register of Historic Places.” Management of cultural resources are further guided by other Federal laws and policies, including the National Environmental Policy Act and Executive Order 13007. The Tonto National Forest is unable to guarantee that all historic properties and other cultural resources are avoided in every future instance, although avoidance is preferred when feasible. Many of the guidelines in the Cultural and Historic Resources section of the revised plan (chapter 2) capture the intent to protect cultural resources and to mitigate any

detrimental natural or human-caused disturbance. Some of these guidelines were modified to demonstrate this intent more clearly. Consultation with Tribes and other parties is mandated by the National Historic Preservation Act.

**Comment Number(s):**

2970-615

The list of impacts referenced by the commenter is not exhaustive and was not intended to be. However, we agree that it is appropriate to include “mining and minerals related activities” in that list. Therefore, this information has been added per the commenter's request.

**Comment Number(s):**

2970-618

We are not familiar with the source of the “five essential and invariant mandates for Federal agency cultural resource management” being referenced by the commenter. However, the Tonto National Forest will continue to comply with all Federal law and policy, including compliance with the directive in the National Historic Preservation Act to “take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register”. The comment does correctly highlight that the plan language needs to closely follow the language of the National Historic Preservation Act. In response to the commenter, the first desired condition in the Cultural and Historic Resources section of the revised plan (chapter 2) was edited to state: “Historic properties, including traditional cultural properties, retain all of the characteristics that qualify the property for listing in the National Register of Historic Places and convey its historical significance, including any aspects of the property’s integrity (i.e. location, design, setting, materials, workmanship, feeling, or association) that have been identified as supporting its eligibility.”

**Comment Number(s):**

2970-616

We concur with comment that Tribes need to be consulted prior to interpretive development that discusses prehistory or Tribal values. Developing interpretation would be considered an undertaking and subject to applicable consultation per the National Historic Preservation Act. Further, Management Approach 08 in the Tribal Relations section (revised plan, chapter 2) states: “Cooperatively develop interpretive and educational exhibits that focus on the history of the lands managed by the Tonto National Forest in collaboration with American Indian Tribes to provide the public with a greater understanding and appreciation of history, culture, and traditions.”

**Comment Number(s):**

2925-00

The referenced guideline refers to activities initiated and pursued by the Forest as part of our routine management. It does not address activities initiated and/or pursued by proponents, permittees, etc. The original language required that the National Historic Preservation Act be satisfied but did not explicitly prohibit any potential future activities. However, the language of the referenced guideline in the revised plan (chapter 2) was edited to clarify the intent as follows: “Forest activities (e.g., dispersed and developed recreation, road construction, and range improvements) should be managed to minimize adverse impacts (e.g., disturbance, damage, movement of, alterations, or removal) to cultural and historic resources, as directed by the National Historic Preservation Act as amended.”

We concur that that the plan language needs to accurately reflect the direction of the National Historic Preservation Act, which does not necessarily afford isolated artifacts the same protection as historic properties. However, all recovered material should be appropriately curated if data recovery is undertaken to mitigate adverse effects. The referenced guideline in the revised plan (chapter 2) was edited as follows: “When cultural resources cannot be preserved in place, artifacts and records should be curated following current professional standards.”

## **Designated and Recommended Research Natural Areas**

**Concern Statement 18.**     *Commenters are concerned about future management of recommended research natural areas.*

Response:

**Comment Number(s):**

2922-6

The standard to restrict livestock grazing in recommended or designated research natural areas is to ensure these areas remain as un-disturbed as possible for research purposes (forest plan, chapter 3, Designated and Recommended Research Natural Areas and Botanical Areas). During the evaluation process, we considered areas that have benchmark value for studies or research, and areas not already included in the regional network of research natural areas (i.e., those poorly represented). We evaluated both existing ones (in the 1985 forest plan), and new or additional areas. The additional areas include the Dutchwoman Butte recommended research natural area and the Three Bar recommended research natural area. The recommended Dutchwoman Butte research natural area serves as valuable reference area in that it represents one of the very few semi-desert grasslands that have not been grazed by domestic livestock (due to the inaccessibility of the area) and it can be used to assess the impacts that have occurred on managed sites with similar ecosystems. None of the other research natural areas have been completely ungrazed from livestock. The Three Bar recommended research natural area has high research value and interest from the public and there have been a number of past and ongoing wildlife studies in the area. The area also serves as a valuable reference area in that it contains a variety of ecosystem types that have been ungrazed (since the 1940s) and can be used to assess the impacts that have occurred on managed sites with similar ecosystems. The area is unique from the other recommended or designated research natural areas in that it contains a contiguous span of ecosystem types from Sonoran desert, semi-desert grassland, chaparral, and deciduous riparian woodlands among steep slopes and rocky ravines which is absent in the other designated and recommended research natural areas. We have a cooperating agency agreement with Arizona Game and Fish department and their staff has been involved during the plan revision process, including reviewing special areas such as research natural areas and botanical areas. We considered the current uses, desired conditions, and potential management conflicts of these areas during the evaluation process and we believe the standards and guidelines for these areas are in line with National Forest System land management mandates.

**Comment Number(s):**

2736-66

Research conducted in designated and recommended research natural areas and botanical areas is generally done under a special use permit, volunteer agreement, memorandum of understanding, or other authorization or agreement. As a Forest policy, research activities are required to provide results to the Forest at completion of their project, as well as coordinate with related agencies (e.g., Arizona Game and

Fish Department, Fish and Wildlife Service, etc.) for additional permits as needed. Most research activities are small in size and do not conflict with recreational uses such as camping or hunting. However, some research projects occasionally take on a larger footprint and require the land to be undisturbed, thus the need for a restriction on campfires and camping to prevent impacts to research results. For these projects, the Forest would issue a temporary closure order in the area restricting these activities during the duration of the research project or for the shortest possible duration. Information would be posted on the Forest website, social media, and at local entry points (i.e., roads, trailheads, etc.) about any restrictions or closures.

**Concern Statement 19.**     *Comments suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2816-89

Designated and recommended research natural areas and botanical areas are managed to maintain or enhance the characteristics in which they are designated. Balancing conflicting resource needs and providing for comprehensive multi-use management, consistent with the conservation ethic, is a continuous objective in administering the resources of the Tonto National Forest and setting a standard that limits where common variety minerals are obtained in designated or recommended research natural areas and botanical areas is consistent with managing for multiple-use and the sustained yield of forest resources and follows authority provided in regulations at 36 CFR 228, Subpart C, for the disposal of mineral materials, where the Forest Service has discretion to deny disposal of salable minerals, such as sand and gravel and common variety building stone.

## Designated Wilderness

**Concern Statement 20.**     *Commenter shares the importance of designated wilderness areas.*

Response:

**Comment Number(s):**

2719-2

We agree that the wilderness experience is important for its restorative powers and for gaining an appreciation of the natural wonders of the world. The primary mandate of the Wilderness Act is to preserve wilderness character, including the natural, untamed, undeveloped, and primitive aspects that make up the construct of wilderness. Uses within wilderness areas that directly degrade wilderness character, including use of motor vehicles, motorboats, landing of aircraft, mechanical transport, and permanent and temporary roads are prohibited, both for land managers and the public are not permitted unless there is a demonstrated need in compliance with the Wilderness Act.

Only Congress has the authority to designate, add or remove acres from wilderness. There are 593,661 acres of Congressionally Designated Wilderness on the Tonto National Forest that were established in the original Wilderness Act of 1964 or subsequent legislations. To date, of the eight congressionally

designated wilderness areas on the Tonto, acreages have either remained the same as when originally designated or increased through subsequent legislation.

**Concern Statement 21.** *Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2986-112

The Tonto National Forest is managed under the Multiple-Use Sustained-Yield Act, which authorizes livestock grazing as one of these uses. As such, the Forest Service policy does not support voluntary permit retirement.

## Developed Recreation

**Concern Statement 22.** *Commenters are concerned about fees for use on public lands.*

Response:

**Comment Number(s):**

69-2

The forest plan is strategic in nature and does not include project and activity decisions such as additional fee sites or changes to fee areas. Any changes to fee areas or adding new fee sites requires compliance with compliance with the Federal Lands Recreation Enhancement Act regulations and is out of the scope of the forest plan revision.

**Concern Statement 23.** *Commenters are concerned that the Forest is not prioritizing motorized recreation.*

Response:

**Comment Number(s):**

2733-1

We agree that recreation was not a priority when the original forest plan was written in 1985. The greater Phoenix area has grown drastically since then and recreation activities have expanded over the years as technology changed. When writing the draft plan, we placed partnerships and recreation at the beginning of the plan, adhering to regional priorities- “R3’s 3 R’s”: relationships, recreation, and restoration. We believe that with the current set of plan components, we will be able to better manage recreational uses and balance motorized and non-motorized activities across the Forest. For example, the Motorized Recreation section provides unique guidance for motorized activities that weren’t previously in the 1985 forest plan. Again, we thank you for your support.

**Concern Statement 24.**     *Commenters with management suggestions to incorporate in the forest plan to enhance the recreation experience.*

Response:

**Comment Number(s):**

2937-5

Thank you for the suggestion. The district has considered making portions of the Lower Salt River Recreation Area an alcohol-free zone. However, this would be a very drastic change to current management of the area; for this kind of management decision, we would prefer to provide a more extensive collaborative effort with the specific parties affected in the area and evaluate potential alternatives to such a policy. At this time, an alcohol-free zone on the Lower Salt River was not evaluated for the forest plan but we may reconsider it at another point in time where it would undergo project level National Environmental Policy Act analysis and public involvement.

**Comment Number(s):**

2970-496

The forest plan is strategic in nature and does not include project and activity decisions such as improvements of specific sites or construction/removal of facilities. Plan components related to developed facilities can be found in the Developed Recreation section. There are no plan components that would prohibit providing restrooms at campgrounds.

## **Dispersed Recreation**

**Concern Statement 25.**     *Commenter is concerned about negative impacts caused by irresponsible use of the forest by dispersed recreationists.*

Response:

**Comment Number(s):**

2947-17

We too would like to see all users be respectful of National Forest System lands and not dump trash, carelessly start fires, or drive off designated roads. A desired condition in the Recreation section states, "Recreation sites are managed to standard and free of litter, graffiti, vandalism, theft, illegal activity, and trash dumping to enhance the recreation experience" (forest plan, chapter 2, Recreation). Additionally, existing laws already prohibit these activities. Law enforcement officers patrol dispersed areas as often as they can to monitor illegal activities, and staff maintain educational signs to encourage responsible use on the National Forest. As another plan component states, "Information about public safety, fee information, rules, and regulations, should be posted at recreation sites and other high-visitation access points, kept up to date with relevant information, and maintained to be visually appealing" (forest plan, chapter 2, Recreation).

**Concern Statement 26.** *Commenter offers suggestions about multiple aspects of recreation management, including allowing camping in undesignated campgrounds with no fees.*

Response:

**Comment Number(s):**

62-3

Recreation fees are charged based on the Federal Lands Recreation Enhancement Act and specific sites that charge fees are not determined by this plan. The following plan component provides direction on displaying signage with regulations: “Public information about the recreational opportunities on the Forest as well as the rules, regulations, and expectations for visiting them is clear and informative” (forest plan, chapter 2, Recreation). Further guidance on displaying minimum fine amounts is not necessary as these dollar amounts are subject to change and the Forest would have to replace signs as they become out of date. Motor vehicle use will be limited to the routes and areas designated for that use as it is defined in the final travel management record of decision. The forest plan alone would not change the designated system. However, it would provide guidance for further route planning such as priority uses for a given area.

**Concern Statement 27.** *Commenters are concerned about dispersed camping on active grazing allotments and the need for more education focused on stewardship of the resources.*

Response:

**Comment Number(s):**

2947-18, 2945-2

All resources, permittees, and cooperators are considered, including grazing operations, when planning for development of future dispersed recreation areas. Site-specific environmental analysis will still be conducted for new sites, at which time the public and all interested and affected parties would have an opportunity to comment on development of new sites. In relation to the second part of this comment about enacting an education system related to stewardship of the land, a desired condition in the Recreation section states “Public information about the recreational opportunities on the Forest as well as the rules, regulations, and expectations for visiting them is clear and informative.” Another guideline states “Information about public safety, fee information, rules, and regulations, should be posted at recreation sites and other high-visitation access points, kept up to date with relevant information, and maintained to be visually appealing” (forest plan, chapter 2, Recreation). Signs across the forest at popular access points include language about stewardship, volunteer opportunities, land use ethics, and other outdoor topics, as space is available at each information kiosk. There is nothing in the forest plan that would prohibit or discourage additional education regarding the contributions of grazing permittees as land stewards.



**Concern Statement 28.**     *Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

8-3

Thank you for showing concern toward our trail management practices. This plan component has been updated as: “Every 5 years, take appropriate action (e.g., close, decommission, or convert) on at least 10 miles of motorized and/or non-motorized trails that may not offer recreation value (e.g., unsustainable, low-use, or have no remarkable destination value) or are not needed for administrative use” (forest plan, chapter 2, Recreation).

**Comment Number(s):**

17-1, 17-4

You bring up a valid point; many trails need to cross rivers. However, this plan component only addresses new trails and not existing trails, so existing trails crossing rivers will not be affected. The intent is to avoid building new trails across rivers. Maintenance of existing trails, including those that cross rivers are managed under existing best management practices and Forest Service direction. This plan component is also a guideline rather than a standard, which means we have some flexibility with it if we are still meeting the intent of the guideline and it cannot be reasonably avoided (see the Plan Components description at the beginning of the forest plan).

This comment requests a reference to river and stream access in the Water Based Recreation section (revised plan, chapter 2); the descriptive paragraphs at the beginning of this section reference these locations and activities related to these locations. Historical stream crossings would be included in these locations as well. The plan components in the Water-Based Recreation section (forest plan, chapter 2, Recreation, Dispersed Recreation, Water-Based Recreation) are not specific to either lakes or rivers/streams; they include both types of water access locations. Closing access points is done on a project level basis where site-specific analysis would be required. The purpose of limiting access to rivers and streams may be due to sensitive species habitat, soil instability, or unsanitary conditions, among others. The forest plan gives the Forest broad scale guidance of how to manage these areas and the types of situations that may require further management to help us move closer to its stated desired conditions.

**Comment Number(s):**

2733-7

Although the Forest Service follows the USDA Forest Service Trail Construction and Maintenance Handbook, which discourages building fall-line trails, the sentence “Fall-line trails should be avoided” has been removed from the referenced plan component to remove confusion. The agency will follow sustainable trail building practices and the handbook guidelines, and we acknowledge that every situation is different based on environmental factors and specific area resources.

**Comment Number(s):**

2736-28

Preventative and routine maintenance of dispersed recreation sites would include tasks such as (but not limited to) removing litter, graffiti, and human waste, cleaning restrooms where applicable and stocking paper supplies, removing ash from fire rings and grills as needed, and performing grading or treadwork on trails and roads to the sites. Sustainable recreation is defined as the set of settings and opportunities on the National Forest System that is ecological, economical, and socially sustainable for present and future generations (36 CFR 219.19). There are many reasons that could cause the Forest to close a dispersed site or otherwise mitigate effects based on this definition. For ecological reasons, an endangered species could have sensitive habitat in the area; for economic reasons, the Forest could not have enough staff to keep up with constant litter accumulation at a busy dispersed site; or for social reasons, a site could experience constant user-conflicts where two sites need to be separately designated instead of the one.

**Comment Number(s):**

2736-27

The current plan component language of “effects mitigated” would include the possibility of redirecting users to an additional site. Dispersing use from an area of high concentrated use to additional nearby locations could potentially help reduce maintenance needs, user conflicts, and negative impacts to other resources such as vegetation trampling. The Monitoring section of the forest plan is a separate document that addresses how we will monitor resources. Closing areas would require site-specific project level analysis, which is outside the scope of this revision process. Additionally, this action would only generally be done as a last resort.

**Comment Number(s):**

2736-26

Trail management objectives are documentation of the intended purpose and management of a National Forest System trail based on management direction, including access objectives. These include specifics such as the level of development of the trail and the types of uses to be managed on the trail. Each trail has its own unique trail management objectives which are not defined in this plan. Specifics such as signs and seasonal closures are project-specific, and if they are not identified in each trail's trail management objectives, they are covered by separate project-specific environmental analysis.

## **Dispersed Recreation - Aviation**

*Concern Statement 29. Commenters suggest changes related to aviation resource plan components and descriptions to help provide additional information in the forest plan and updates in the final environmental impact statement.*

Response:

**Comment Number(s):**

37-6, 8, 10, 11, 13, 15, 16, 17, 18, 19, 20, 23

Changes have been made to the forest plan to include plan components and language that address recreation aviation activities while still leaving flexibility for the Forest and its partners to develop this use and management of it in the future. In the forest plan, under the descriptive section of Dispersed Recreation, the first paragraph has been changed to include “aircraft access” so that it now reads: “Dispersed recreation occurs throughout the forest, outside of developed Forest Service recreation sites,

and involves activities which are not dependent upon developed facilities or sites. Examples include but are not limited to hiking, backpacking, hunting, wildlife viewing, rock climbing, off-highway vehicle use, equestrian use, mountain biking, and aircraft access.” A new plan component has been added: “Airstrips provide aviation access for dispersed recreation opportunities” (forest plan, chapter 2, Recreation, Dispersed Recreation, Motorized Recreation). The following management approach has also been revised to say: “Utilize collaborative partnerships where volunteers plan, lead, and execute a majority of motorized and non-motorized trail and airstrip maintenance” (forest plan, chapter 2, Recreation, Dispersed Recreation).

The Roads section of the final environmental impact statement reads, “There are 3 historic inventoried airstrips located within the Tonto National Forest. The Pleasant Valley Airstrip located in Young, AZ is the only one that is officially part of the Tonto National Forest transportation infrastructure but is currently not maintained by Forest Service.” This statement is accurate even if the Grapevine Airstrip has recently been chartered with the Federal Aviation Administration; this airstrip has not yet become an inventoried transportation infrastructure with the Tonto National Forest and thus is not specifically mentioned here.

## **Dispersed Recreation – E-Bikes**

*Concern Statement 30. Comments related to e-bikes on the Tonto National Forest. Some request continued access for e-bikes on all roads and trails and other do not feel they should be allowed on non-motorized trails because they are powered.*

Response:

### **Comment Number(s):**

3-1, 22-1, 22-2, 25-3, 25-4, 25-6, 2927-4

We realize the use of e-bikes is a growing use of National Forest System lands. However, e-bikes are not specifically addressed in the forest plan at this time. The reference to e-bikes on page 27 of the revised plan is used generally and a definition is not provided at this time; the Tonto National Forest follows agency and/or regional policy to manage for e-bikes and a definition and explanation of classifications can be found in that direction.

Signs are an important education and regulatory tool necessary for the successful functionality of multi-use recreation areas and trails. As user trends and technology changes, the Forest must adapt as well and update signs and kiosks to reflect new uses. Funding is determined by Congress on an annual basis and is distributed to individual programs at a national, regional, and forest level. It is not possible to know what funding will be for the life of the forest plan, but each department within the agency plans their budget accordingly each year.

## Eligible Wild and Scenic Rivers

**Concern Statement 31.** *Commenter is concerned that previously submitted comments were not considered throughout the wild and scenic river eligibility study.*

Response:

**Comment Number(s):**

2970-594

Appendix E of the environmental impact statement states that “the public was encouraged to submit feedback on outstandingly remarkable values using the Wild and Scenic River Story Map.” but this does not mean we disregarded comments submitted outside of the portal. The Tonto National Forest considered all comments submitted during the wild and scenic river eligibility process, both during and outside of comment periods. This has been clarified in the Step 1: Eligibility section of appendix E of the environmental impact statement.

**Concern Statement 32.** *Commenter suggests that language relating to eligible wild and scenic river suitability be removed from the final forest plan and the final environmental impact statement.*

Response:

**Comment Number(s):**

2970-595

The suitability language in appendix E of the environmental impact statement is consistent with Forest Service Policy in 1909.12 Chapter 80 Section 83, which states “Any eligible river may be studied for its suitability for inclusion in the National System at any time. Rivers may be studied for suitability as part of a plan development or revision, as part of a plan amendment, in conjunction with a project decision, or in a separate study” A suitability study provides the basis for determining which eligible rivers or river segments should be recommended to Congress as potential additions to the National Wild and Scenic Rivers System.

The timing for conducting a suitability study may vary. In the case of the Tonto National Forest, suitability will be conducted either in response to a project proposal that could affect the river’s eligibility, or if a proposed project has the potential to impact the free-flow of any eligible segment. This is consistent with the Forest Service Handbook, which states “If a proposed project has the potential to adversely affect the free-flow or outstandingly remarkable values of any river that has previously been determined to be eligible, the responsible official should study the suitability of that river for inclusion in the National System before approving the project. If the river is found suitable, then the proposed project must maintain free-flow and protect the outstandingly remarkable values (sec. 84).”

**Concern Statement 33.** *Commenters are concerned about changes between the 1993 potentially eligible wild and scenic river segments and the eligible wild and scenic rivers eligibility process.*

Response:

**Comment Number(s):**

2970-585, 2970-593

Classifications were based on a set of criteria that was not established at the time of the 1993 Potentially Eligible Wild and Scenic River Study was conducted. These criteria are outlined in appendix E of the environmental impact statement and are consistent with criteria established in the Forest Service Handbook Chapter 80 Section 82.8. When the criteria were applied to segments from the 1993 study that were considered eligible based on free-flow characteristics and outstandingly remarkable values, they received the current classifications. The rationale for this can be found in table 39 within appendix E of the environmental impact statement. The Tonto National Forest considered all comments submitted during the wild and scenic river eligibility process, both during and outside of comment periods. This has been clarified in the Step 1: Eligibility section of appendix E of the environmental impact statement.

**Comment Number(s):**

2970-592, 2970-601

Per agency policy there is no minimum length of a segment, but segment length should be sufficient to enable protection of the outstandingly remarkable values if the area were managed (FSH Ch. 80 Sec. 82.62). Per Ch 70 the length can vary, but the corridor must be at least one-quarter mile on either side of the river. During the eligibility process, close consideration was given to the corridors established for the eligible wild and scenic river. Identified corridors of eligible segments represent where the outstandingly remarkable values were present along the segment and where management would be sufficient to protect the outstandingly remarkable values, classification, and free-flow condition (as detailed in appendix E of the environmental impact statement).

**Comment Number(s):**

2738-6

Eligibility determinations were maintained for Upper Salt River, Lower Tonto Creek, Upper Tonto Creek, Salome Creek, and the Verde River.

Upon further review of the eligibility requested within public comments, the Tonto National Forest has removed the Lower Salt River from eligibility in the national wild and scenic rivers system. In order to be eligible, a segment must be free flowing, and possess one or more outstandingly remarkable values. Though there are recreation and cultural values on the Lower Salt River, it does not qualify for eligibility for the national wild and scenic river system because it does not meet the definition of free-flowing.

Free-flowing is defined in the Wild and Scenic Rivers Act as “existing or flowing in a natural condition without impoundment, diversion, straightening, riprapping, or other modification of the waterway” (FSH 1909.2 Ch. 80 Sec 82.71). Waters flowing within the Lower Salt River are dictated by water delivery obligations as part of a Federal Reclamation project, and therefore do not flow in a natural condition. While the USDA-USDI Guidelines state “a river segment may flow between large impoundments will not necessarily preclude its designation,” this section of the Salt River, south of Stewart Mountain Dam, does not meet the eligibility criteria because the flow rates on the Lower Salt River are artificial and

intermittent, dependent on water demand from the Phoenix Metropolitan area. In essence this stretch of river functions as a water delivery canal rather than a natural free-flowing river segment.

While there are places where eligibility has been maintained for river segments between large impoundments, the flow of water from them does not regularly fluctuate in response to demand to the extent of the Lower Salt River. For example, the Custer-Gallatin received comments of concern on eligibility of a segment due to the presence of energy dams upstream of the eligible segment. These dams, specific to hydroelectric energy production, do not regularly alter flow like the dams on the Tonto because they store water long-term to ensure a reliable supply during periods of drought.

Additionally, free-flowing rivers are able to engage in channel forming processes and move across the landscape naturally. The flow of the Lower Salt has been altered from its natural condition by six major reservoirs and dams which impound and control the flows. Flows on the Lower Salt, as controlled by releases from these impoundments, restricts the channel forming process and the ability for the segment to move across the landscape naturally.

**Concern Statement 34.** *Commenters are concerned about eligible wild and scenic rivers being included in the revised forest plan and their implications to future forest management.*

Response:

**Comment Number(s):**

2947-8

As per direction in FSH 1909.12 Chapter 80, the Tonto National Forest conducted an eligibility study on each free-flowing river/stream on the forest to determine its potential for inclusion in the National Wild and Scenic Rivers System, which is one of many requirements of the 2012 Planning Rule that must be adhered to when a forest revises its forest plan. Each river was also studied to determine whether it possessed an outstandingly remarkable value. Those streams and rivers that were both free-flowing and had at least one outstandingly remarkable value were identified as eligible for inclusion as a wild and scenic river. The rationale for these decisions can be found on the Tonto National Forest website at <https://www.fs.usda.gov/detailfull/tonto/landmanagement/planning/?cid=fseprd594556&width=full>.

Rivers the Forest Service determines to be eligible or suitable for inclusion in the national system (sec 5(d)(1) of the Act) must have certain interim protection measures. These protection measures apply until a decision is made on the future use of the river and adjacent lands through an Act of Congress or a determination that the river is not suitable. Along with the interim protection measures, additional statutory, regulatory, or policy requirements may apply if the river is located within a wilderness area or other designated area (FSM 2354.42e).

The plan must provide plan components, including standards and guidelines, to provide for: Protection of designated wild and scenic rivers as well as management of rivers found eligible or determined suitable for the national wild and scenic river system to protect the values that provide the basis for their suitability for inclusion in the system. (36 CFR 219.10)

While we have removed the specific standard referenced in this comment, the plan includes a standard that states “Activities in eligible wild and scenic river corridors shall comply with interim protective measures outlined in Forest Service Handbook 1909.12, 84.3, or the most current version.” The interim protection measures related to domestic livestock grazing state:

“In segments with wild classification: Domestic livestock grazing should be managed to protect identified river values. Existing structures may be maintained. New facilities may be developed to facilitate livestock management so long as they maintain the values for which a river was found eligible or suitable, including the area’s essentially primitive character.

In segments with scenic classification: Domestic livestock grazing should be managed to protect identified river values. Existing structures may be maintained. New facilities may be developed to facilitate livestock management so long as they maintain the values for which a river was found eligible or suitable, including the area’s largely undeveloped character.

In segments with recreational classification: Domestic livestock grazing should be managed to protect identified river values. Existing structures may be maintained. New facilities may be developed to facilitate livestock management so long as they maintain the values for which a river was found eligible or suitable.”

**Comment Number(s):**

2991-16

As per direction in FSH 1909.12 Chapter 80, the Tonto National Forest conducted an eligibility study on each free-flowing river/stream on the forest to determine its potential for inclusion in the National Wild and Scenic Rivers System. Each river was also studied to determine whether it possessed an outstandingly remarkable value. Those streams and rivers which were both free-flowing and had at least one outstandingly remarkable value were identified as eligible for inclusion as a wild and scenic river. The rationale for these decisions can be found on the Tonto National Forest website at <https://www.fs.usda.gov/detailfull/tonto/landmanagement/planning/?cid=fseprd594556&width=full>.

Those streams with a resource that was found to be unique, rare, or exemplary when compared to other streams in the region of comparison were rated with an outstandingly remarkable value and documented in appendix E. Only streams with outstandingly remarkable values were identified as eligible for inclusion in the national wild and scenic river system. The determination that a river area did or did not contain one or more outstandingly remarkable value was a professional judgment on the part of the responsible official as informed by the interdisciplinary team, best available scientific information, and public participation.

Rivers the Forest Service determines to be eligible or suitable for inclusion in the national system (sec 5(d)(1) of the Act) must have certain interim protection measures. These protection measures apply until a decision is made on the future use of the river and adjacent lands through an Act of Congress or a determination that the river is not suitable. Along with the interim protection measures, additional statutory, regulatory, or policy requirements may apply if the river is located within a wilderness area or other designated area (FSM 2354.42e).

The plan must provide plan components, including standards and guidelines, to provide for: Protection of designated wild and scenic rivers as well as management of rivers found eligible or determined suitable for the national wild and scenic river system to protect the values that provide the basis for their suitability for inclusion in the system (36 CFR 219.10).

**Comment Number(s):**

2947-7

The Forest followed the directives in Forest Service Handbook 1909.12, chapter 80, sections 82.12 and 82.14 when determining eligibility for inclusion in the wild and scenic river system, which is one of many requirements of the 2012 Planning Rule that must be adhered to when a forest revises its forest plan. To be identified as outstandingly remarkable, a river-related value must be a unique, rare, or exemplary feature that is significant when compared with similar values from other rivers at a regional or national scale. Unique, rare, or exemplary features are those that are conspicuous examples of these values, among the best representatives of these features, within a region or the Nation.

**Comment Number(s):**

2857-4

The forest plan does not authorize site-specific prohibitions or activities. A site-specific analysis will need to be conducted to determine effects on the ground, including to eligible wild and scenic rivers. A responsible official may authorize site-specific projects and activities on National Forest System lands within Forest Service-identified eligible or suitable river corridors when the project and activities are consistent with the interim protection measures outlined in the Forest Service Handbook 1909.12 Chapter 80 Section 84.3. These decisions would be consistent with the National Environmental Policy Act and Forest Service manual and handbook direction and would include analysis and opportunity for public involvement.

Forest Service-identified eligible and suitable rivers must be protected sufficiently to maintain free flow and outstandingly remarkable values unless a determination of ineligibility or non-suitability is made. A river determined through a suitability study to be not suitable shall no longer be considered eligible and interim protection measures no longer need to be applied to those rivers.

The plan includes a standard that states “Activities in eligible wild and scenic river corridors shall comply with interim protective measures outlined in Forest Service Handbook 1909.12, 84.3, or the most current version.” The interim protection measures related to domestic livestock grazing state:

“In segments with wild classification: Domestic livestock grazing should be managed to protect identified river values. Existing structures may be maintained. New facilities may be developed to facilitate livestock management so long as they maintain the values for which a river was found eligible or suitable, including the area’s essentially primitive character.

In segments with scenic classification: Domestic livestock grazing should be managed to protect identified river values. Existing structures may be maintained. New facilities may be developed to facilitate livestock management so long as they maintain the values for which a river was found eligible or suitable, including the area’s largely undeveloped character.

In segments with recreational classification: Domestic livestock grazing should be managed to protect identified river values. Existing structures may be maintained. New facilities may be developed to facilitate livestock management so long as they maintain the values for which a river was found eligible or suitable.”

**Comment Number(s):**

2966-7

The plan contributes to ecological, social, and economic sustainability focused on meeting the needs of the present generation without compromising the ability of future generations to meet their needs. The plan gives direction to manage the forest consistent with the Multiple-Use Sustained-Yield Act of 1960



and provides goods and services including outdoor recreation, timber, range, watershed, wildlife, and fish. The Multiple-Use Sustained-Yield Act of 1960 (section 1) states that “the national forests are established and shall be administered for outdoor recreation, range, timber, watershed, and wildlife and fish purposes.” The National Forest Management Act (section 6(e)(1)) states that in revising plans, “provide for multiple use and sustained yield of the products and services obtained therefrom in accordance with the Multiple-Use, Sustained-Yield Act of 1960, and in particular, include coordination of outdoor recreation, range, timber, watershed, wildlife and fish, and wilderness...”

Management area plan direction contains the plan components applicable to specific areas that call for management that is in addition to or different than forestwide management. A management area represents a management emphasis for an area or several similar areas on the landscape. Forestwide plan components are applied unless there is management direction specific to the management area. All management area plan components are based on applicable authorities and the specific purposes for which the area was created, recommended, or designated. All uses are allowable within these management areas unless specifically prohibited due to the purpose for which the management area was identified.

**Concern Statement 35.**     *Commenters are concerned about the management of eligible wild and scenic rivers and suggest changes in plan components.*

Response:

**Comment Number(s):**

2970-586

The suitability language in appendix E of the environmental impact statement is consistent with Forest Service Policy in 1909.12 Chapter 80 Section 83, which states “Any eligible river may be studied for its suitability for inclusion in the National System at any time. Rivers may be studied for suitability as part of a plan development or revision, as part of a plan amendment, in conjunction with a project decision, or in a separate study.” A suitability study provides the basis for determining which eligible rivers or river segments should be recommended to Congress as potential additions to the National Wild and Scenic Rivers System.

The timing for conducting a suitability study may vary. In the case of the Tonto National Forest, suitability will be conducted either in response to a project proposal that could affect the river’s eligibility, or if a proposed project has the potential to impact the free-flow of any eligible segment. This is consistent with the Forest Service Handbook, which states “If a proposed project has the potential to adversely affect the free-flow or outstandingly remarkable values of any river that has previously been determined to be eligible, the responsible official should study the suitability of that river for inclusion in the National System before approving the project. If the river is found suitable, then the proposed project must maintain free-flow and protect the outstandingly remarkable values (sec. 84).”

**Comment Number(s):**

2816-88

As per direction in FSH 1909.12 Chapter 80, the Tonto National Forest conducted an eligibility study on each free-flowing river/stream on the forest to determine its potential for inclusion in the National Wild and Scenic Rivers System. Each river was also studied to determine whether it possessed an outstandingly

remarkable value. Those streams and rivers which were both free-flowing and had at least one outstandingly remarkable value were identified as eligible for inclusion as a wild and scenic river. the rationale for these decisions can be found on the Tonto National Forest website at <https://www.fs.usda.gov/detailfull/tonto/landmanagement/planning/?cid=fseprd594556&width=full>.

Rivers the Forest Service determines to be eligible or suitable for inclusion in the national system (sec 5(d)(1) of the Act), must have certain interim protection measures. These protection measures apply until a decision is made on the future use of the river and adjacent lands through an Act of Congress or a determination that the river is not suitable. Along with the interim protection measures, additional statutory, regulatory, or policy requirements may apply if the river is located within a wilderness area or other designated area (FSM 2354.42e).

The plan must provide plan components, including standards and guidelines, to provide for: Protection of designated wild and scenic rivers as well as management of rivers found eligible or determined suitable for the national wild and scenic river system to protect the values that provide the basis for their suitability for inclusion in the system (36 CFR 219.10).

While we have removed the specific standard referenced in this comment, the plan includes a standard that states “Activities in eligible wild and scenic river corridors shall comply with interim protective measures outlined in Forest Service Handbook 1909.12, 84.3, or the most current version.” The interim protection measures related to mining and minerals state:

“Protection Measures with Wild Rivers.

(1) Locatable Minerals. Subject to valid existing rights, mining claims are prohibited within one-quarter mile of a legislatively mandated study river under section 9(b) of the Act. Existing mining activity on a legislatively mandated study river and existing or new mining activity on a Forest Service-identified eligible or suitable river are subject to regulations in 36 CFR part 228 and must be conducted in a manner that minimizes surface disturbance, sedimentation, pollution, and visual impairment.

(2) Leasable Minerals. For all eligible or suitable rivers, leases, licenses, and permits under mineral leasing laws must include conditions necessary to protect the values of the river corridor that make it eligible or suitable for inclusion in the National System.

(3) Saleable Minerals. For all eligible or suitable rivers, disposal of saleable mineral material is prohibited.

Protection Measures in Scenic and Recreational Rivers.

(1) Locatable Minerals. Subject to valid existing rights, mining claims are prohibited within one-quarter mile of a legislatively mandated study river under section 9(b) of the Wild and Scenic Rivers Act. Existing mining activity on a legislatively mandated study river and existing or new mining activity on a Forest Service-identified eligible or suitable river are subject to regulations in 36 CFR part 228 and must be conducted in a manner that minimizes surface disturbance, sedimentation, pollution, and visual impairment.

(2) Leasable Minerals. For all eligible or suitable rivers, leases, licenses, and permits under mineral leasing laws must include conditions necessary to protect the values of the river corridor that make it eligible or suitable for inclusion in the National System.

(3) Saleable Minerals. For all eligible or suitable rivers, saleable mineral material disposal is allowed if the values for which the river may be included in the National System are protected.”

**Comment Number(s):**

2736-18, 64, 65

The plan includes a standard that states “Activities in eligible wild and scenic river corridors shall comply with interim protective measures outlined in Forest Service Handbook 1909.12, 84.3, or the most current version.”

The interim protection measures for wildlife and fish project within eligible wild and scenic river segments are as follows:

- a. Wild Rivers. Construction of minor structures and vegetation management to protect and enhance wildlife and fish habitat should harmonize with the area’s essentially primitive character and fully protect identified river values. Any portion of a proposed wildlife or fisheries restoration or enhancement project that has the potential to affect the river’s free-flowing character must be evaluated as a water resources project.
- b. Scenic Rivers. Construction of structures and vegetation management designed to protect and enhance wildlife and fish habitat should harmonize with the area’s largely undeveloped character and fully protect identified river values. Any portion of a wildlife or fisheries restoration or enhancement project that has the potential to affect the free-flowing character must be evaluated as a water resources project.
- c. Recreational Rivers. Construction of structures and vegetation management to protect and enhance wildlife and fish habitat should fully protect identified river values. Any portion of a wildlife or fisheries restoration or enhancement project that has the potential to affect the river’s free-flowing character must be evaluated as a water resources project.

We have updated the language in the environmental impact statement (vol. 3 Appendix E: Wild and Scenic Rivers Eligibility Process) to be consistent with language from the Forest Service handbook interim protection measures for water resource projects on eligible wild and scenic rivers.

A water resources projects is defined in 36 CFR part 297 as the construction or development of water supply dams, diversions, flood control works, and other water resources projects that affect the river’s free-flowing characteristics. For Forest Service-identified eligible rivers, water resources projects proposed on these segments shall be analyzed as to their effect on a river’s free-flow, water quality, and outstandingly remarkable values, with adverse effects to be prevented to the extent of existing agency authorities (such as special-use authority).

**Concern Statement 36.**     *Commenters are concerned about the classification of some eligible wild and scenic river segments.*

Response:

**Comment Number(s):**

2970-710

Classifications were based on a set of criteria that was not established at the time of the 1993 Potentially Eligible Wild and Scenic River Study was conducted. These criteria are outlined in appendix E of the

environmental impact statement and are consistent with criteria established in the Forest Service Handbook Chapter 80 Section 82.8. When the criteria were applied to segments from the 1993 study that were considered eligible based on free-flow characteristics and outstandingly remarkable values, they received the current classifications.

The most natural rivers will be classified wild; those somewhat less natural, scenic; and those least natural, recreational. Although each classification permits certain existing development, the criteria do not imply that additional inconsistent development is permitted in the future.

The rationale for the recreational classification Arnett Creek states: “Though there is no water resource development within this segment, there is a fish barrier just upstream from the segment. There is a lot of work along this corridor, including a lot of shoreline development including fences and stock tanks. This segment is easily accessible, with roads viewable within the river corridor. Water quality is impaired on both Arnett Creek and Telegraph Canyon.” These values are consistent with a “recreational” classification.

Segments identified in the 1993 Potentially Eligible Wild and Scenic Rivers Study were never evaluated to make a final eligibility determination and were not amended into the 1985 Tonto National Forest plan. The segments identified as potentially eligible in 1993 are not held to the interim protection measures outlined in the Forest Service Handbook (Forest Service Handbook 1909.12, 84.3).

**Comment Number(s):**

2970-708

Classifications were based on a set of criteria that was not established at the time of the 1993 Potentially Eligible Wild and Scenic River Study was conducted. These criteria are outlined in appendix E of the environmental impact statement and are consistent with criteria established in the Forest Service Handbook Chapter 80 Section 82.8. When the criteria were applied to segments from the 1993 Study that were considered eligible based on free-flow characteristics and outstandingly remarkable values, they received the current classifications. The rationale for this can be found in table 39 within appendix E of the environmental impact statement.

**Comment Number(s):**

2970-711

The rationale for the classification of Tangle Creek states: “Both segments of this creek are free of impoundments. In the recreational portion there is substantial evidence of human activity including fences, roads, and admin sites. There is no substantial development in the scenic portion. The recreational portion is easily accessed by FSR269 and public comments also indicated the accessibility of this segment. The scenic portion is mostly undisturbed with inconspicuous roads running parallel. No known water quality concerns.” These values are consistent with the criteria for “recreational” and “scenic” classifications given.

The criteria for classification are outlined in appendix E of the environmental impact statement and are consistent with criteria established in the Forest Service Handbook Chapter 80 Section 82.8. The most natural rivers will be classified wild; those somewhat less natural, scenic, and those least natural, recreational. Although each classification permits certain existing development, the criteria do not imply that additional inconsistent development is permitted in the future.

**Comment Number(s):**

2970-709

The rationale for the recreational classification Arnett Creek has been updated and states: “Though there is no water resource development within this segment, there is a fish barrier just downstream from the segment. There is a lot of work along this corridor, including a lot of shoreline development including fences and stock tanks. This segment is easily accessible, with roads viewable within the river corridor. Water quality is impaired on both Arnett Creek and Telegraph Canyon.” These values are consistent with a “recreational” classification per the established classification criteria.

While this is changed from the 1993 study, determination of classification was based on a set of criteria that was not established at the time of the 1993 Potentially Eligible Wild and Scenic River Study was conducted. These criteria are outlined in appendix E of the environmental impact statement and are consistent with criteria established in the Forest Service Handbook Chapter 80 Section 82.8. When the criteria were applied to segments from the 1993 Study that were considered eligible based on free-flow characteristics and outstandingly remarkable values, they received the current classifications. The most natural rivers will be classified wild; those somewhat less natural, scenic, and those least natural, recreational. Although each classification permits certain existing development, the criteria do not imply that additional inconsistent development is permitted in the future.

**Comment Number(s):**

2970-713

The rationale for the scenic classification Lower Tonto Creek states: “No known impoundments along this segment. There is evidence of grazing in this area. Limited access to this area only through private property. This segment is water quality limited for nutrients.” These values are consistent with a scenic classification.

**Comment Number(s):**

2932-15

While we recognize the importance of Salt River Project’s ability to manage their assets as part of the tri-party agreement<sup>5</sup>, we do not believe that management of the eligible assets of Fish Creek inhibits their management activities. The existing improvements in and around the river corridor for Fish Creek were documented and considered when determining the classification of the segment as scenic. The classification of a river segment is based on the current level of development in the river corridor of which Salt River Project improvements were considered. Maintenance of these improvements would not be inhibited by the presence of an eligible wild and scenic river as long as these maintenance activities would not permanently impact the free-flowing condition, classification, and outstandingly remarkable values of the segment (forest plan chapter 3, Eligible Wild and Scenic Rivers Management Area (EWSRMA), Guideline 01).

Additionally, the plan includes a guideline that activities in an eligible river corridor shall comply with interim protective measures outlined in Forest Service Handbook 1909.12, 84.3 (forest plan chapter 3, EWSRMA, Guideline 02). Where the Forest “may authorize site-specific projects and activities on National Forest System lands within legislatively mandated study river corridors, or within Forest

---

<sup>5</sup> Management Memorandum among the Salt River Project Agricultural Improvement and Power District, United States Department of Agriculture Forest Service and United State Bureau of Reclamation, dated April 27, 1979.  
<https://www.resolutionmineeis.us/documents/authors/srp>

Service-identified eligible or suitable river corridors when the project and activities are consistent with the...interim protection measures” (Forest Service Handbook 1909.12, 84.3).

Specific to new utility proposals, these interim protections measures state, “new transmission lines such as gas lines, water lines, and similar linear facilities are not compatible and are discouraged. Where no reasonable alternative exists, additional or new facilities should be restricted to existing rights-of-way. Where new rights-of-way would be necessary for a utility line, the proposed project must be evaluated as to its effect on the river’s outstandingly remarkable values and classification. Any portion of a utility proposal that has the potential to affect the river’s free-flowing character must be evaluated as a water resources project.” If a new utility proposal is needed in this area, the Forest would work with Salt River Project on a site-specific basis in making the determination if this would be the case and if a suitability study would be necessary.

**Concern Statement 37.**     *Commenters are concerned about the eligible wild and scenic river study process relating to unnamed streams, rationale spreadsheet, scales of analysis for the region of comparison, and segments considered eligible.*

Response:

**Comment Number(s):**

2970-587

Forest Service Handbook, Chapter 80, Section 82.2 states “When conducting an eligibility study of Forest Service-identified rivers (sec. 5(d)(1) of the Act) during land management plan development or revision, the interdisciplinary team shall include all potential wild, scenic, and recreational rivers flowing wholly or partially on National Forest System lands as identified in the Nationwide Rivers Inventory and by other sources. The rivers to be studied for eligibility include all rivers named on a standard U. S. Geological Survey 7.5-minute USGS quadrangle map.”

To start the Tonto's wild and scenic river eligibility process, the named streams were identified using the National Hydrography Dataset flowline feature class. The National Hydrography Dataset and associated stream names from the geographic names information system were cross checked with a 7.5-minute quad for accuracy. Through this review, it was determined that there are 345 named rivers and streams within the Tonto National Forest’s planning area.

In the review for eligibility 3 unnamed streams from internal sources and 2 unnamed streams from public comments were examined for potential outstandingly remarkable values for a total of 350 streams, about 2,400 miles, reviewed (as detailed in appendix E of the environmental impact statement).

**Comment Number(s):**

2970-588

Per agency policy, when the study is complete, the outcome will be a finding by the responsible official for each river evaluated as to whether or not the river is eligible for inclusion in the wild and scenic river system. The interdisciplinary team documented a finding of eligibility or ineligibility (sec. 82.2) for each river within the rationale spreadsheet and, for each eligible river, its potential classification in an appendix to the environmental analysis document for a land management plan, revision, or amendment, and summarize the findings in the plan decision document.

The Tonto National Forest fully meets the documentation requirements for a wild and scenic river eligibility study as outlined in FSH Chapter 80 Section 82.93. This includes:

1. A series of tables and narratives that provide the basis for making the determination of eligibility.
2. One or more tables listing each river segment with information supporting whether the river is deemed eligible or not (such as free-flowing characteristics, water quality, and presence or absence and a description of outstandingly remarkable values),
3. One or more maps showing all rivers studied for eligibility that identifies:
  - a. Eligible segments,
  - b. Proposed classification of eligible segments, and
  - c. Locations of corridors, boundaries, and termini of eligible segments.

**Comment Number(s):**

2970-583, 584

The Forest followed the directives in Forest Service Handbook 1909.12, chapter 80, sections 82.12 and 82.14 when determining eligibility for inclusion in the wild and scenic river system. To be identified as outstandingly remarkable, a river-related value must be a unique, rare, or exemplary feature that is significant when compared with similar values from other rivers at a regional or national scale. Unique, rare, or exemplary features are those that are conspicuous examples of these values, among the best representatives of these features, within a region or the Nation.

The Tonto National Forest recognizes that river or stream segments across the forest may have some regional importance, but it does not automatically mean the segment possesses a river-related value that is unique, rare, or exemplary when compared with similar values within the State of Arizona. Those streams with a resource that was found to be unique, rare, or exemplary when compared to other streams in the region of comparison were rated with an outstandingly remarkable value and documented in appendix E. Only streams with outstandingly remarkable values were identified as eligible for inclusion in the national wild and scenic river system. The determination that a river area did or did not contain one or more outstandingly remarkable value was a professional judgment on the part of the responsible official as informed by the interdisciplinary team, best available scientific information, and public participation.

**Comment Number(s):**

2970-589

The region of comparison is a geographic area that provides the basis for meaningful comparative analysis of potentially eligible rivers. Per chapter 80 of the Forest Service Handbook, the interdisciplinary team was tasked with identifying the region of comparison for the resources of scenery, geology, recreation, wildlife, fisheries, cultural resources, plants, and other natural features (and outstandingly remarkable value within each resource) that would then serve as the basis for meaningful comparative analysis.

After considerable discussion, the team chose the boundary of the State of Arizona as the region of comparison for the wild and scenic eligibility study. Though the region of comparison can vary for different rivers or categories of outstandingly remarkable values the interdisciplinary team determined

that this region of comparison was acceptable for all resource areas and served as the basis for meaningful comparative analysis in the eligibility process.

**Comment Number(s):**

2970-596

Forest Service Handbook, Chapter 80, Section 82.2 states “When conducting an eligibility study of Forest Service-identified rivers (sec. 5(d)(1) of the Act) during land management plan development or revision, the interdisciplinary team shall include all potential wild, scenic, and recreational rivers flowing wholly or partially on National Forest System lands as identified in the Nationwide Rivers Inventory and by other sources. The rivers to be studied for eligibility include all rivers named on a standard U. S. Geological Survey 7.5-minute USGS quadrangle map. “

To start the Tonto's wild and scenic river eligibility process, the named streams were identified using the National Hydrography Dataset flowline feature class. The National Hydrography Dataset and associated stream names from the geographic names information system were cross checked with a 7.5-minute quad for accuracy. Through this review, it was determined that there are 345 named rivers and streams within the Tonto National Forest's planning area.

In the review for eligibility, 3 unnamed streams from internal sources and 2 unnamed streams from public comments were examined for potential outstandingly remarkable values for a total of 350 streams, about 2,400 miles, reviewed.

**Comment Number(s):**

2970-597

Per agency policy, when the study is complete, the outcome will be a finding by the responsible official for each river evaluated as to whether or not the river is eligible for inclusion in the wild and scenic river system. The interdisciplinary team documented a finding of eligibility or ineligibility (sec. 82.2) for each river within the rationale spreadsheet and, for each eligible river, its potential classification in an appendix to the environmental analysis document for a land management plan, revision, or amendment, and summarize the findings in the plan decision document.

The Tonto National Forest fully meets the documentation requirements for a wild and scenic river eligibility study as outlined in FSH Chapter 80 Section 82.93 (Detailed in appendix E of the environmental impact statement). This includes:

1. A series of tables and narratives that provide the basis for making the determination of eligibility.
2. One or more tables listing each river segment with information supporting whether the river is deemed eligible or not (such as free-flowing characteristics, water quality, and presence or absence and a description of outstandingly remarkable values),
3. One or more maps showing all rivers studied for eligibility that identifies:
  - a. Eligible segments,
  - b. Proposed classification of eligible segments, and
  - c. Locations of corridors, boundaries, and termini of eligible segments.



**Comment Number(s):**

2970-598

The region of comparison is a geographic area that provides the basis for meaningful comparative analysis of potentially eligible rivers. Per chapter 80 of the Forest Service Handbook. The interdisciplinary team was tasked with identifying the region of comparison for the resources of scenery, geology, recreation, wildlife, fisheries, cultural resources, plants, and other natural features (and outstandingly remarkable value within each resource) which would then serve as the basis for meaningful comparative analysis.

After considerable discussion, the team chose the boundary of the State of Arizona as the region of comparison for the wild and scenic eligibility study. Though the region of comparison can vary for different rivers or categories of outstandingly remarkable values the interdisciplinary team determined that this region of comparison was acceptable for all resource areas and served as the basis for meaningful comparative analysis in the eligibility process.

**Comment Number(s):**

2970-707

Referencing information provided, Cherry Creek was reviewed by resource specialists for potential recreation, wildlife, and fish outstandingly remarkable values and it was determined that the values on this segment were not outstanding in the region of comparison and Cherry Creek is not eligible for inclusion in the National Wild and Scenic Rivers System.

**Comment Number(s):**

2970-705

Referencing information provided, Devil's Canyon was reviewed by resource specialists for potential historic, geologic, scenic, ecological, and wildlife outstandingly remarkable values. Through this review it was determined that the values on this segment were not outstanding in the region of comparison and Devil's Canyon is not eligible for inclusion in the National Wild and Scenic Rivers System.

**Comment Number(s):**

2970-700

Referencing information provided, Haigler Creek was reviewed by resource specialists for potential scenic, wildlife, and fish outstandingly remarkable values and it was determined that the values present on this segment were not outstanding in the region of comparison and Haigler Creek is not eligible for inclusion in the National Wild and Scenic Rivers System.

**Comment Number(s):**

2970-706

Referencing information provided, Pinto Creek was reviewed by resource specialists for potential scenic, riparian, ecological, and cultural outstandingly remarkable values and it was determined that the values on this segment were not outstanding in the region of comparison and Pinto Creek is not eligible for inclusion in the National Wild and Scenic Rivers System.

**Comment Number(s):**

2970-699

Referencing information provided, specialists on the Tonto reviewed the East Verde River for potential recreation, wildlife, fish, scenery, and riparian outstandingly remarkable values. Through this review, it was determined that the East Verde River is eligible for inclusion in the National Wild and Scenic River System for a scenic outstandingly remarkable value. In the East Verde River's 34-mile descent to its confluence with the Verde River, it travels past and through a myriad of geologic layers and life zones giving it a wide variety of truly beautiful scenery rarely found elsewhere in the area of comparison, the state of Arizona. Starting in the ponderosa pine forest of the Payson area, the river proceeds through deep canyons that are composed of the same Paleozoic layers that make the Grand Canyon famous but also intruded by more recent volcanic events. The scenically renowned Bright Angel Shale and Tapeats Sandstone eventually give way to a stunning canyon of bright pink Payson Granite unique to the East Verde River which forms a series of waterfalls that land in beautiful, peaceful pools. The scenery is enhanced by riparian vegetation including big shady Cottonwoods and an unusual amount of Arizona Cypress. Later, as it winds down to the Sonoran Desert, it drops into multiple black gorges of Precambrian rock that further contribute to the beauty of the surrounding desertscape.

The segment has been given a scenic classification where the segment begins, approximately 9 miles below the headwaters at the west boundary of the "East Verde Park Estates" and continues to the west boundary of the L.F. Ranch. Then the segment was classified as "wild" from the west boundary of the L.F. Ranch and continues to the confluence with the Verde River.

The change in eligibility of this segment has been documented in appendix E of the final environmental impact statement.

**Comment Number(s):**

2970-701

Referencing information provided, Spring Creek was reviewed by resource specialists for potential fish outstandingly remarkable values, and it was determined that the values present on this segment were not outstanding in the region of comparison. While we highly value all our stream reaches where native fish are present, we have not found information to suggest that the fish population or habitat in Spring Creek comprises an outstandingly remarkable value when compared with other rivers and streams throughout the State of Arizona. Therefore, Spring Creek is not eligible for inclusion in the National Wild and Scenic Rivers System.

**Comment Number(s):**

2970-703

Referencing information provided, Sycamore Creek was reviewed by resource specialists for potential ecological and recreational outstandingly remarkable values, and it was determined that the values on this segment were not outstanding in the region of comparison and Sycamore Creek is not eligible for inclusion in the National Wild and Scenic Rivers System.

**Comment Number(s):**

2970-702

Specialists on the Tonto reviewed Christopher Creek for potential recreation outstandingly remarkable values. Through this review, it was determined that the Christopher Creek is eligible for inclusion in the National Wild and Scenic River System for its recreation outstandingly remarkable value.

This segment of Christopher Creek, above the confluence with Upper Tonto Creek, is home to a number of recreational activities including fishing, canyoneering, and climbing. It is also revered by the elite steep creek kayaking community as one of, if not the best, relatively rare steep class V+ creek segments in Arizona. The creek quickly drops into a prolonged slot canyon composed of a series of very difficult and dangerous waterfalls that are runnable only by elite kayakers looking for a challenge. This outstanding remarkable value for recreation is enhanced by its relatively short length and its accessibility by road, making it possible to run twice in one day. The entire eligible segment was assigned a recreational classification.

The inclusion of this segment as eligible has been documented in appendix E of the final environmental impact statement.

**Comment Number(s):**

2738-2, 3002-3, 4

The Forest followed the directives in Forest Service Handbook 1909.12, chapter 80, sections 82.12 and 82.14 when determining eligibility for inclusion in the wild and scenic river system. To be identified as outstandingly remarkable, a river-related value must be a unique, rare, or exemplary feature that is significant when compared with similar values from other rivers at a regional or national scale. Unique, rare, or exemplary features are those that are conspicuous examples of these values, among the best representatives of these features, within a region or the Nation.

When starting this process, we thought the potentially eligible segments from the 1993 Wild and Scenic Rivers Study had been evaluated within a region of comparison, but after digging into the study further we realized this was not the case and we chose to evaluate the potentially eligible segments from the 1993 study with all other named streams during this process. The information provided within the report was utilized, but during this evaluation some of the potentially eligible segments in the 1993 study were not found to have outstandingly remarkable values in the region of comparison, or they had changed circumstances, and therefore were determined not eligible for inclusion in the national wild and scenic river system.

The Tonto National Forest recognizes that river or stream segments across the forest may have some regional importance, but it does not automatically mean the segment possesses a river-related value that is unique, rare, or exemplary when compared with similar values within the State of Arizona. Those streams with a resource that was found to be unique, rare, or exemplary when compared to other streams in the region of comparison were rated with an outstandingly remarkable value and documented in appendix E. Only streams with outstandingly remarkable values were identified as eligible for inclusion in the national wild and scenic river system. The determination that a river area did or did not contain one or more outstandingly remarkable value was a professional judgment on the part of the responsible official as informed by the interdisciplinary team, best available scientific information, and public participation.

**Comment Number(s):**

2738-5

The region of comparison is a geographic area that provides the basis for meaningful comparative analysis of potentially eligible rivers. Per chapter 80 of the Forest Service Handbook. The interdisciplinary team was tasked with identifying the region of comparison for the resources of scenery, geology, recreation, wildlife, fisheries, cultural resources, plants and other natural features (and outstandingly remarkable value within each resource) which would then serve as the basis for meaningful comparative analysis.

After considerable discussion, the team chose the boundary of the State of Arizona as the region of comparison for the wild and scenic eligibility study. Though the region of comparison can vary for different rivers or categories of outstandingly remarkable values the interdisciplinary team determined that this region of comparison was acceptable for all resource areas and served as the basis for meaningful comparative analysis in the eligibility process.

**Comment Number(s):**

2738-4

The Forest followed the directives in Forest Service Handbook 1909.12, chapter 80, sections 82.12 and 82.14 when determining eligibility for inclusion in the wild and scenic river system. To be identified as outstandingly remarkable, a river-related value must be a unique, rare, or exemplary feature that is significant when compared with similar values from other rivers at a regional or national scale. Unique, rare, or exemplary features are those that are conspicuous examples of these values, among the best representatives of these features, within a region or the Nation.

The Tonto National Forest recognizes that river or stream segments across the forest may have some regional importance, but it does not automatically mean the segment possesses a river-related value that is unique, rare, or exemplary when compared with similar values within the State of Arizona. Those streams with a resource that was found to be unique, rare, or exemplary when compared to other streams in the region of comparison were rated with an outstandingly remarkable value and documented in appendix E. Only streams with outstandingly remarkable values were identified as eligible for inclusion in the national wild and scenic river system. The determination that a river area did or did not contain one or more outstandingly remarkable value was a professional judgment on the part of the responsible official as informed by the interdisciplinary team, best available scientific information, and public participation.

The Tonto National forest compiled notes and determinations on specific stream segments into the wild and scenic rivers eligibility spreadsheet, which can be found on the Tonto National Forest website at <https://www.fs.usda.gov/detailfull/tonto/landmanagement/planning/>

**Concern Statement 38.**     *Commenters provide additional information about eligible wild and scenic river segments.*

Response:

**Comment Number(s):**

2806-20

The presence of Audubon's designated important bird areas along the Lower Salt River and Verde River has been documented in appendix E of the environmental impact statement under the descriptions of each respective segment.

Response:

**Comment Number(s):**

2738-7

Information on paddling opportunities was added to the descriptions of the recreational outstandingly remarkable values for Lower Tonto Creek, Upper Tonto Creek, and Salome Creek. This information can be found in appendix E of the final environmental impact statement.

**Concern Statement 39.**     *Commenters are concerned about the status of the lower Salt River as an eligible wild and scenic river.*

Response:

**Comment Number(s):**

2947-9

As per direction in FSH 1909.12 Chapter 80, the Tonto National Forest conducted an eligibility study on each free-flowing river/stream on the forest to determine its potential for inclusion in the National Wild and Scenic Rivers System, which is one of many requirements of the 2012 Planning Rule that must be adhered to when a forest revises its forest plan. Each river was also studied to determine whether it possessed an outstandingly remarkable value. Those streams and rivers which were both free-flowing and had at least one outstandingly remarkable value were identified as eligible for inclusion as a wild and scenic river. The rationale for these decisions can be found in the project record.

Upon further review of the eligibility requested within public comments, the Tonto National Forest has removed the Lower Salt River from eligibility in the National Wild and Scenic Rivers System. In order to be eligible, a segment must be free flowing, and possess one or more outstandingly remarkable values. Though there are recreation and cultural values on the on the Lower Salt River, it does not qualify for eligibility for the National Wild and Scenic River System because it does not meet the definition of free-flowing. However, the Upper Salt River segment is still identified as eligible.

Rivers the Forest Service determines to be eligible or suitable for inclusion in the national system (sec 5(d)(1) of the Act), must have certain interim protection measures. These protection measures apply until a decision is made on the future use of the river and adjacent lands through an Act of Congress or a determination that the river is not suitable. Along with the interim protection measures additional statutory, regulatory, or policy requirements may apply if the river is located within a wilderness area or other designated area (FSM 2354.42e).

The plan must provide plan components, including standards and guidelines, to provide for: Protection of designated wild and scenic rivers as well as management of rivers found eligible or determined suitable for the National Wild and Scenic Rivers System to protect the values that provide the basis for their suitability for inclusion in the system (36 CFR 219.10).

While we have removed the specific standard referenced in this comment, the plan includes a standard that states “Activities in eligible wild and scenic river corridors shall comply with interim protective measures outlined in Forest Service Handbook 1909.12, 84.3, or the most current version.” The interim protection measures related to domestic livestock grazing state:

In segments with Wild classification: Domestic livestock grazing should be managed to protect identified river values. Existing structures may be maintained. New facilities may be developed to facilitate livestock management so long as they maintain the values for which a river was found eligible or suitable, including the area’s essentially primitive character.

In segments with Scenic classification: Domestic livestock grazing should be managed to protect identified river values. Existing structures may be maintained. New facilities may be developed to facilitate livestock management so long as they maintain the values for which a river was found eligible or suitable, including the area’s largely undeveloped character.

In segments with Recreational classification: Domestic livestock grazing should be managed to protect identified river values. Existing structures may be maintained. New facilities may be developed to facilitate livestock management so long as they maintain the values for which a river was found eligible or suitable.

**Comment Number(s):**

2932-16

Upon further review of the eligibility requested within public comments, the Tonto National Forest has removed the Lower Salt River from eligibility in the National Wild and Scenic Rivers System. In order to be eligible, a segment must be free flowing, and possess one or more outstandingly remarkable values. Though there are recreation and cultural values on the on the Lower Salt River, it does not qualify for eligibility for the National Wild and Scenic River System because it does not meet the definition of free-flowing.

Free-flowing is defined in the Wild and Scenic Rivers Act as “existing or flowing in a natural condition without impoundment, diversion, straightening, riprapping, or other modification of the waterway” (FSH 1909.2 Ch. 80 Sec 82.71). Waters flowing within the Lower Salt River are dictated by water delivery obligations as part of a Federal Reclamation project, and therefore do not flow in a natural condition. While the USDA-USDI Guidelines state “a river segment may flow between large impoundments will not necessarily preclude its designation,” this section of the Salt River, south of Stewart Mountain Dam, does not meet the eligibility criteria because the flow rates on the Lower Salt River are artificial and intermittent dependent on water demand from the Phoenix Metropolitan area. In essence this stretch of river functions as a water delivery canal rather than a natural free-flowing river segment.

While there are places where eligibility has been maintained for river segments between large impoundments, the flow of water from them does not regularly fluctuate in response to demand to the extent of the Lower Salt River. For example, the Custer-Gallatin received comments of concern on eligibility of a segment due to the presence of energy dams upstream of the eligible segment. These dams, specific to hydroelectric energy production, do not regularly alter flow like the dams on the Tonto do because they store water long-term to ensure a reliable supply during periods of drought.

Additionally, free-flowing rivers are able to engage in channel forming processes and move across the landscape naturally. The flow of the Lower Salt has been altered from its natural condition by six major reservoirs and dams which impound and control the flows. Flows on the Lower Salt, as controlled by releases from these impoundments, restricts the channel forming process and the ability for the segment to move across the landscape naturally.

**Concern Statement 40.**     *Commenters are concerned about the outstandingly remarkable values, segment length, and classification of Greenback Creek as an eligible wild and scenic river.*

Response:

**Comment Number(s):**

77-4

The corridor boundary for Greenback Creek has been adjusted to remove the private land. The Tonto National Forest does not have the authority to manage activities on private land and therefore the management direction does not apply to private lands.

**Comment Number(s):**

77-5

The Forest reviewed Greenback Creek to validate the existing outstandingly remarkable values. Using criteria established through the wild and scenic river eligibility process (appendix E of the final environmental impact statement), the eligibility of Greenback Creek for its cultural and historical outstanding remarkable value remains. There are prehistoric sites abound and it is documented that the Western Apaches did farm along Greenback Creek as documented in the Indian Claims Commission proceedings (21 Ind. C1. Comm. 189). Access to a river segment is not required for it to be eligible.

Additionally, the corridor boundary for Greenback Creek has been adjusted to remove the private land. The Tonto National Forest does not have the authority to manage activities on private land and therefore the management direction does not apply to private lands.

**Comment Number(s):**

77-3

We disagree with the commenter's assertion. The Forest reviewed Greenback Creek to validate the existing outstandingly remarkable values. Using criteria established through the wild and scenic river eligibility process (appendix E of the final environmental impact statement), the eligibility of Greenback Creek for its cultural and historical outstanding remarkable value remains. There are prehistoric sites abound and it is documented that the Western Apaches did farm along Greenback Creek as documented in the Indian Claims Commission proceedings (21 Ind. C1. Comm. 189).

**Concern Statement 41.**      *Comments provide support for wild and scenic river eligibility process.*

Response:

**Comment Number(s):**

2736-3, 2795-3

We appreciate your support on the management direction for the Tonto National Forest management plan. We look forward to continuing working together under the Memorandum of Understanding for statewide cooperation, coordination, collaboration between the U.S. Forest Service and the Department for management and conservation of fish and wildlife populations and habitats on National Forest System lands in Arizona (FS # 10-MU-11031600-019). The species you maintain and manage are important to the health and resilience of the ecosystems on the Tonto National Forest.

Forest Service-identified eligible rivers must be protected sufficiently to maintain free flow and outstandingly remarkable values unless a determination of ineligibility or non-suitability is made. A responsible official may authorize site-specific projects and activities on National Forest System lands within Forest Service-identified eligible or suitable river corridors when the project and activities are consistent with the interim protection measures outlined in the Forest Service Handbook 1909.12 Chapter 80 Section 84.3. The interim protection measures for wildlife and fish project within eligible wild and scenic river segments are as follows:

a. Wild Rivers. Construction of minor structures and vegetation management to protect and enhance wildlife and fish habitat should harmonize with the area's essentially primitive character and fully protect identified river values. Any portion of a proposed wildlife or fisheries restoration or enhancement project

that has the potential to affect the river's free-flowing character must be evaluated as a water resources project.

b. Scenic Rivers. Construction of structures and vegetation management designed to protect and enhance wildlife and fish habitat should harmonize with the area's largely undeveloped character and fully protect identified river values. Any portion of a wildlife or fisheries restoration or enhancement project that has the potential to affect the free-flowing character must be evaluated as a water resources project.

c. Recreational Rivers. Construction of structures and vegetation management to protect and enhance wildlife and fish habitat should fully protect identified river values. Any portion of a wildlife or fisheries restoration or enhancement project that has the potential to affect the river's free-flowing character must be evaluated as a water resources project.

These decisions would be done on a site-specific bases and consistent with the National Environmental Policy Act and Forest Service manual and handbook direction and would include analysis and opportunity for public involvement.

**Concern Statement 42.**     *Comments provide information regarding eligibility and classification of Lime Creek as an eligible wild and scenic river.*

Response:

**Comment Number(s):**

2970-712

While we appreciate the input on the classification of this segment, this segment was reviewed as a response to comment and it was determined that that previously identified fish outstandingly remarkable value was not described accurately and this segment is no longer eligible for inclusion in the National Wild and Scenic Rivers System (see appendix E of the environmental impact statement for more detail). Fires in the area, including the Cave Creek Complex, have taken a toll on the system resulting in changed conditions and little suitable fish habitat on the segment. While we highly value all our stream reaches where native fish are present, the fish population or habitat in Lime Creek does not comprise an outstandingly remarkable value when compared with other rivers and streams throughout the State of Arizona.

**Comment Number(s):**

58-36

There are no specific requirements for minimum flows or for temporal or spatial continuity of flows for an eligible segment. Flows are considered sufficient for eligibility if they sustain or complement the outstandingly remarkable values for which the river would be designated. The corridor of the eligible segment was selected (FSH 1909.12, 82.62).

This segment was reviewed as a response to comment and it was determined that that previously identified fish outstandingly remarkable value was not described accurately and this segment is no longer eligible for inclusion in the National Wild and Scenic Rivers System (see appendix E of the environmental impact statement for more detail). Fires in the area, including the Cave Creek Complex, have taken a toll on the system resulting in changed conditions and little suitable fish habitat on the segment. While we highly value all our stream reaches where native fish are present, the fish population



or habitat in Lime Creek does not comprise an outstandingly remarkable value when compared with other rivers and streams throughout the State of Arizona.

The determination that a river area does or does not contain one or more outstandingly remarkable values is a professional judgment on the part of the responsible official as informed by the interdisciplinary team, best available scientific information, and public participation.

**Concern Statement 43.** *Commenters request additional outstandingly remarkable values be included in the final forest plan and final environmental impact statement for the segments selected for eligible wild and scenic rivers.*

Response:

**Comment Number(s):**

2970-590, 591, 698, 2738-8

In response to public comment, the Forest reviewed the following rivers to validate the existing outstandingly remarkable values and free-flowing condition: Upper Tonto Creek, Lower Tonto Creek, Salome Creek, Lime Creek, Dude Creek, Lower Salt River, Upper Salt River, Greenback Creek, Verde River, and Arnett Creek.

- The following segments had no change to outstandingly remarkable values: Greenback Creek, Upper Tonto Creek, Lower Tonto Creek, Salome Creek, Upper Salt River, and the Verde River.
- The following segments had new information provided that resulted in identification of a new outstandingly remarkable value: Arnett Creek
- The following segments had new information resulting in non-eligibility determination: Lime Creek, Dude Creek
- The following segment had a change to outstandingly remarkable values: Arnett Creek
- The following segment had a change to eligibility based on free-flow characteristics: Lower Salt River.

As stated in appendix E and associated rationale documentation, segments may have some regional importance, but it do not possess a river-related value that is unique, rare, or exemplary when compared with similar values from other rivers at a regional or national scale. Those streams with a resource that was found to be unique, rare, or exemplary when compared to other streams in the region of comparison were rated with an outstandingly remarkable value and documented in appendix E. Only streams with outstandingly remarkable values were identified as eligible for inclusion in the national wild and scenic river system.

**Comment Number(s):**

2970-697

Arnett Creek was reviewed for a potential ecological outstandingly remarkable value based on its riparian vegetation. We determined that Arnett Creek has an ecological outstandingly remarkable value. This information was updated in appendix E of the environmental impact statement to read “The perennial desert ecosystems found in Arnett Creek are rare in the State of Arizona and on the Tonto. While there are similar Sonoran desert riparian areas within the State (notably further south), Arnett Creek is different

than those areas in that it is positioned within the upland division of the Sonoran desert (northern most extent of the Sonoran desert). Additionally, there are few riparian areas in the State that have such complex geology and paloverde mixed-cacti plant communities within the riparian zone. The well-developed tree, shrub and herbaceous components contribute to excellent diversity in both species and vegetative structure. This riparian vegetation contributes to good channel and bank stability, and a properly functioning floodplain, which enhances wetness and recharge of the shallow aquafer during high flow events.”

**Comment Number(s):**

2970-637

Consideration of the commenter's assertion are detailed in the following responses.

As stated in appendix E and associated rationale documentation, segments may have some regional importance, but it do not possess a river-related value that is unique, rare, or exemplary when compared with similar values from other rivers at a regional or national scale. Those streams with a resource that was found to be unique, rare, or exemplary when compared to other streams in the region of comparison were rated with an outstandingly remarkable value and documented in appendix E. Only streams with outstandingly remarkable values were identified as eligible for inclusion in the national wild and scenic river system.

**Comment Number(s):**

2970-643

Information was added to appendix E of the final environmental impact statement to enhance the description of the recreational values on Salome Creek and incorporate whitewater kayaking. The description now reads “Recreation was also identified as being outstandingly remarkable in Salome Creek. The steep, narrow nature of the canyon, set in the Salome Wilderness, provides outstanding canyoneering opportunities in a unique remote setting. Visitors come from across the State to take advantage of unique canyoneering opportunities including a whirlpool/plunge pool that visitors repel down into. Other primitive recreation opportunities in the area including hiking, backpacking, picnicking, whitewater kayaking, fishing, and hunting. Commercial outfitting and guiding of hunting, fishing, and hiking related activities occur in the area.”

**Comment Number(s):**

2970-641

Information was added to appendix E of the final environmental impact statement to enhance the description of the recreational values on Upper Tonto Creek and incorporate whitewater kayaking. The description now reads “There are no developed sites or facilities in this segment, and the spectacular geologic and botanical beauty of the area draws visitors from across the State and country to hunt, fish, rock climb, whitewater kayak, and canyoneer in a remote setting. Canyoneering opportunities in this area are considered very high quality and unique within the State. The remoteness, limited access, and scenic quality of this creek combine to create a true wilderness experience.

**Comment Number(s):**

2970-642

Information was changed appendix E of the final environmental impact statement to the description of the recreational values on Lower Tonto Creek to remove the “minimal” disclaimer around whitewater

boating. The description now reads “The lower portion of Tonto Creek was identified as having outstandingly remarkable recreation resource values when compared to similar river resources across Arizona and the Nation. There are no developed sites or facilities within the segment, but dispersed recreation activities are popular and include hiking, backpacking, fishing, whitewater boating, wildlife viewing and canyoneering. The accessibility, beauty and geologic structure of the canyon provides unique, large group canyoneering opportunities that draw visitors from within and beyond the State of Arizona.”

**Comment Number(s):**

2970-639

Language has been updated in appendix E of the final environmental impact statement based on this comment. We have expanded the area of influence for the recreational opportunities to be on a national level. We have also added information about the portion of the Upper Salt River with a recreational classification as this was missed in draft documentation.

**Comment Number(s):**

2970-640

Scenery specialists on the Tonto reviewed the Verde River for a potential scenery outstandingly remarkable value and determined that while there were scenic qualities of the segment, the values were not outstandingly remarkable in the region of comparison. The Verde River remains eligible for fish, wildlife, recreation, and historic outstandingly remarkable values.

**Comment Number(s):**

2970-638

While we agree with the additional recreation opportunities on this segment that add to the outstandingly remarkable value, this segment is no longer considered eligible for inclusion in the national wild and scenic river system based on the free-flow characteristics and the unnatural system as a result of upstream dams.

Upon further review of the eligibility requested within public comments, the Tonto National Forest has removed the Lower Salt River from eligibility in the National Wild and Scenic Rivers System. In order to be eligible, a segment must be free flowing, and possess one or more outstandingly remarkable values. Though there are recreation and cultural values on the on the Lower Salt River, it does not qualify for eligibility for the National Wild and Scenic Rivers System because it does not meet the definition of free-flowing.

Free-flowing is defined in the Wild and Scenic Rivers Act as “existing or flowing in a natural condition without impoundment, diversion, straightening, riprapping, or other modification of the waterway.” (FSH 1909.2 Ch. 80 Sec 82.71). Waters flowing within the Lower Salt River are dictated by water delivery obligations as part of a Federal reclamation project, and therefore do not flow in a natural condition. While the USDA-USDI guidelines state “a river segment may flow between large impoundments will not necessarily preclude its designation,” this section of the Salt River, south of Stewart Mountain Dam, does not meet the eligibility criteria because the flow rates on the Lower Salt River are artificial and intermittent dependent on water demand from the Phoenix Metropolitan area. In essence this stretch of river functions as a water delivery canal rather than a natural free-flowing river segment.

While there are places where eligibility has been maintained for river segments between large impoundments, the flow of water from them does not regularly fluctuate in response to demand to the extent of the Lower Salt River. For example, the Custer-Gallatin received comments of concern on eligibility of a segment due to the presence of energy dams upstream of the eligible segment. These dams, specific to hydroelectric energy production, do not regularly alter flow like the dams on the Tonto do because they store water long-term to ensure a reliable supply during periods of drought.

Additionally, free-flowing rivers are able to engage in channel forming processes and move across the landscape naturally. The flow of the Lower Salt has been altered from its natural condition by six major reservoirs and dams which impound and control the flows. Flows on the Lower Salt, as controlled by releases from these impoundments, restricts the channel forming process and the ability for the segment to move across the landscape naturally.

## Energy Production and Delivery

**Concern Statement 44.**     *Commenter is concerned with vegetation maintenance in existing rights-of-way.*

Response:

**Comment Number(s):**

2932-26, 27, 28,

2938-9, 10, 11

Desired vegetation conditions are defined by the Federal Energy Regulatory Commission in partnership with the utility. The authorizations for energy facilities currently held on the Tonto National Forest require compliance with all Federal, State, and local laws and regulations including those that require the utility to maintain the vegetation within the right of way. Corridor vegetation management plans are reviewed to ensure compliance with the Forest prior to site-specific working being completed. That review ensures compliance with the forest plan.

The Forest understands the utilities' legal requirement to maintain permitted corridors to provide safe and reliable power. Desired conditions are what drive the plan. All project-level management activities should be aimed at the achievement of the desired conditions for those resources in the area where the project is located. Desired conditions can be thought of as vision statements that help define a collective vision for the forest in the future.

The standard in question was removed as a standard and rewritten to be a management approach, which now reads: Work with partners to design transmission line corridors to blend with the existing character of the landscape (revised plan. chapter 2, Energy Production and Delivery).

Any project proposed within an existing corridor would be reviewed per law, regulation, and policy. The existing authorization holder would have the opportunity to comment and possibly object to any proposal within the existing corridor. Existing Regulation 36 CFR 251.54 (e)(v) states "The proposed use will not unreasonably conflict or interfere with administrative use by the Forest Service, other scheduled or authorized existing uses of the National Forest System, or use of adjacent non-National Forest System lands."

This standard only applies to actions that harvest forest products. It does not apply to all vegetation manipulation that may occur as part of a non-forest product project.

**Concern Statement 45.** *Commenters ask clarifying questions about the plan components related to utility and transmission line corridors.*

Response:

**Comment Number(s):**

2255-1, 2927-6, 2932-30,

2938-6, 7, 8

All project level proposals for use of National Forest System lands (including energy facilities and transmission corridors) are reviewed for consistency with law (including the Multiple Use-Sustained Yield Act of 1960), regulation, and policy. Additionally, all projects must comply with the Forest Plan, which provides for project level design criteria intended to protect natural resources including Scenic Values, and wildlife and cultural resources.

Forest plan direction applies to activities and uses on forest-administered lands, not privately owned lands. The Scenery Resources section (revised plan, chapter 2) has desired conditions, standards, guidelines, and objectives that are intended to maintain or improve scenic integrity objectives.

Per the 2012 Planning Rule, a guideline describes constraints on a project's or activity's actions. As indicated in the revised plan (chapter 1), guidelines allow for departure, as it is written, providing the intent of the guidelines is met and rationale is given for the departure. In other words, while guidelines are mandatory, they provide some flexibility on how they are implemented. Any deviation from the intent of a guideline would require a plan amendment, which would be addressed in project level planning.

Forest Service Manual 2703.2(3) states: "Do not authorize the use of National Forest System lands solely because it affords the applicant a lower cost or less restrictive location." Economic feasibility cannot be considered in a decision where potential resource impact would be greater. A guideline in the revised plan (chapter 2, Energy Production and Delivery states: New electrical-utility lines of 33 kilovolts or less, and telephone lines should be buried, unless one or more of the following applies:

\*visual quality objectives of the area can be met using an overhead line;

\*burial is not feasible due to geologic hazard or unfavorable geologic conditions;

\*it would result in greater long-term site disturbance; or

\*it is not technically feasible.

**Concern Statement 46.** *Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2932-29

Per the 2012 Planning Rule, a guideline describes constraints on a project's or activity's actions. As indicated in the revised plan (chapter 1), guidelines allow for departure, as it is written, providing the intent of the guidelines is met and rationale is given for the departure. In other words, while guidelines are mandatory, they provide some flexibility on how they are implemented. Any deviation from the intent of a guideline would require a plan amendment, which would be addressed in project level planning. The guideline the commenter references was removed from the revised plan. Additionally, a guideline in the Special Uses section (revised plan, chapter 2) was changed to read: "Utilities should utilize existing facilities, roads, sites, and corridors unless new sites can provide better social and/or ecological resource benefits." Co-location is a best management practice and is encouraged; however, 36 CFR 251.54 (e)(v) states "The proposed use will not unreasonably conflict or interfere with administrative use by the Forest Service, other scheduled or authorized existing uses of the National Forest System, or use of adjacent non-National Forest System lands." If co-location is determined to conflict during review of the project proposal, other locations will be reviewed per 36 CFR 251.

## **Fire and Fuels (Wildland Fire)**

**Concern Statement 47.**     *Commenter is concerned with the roles Forest Service roads and trails play in affecting wildfires.*

Response:

**Comment Number(s):**

2970-719

Data from the Phoenix Interagency Dispatch show that, between 1997 and 2017, about 70 percent of fires were human caused and, though we don't currently have the numbers, our spatial data do show a significantly higher fire frequency along roads than in other areas. Your concern about human ignitions along roads is very briefly addressed in the environmental impact statement in chapter 3 under Vegetation, Ecological Response Units, Fire, and Fuels, Comparison Across Alternatives, Management Areas, Lakes and Rivers Management Areas. It is true that closed roads can affect the movement of fire across the landscape, depending on how permanent the closure is/was, local conditions, including the vegetation and soil type and condition associated with a given road. If a closed roadbed has only sparse fine surface fuels, or now fuels, it may act effectively as a firebreak unless conditions, particularly wind, are such that the fire can spot across it. If a road in the Ponderosa Pine / Evergreen Oak has been closed long enough that sprouting woody vegetation has reclaimed parts of it or the verges, it may provide ladder fuels where they would otherwise have been shaded out by the overstory or cut back as part of road maintenance.

**Concern Statement 48.**     *Comment showing the connection between prescribed fire and air quality nonattainment areas and recommended approaches to best implement this type of management.*

Response:

**Comment Number(s):**

2803-3

The Tonto National Forest, along with all other State and Federal land managers within Arizona jurisdiction, are required to follow Title 18, Article 15 of the Arizona Revised Statutes. Article 15 outlines the State certified Enhanced Smoke Management Program that the Arizona Department of Environmental

Quality oversees. Arizona has an Enhanced Smoke Management Program, and we will commit to comply with Article 15, requiring the implementation of emission reduction techniques to minimize emissions from prescribed burns and other fuel treatments to the greatest extent possible while achieving the desired conditions from treatments. Considerable coordination among Forests takes place when prescribed fires and wildfires that may affect sensitive receptors are proposed. This coordination is facilitated by the interagency Smoke Management Group housed at the Arizona Department of Environmental Quality. Multiple smoke monitors track emissions concentrations at sites within the boundaries of the Tonto National Forest, and in nearby areas. When fire managers are preparing to implement a prescribed burn, the following documents must first be submitted to the Arizona Department of Environmental Quality for approval prior to being issued a smoke permit for the fire:

- Annual Registration (yearly)
- Smoke Management Burn Plan (per project)
- Daily Burn Permit Request (daily.)

All prescribed burns are looked at on a case-by-case basis by Arizona Department of Environmental Quality. After analyzing the information Arizona Department of Environmental Quality will then:

- approve the permit request
- disapprove the request with cause
- approve on a conditional basis
- if needed, ask for additional information to help with their decision

**Concern Statement 49.** *Commenters are concerned with increasing or decreasing the amount and frequency of prescribed fire to benefit forest resources.*

Response:

**Comment Number(s):**

24-1, 44-3, 65-5, 2947-10, 2972-15, 16

The 2012 Planning Rule (36 CFR 219) is the overriding regulation that guides the development, amendment, and revision of land management plans for all units of the National Forest System. As such, the National Environmental Policy Act that is underway as a part of the process of forest plan revision is programmatic in nature and does not dictate the level of specificity that project level plan implementation does. It sets the sideboards for project level National Environmental Policy Act, which is site-specific. We agree that the potential for uncharacteristically severe fire across large portions of the Tonto National Forest supports some urgency for the implementation of the restoration treatments proposed under the Four Forest Restoration Initiative (4FRI). However, 4FRI is a site-specific project that implements four different forest plans, including the current Tonto plan.

We agree that fire has an important role in ponderosa pine forests, and other vegetation types on the Tonto National Forest. The only exception is the Sonoran Desert and some of the associated riparian areas. The fire return interval for fire in the Sonoran Desert is, at its most frequent, was well over 200 years, and quite a bit longer for the vast majority of the Sonoran Desert (Wahlberg et al. 2017). In the last 20 years,

within the boundaries of the Tonto National Forest well over 100,000 acres of Sonoran Desert have burned, producing adverse effects that will take decades to heal, at best, if they ever can. These fires are far outside of any Historic Range of Variability, and are largely fueled by exotic, invasive grasses.

The preponderance of studies on the effects of prescribed fire on the types of ecosystems on the Tonto National Forest, with the exception of the desert areas (in which no fire is proposed) indicates that prescribed fire is beneficial to habitat and wildlife that are native to the area (Huffman et al., 2020; Roerick et al., 2019; Bock and Bock 1988, Humphrey 1958; Bock et al., 2016). We agree there are risks associated with the smoke from wildland fire, but there are national, state, and local regulations that are followed when prescribed fire is implemented. These are described in volume 2 of the environmental impact statement in the first two sections in the Air Quality section of chapter 3.

With the exception of the Sonoran Desert and its associated riparian systems, ecosystems on the Tonto National Forest evolved with fire. Over 40 percent of the Tonto National Forest had a fire return interval of less than 35 years. These areas evolved with, and are adapted to or dependent on, frequent fire to maintain sustainable ecological functions. The interruption of the natural fire regimes has changed the species composition and fuel structure of many southwestern ecosystems (Swetnam 1990, Huffman, Springer and Crouse 2018), increasing the potential for uncharacteristically severe fire effects and extreme fire behavior. The interruption of the natural fire regimes is primarily due to the overgrazing of livestock, selective timber harvesting, and fire suppression (Covington and Moore 1994). There is no substitute for wildland fire, it is an ecological need across the majority of the Tonto National Forest.

We agree that fire is an important tool in the management of habitat for multiple wildlife species. Areas where habitat will benefit from wildland fire will be considered for treatments on a site-specific project level that will be tailored to the specific habitat needs of a given species.

Humans have moved into and built infrastructure within, and/or adjacent to these fire adapted ecosystems. From an ecological perspective, wildfires would be the preferred type of fire where fuel structures are not highly departed from their historic conditions, and the expected fire effects would be beneficial. However, the conditions under which fires ignited by natural ignitions burn in areas where the fuels are highly departed from historical norms are not always conducive to protecting lives, property, and natural resources. Using prescribed fire when possible is an effective management strategy to retain fire on the landscape, but with greater control than is sometimes possible with wildfires.

Priority watersheds for restoration are identified through the national Watershed Condition Framework. The current forest plan, national direction, regional emphasis, resource values, costs, local issues, and needs within our forest all play a role in identifying and prioritizing watersheds for restoration. Watersheds on the Tonto National Forest were identified for maintenance or in need of improvement by an interdisciplinary team and were later reviewed and approved by the forest supervisor. All priority watersheds have a reasonable and achievable program of work over the next 5 years that was identified by the interdisciplinary team as aligning with both internal and external priorities.

We recognize that wildland fire can destroy flammable range infrastructure such as wooden posts and stays or black pipes used to transport water. When managing a wildland fire on the Tonto National Forest, an incident management team will consider forest plan direction when possible. However, forest plans do not give direction on the strategies or tactics used in the management of wildfires.



**Concern Statement 50.** *Commenter is requesting additional analysis in the final environmental impact statement that would include the cost to local governments of the wildland fire treatment acres by alternative.*

Response:

**Comment Number(s):**

2991-20

The desirable rate of treatment was developed by integrating what we anticipated was realistic, based on treatment averages for the 5 years and expected trends in related variables, such as funding, resource capacity, treatment windows, markets, air quality, conflicting priorities for management actions, etc., as well as what is ecologically sound. For fire, we used the average annual number of acres that would need to be burned to achieve an average fire frequency that aligned with the range and average fire return interval for each vegetation type (chapter 2, Vegetation and Ecological Response Units (ERU), table 3), as well as a 5-year average of acres burned. Historically, the average annual acres of wildfire on the Tonto National Forest would have been well over 100,000 (Kaib et al. 1996, Kaib 2001). The proposed 325,000 acres are spread out over a 10-year period, averaging about 33,000 acres a year. Some years there would be fewer acres and some years there would be more. Ideally, the acres would occur as a combination of small to medium sized wildfires combined with prescribed fires. The ratio of wildfire to prescribed fire would vary from year to year. While the Forest would prefer to be able to burn allotments in full collaboration with permittees, it is to be expected that many acres will burn in wildfires. Wildfire locations are unpredictable, and it is not always possible to keep them small. Strategies and tactics used for the management of wildfires are not dictated by the forest plan. About 42 percent of the forest (approximately 1,250,255 acres) are comprised of ecosystems that evolved with frequent fire, which burned with low to mixed severity at least every 35 years, and usually more often. Sometimes as often as every year or two. About 26 percent (approximately 759,178 acres) is adapted to infrequent fire, which burns with mixed to high severity, but no more frequently than every 35 years; sometimes it is over 200 years between fires, but that would be rare. Portions of the Tonto National Forest will burn each year in planned or unplanned ignitions (prescribed fire or wildfire).

Whether a primary objective for the management of a given fire is to put it out as soon as possible or to manage it primarily for resource benefits, an incident management team will include forest plan direction when possible. However, forest plans do not give direction on the strategies or tactics used in the management of wildfires. This year (2020), COVID-19 has resulted in significantly increased visitation on the Tonto National Forest, creating additional complications and risks in the management of wildfires. Region 3 of the Forest Service directed that all fires would be suppressed, though the safety and protection of firefighters, the public, and infrastructure are a fundamental part of the equation. Lives, property, infrastructure, and natural resources are all taken into consideration when strategies and tactics are developed by an incident management team. Values at risk are identified, based both on the effects of the fire itself, and on the expected post-fire effects, such as debris flows and flooding. These are all identified if they can be, and protected where they can be, but the primary objective will always be for the safety and protection of firefighters, the public, and critical infrastructure (such as major powerlines, bridges, and highways).

Currently, the largest fires on the landscape are not being managed for resource benefit, but have been large, potentially dangerous fires that have produced extensive areas of undesirably high severity effects.

Fires that are managed primarily for resource benefit are unlikely to produce significant adverse effects, and would be nowhere near the size of the Woodbury or Bush Fires.

**Concern Statement 51.** *Commenter is requesting additional language in the forest plan regarding education about the benefits of prescribed fire.*

Response:

**Comment Number(s):**

2932-47

We appreciate the recognition that educating the public about the benefits of wildland fire is important, and it is included in the plan. It can be found in the forest plan (chapter 2). Under Fire and Fuels, the following is included under Desired Conditions (FF-DC):

“Wildland fire is recognized and understood, both internally and externally, as a necessary disturbance process integral to the sustainability of the Tonto National forest's fire-adapted vegetation types.”

Under 'Management Approaches', number 07 states “Provide the public with information and/or educational opportunities on fire prevention, smoke management, and both the dangers and beneficial effects of wildland fire is an integral part of the Tonto National Forest fire management program. Incorporate strategies to inform the public about ongoing wildfires, and ongoing or upcoming prescribed fires. “

Additionally, we agree that the forest product industry is a key partner to meeting plan objectives. When project level National Environmental Policy Act is undertaken, industry partners, as stakeholders, are invited to participate in public meetings and scoping. Their input is useful and helpful as they are the ones who assist us in implementing projects.

**Concern Statement 52.** *Commenters are requesting additional plan components be included in the forest plan to address post-fire rehabilitation management of forest resources.*

Response:

**Comment Number(s):**

2947-11

The desirable rate of treatment was developed by integrating what we anticipated was realistic, based on treatment averages for the 5 years and expected trends in related variables, such as funding, resource capacity, treatment windows, markets, air quality, conflicting priorities for management actions, etc., as well as what is ecologically sound. For fire, we used the average annual number of acres that would need to be burned to achieve an average fire frequency that aligned with the range and average fire return interval for each vegetation type (chapter 2, Vegetation and Ecological Response Units (ERU), table 3), as well as a 5-year average of acres burned. Historically, the average annual acres of wildfire on the Tonto National Forest would have been well over 100,000 (Kaib et al. 1996, Kaib 2001). The proposed 325,000 acres are spread out over a 10-year period, averaging about 33,000 acres a year. Some years there would be fewer acres and some years there would be more. Ideally, the acres would occur as a combination of small to medium sized wildfires combined with prescribed fires. The ratio of wildfire to prescribed fire

would vary from year to year. While the Forest would prefer to be able to burn allotments in full collaboration with permittees, it is to be expected that many acres will burn in wildfires. Wildfire locations are unpredictable, and it is not always possible to keep them small. Strategies and tactics used for the management of wildfires are not dictated by the forest plan. About 42 percent of the forest (approximately 1,250,255 acres) are comprised of ecosystems that evolved with frequent fire, which burned with low to mixed severity at least every 35 years, and usually more often. Sometimes as often as every year or two. About 26 percent (approximately 759,178 acres) is adapted to infrequent fire, which burns with mixed to high severity, but no more frequently than every 35 years; sometimes it is over 200 years between fires, but that would be rare. Portions of the Tonto National Forest will burn each year in planned or unplanned ignitions (prescribed fire or wildfire). Regardless of the objectives, strategies, and tactics used in the management of a wildfire, the effects are likely to include damage to wooden range infrastructure, along with the beneficial effects of reducing fuels, reducing the encroachment of woody species into grasslands, and keeping forests more open.

We recognize that wildland fire can destroy flammable range infrastructure such as wooden posts and stays or black pipes. Whether a primary objective for the management of a given fire is to put it out as soon as possible or to manage it primarily for resource benefits, an incident management team will include forest plan direction when possible. However, forest plans do not give direction on the strategies or tactics used in the management of wildfires. This year (2020), COVID-19 has resulted in significantly increased visitation on the Tonto National Forest, creating additional complications and risks in the management of wildfires. Region 3 of the Forest Service directed that all fires would be suppressed, though the safety and protection of firefighters, the public, and infrastructure are a fundamental part of the equation. Infrastructure and resources for range are part of what is taken into consideration when strategies and tactics are developed by an incident management team. Values, such as fences, corrals, tanks, and pipe are identified if they can be, and protected where they can be, but the primary objective will always be for the safety and protection of firefighters, the public, and critical infrastructure (such as major powerlines, bridges, and highways). On the Tonto National Forest, resource advisors who work with the incident management team and fire crews usually include range management specialists for the forest.

This year, prior to fire season, the region set aside some funding to replace range infrastructure that was destroyed in wildfires. Unfortunately, it has been very active fire season in the southwest, and the need was far greater than had been anticipated.

**Comment Number(s):**

2922-16

The forest plan describes desired conditions for different vegetation types, management areas, and disciplines (recreation, wildlife, fire, etc.), along with standards, guidelines, and management approaches. Management actions designed to maintain or improve the condition of any area in relation to its desired condition, as described in the forest plan. When an incident, such as a wildfire, insect infestations, severe drought, invasive species, or other situations move an area away from desired conditions, the area is evaluated and management actions are designed and implemented to address the specific situation in a manner that moves the area toward the desired condition and in compliance with the other plan components. Desired conditions, standards, and guidelines are the same for areas that burn with undesirable severity as they are for other areas within the same land designation, regardless of the source of the disturbance. For example, if an area is designated as critical habitat for Gila Chub Minnow, the desired conditions, standards, and guidelines are the same whether the area burns with high severity, or there is an insect infestation, or it is adversely impacted by livestock or visitors. The effects of a wildfire

are evaluated during and after the fire at various levels. Initially, resource advisors and burned area emergency response teams reference the forest plan as they determine if and what should be done. The management of a fire, including the management of immediate post-fire conditions, draws heavily from the forest plan, though it is not required. The Forest Service Handbook is referenced as well, and includes best management practices and Forest Service policy, as well as mitigations to address law, regulation, and policy.

There are guidelines in the plan that would apply to areas that burn with unnaturally high severity:

- Chapter 2, Forestwide Plan Direction, Vegetation and Ecological Response Units (ERU), Guidelines (ERU-G): 02, 03, 12,
- Chapter 2, Forestwide Plan Direction, Watersheds and Water Resources, Standards (WAT-S): 01
- Chapter 2, Forestwide Plan Direction, Watersheds and Water Resources, Guidelines (WAT-G): 08, 09, 11,
- Chapter 2, Forestwide Plan Direction, Invasive and noxious Species, Standards (INS-S): 01, 02
- Chapter 2, Forestwide Plan Direction, Invasive and noxious Species, Guidelines (INS-G): 02, 03, 04, 06, 08
- Chapter 2, Forestwide Plan Direction, Soils, Guidelines (SL-G): 03

There are additional standards and guidelines throughout chapter 2. Some specifically address conditions created by undesirable fire severity, some address ground disturbing activities, some address the evaluation of conditions, monitoring, and so on.

Under the 2012 Planning Rule (36 CFR 219.12(a)(5)), monitoring consists of two elements: the plan monitoring program and broader-scale monitoring strategies (FSH 1909.12-2015-1). Chapter 4 of the forest plan describes the monitoring plan and strategy. As an example, one of the indicators to be assessed every 2 years for departure from desired conditions is the status of terrestrial and aquatic ecosystems, and the status of ecological conditions for at-risk species. The indicators and monitoring frequencies are discussed in table 22 in this section of the forest plan.

**Concern Statement 53.**     *Commenter is requesting additional analysis in the final environmental impact statement and plan components be added to the final forest plan related to post-fire disturbance.*

Response:

**Comment Number(s):**

2966-18

The 2012 Planning Rule (36 CFR 219) is the overriding regulation that guides the development, amendment, and revision of land management plans for all units of the National Forest System. As such, the National Environmental Policy Act that is underway as a part of the process of Forest Plan Revision is programmatic in nature and does not dictate the level of specificity that project level plan implementation does. It sets the sideboards for project level National Environmental Policy Act, which is site-specific.

Additionally, when an incident, such as a wildfire, insect infestations, severe drought, invasive species, or other situations, move an area away from desired conditions, the area is evaluated and management actions on a site-specific project layer level are designed and implemented to address the specific situation in compliance with the forest plan. Desired conditions, standards, and guidelines are the same for areas that burn with undesirable severity as they are for other areas within the same land designation, regardless of the source of the disturbance. For example, if an area is designated as critical habitat for Gila Chub Minnow, the desired conditions, standards, and guidelines do not change if that area burns with high severity, or there is an insect infestation, or it is adversely impacted by livestock or visitors.

The forest plan describes desired conditions for different vegetation types, management areas, and disciplines (recreation, wildlife, fire, etc.), along with standards, guidelines, and management approaches. Management actions are designed to maintain or improve the condition of any area in relation to its desired condition, as described in the forest plan. When an incident, such as a wildfire, insect infestations, severe drought, invasive species, or other situations move an area away from desired conditions, the area is evaluated and management actions are designed and implemented to address the specific situation. Desired conditions, standards, and guidelines are the same for areas that burn with undesirable severity as they are for other areas within the same land designation, regardless of the source of the disturbance. For example, if an area is designated as critical habitat for Gila Chub Minnow, the desired conditions, standards, and guidelines are the same whether the area burns with high severity, or there is an insect infestation, or it is adversely impacted by livestock or visitors. The effects of a wildfire are evaluated during and after the fire at various levels. Initially, resource advisors and burned area emergency response teams reference the forest plan as they determine if and what should be done. The management of a fire, including the management of immediate post-fire conditions, draws heavily from the forest plan, though it is not required. The Forest Service Handbook is referenced as well, and includes best management practices and Forest Service policy, as well as mitigations to address law, regulation, and policy.

There are guidelines in the plan that would apply to areas that burn with unnaturally high severity:

- Chapter 2, Forestwide Plan Direction, Vegetation and Ecological Response Units (ERU), Guidelines (ERU-G): 02, 03, 12,
- Chapter 2, Forestwide Plan Direction, Watersheds and Water Resources, Standards (WAT-S): 01
- Chapter 2, Forestwide Plan Direction, Watersheds and Water Resources, Guidelines (WAT-G): 08, 09, 11,
- Chapter 2, Forestwide Plan Direction, Invasive and noxious Species, Standards (INS-S): 01, 02
- Chapter 2, Forestwide Plan Direction, Invasive and noxious Species, Guidelines (INS-G): 02, 03, 04, 06, 08
- Chapter 2, Forestwide Plan Direction, Soils, Guidelines (SL-G): 03

There are additional standards and guidelines throughout chapter 2 that apply, along with numerous management approaches. Some specifically address conditions created by undesirable fire severity, some address ground disturbing activities, some address the evaluation of conditions, monitoring, and so on.

Under the 2012 Planning Rule (36 CFR 219.12(a)(5)), monitoring consists of two elements: the plan monitoring program and broader-scale monitoring strategies (FSH 1909.12-2015-1). Chapter 4 of the forest plan describes the monitoring plan and strategy. As an example, one of the indicators to be assessed every 2 years for departure from desired conditions is the status of terrestrial and aquatic ecosystems, and

the status of ecological conditions for at-risk species. The indicators and monitoring frequencies are discussed in table 22 in this section of the forest plan.

**Concern Statement 54.** *Commenter is requesting additional analysis in the final environmental impact statement relating to pile burnings.*

Response:

**Comment Number(s):**

2803-4

The Tonto National Forest is in Gila, Maricopa, Pinal, and Yavapai counties, though smoke from wildland fires can affect adjacent counties, including Coconino County.

We will utilize the full range of emissions reduction techniques and mitigations available. Air curtains are a potential tool that could be used under some specific circumstances. However, reports from other forests in Region 3 (the Coconino and the Lincoln), and in Region 1 (the Kootenai) indicate that air curtains are not cost effective, and have a number of other downsides including:

- In Arizona, the Environmental Protection Agency designated them as sources similar to commercial or industrial sources, so they now require different permits than prescribed fire does
- They need to be staffed by firefighters whenever they are in use
- There needs to be a contingency resource nearby (such as an engine)
- Slash and other green waste must be hauled to the air curtain
- The air curtain must be loaded with a machine
- The combustion is much more complete than pile burning, but is very slow

These things mean that air curtains can be prohibitively expensive and are not currently likely to be an efficient or effective means of disposing of slash. They do, however, produce significantly fewer emissions for the same amount of slash, and do not require a specific burn window. They will be considered when site-specific conditions may make them viable, such as an option for a green waste disposal pit.

Currently, there is a limited market for biomass in northern Arizona, in large part because the market is saturated. While this may change in the future, it is not currently a viable option.

## Forest Closures

**Concern Statement 55.** *Commenters are concerned about future area closures for motorized recreation and target shooting and the need for punishments to recreation offenders as an option instead.*

Response:

**Comment Number(s):**

68-2, 4

While the forest planning process cannot dictate staffing levels for law enforcement, the forest plan does emphasize education and outreach as effective management strategies to encourage public compliance and respect for forest lands. The following plan components aim to address education about safe, responsible recreation including promoting leave no trace ethics: “Public information about the recreational opportunities on the forest as well as the rules, regulations, and expectations for visiting them is clear and informative.”; “During the 10-year period following plan approval, implement at least 3 strategies to raise awareness of discouraged practices (e.g., illegal dumping, unsafe shooting practices, driving on closed roads) to promote visitor safety and natural resource protection.”; “Land use ethics (e.g., Leave No Trace and pack-it-in pack-it-out) should be promoted for all recreation opportunities and settings.”; and “Promote established programs (e.g., Leave No Trace, Kids in the Woods, Passport in Time, Discovery Agents, and Bear Aware) and develop new conservation education programs that help connect people to nature and encourage responsible use at various locations (e.g., schools, youth activities, fairs, and volunteer events)” (forest plan, chapter 2, Recreation). The forest plan as a standalone document does not close any specific areas to general use.

We believe this comment is also referencing closing areas to target shooting; closing areas to target shooting would be done on a project level basis where site-specific analysis would be required. The purpose of limiting shooting access in specific areas may be due to sensitive species habitat, soil instability, unsanitary conditions, or unsafe conditions due to high congestion recreation areas, among others. The forest plan gives the Forest broad scale guidance of how to manage these areas to help us move closer to its stated desired conditions. Additional information can be found in the Recreational Shooting section of chapter 2 of the revised plan.

## Forest Products

**Concern Statement 56.** *Commenter is requesting the timber suitability analysis include information about other recent and similar project analysis and include a discussion about why they are different.*

Response:

**Comment Number(s):**

2932-59

This plan revision process is programmatic and will give the overall forest wide direction for all site-specific projects that implement it. All site-specific projects must comply with the current Forest Plan, or else go through the amendment process. The revised plan does not propose any action it provides the framework and direction for all site-specific projects that implement it. As we have developed this revised plan, we have considered large landscape level projects, such as the Rim Country environmental impact statement.

At the forest planning level, the analysis looks at the entire forest to determine timber suitability. The analysis covers all the Tonto National Forest and its 2,864,080 acres. Of these it was determined that 199,362 acres on the Tonto National Forest may be suited for timber production. This number does not change by alternative in the revised plan.

The next phase of the timber suitability analysis determines which of the lands that may be suited for timber production, are suited for timber production, based on each alternative. This is done by assessing

the compatibility of timber production with desired conditions, objectives and other areas recommended by each alternative. The resulting acres for each alternative that are suited for timber production are: alternative A - 189,295, alternative B – 188,851, alternative C – 184,224 and alternative D - 189,295. These are the acres determined to be suitable for timber production within the entire planning area or Tonto National Forest. A more complete discussion of timber suitability can be found in appendix B of the environmental impact statement (Description of the Analysis Process, Timber Suitability Analysis and Planned Timber Sale Program).

The Four Forest Restoration Initiative's Rim Country Project, although it covers a very large area and several forests, is more of a site-specific analysis. The Rim Country Project is proposing a site-specific action and must comply with the direction provided in applicable forest plans. Rim Country is only looking at the timber resource in the northern portion of the Tonto National Forest and a small area of the Sierra Anchas, totaling approximately 138,000 acres. It does not consider the remaining acres of timber that are contained within the Tonto National Forest. The Rim Country Project does comply with the Tonto National Forest's current forest plan and with the Tonto's revised forest plan.

The treatment objectives that were developed for each alternative in the environmental impact statement include a wide range of average, annual acres to be treated. These ranges were developed to incorporate both ecological and management realities. The number of acres that will receive mechanical treatment were developed consistent with the theme and objectives for each alternative. A comparison of treatment objectives for vegetation and wildland fire can be found in chapter 2 of the environmental impact statement (Alternatives Considered in Detail, Comparison of Alternatives). The desirable rate of treatment was developed by integrating what we anticipated was realistic, based on treatment averages for 15 years and expected trends in related variables, such as funding, resource capacity, treatment windows, markets, air quality, conflicting priorities for management actions, etc., as well as what is ecologically sound. The high and low ranges given for mechanical treatments represents the most optimistic and the most pessimistic outcomes, based on the constraints described above and under in appendix B of the environmental impact statement (Description of the Analysis Process, Overall Assumptions). Management and ecological constraints are further described in this part of the environmental impact statement.

Areas classified as "Lands that may be suitable for timber production" provide the base for calculating the sustained yield limit of the forest (36 CFR 219.11(d)(6) and FSH 1909.12, Chapter 60, section 64.31). These lands are designated by mid-scale mapping at a large scale. As the Forest moves into implementation and begins to take closer look at specific areas, managers recognize that within larger areas that are classified as "Lands that may be suitable for timber production"; there may be scattered inclusions of areas that are more appropriately managed as "Unsuitable for Timber Production" lands.

**Concern Statement 57.**     *Commenters are concerned with carbon sequestration.*

Response:

**Comment Number(s):**

2932-35

We agree with the commenter's statement that the removal and use of forest products could lead to additional carbon sequestration. To address this we have added, "Removal of forest products used in construction can also lead to additional carbon sequestration" to the environmental impact statement (chapter 3, Forestry and Forest Products, Effects Common to all Alternatives).



**Concern Statement 58.** *Commenter is requesting clarification on utilization standards for timber suitability in the final environmental impact statement.*

Response:

**Comment Number(s):**

2932-61

To address commenter's concern regarding utilization standards the following definition was added as a footnote to the applicable sections of the environmental impact statement: The region 3 utilization standards were used for determining the sustained yield limit and projected timber sale quantity and representing it in both cubic and board feet. These utilization standards are timber species over 5 inches diameter at breast height (dbh), to a 4-inch minimum top diameter inside bark (dib) for merchantable cubic feet volumes and timber species over 9 inches dbh to a 6 inch minimum top dib for merchantable board feet volumes. This documents the size class of an individual tree and the utilizations specification for each said size class.

**Comment Number(s):**

2932-62

Per the 2012 Planning Rule (36 CFR 218), deviation from a standard within a project requires a plan amendment for that deviation and guidelines are mandatory with some flexibility on how they are implemented in meeting the intent of the existing guideline. Any deviation from the intent of a guideline requires a plan amendment.

To address commenter's concern regarding utilization standards the following definition was added as a footnote to the applicable sections of the environmental impact statement: The region 3 utilization standards were used for determining the sustained yield limit and projected timber sale quantity and representing it in both cubic and board feet. These utilization standards are timber species over 5 inches diameter at breast height (dbh), to a 4-inch minimum top diameter inside bark (dib) for merchantable cubic feet volumes and timber species over 9 inches dbh to a 6 inch minimum top dib for merchantable board feet volumes.

To address the commenter's concern regarding changes to the utilization standards could require a plan amendment of additional National Environmental Policy Act analysis, the following statement was added to the environmental impact statement (chapter 3, Forestry and Forest Products, Environmental Effects, Timber Suitability, Projected Timber and Wood Sale Quantity and Appendix B: Description of the Analysis Process, Timber Suitability Analysis and Planned Timber Sale Program, Projected Timber Sale Quantity and Projected Wood Sale Quantity): Should utilization standards change during the life of the plan, the same metrics used to calculate sustained yield limit, projected timber sale quantity and projected wood sale quantity will be used when tracking or comparing actual volumes sold to the sustained yield limit, projected timber sale quantity and projected wood sale quantity.

**Concern Statement 59.** *Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2932-33

The 2012 Planning Rule sets forth the direction to: “maintain and restore National Forest System land and water ecosystems while providing for ecosystem services and multiple uses. The planning rule is designed to ensure that plans provide for the sustainability of ecosystems and resources; meet the need for forest restoration and conservation, watershed protection, and species diversity and conservation; and assist the Agency in providing a sustainable flow of benefits, services, and uses of National Forest System lands that provide jobs and contribute to the economic and social sustainability of communities.” (36 CFR 219).

While we agree with the commenter’s assertion about the importance of connecting “a healthy watershed to a reliable and sustainable water supply”, we believe that the referenced desired condition as written meets this need. It captures the need to improve watershed health along with several other important ecosystem services. The list is not all inclusive. Watershed condition and its sustainability is discussed further in the revised plan (chapter 2, Watersheds and Water Resources). The desired conditions, objectives, standards, guidelines and Management approaches for watersheds and water resources will also apply to forest products and any other site-specific projects conducted under the revised plan for any other resource as indicated in the revised plan (chapter 1, Forest Plan Framework and Organization, Interrelationships of Forest Plan Content). Furthermore, to effectively manage to the desired conditions of a resource, project planners and decision makers must ensure they use the entire plan and not just the plan components listed for that resource. Effective integrated resource management recognizes the interdependency of ecological, social, cultural, and economic resources and how management of one resource can influence the management or condition of other resources.

We agree with the commenter’s statement, regarding the standard they reference, on the importance harvesting systems economics and have added clarification the standard, which now reads: “Harvesting systems shall primarily be selected for their ability to move toward achieving desired conditions (e.g., vegetation, watershed, and riparian) and not for their ability to provide the greatest dollar return or unit output of timber, while remaining as economical as possible.”

Finally, we believe the revision of the referenced Forest Products Management Approach is unnecessary. The need to supply goods to varying size business is addressed in several places in the revised plan: (chapter 2, Forest Products): Objective 01 points out that personal and commercial timber harvest contributes to the creation of both small and large business and employment opportunities; Guideline 01 points out the need to tailor timber and fuelwood harvests to meet the needs and capabilities of local industry, businesses and individuals; and Management Approach 03 acknowledges the need to design small timber contracts to accommodate small operators and local communities.

**Comment Number(s):**

2736-45, 46

The plan revision is programmatic document that provides a framework for the management of all resources across the forest. The entire Partnerships and Volunteers (PV) section of the revised plan (chapter 2) talks directly to what the commenter is requesting. As such, we do not need to write resources

specific planning components for each resource or every group that we will work with as we plan projects that implement the revised plan.

The recommended addition that the commenter is requesting can be found in the Wildlife, Fish, and Plants (WFP) section of the revised plan (chapter 2). As direction for wildlife, fish, and plants is forestwide and apply to all projects, it is not appropriate to have it only in the section addressing Forestry and Forest Products.

**Comment Number(s):**

2948-22, 23

We appreciate your interest and support of our planning effort. We recognize the value of maintaining a continual supply of dead standing trees in various stages of decomposition for a variety of wildlife species including bats, many species of birds and small mammals. A desired condition for forestry and forest products (revised plan, chapter 2) states: “Harvest of dead and dying trees balance economic value with the needs of wildlife habitat, soil productivity, and ecosystem functions.” This desired condition is addressed by a forestry and forest products guideline, which: “Timber harvest and mechanical fuels treatments should be designed to develop or manage vegetation and coarse woody debris within the range of the desired conditions (e.g., snags, large woody debris). If these attributes were not present in the stand before the activity, treatments should be designed to help meet those requirements in the future” (revised plan, chapter 2).

The forest plan is designed so that all the sections work together to achieve objectives. No one section is intended to stand alone. The above forestry and forest products desired condition and guideline are designed to help meet the desired conditions for the upland ecological response units, especially in the Ponderosa Pine, Ponderosa pine- Evergreen Oak, Mixed Conifer-Frequent Fire and Wet Mixed Conifer Ecological Response Units. Examples of the desired conditions for the Upland Ecological Response Units and Ponderosa Pine-Evergreen Oak Perennial Grass Subclass can be found in this section of the revised plan (chapter 2).

All the Upland Ecological Response Units contain similar desired condition statements that identify the sizes and numbers of snags desired across the landscape based on the range of historic variability for each ecological response unit (ERU). When desired conditions and guidelines are used in conjunction with vegetative treatments, the type and quantity of snags needed by wildlife species, including bats, should be readily available.

**Comment Number(s):**

2932-38

While we understand the commenter's request, we will not be making the suggested edit. The Forest is committed to providing a sustainable and increased product supply that is both reliable and consistent, the Forest must comply with all applicable laws, regulations, and policies. These are subject to change, though, that change is infrequent, it does occur as the administrative and congressional branches of the government fluctuate and shift priorities. This change is beyond the scope and control of the Forest and is outside the scope of this plan revision process. As budgets and manpower fluctuate over time, the Forest will shift resource to meet targets as best it can, but there is no guarantee that it will be able to meet all of its objectives.

The Forest is also often the subject of litigation and can be enjoined by the courts to cease operations on forest management projects. This can often delay projects for substantial periods of time preventing the

Forest from undertaking projects that generate products for public consumption in a timely and consistent fashion.

Delays can also occur during the National Environmental Policy Act process causing delays in project preparation leading to outputs that fluctuate from year to year.

The Forest will do all it can to deal with these and other interruptions to the flow of goods and services provided; however, many are outside of the Forest's control. The Forest has chosen treatment objectives that contain a range of annual acres treated. Some years there will be more acres treated and some years there will be less, but the objective is to maintain a constant flow.

**Concern Statement 60.**     *Commenters suggest additional analysis or clarifying language be included in the final environmental impact statement.*

Response:

**Comment Number(s):**

2932-44

For adjacent Forest Service lands, this information can be found on each forest's Schedule of Proposed Action on the website. We are unaware of if adjacent Tribal or private lands make this information available as they are not required to as we are per the National Environmental Policy Act (40 CFR 1500).

**Concern Statement 61.**     *Commenters suggest additional analysis, language, or maps be included related to timber suitability in the final environmental impact statement.*

Response:

**Comment Number(s):**

2932-55, 56, 57, 58

As identified in the overall assumptions section of the environmental impact statement (appendix B), it is assumed that the budget for the Tonto National Forest will continue to decline annually; however, the level of decrease is unknown and cannot be quantified. Because of expected decreasing budgets, field staff levels will continue to be at a minimum. It is also assumed that the resources required to implement management actions in the forest plan would be available. In the development of the environmental impact statement and analysis of the alternatives, these assumptions were applied across all resources, where applicable.

The desirable rate of treatment was developed by integrating what we anticipated was realistic, based on treatment averages for 5 years and expected trends in related variables, such as funding, resource capacity, treatment windows, markets, air quality, conflicting priorities for management actions, etc., as well as what is ecologically sound.

The Forest has no control over the budget process and, therefore, the effect of increasing or decreasing the budget or staffing were not analyzed. While a dramatic increase or decrease in budget would affect how the Forest accomplished its targets it is assumed that the Forest would shift the available resources to meet its commitments.

**Comment Number(s):**

2932-60

Putting all alternatives on one map was explored. The resulting map was cluttered, unreadable, and most likely would not meet the information that the commentor is looking for.

**Comment Number(s):**

2932-53

Suitable timber lands are areas identified as capable of producing a regular, periodic output of timber, maintained in perpetuity, without impairment of the productivity of the land or inconsistency with other land management direction. They are lands that can be managed specifically for the purpose of producing timber. Suitable timber acres vary by alternative due to the different management emphases and differing recommended wilderness, research, natural, botanical, or special management areas.

The planned timber sale program is an estimate of forest product yields associated with projects designed to contribute to the accomplishment of the plan's desired conditions and objectives, consistent with the other plan components during the plan period (by decade). Planned treatment types and management levels were developed consistent with the theme and objectives for each alternative and the number of acres treated under each alternative. These estimates are based on the projected fiscal capability and organizational capacity of the planning unit. They do not require any specific actions to be taken, rather, they are estimates of actions taken to accomplish the intent of the revised Plan. A more complete discussion of the planned timber sale program can be found in the environmental impact statement (Appendix B: Description of the Analysis Process, Timber Suitability Analysis and Planned Timber Sale Program, Planned Timber Sale Program).

The number of acres that will receive mechanical treatment were developed consistent with the theme and objectives for each alternative. A comparison of treatment objectives for vegetation and wildland fire can be found in the environmental impact statement (chapter 2, Alternatives Considered in Detail, Comparison of Alternatives).

The desirable rate of treatment was developed by integrating what we anticipated was realistic, based on treatment averages for 5 years and expected trends in related variables, such as funding, resource capacity, treatment windows, markets, air quality, conflicting priorities for management actions, etc., as well as what is ecologically sound. Overall assumptions are identified in appendix B of the (Description of the Analysis Process, Overall Assumptions). Management and ecological constraints are further described in appendix B of the environmental impact statement (Description of the Analysis Process, Vegetation Ecological Response Units and Fire and Fuels, Assumptions).

For mechanical treatments, we combined the natural disturbance regimes (mostly fire regime) with the last 15 years of mechanical treatments on the forest, including firewood, commercial sales, restoration treatments, hazardous fuel reduction, etc. as well as trying to anticipate trends affecting work capacity as described above.

For fire, we used the average annual number of acres that would need to be burned to achieve an average fire frequency that aligned with the range and average fire return interval for each vegetation type in tabular form (environmental impact statement, chapter 2, Vegetation and Ecological Response Units), as well as a 5-year average of acres burned. Historically, the average annual acres of wildfire on the Tonto National Forest would have been well over 100,000 (Kaib et al. 1996, Kaib 2001). The proposed 325,000 acres are spread out over a 10-year period, averaging about 33,000 acres a year. Some years there would

be fewer acres and some years there would be more. Ideally, the acres would occur as a combination of small to medium sized wildfires combined with prescribed fires. The ratio of wildfire to prescribed fire would vary from year to year.

**Concern Statement 62.** *Commenters are concerned about plan direction regarding logging and mechanical treatments on national forest system lands.*

Response:

**Comment Number(s):**

42-2, 65-6, 804-2, 1287-1, 2736-44

The Tonto National Forest is managed under the Multiple Use and Sustained Yield Act, which authorizes vegetation management and timber production as one of these uses.

This plan revision process is programmatic and will give the direction for all site-specific projects that implement it. All site-specific projects must comply with the current Forest Plan, or else go through the amendment process. As we have developed this revised plan, we have considered large landscape level projects, such as the Rim Country environmental impact statement.

A no harvesting or cutting alternative would not meet the legal direction of the National Forest Management Act or Multiple Use–Sustained Yield Act which direct that forests will be managed using multiple use, sustained yield principles.

The Multiple Use-Sustained-Yield Act (MUSYA) of 1960 (section 1) states that,

“the national forests are established and shall be administered for outdoor recreation, range, timber, watershed, and wildlife and fish purposes.”

The National Forest Management Act (NFMA) (section 6(e)(1)) states that in revising plans,

“provide for multiple use and sustained yield of the products and services obtained therefrom in accordance with the Multiple-Use, Sustained-Yield Act of 1960, and in particular, include coordination of outdoor recreation, range, timber, watershed, wildlife and fish, and wilderness...”

The forests are managed for timber (cutting trees) consistent with the National Forest Management Act and Multiple Use-Sustained-Yield Act. These laws do not require harvest of timber and forest products when/where ecological conditions are not appropriate. The plan is designed to manage for ecological desired conditions, as well as social and economic desired conditions (including uses such as livestock grazing, harvest of forest products, and recreation). The timber and forest products produced are the byproducts of activities designed to move vegetation toward ecological desired conditions.

## Forest Project - Salt River Horses

**Concern Statement 63.** *Commenters request more information about the Salt River Horse management plan.*

Response:

**Comment Number(s):**

4-1, 2838-4

The Salt River Horse Management plan is designed by the Arizona Department of Agriculture. It was made from suggestions by the Salt River Horse Collaborative, US Forest Service, Arizona Governor's office, and the general public. The Salt River Horse Management Area section of the forest plan provides guidance and plan components directing the Forest on how to manage for this management area (forest plan, chapter 3, Salt River Horse Management Area).

Though we do not have specific information to quantify the economic and other values of the herd, the plan components were developed in response to public comment. This direction includes a desired condition that "The area provides a safe environment for both the Salt River Horses and forest users" (forest plan, chapter 3, Salt River Horse Management Area). The Salt River Horse Herd is protected in the lower Salt River by State law, HB 2340, and managed by the Arizona Department of Agriculture. Additionally, "The Salt River Horse herd shall only be located and managed within the Salt River Horse Management Area" (forest plan, chapter 3, Salt River Horse Management Area). The forest plan is programmatic in nature, and specific projects to implement the plan will require site-specific environmental analysis through the National Environmental Policy Act (NEPA) process under 40 CFR 1500 and comply with all forest plan components. Site-specific analysis will consider the effect of the proposed project to affected resources, including to the Salt River Horse Management Area, and will be consistent with the forest plan.

**Concern Statement 64.** *Commenters oppose fencing as a management tool for the Salt River Horses.*

Response:

**Comment Number(s):**

16-1, 63-3, 2592-3, 2630-3, 2632-1, 2646-1, 2701-2, 2934-5, 2960-2, 3

We appreciate your support of our planning efforts. The Salt River Horses are humanely managed by the Intergovernmental Agreement between the US Forest Service and the Arizona Department of Agriculture as a result of HB 2340. Per this agreement, the Forest Service created the Salt River Horse Collaborative whose duty was to present 3 proposals for a long-term management plan of the horses. These proposals were then used to create management plans by the Arizona Department of Agriculture for the governor to approve. In accordance with the management plan from the Arizona Department of Agriculture, the east side of Bush highway, including the seeps, are not within the approved horse areas and are not protected under the State law. Additionally, under the revised forest plan for the Tonto National Forest, "The Salt River Horse herd shall only be located and managed within the Salt River Horse Management Area." (forest plan, chapter 3, Salt River Horse Management Area)

The plan from the Arizona Department of Agriculture also calls for the use of a humane birth control, PZP, to manage the population size. Any removal done in the forest by the 3rd party management group must be approved beforehand by the Arizona Department of Agriculture and horses cannot be returned to the forest per Forest Service regulations. As of right now, no other rescue is authorized to take a horse from the Salt River Horse herd. The use of supplemental feeding during extreme summer months is done to keep the herd in good health. Each feed location is approved before the start of supplemental feedings, and the 3rd party group will feed in multiple spots on each location with only certified “weed free” hay. This is all done under supervision from the Arizona Department of Agriculture. Presently, the Salt River Wild Horse Management Group has the contract with the Arizona Department of Agriculture to be the 3rd party management group, although all volunteer help is welcomed and appreciated.

The fence installed on the lower Salt River will not prevent the horses from reaching the river. It was designed to be a border between recreation sites, reservation, and the management areas for the Salt River Horse herd. Within the Salt River Horse Management Area, the horses have over 21,000 acres to roam freely, including multiple miles along the lower Salt River. The fence the commenter is referring to was authorized under a separate decision. The forest plan is programmatic in nature. Construction or removal of fence lines would need to be considered at the project level.

The Forest Service also supports equestrian use, including staging in authorized areas. There is nothing in the forest plan that would prohibit this continued use.

## **Forest Projects – Four Forest Restoration Initiative (4FRI)**

*Concern Statement 65. Commenter requests consistency with the 4FRI Rim Country EIS specific to timber suitability.*

Response:

### **Comment Number(s):**

2991-24

This plan revision process is programmatic and will give the direction for all site-specific projects that implement it. The Four Forest Restoration Initiative’s Rim Country Project, although it covers a very large area and several forests, is more of a site-specific analysis that must comply with the direction provided in applicable forest plans. The Rim Country Project does comply with the Tonto National Forest’s current forest plan and with the Tonto’s revised forest plan. The desired conditions identified in the Rim Country Draft environmental impact statement and the desired conditions described in the Tonto National Forest revised forest plan for ponderosa pine are in alignment. Desired conditions for Rim Country can be found in the Rim Country Draft environmental impact statement, appendix D, Section B-Management Direction, Desired Conditions, and Treatment Design, Ponderosa Pine Forest, Outside of Mexican Spotted Owl Habitat and Landscapes outside of Goshawk post-fledging areas (PFAs) section. Desired conditions for ponderosa pine can be found in the Tonto National Forest revised forest plan, chapter 2.-Forestwide Direction, Vegetation and Ecological Response Units (ERU), Ponderosa Pine Forest (ERU-PPF).



## Forest Projects - Resolution Copper

**Concern Statement 66.** *Commenter is concerned about how Resolution Copper is connected to the revised forest plan.*

Response:

**Comment Number(s):**

1980-1

The Resolution Copper project was authorized by Congress in the Defense Spending Act and is undergoing analysis in a separate project. Consultation activities for the Resolution Copper project are ongoing but separate from consultation with Tribes for this forest planning project. Several laws, Executive Orders (EOs), and policies require the Forest Service to consult with federally-recognized Tribes. Specifically, EO 13175 requires consultation with Tribes when proposed policies or management actions may affect their interests. The National Environmental Policy Act mandates consultation with Tribes, as well as Section 106 of National Historic Preservation Act.

**Concern Statement 67.** *Commenters are concerned about the loss of rock-climbing opportunities due to the Resolution Copper environmental impact statement.*

Response:

**Comment Number(s):**

1713-2, 1763-2, 1849-1, 1884-2, 3, 2130-1, 2931-2

Rock climbing is one recreational activity among many that occur on the Tonto National Forest. The rock-climbing community has been active throughout the National Environmental Policy Act process and climbing is considered throughout the analysis. Additionally, in response to public comment, plan components related to rock climbing have been added to the Recreation section in the final forest plan. The forest plan is strategic in nature and does not include project and activity decisions such as the Resolution Copper mine project. These are conducted in site-specific National Environmental Policy Act processes. We acknowledge that rock climbing use will potentially increase in the Superstition Wilderness area; the Recreation, Dispersed Recreation, Non-Motorized Dispersed Recreation, and Designated Wilderness sections address managing use in this area. In response to public comments, we have modified the direction in the forest plan regarding rock climbing and associated infrastructure and summarized these changes in the Rock Climbing and Fixed Anchors section beginning on page 360.

Climbing is an appropriate activity on the majority of the Tonto National Forest; several plan components in the Recreation, Dispersed Recreation, and Non-Motorized Dispersed Recreation sections cover management of this activity.

## Forest Projects - Travel Management

**Concern Statement 68.** *Commenters are concerned about the Travel Management Rule and how the travel management decision is connected to the revised forest plan.*

Response:

**Comment Number(s):**

2970-722

The 2005 Travel Management Rule (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas. Forest Plan components such as objectives, standards and guidelines provide for consistency with Travel Management decisions and are put in place to help achieve resource desired conditions. Plan objectives to decommission roads and motorized trails are consistent with existing direction in “determining the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System (NFS) lands” (the minimum road system, 36 CFR 212.5(b)(1)). Appendix B in the forest plan, Proposed and Probably Foreseeable Actions, states “prioritize decommissioning of roads that impact flow regimes, are redundant routes, cause mass movement of soils and sediment, are built within the riparian management zone, or have substantial negative impacts to at-risk species.” This also aligns with objectives for Roads (RD) which indicate “prioritize decommissioning of roads that impact flow regimes, are redundant routes, cause mass movement of soils and sediment, are built within the riparian management zone, or have substantial negative impacts to at-risk species.” All projects and activities authorized by the Forest Service must be consistent with the land management plan (16 USC 1604(i) and 36 CFR 219.15(b-c)). Road density thresholds were not considered at the forest plan level because road impacts are more complex than a simple road density calculation and are influenced by more than one resource. Route changes on the forest need to be conducted at the project level per the 2005 Travel Management Rule.

**Comment Number(s):**

44-4, 2279-1, 2317-1, 2736-50, 52, 2673-1, 2665-2, 2800-1, 2804-1, 2812-1, 2806-3, 2966-4, 2923-16, 17, 20, 2970-605, 608, 714, 721, 726, 737, 2991-28

The 2005 Travel Management Rule (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas. In contrast, the 2012 Planning Rule (36 CFR 219) is the overriding regulation that guides the development, amendment, and revision of land management plans for all units of the National Forest System. As such it is programmatic in nature and does dictate the level of specificity that project level plan implementation does. All project level specificity and decisions for the management of motor vehicle use is done in compliance with the 2005 Travel Management Rule either forestwide (as is the case with the current travel management planning process) or on a more site-specific need, such as by district or area. This planning process provides plan components to guide management of the forest, including for motorized use.

**Comment Number(s):**

2736-49, 2970-731, 736

The 2005 Travel Management Rule (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas. The forest plan guides

management for all resources, including roads and motorized trails. Forest plan components such as objectives, standards and guidelines provide for consistency with travel management decisions. Plan objectives to decommission roads and motorized trails are consistent with existing direction in “determining the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System (NFS) lands” (the minimum road system, 36 CFR 212.5(b)(1)). Appendix B of the forest plan, Proposed and Probably Foreseeable Actions, provides further input as to potential sources for decommissioning that align existing policy and plan objectives and chapter 1 outlines the flexibility of the forest plan in providing for adaptive planning and monitoring. In addition, the forest plan states: All projects and activities authorized by the Forest Service must be consistent with the land management plan (16 USC 1604(i) and 36 CFR 219.15(b-c)).

**Comment Number(s):**

2970-738

The 2005 Travel Management Rule (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas. In contrast, the 2012 Planning Rule (36 CFR 219) is the overriding regulation that guides the development, amendment, and revision of land management plans for all units of the National Forest System. As such it is programmatic in nature and does dictate the level of specificity that project level plan implementation does. All project level specificity and decisions for the management of motor vehicle use is done in compliance with the 2005 Travel Management Rule either forestwide (as is the case with the current travel management planning process) or on a more site-specific need, such as by district or area. This planning process provides plan components to guide management of the forest, including for motorized use. Specifying road densities is not an appropriate effects analysis measurement for this programmatic document, because road impacts are more complex than a simple road density calculation. Effects related to motorized use are discussed by resource, where applicable, in chapter 3 of the environmental impact statement.

**Comment Number(s):**

1609-1, 2807-2

The 2005 Travel Management (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas. In contrast, the 2012 Planning Rule (36 CFR 219) is the overriding regulation that guides the development, amendment, and revision of land management plans for all units of the National Forest System. As such it is programmatic in nature and does dictate the level of specificity that project level plan implementation does. All project level specificity and decisions for the management of motor vehicle use is done in compliance with the 2005 Travel Management Rule either forestwide (as is the case with the current travel management planning process) or on a more site-specific need, such as by district or area. This planning process provides plan components to guide management of the forest, including for motorized uses. When the travel management process is complete, a motor vehicle use map will be made available to display available routes. Motorized use is specifically prohibited in designated wilderness areas by the Wilderness Act. The route the commenter refers to has been brought to the attention of Congress, who are the only entity that can make these changes. Travel management will be implemented according to the associated environmental impact statement and is a separate decision from the forest plan revision but both will direct decision making going forward.

**Comment Number(s):**

2991-27

The 2005 Travel Management Rule (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas. In contrast, the 2012 Planning Rule (36 CFR 219) is the overriding regulation that guides the development, amendment, and revision of land management plans for all units of the National Forest System. As such it is programmatic in nature and does dictate the level of specificity that project level plan implementation does. All project level specificity and decisions for the management of motor vehicle use is done in compliance with the 2005 Travel Management Rule either forestwide (as is the case with the current travel management planning process) or on a more site-specific need, such as by district or area. This planning process provides plan components to guide management of the forest, including for motorized uses. Additionally, while commenter's quotation from the Multiple Use and Sustained Yield Act is correct, in defining "Multiple Use", the Act specifies "that some land will be used for less than all of the resources". The Act also maintains that "The establishment and maintenance of areas of wilderness are consistent with the purposes and provisions of this Act" which removes any ambiguity that prioritizing some areas of natural forces are consistent with the Act. The Forest has developed four alternatives, including the proposed action, and in response to comments received, showing the range of actions when human influences are more prevalent as opposed to when natural processes are given more focus.

**Comment Number(s):**

2625-1

The 2005 Travel Management Rule (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas. In contrast, the 2012 Planning Rule (36 CFR 219) is the overriding regulation that guides the development, amendment, and revision of land management plans for all units of the National Forest System. As such it is programmatic in nature and does dictate the level of specificity that project level plan implementation does. All project level specificity and decisions for the management of motor vehicle use is done in compliance with the 2005 Travel Management Rule either forestwide (as is the case with the current travel management planning process) or on a more site-specific need, such as by district or area. This planning process provides plan components to guide management of the forest, including for motorized use. This planning process provides plan components to guide management of the forest, including for motorized use. There are single track motorized trails currently under consideration in the Travel Management Draft Record of Decision. Additional proposed motorized trails would need to comply with both the Travel Management Rule and the forest plan. An objective in the Recreation section in the revised plan states: Within 10 years of plan approval, develop or modify 1 to 4 systems of sustainable designated motorized trails (e.g., motorcycle, jeep, and off-highway vehicle trails) to adequately provide for these user groups and reduce user conflicts. New or modified system trail locations are generally prioritized based on user demand and public input.

**Comment Number(s):**

2805-1

The 2005 Travel Management (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas. In contrast, the 2012 Planning Rule (36 CFR 219) is the overriding regulation that guides the development, amendment, and revision of land management plans for all units of the National Forest System. As such it is programmatic in nature and does dictate the level of specificity that project level plan implementation does. All project level actions and decisions for the management of motor vehicle use is done in compliance with the 2005 Travel Management Rule either forestwide (as is the case with the current travel management planning process) or on a more site-specific need, such as by district or area. This planning process provides plan

components to guide management of the forest, including for motorized use. A land management plan guides and constrains Forest Service personnel and resource management, not the public. Any constraint on the public needs to be imposed by law, regulation, or through the issuance of an order by the responsible official under 36 CFR part 261, Subpart B. Motor vehicle use will be limited to the routes and areas designated for that use as it is defined in the final Travel Management Record of Decision. Any changes to the designated system will require further environmental analysis and would comply with the 2005 Travel Management Rule and the forest plan.

## **General - Comment / Opinion**

**Concern Statement 69.** *Commenter is concerned with the use of chemicals to control habitats and the need to discuss this type of method with the publics that use the forest. Commenter also suggests more personnel to address problems like trash, weeds, and overgrowth as they arise so they are less of a long-term issue.*

Response:

**Comment Number(s):**

2831-3

This plan revision process is programmatic, guiding the Tonto National Forest in fulfilling its stewardship responsibilities to best meet the current and future needs of the American people. This plan provides the vision, strategy, and constraints (revised plan, chapter 1) that guide integrated resource management, provide for ecological sustainability, and contribute to social and economic sustainability on the forest and within the broader landscape. When we undergo site-specific planning, we comply with the National Environmental Policy Act, as well as we follow the Forest Service Manual (FSM), Forest Service Handbook (FSH) and other policies directed by the United States Department of Agriculture (USDA). The National Environmental Policy Act requires scoping as determined by the line officer. These are systematic oversight processes in which we adhere to with any actions dealing with this related topic. The use of any herbicide on Forest Service land must follow all Forest Service policy, as well as the herbicide label which is a legal binding document that must be followed at all times. On the Tonto National Forest, we practice integrated pest management (IPM). Integrated pest management is an ecosystem-based strategy that focuses on long-term prevention, control, or management of pests (in this case weeds), or their damage through a combination of techniques and treatments. Herbicides is just one of the many tools we use in our integrated pest management program. Herbicides are used only after detection/monitoring indicates they are needed according to the invasive species curve model, as well as treatments are made with the goal of reducing or removing only a target organism (weed). Chemical control with herbicides has been an important tool for managing weeds across landscapes for many years. Many of today's herbicides are more effective and selective. These traits make them less harmful to the environment when they are used properly. Herbicides are a category of pesticides that can be an effective tool for invasive plant management but must be carefully and thoughtfully used to avoid damage to non-target species and to protect the health and safety of the user, the public, and the environment. Use of herbicides requires careful consideration and planning. The Forest Service has a policy on pesticide use regarding invasive plant control and Tonto National Forest engagement towards the issue (please see FSM-2100). Nationally, all herbicides are regulated by the Federal Environmental Protection Agency (EPA). In Arizona, herbicides are also regulated by the Arizona Department of Agriculture (AZDA). One must be licensed by the Arizona Department of Agriculture to apply herbicides on Tonto National Forest

System land (see FSM 2100). When using herbicides, Federal law requires that you follow the directions on the herbicide label. An herbicide label is a legal document providing important information about an herbicide, its appropriate use, and the precautions needed to avoid off-target movement and to protect environmental quality. This also includes health and safety rules to protect the herbicide applicator and the public. And finally, the Tonto National Forest works with an array of partners and volunteers during the planning of invasive species projects. These participants from the public offer an invaluable contribution in our planning efforts to combat invasive species, which also provides us with the correct mode of action to take pertaining to the regarding issue.

**Concern Statement 70.**     *Commenter expresses general support for the plan revision process and suggests plan components to incorporate into the final forest plan.*

Response:

**Comment Number(s):**

2809-1

Thank you for your support and partnership through the years. Arizona State Land Department is an important partner that we strive to work and participate with. Arizona State Land Department is always welcome to participate in public scoping, or general comment, and direct collaboration as necessary. Management and access issues related to specific trails will be addressed on a site-specific basis and are not addressed in the forest plan; the forest plan is programmatic in nature and does not include project and activity decisions such as implementation of the travel management plan or trail projects. In relation to recreational shooting management, plan components in the Recreational Shooting section, including “Work with partners to identify and improve recreational shooting opportunities based on, additional public needs, and improve recreational shooting opportunities on the forest. Collaborate with partners to develop criteria for determining where recreational shooting is appropriate and where it is not appropriate.” and “Consider recreational shooting restrictions in areas that may cause harm to species of conservation concern, cultural resources (e.g., rock art and other archaeological artifacts), cause resource damage, or endanger public safety (e.g., high-use areas). Work with partner agencies and groups to develop criteria for determining where recreational shooting is appropriate and where it is not appropriate.” identify how the Forest should work with partners such as Arizona State Land Department to provide safe recreation opportunities. The Tonto appreciates your ongoing support and looks forward to our continued relationship.

**Concern Statement 71.**     *Commenter is concerned with management of conflicting uses in the Coon Bluff and Goldfield areas relating to hunting and horseback riding.*

Response:

**Comment Number(s):**

2983-4

This comment is outside the scope of the plan revision process as it is related to site-specific information and it expresses opinion. For information about the management of the Salt River Horses, see chapter 2 of the revised plan.

**Concern Statement 72.**      *Comments about works cited and hyperlinks with additional information provided with submitted comments.*

Response:

**Comment Number(s):**

2970-629, 632

References and citations associated with specific comments are considered between draft and final and are used to update best available scientific information, analysis, and plan components where appropriate. Included references are captured in the forest plan revision project record.

**Concern Statement 73.**      *Commenter is concerned with carbon sequestration.*

Response:

**Comment Number(s):**

269-1

We appreciate your support of our planning efforts per 36 CFR 219. The Multiple-Use Sustained-Yield Act of 1960 mandates national forests be managed for multiple uses which includes recreation, motorized access, wilderness area management, and ecosystems management to protect wildlife habitat. The final environmental impact statement analyzes the effects each alternative has on forest resources including cultural and historic resources and areas of Tribal importance. Carbon stocks, both vegetative carbon and soil organic carbon, was analyzed in the final assessment report of ecological conditions, trends, and risks to sustainability document. That information was used to develop needs to change statements and ultimately plan components in the forest plan.

**Concern Statement 74.**      *Commenters are concerned with managing the forest for multiple uses as mandated by the Multiple Use Sustained Yield Act.*

Response:

**Comment Number(s):**

1541-1

The Multiple Use Sustained Yield Act mandates national forests be managed for multiple uses which includes recreation, motorized access, wilderness area management, and ecosystems management to protect wildlife habitat. The 2012 Planning Rule also outlines a process to identify areas on the forest to potentially identify as recommended wilderness areas during the plan revision process (see appendix D of the environmental impact statement). The final forest plan recommends just over 100,000 acres of land to be managed as recommended wilderness which will help with wildlife, tree, and plant protections. As we move into forest plan monitoring (36 CFR 219.12) and project level plan implementation, we will be looking for partners and volunteers to help us achieve our desired conditions and would appreciate your continued support.

**Comment Number(s):**

2369-1, 2719-3

The Multiple Use Sustained Yield Act mandates national forests be managed for multiple uses which includes recreation, motorized access, grazing, wilderness area management, and ecosystems management to protect wildlife habitat. During plan revision the 2012 Planning Rule also outlines a process to identify areas on the forest to potentially identify as recommended wilderness (see appendix D of the environmental impact statement). The final forest plan recommends just over 100,000 acres of land to be managed as recommended wilderness which restricts future motorized opportunities in those areas. In addition, the final forest plan recommends botanical and research natural areas which do not authorize grazing. However, multiple use opportunities, including grazing and motorized use, will continue to be provided on the Tonto National Forest.

**Comment Number(s):**

1160-1

The Multiple Use Sustained Yield Act mandates national forests be managed for multiple uses which includes recreation, motorized access, wilderness area management, and ecosystems management to protect wildlife habitat. During plan revision the 2012 Planning Rule also outlines a process to identify areas on the forest to potentially identify as recommended wilderness (see appendix D of the environmental impact statement). The final forest plan recommends just over 100,000 acres of land to be managed as recommended wilderness which will help with wildlife, tree, and plant protections. As we move into forest plan monitoring (36 CFR 219.12) and project level plan implementation, we will be looking for partners and volunteers to help us achieve our desired conditions and would appreciate your continued support.

**Comment Number(s):**

750-1

We appreciate your participation throughout the plan revision process. The Multiple Use Sustained Yield Act mandates national forests be managed for multiple uses which includes recreation, motorized access, wilderness area management, and ecosystems management to protect wildlife habitat. The Forest followed the 2012 Planning Rule (36 CFR 219) to develop the forest plan and associated environmental impact statement which includes management and analysis of all forest resources. The forest plan, chapter 3, Recommended Wilderness section also covers the areas to be managed as recommended wilderness. These areas will not be managed as wilderness but to protect the wilderness characteristics. Management for designated wilderness is also included in the forest plan and mechanized and motorized uses are not authorized as they are incompatible with wilderness.

**Concern Statement 75.**     *Commenters are concerned with protecting the natural resources of the national forest.*

Response:

**Comment Number(s):**

1500-1

The Multiple Use Sustained Yield Act mandates national forests be managed for multiple uses which includes recreation, motorized access, wilderness area management, and ecosystems management to protect wildlife habitat. During plan revision the 2012 Planning Rule also outlines a process to identify areas on the forest to potentially identify as recommended wilderness (see appendix D of the



environmental impact statement). The final forest plan recommends just over 100,000 acres of land to be managed as recommended wilderness which will help with wildlife, tree, and plant protections.

**Comment Number(s):**

704-1

We appreciate your participation throughout the plan revision process. The Multiple Use Sustained Yield Act mandates national forests be managed for multiple uses which includes recreation, motorized access, wilderness area management, and ecosystems management to protect wildlife habitat. The Forest followed the 2012 Planning Rule (36 CFR 219) to develop the forest plan and associated environmental impact statement which included management and analysis of all forest resources. Protections for species are incorporated into the plan components for each resource and can be found in one place in the Analysis of At-Risk Species (final environmental impact statement, appendix G) which includes a species and plan component crosswalk. Based on public comments a new appendix was included that shows how the forest plan supports wildlife habitat connectivity (appendix H). As the Forest Service manages multiple uses, there are a few instances on the forest with a management focus of non-motorized; those include: designated wilderness, recommended wilderness, and inventoried roadless areas. See the forest plan, chapter 3 Management Areas and then those sections for management direction related to non-motorized use.

**Comment Number(s):**

1676-1

We appreciate your participation throughout the plan revision process. The Multiple Use Sustained Yield Act mandates national forests be managed for multiple uses which includes recreation, motorized access, wilderness area management, and ecosystems management to protect wildlife habitat. The Forest followed the 2012 Planning Rule (FSH 1909.12) to develop the forest plan and associated environmental impact statement which included management and analysis of all forest resources. Protections for species are incorporated into the plan components for each resource and can be found in one place in the Analysis of At-Risk Species (final environmental impact statement, appendix G) which includes a species and plan component crosswalk. Based on public comments a new appendix was included that shows how the forest plan supports wildlife habitat connectivity (appendix H). As the Forest Service manages multiple uses, there are a few instances on the forest with a management focus of non-motorized; those include: designated wilderness, recommended wilderness, and inventoried roadless areas. See the forest plan, chapter 3 Management Areas and then those sections for management direction related to non-motorized use. Expanding or changing the administrative boundary of the Tonto National Forest is outside the scope of the plan revision process and outside of the jurisdiction of the Forest.

**Concern Statement 76.**     *Commenter is concerned with the effects of the alternatives on scenic integrity, ROS, class conditions, and carrying capacities related to the management of the Arizona National Scenic Trail.*

Response:

**Comment Number(s):**

79-12

Thank you for your concerns about the national trails. We agree that the ideal setting for the Arizona National Scenic Trail is within a primitive or semi-primitive non-motorized recreation opportunity spectrum settings on the forest. Unfortunately, this is not always the case as the Arizona Trail existed on the ground prior to its congressional designation as a National Scenic Trail. There are places where the Trail is not consistent with desired conditions and located in recreation opportunity spectrum settings other than primitive and semi-primitive non-motorized settings. The forest plan includes a guideline that “all project-level decisions, implementation activities, and management activities will ensure consistency with recreation opportunity spectrum, or current protocol”. This guideline will help the Forest implement site-specific projects to achieve the desired conditions for recreation and the Arizona National Scenic Trail. The Forest Service will continue working with the Arizona Trail Association to make more miles of the trail conform to the National Trails System Act. Potential impacts to the nature and purposes of the trail (including from timber and mining) will be analyzed at the project level, in compliance with the National Environmental Policy Act and all applicable laws, regulations, and policies. This may include efforts to better alignment with the National Trails System Act and the Arizona Trail Comprehensive Plan, will be made throughout the life of this Forest Plan. We look forward to working with you, the public, and the Arizona Trail Association on projects related to the Arizona Trail. We believe that our final forest plan and final environmental impact statement are sufficient and meet the Center for Environmental Quality (CEQ) regulations found at 40 CFR Parts 1500-1508 and that the Tonto's Forest Plan does recognize the comprehensive planning requirements of the National Trails System Act. Once signed, The Arizona Trail Comprehensive Trail Management Plan will be a companion document for the management of the Arizona National Scenic Trail as indicated in the forest plan (chapter 3, National Trails).

**Concern Statement 77.**      *Commenters are concerned with the forest being managed for the benefits of the public.*

Response:

**Comment Number(s):**

44-7, 106-1, 157-4, 1349-1

We appreciate your participation throughout the plan revision process. The Multiple Use Sustained Yield Act mandates national forests be managed for multiple uses which includes recreation, motorized access, wilderness area management, and ecosystems management to protect wildlife habitat. The Forest followed the 2012 Planning Rule (36 CFR 219) to develop the forest plan and associated environmental impact statement which included management and analysis of all forest resources.

**Concern Statement 78.**      *Commenter is requesting additional information or analysis about livestock grazing infrastructure projects and groundwater pumping in riparian areas, seeps, springs, and wetlands.*

Response:

**Comment Number(s):**

2970-513

We appreciate your support of our planning efforts per 36 CFR 219. Specific responses to each question are captured separately as each item was considered individually. Materials referenced in the forest plan and the final environmental impact statement can be found in the project record.

**Concern Statement 79.** *Commenter is requesting all public comments be posted and available on a public facing website.*

Response:

**Comment Number(s):**

274-1

All comments for this project were posted in the reading room and could be viewed during the comment period.

## **General - Environmental Impact Statement**

**Concern Statement 80.** *Commenter offers recommendation that multiple Tribes need to be consulted during the plan revision process to ensure their needs and concerns are captured.*

Response:

**Comment Number(s):**

2811-5

The list of personnel the commenter is referring to is a list of those responsible for writing sections of the analysis for this forest planning revision process. The larger planning effort is supported by all forest staff and partners with relevant knowledge or subject matter expertise and in response to numerous public forums and comments received. Additionally, since 2015, the Tonto National Forest leadership and staff have attended 13 consultation meetings with the Tribes to discuss forest plan revision. The Forest consults on a Government-to-Government basis with representatives of Tribal nations authorized by their government to represent Tribes in consultation with representatives of the United States. While this consultation process is not a public process and the details of these meetings are not part of the final environmental impact statement, chapter 2 and appendix C of this document give general information about Tribal consultation.

**Concern Statement 81.** *Comment pointing out grammatical errors and typos to have corrected in the final forest plan and final environmental impact statement.*

Response:

**Comment Number(s):**

2927-16

We appreciate you pointing out typos; they have been updated in the final environmental impact statement.

**Concern Statement 82.** *Commenter requests the plan components in the final forest plan be further analyzed in the final environmental impact statement to disclose the effects of future actions as a result of the final forest plan being implemented.*

Response:

**Comment Number(s):**

2925-85

We have followed the plan revision process per 36 CFR 219 and FSH 1909.12 to develop the forest plan and the associated environmental impact statement. Forest plans provide a framework to guide future management but do not make management decisions. Future management decisions done to implement the forest plan, such as to authorize a project under a set of conditions, or to close an area for a specific activity, will need site-specific environmental analysis under 40 CFR 1500 and 36 CFR 220 before those decisions could be made. The forest plan does include language prohibiting, closing, or restricting uses and in those cases will require additional site-specific analysis to implement along with objectives to issue closure orders within a specific timeframe. The programmatic environmental impact statement that was conducted for the plan revision process is discussed in FSH 1909.12, chapter 20. The Forest Service believes the level of analysis in the environmental impact statement is appropriate for the nature of the forest plan. Between the draft and final many of the plan components were updated to be consistent with law, regulation, and policy and to respond to public comments.

**Concern Statement 83.** *Commenter suggests alternative B in the environmental impact statement be more restrictive to not allow extraction in areas where threatened or endangered species occur.*

Response:

**Comment Number(s):**

2927-23

The Tonto National Forest is managed under the Multiple-Use Sustained-Yield Act. As well, other laws governing mineral extraction on the Tonto include the Common Varieties of Mineral Materials Act of 1947 (30 U.S.C. 601) that authorizes the Secretary of Agriculture to prescribe rules and regulations to dispose of common variety mineral materials; The Mineral Leasing Act of 1920 (30 USC 181), The Mining and Minerals Policy Act of 1970 (30 CFR 21 et seq.), and the General Mining Act of 1872 (30 USC 22 et seq.) that authorizes and governs prospecting and mining for economic minerals on Federal public lands. Other laws, regulations, and policy that authorize mining on National Forest System lands can be found in the revised plan, chapter 2, Mining, Minerals, and Abandoned Mines (MMAM). Additionally, the mere presence of a threatened or endangered species and potential adverse effects does not necessarily disallow extraction in the area.

**Concern Statement 84.**     *Commenter is asking for clarification about the language in the draft environmental impact statement.*

Response:

**Comment Number(s):**

2816-99

The narrative for Issue 4: Economics used to describe a piece of alternative B has been updated to incorporate your concerns. Additional information about water management in the revised plan can be found in the Watersheds and Water Resources section of chapter 2 of the forest plan.

**Concern Statement 85.**     *Commenters seeking clarification or additional analysis in the final environmental impact statement.*

Response:

**Comment Number(s):**

2991-4

We appreciate Gila County's engagement in the plan revision process. The final environmental impact statement has been updated to include the information required in 36 CFR 219.4(b)(2). This information can be found in Appendix C: Public Engagement and Coordination with Other Planning Efforts. In addition, the assessment volume II: Social, Cultural, and Economic Conditions, Trends, and Risks to Sustainability includes a whole section of Other Land and Resource Plans. Included in this write up was the Gila County Comprehensive Master Plan and the Land Use and Resource Policy Plan for Federal Lands Situated in the County of Gila. The Assessment document was the first phase, and foundation of the revision phase of the process.

**Comment Number(s):**

2925-87

The forest plan provides a programmatic framework that guides site-specific actions but does not authorize, fund, or carryout any project or activity. Before any ground-disturbing actions take place, they must be authorized in a subsequent site-specific environmental analysis. This plan provides the vision, strategy, and constraints that guide integrated resource management, provide for ecological sustainability, and contribute to social and economic sustainability on the forest and within the broader landscape, which includes plan components for mineral activities. All projects and activities authorized by the Forest Service must be consistent with the land and resource management plan (forest plan), including standards and guidelines. Programmatic effects from the alternatives considered for the forest plan have been analyzed under the assumption the projects will comply with plan components. If a project is unable to comply with the forest plan as written there would be a need to do site-specific or forest wide amendment at which time, cumulative effects of the project, and past, present, and reasonably foreseeable future actions will be analyzed.

## General - Forest Plan

**Concern Statement 86.** *Commenter is concerned with management areas restricting future recreational opportunities and suggests some clarifications to plan components for roads, motorized trails, recommended wilderness, and the Lakes and Rivers Management Area.*

Response:

**Comment Number(s):**

2736-6

All projects that implement the forest plan will be addressed on a project level basis and undergo environmental analysis in compliance with the National Environmental Policy Act and our regulations (36 CFR 220) as required, including route decommissioning which will be done in compliance with the 2007 Travel Management Rule as applicable. The same would hold true for installation of fences and gates in compliance with the forest plan and all applicable law, regulation, and policy.

Per agency policy in the Forest Service Handbook (FSH 1909.12 Chapter 20 and 70), when developing plan components for recommended wilderness areas, the responsible official has discretion to implement a range of management options. All plan components applicable to a recommended area must protect and maintain the social and ecological characteristics that provide the basis for wilderness recommendation. To accomplish this the plan includes components for recommended wilderness that:

1. Enhance the ecological and social characteristics that provide the basis for wilderness designations;
2. Continue existing uses, only if such uses do not prevent the protection and maintenance of the social and ecological characteristics that provide the basis for wilderness designation; and
3. Alter existing uses, subject to valid existing rights; and
4. Eliminate existing uses, except those uses subject to valid existing rights.

**Concern Statement 87.** *Commenter is seeking information about what a forest plan is.*

Response:

**Comment Number(s):**

59-2

As indicated in chapter 1 of the revised plan, “This land and resource management plan (also referred to as the ‘forest plan’) guides the Tonto National Forest in fulfilling its stewardship responsibilities to best meet the current and future needs of the American people. This plan provides the vision, strategy, and constraints that guide integrated resource management, provide for ecological sustainability, and contribute to social and economic sustainability on the forest and within the broader landscape.” More detailed information about the plan and its components can be found in chapter 1 of the plan.

**Concern Statement 88.** *Commenter suggests including a glossary in the final forest plan similar to what is included in the draft EIS and defining the terms such as management actions.*

Response:

**Comment Number(s):**

2921-6

The Forest Service appreciates your support of the plan revision process per 36 CFR 219. We have reviewed public comments and updated the language in the forest plan to ensure we are using consistent language throughout the final forest plan. Chapter 1 of the forest plan was also updated to further clarify the plan components and when a forest plan amendment or project amendment would be necessary. The suggestions to add a glossary to the final forest plan was considered but not incorporated as it was determined not necessary with the additional footnotes provided throughout. In addition, part of the updating for consistent language throughout the final forest plan including updating all plan components to use the terminology “management activities” which means all types of management the Forest conducts, authorizes, or permits.

**Concern Statement 89.** *Commenter is concerned with management approaches in the forest plan imposing restrictions on future forest management.*

Response:

**Comment Number(s):**

2925-84

The 2012 Planning rule does allow for optional plan content, such as management approaches, in forest plans (36 CFR 219.7 (e)(2)). Management approaches are not required plan components and future project consistency determinations are not required for management approaches. The definition of desired conditions, objectives, standards, and guidelines as well as management approaches and how they fit into future implementation is outlined in the Forest Plan Framework and Organization section of chapter 1. Introduction in the final forest plan. The layout and overall organization were not changed based on this comment. Additional information was included in the descriptions of plan components and plan content based on public comments received and discussion during the Technical Partner Meeting on January 29, 2020.

**Concern Statement 90.** *Commenter is in general support of the social, cultural, and economic sustainability needs to change statements identified in the draft forest plan.*

Response:

**Comment Number(s):**

2923-1

We appreciate your support of our planning efforts per 36 CFR 219. As we move into project level plan implementation, we will be looking for volunteers and partners to help us with projects to achieve our desired conditions for recreation and would appreciate your continued support of the program.

**Concern Statement 91.** *Commenter suggests changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2970-746

The forest plan includes plan components that help the Forest implement the travel management decision. The roads section includes an objective to decommission 100 - 600 miles of unauthorized or national forest system roads through the travel management process every ten years. The recreation section includes an objective to “every 5 years, take action on at least 10 miles of motorized and/or non-motorized trails that may not offer recreational value or are not needed for administrative use”. The commentor did not specify how including the minimization criteria related plan components would meet the sustainability and diversity requirements so it is unclear how to incorporate in the forest plan. However, there are numerous plan components throughout the forest plan that address the sustainability and diversity requirements so these additional ones are most likely redundant. Any future additions to the designated route system would comply with the Travel Management Rule of 2005, the revised forest plan, and all other law, regulation, and policy.

**Concern Statement 92.** *Commenter is requesting the final forest plan clarify language related to directives, laws, regulations, policies, and transition to plan implementation.*

Response:

**Comment Number(s):**

2921-5

The Forest Service appreciates your support of the plan revision process per 36 CFR 219. There are several large projects happening on the forest concurrently with forest plan revision. Language will need to be updated in either the final plan and environmental impact statement or in the projects that are finalized after the plan to make sure they are consistent. As required by the National Forests Management Act and the 2012 Planning Rule, subject to valid existing or statutory rights, all projects and activities authorized by the Forest Service after approval of the plan must be consistent with the applicable plan components (16 U.S.C. 1604(i)) as described at 36 CFR 219.15. All project or activity approval documents, made after the effective date of the plan, will describe how the project or activity is consistent with the applicable components of the plan. Authorizations for occupancy and use made before this plan is approved may proceed unchanged until time or reauthorization. We recognize that implementing the revised forest plan will take time, that is the purpose of the information included under Transition in the Implementation of the Plan. Chapter 1 of the final forest plan contains information about plan implementation and consistency of projects with the forest plan.



**Comment Number(s):**

2921-4

The Forest Service appreciates your support of the plan revision process per 36 CFR 219. We have reviewed public comments and updated the language in the forest plan to ensure we are consistent with current laws, regulations, and policies. The 2012 Planning Rule (36 CFR 219) encourage us to streamline the forest plan document and not repeat law, regulations, or policies in the document unless it is appropriate to do so and if it results in clarity for forest management. That strategy has been incorporated into the development of the final forest plan. Where we have some laws, regulations, or policies incorporated into the final plan, like in the mining, minerals, and abandoned mines section, we have ensured our language is consistent.

**General – National Environmental Policy Act (NEPA)**

*Concern Statement 93. Commenters are concerned about the lack of public engagement in the NEPA process, especially for grazing related decisions.*

Response:

**Comment Number(s):**

23-14, 2808-15

The statement being referenced “Most of the active grazing allotments have been assessed for resource conditions and undergone National Environmental Policy Act analysis to balance permitted livestock numbers with available forage production and to maintain or move toward desired conditions” is a statement to describe the current condition of our permitted rangeland management. The Tonto National Forest will continue to revise allotment management plans as needed, incorporating the new plan components into new allotment management plans, and complying with the National Environmental Policy Act and other applicable laws, regulations, and policies. Existing grazing decisions will remain in place until they require revision. We follow our agency's national environmental policy act regulations (36 CFR 220) as they relate to public engagement and the level of analysis required for allotment management plans. Grazing utilization has not been incorporated into the forest plan and will continue to be assessed at the allotment level as that is where site-specific analysis is conducted. The 2012 Planning Rule (§ 219.10(a)) requires that a plan must provide for social, economic, and ecological sustainability and will include plan components for integrated resource management to provide for multiple uses integrated with other resource plan components. These plan components are found in the rangelands, forage, and grazing (GRZ) section in chapter 2 of the forest plan.

*Concern Statement 94. Commenter noting that EPA no longer includes ratings in comment letters.*

Response:

**Comment Number(s):**

2803-5

We appreciate you letting us know of the change in your comment letters and your support of the plan revision process.

**Concern Statement 95.** *Comments from Gila County that indicate there was a request for coordination that was not met by the Tonto National Forest.*

Response:

**Comment Number(s):**

2991-3, 5, 6, 7, 19, 33

We appreciate Gila County's engagement in the plan revision process. 36 CFR 219.4(b)(1) outlines the expectations of coordination with other public planning efforts. The final environmental impact statement has been updated to include the information required in 36 CFR 219.4(b). This information can be found in Appendix C: Public Engagement and Coordination with Other Planning Efforts. Following the comment period, the Forest Service reached out to Gila County to further engagement and coordination. A full accounting of the engagement and coordination with Gila Country can be found in the plan revision administrative record.

**Concern Statement 96.** *Commenter is seeking information about determining the appropriate level of analysis per the NEPA process.*

Response:

**Comment Number(s):**

23-24

The Tonto National Forest complies with both 40 CFR 1500 and 36 CFR 220 when it comes to determining what level of analysis is appropriate for an action.

## Information Request

**Concern Statement 97.** *Commenter requesting information about upcoming release of the final environmental impact statement and how to participate in future public meetings.*

Response:

**Comment Number(s):**

2803-6

The Forest Service has made a note of your request and will plan to send a hard copy and CD to the address provided.

**Comment Number(s):**

2757-2

We appreciate your interest in the plan revision process. Unfortunately, there are not planned public forums related to climbing and or forest plan revision at this time. As we move into forest plan monitoring (FSH 1909.12-Chapter 30) and project level plan implementation, we will be looking for partners and volunteers to help us achieve our desired conditions and would appreciate your continued support.

**Concern Statement 98.**     *Commenters requesting access to the Tonto National Forest Riparian Plan.*

Response:

**Comment Number(s):**

2947-19

We do not have a separate riparian plan for the Tonto. Plan direction for riparian areas is specified in the forest plan. We appreciate your interest in being involved with the Tonto, and we will review and consider the best available science and tools for riparian monitoring during the implementation phase of the forest plan.

**Comment Number(s):**

2943-1

For all site-specific projects, including survey and data gathering, we will continue to work with stakeholders and partners as detailed in the planning components that speak directly to partnership, which can be found in the revised plan Partnerships and Volunteers Desired Conditions and Management Approaches.

## **Invasive Species**

**Concern Statement 99.**     *Commenter is concerned with the impact of Forest Service roads on the spread of invasive species.*

Response:

**Comment Number(s):**

2970-718

The 2005 Travel Management (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas. In contrast, the 2012 Planning Rule (36 CFR 219) is the overriding regulation that guides the development, amendment, and revision of land management plans for all units of the National Forest System. As such it is programmatic in nature and does dictate the level of specificity that project level plan implementation does. All project level specificity and decisions for the management of motor vehicle use will be done in compliance with the 2005 Travel Management Rule either forestwide (as is the case with the current travel management planning process) or on a more site-specific need, such as by district or area. This planning process provides plan components to guide management of the forest, including for motorized uses.

**Concern Statement 100.**     *Commenters are concerned about the use of chemicals to treat invasive species.*

Response:

**Comment Number(s):**

44-2, 65-2, 2667-2, 2687-1, 2688-2, 2697-3, 2983-5

This plan revision process is programmatic, guiding the Tonto National Forest in fulfilling its stewardship responsibilities to best meet the current and future needs of the American people. This plan provides the vision, strategy, and constraints (revised plan, chapter 1) that guide integrated resource management, provide for ecological sustainability, and contribute to social and economic sustainability on the forest and within the broader landscape. When we undergo site-specific planning, and actions which includes the use of herbicides we undergo all of the processes and mechanisms that is directed by the National Environmental Policy Act, as well as we follow the Forest Service Handbook (FSM) and other policies directed by the United States Department of Agriculture (USDA). These are systematic oversights processes in which we adhere to with any actions dealing with this related topic. The use of any herbicide on Forest Service land must follow all Forest Service policy, as well as the herbicide label which is a legal binding document that must be followed at all times; this will be explained a little bit more in the answer to this comment. On the Tonto National Forest, we practice integrated pest management (IPM). Integrated pest management is an ecosystem-based strategy that focuses on long-term prevention, control, or management of pests (in this case weeds), or their damage through a combination of techniques and treatments. Herbicides is just one of the many tools we use in our integrated pest management program. Herbicides are used only after detection/monitoring indicates they are needed according to the invasive species curve model, as well as treatments are made with the goal of reducing or removing only a target organism (weed). Chemical control with herbicides has been an important tool for managing weeds across landscapes for many years. Many of today's herbicides are more effective and selective. These traits make them less harmful to the environment when they are used properly. Herbicides are a category of pesticides that can be an effective tool for invasive plant management but must be carefully and thoughtfully used to avoid damage to non-target species and to protect the health and safety of the user, the public, and the environment. Use of herbicides requires careful consideration and planning. The Forest Service has a policy on pesticide use regarding invasive plant control and Tonto National Forest engagement towards the issue (please see FSM-2100). Nationally, all herbicides are regulated by the Federal Environmental Protection Agency. In Arizona, herbicides are also regulated by the Arizona Department of Agriculture. One must be licensed by the Arizona Department of Agriculture to apply herbicides on Tonto National Forest System land (see FSM 2100). When using herbicides, Federal law requires that you follow the directions on the herbicide label. An herbicide label is a legal document providing important information about an herbicide, its appropriate use, and the precautions needed to avoid off-target movement and to protect environmental quality. This also includes health and safety rules to protect the herbicide applicator and the public.

**Concern Statement 101.** *Commenter suggests additions to the invasive species list included in the final environmental impact statement.*

Response:

**Comment Number(s):**

2944-5

This plan revision process is programmatic, providing the vision, strategy, and constraints (revised plan, chapter 1) that guide integrated resource management, provide for ecological sustainability, and contribute to social and economic sustainability on the forest and within the broader landscape for the next ten or more years. As such, it cannot mention every species across the forest, nor is it required to. Yellow starthistle can cause many problems to the landscape. This plant has the ability to invade rangelands, pastures, croplands, and roadsides throughout the west, especially those with deep, loamy soils. The competitive success of yellow starthistle is directly related to its ability for rapid growth and capture of water, nutrients, light, and space. This species displaces native plant communities, reduces

plant diversity, and accelerates soil erosion and surface runoff. It can form solid stands that drastically reduce forage production for livestock and wildlife. Its ability to deplete soil moisture has been compared to a loss of 15 to 25 percent of annual precipitation (Jetter et al. 2003). On the Tonto National Forest, this plant currently grows mainly on the higher elevation Districts – Payson and Pleasant Valley. Infestations have also been documented in Tonto Basin at elevations below 3000 feet. There may be other invasive species not called out in the plan and even more that we are unaware of or have yet to arrive at the forest. However, the Tonto National Forest takes all invasive species serious. Within the plan there's a management objective in the invasive species section that states the following: develop and use action plans to: (1) determine dispersal and transport, (2) determine prediction and forecasting, (3) map and inventory of current infestations, (4) use maps for management and control tactics, and (5) assess the impacts of the species or control method. Yellow starthistle is a prime candidate for this management objective.

**Concern Statement 102.** *Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2736-23

Native vegetation and weed-free seed are used across the forest whenever possible for rehabilitation efforts and landscaping in developed sites; this management technique is not unique to any one area on the forest (i.e., developed recreation sites). This topic is discussed in the All Vegetation and Ecological Response Units section: “When seeding is desirable for restoration, seeding with native species appropriate for the area (or similar in elevation, soil type, and ecosystem) should be prioritized. Use of desirable, non-native weed-free plant materials (e.g., sterile barley) may be allowed where native plant materials are unavailable, cost-prohibitive, insufficient to address site-specific problems, and the non-native plant materials do not impede re-establishment of native species or degrade ecological integrity” (forest plan, chapter 2, Vegetation and Ecological Response Units, All Upland Ecological Response Units). Native vegetation is the preferred choice of the Forest when replanting within a developed recreation site. However, certain limitations such as those listed in the referenced section may require the Forest to purchase non-native.

**Comment Number(s):**

64-2

As indicated in chapter 1 of the revised plan, “Objectives are concise, measurable, and time-specific statements of a desired rate of progress toward desired conditions and should be based on reasonably foreseeable budgets. Objectives, along with the strategies (from management approaches or Forest Service handbook direction) used to accomplish them, can be thought of as the tools we will use to prioritize project activities to reach desired conditions. Objectives are mileposts along the road toward desired conditions” (Forest Plan Framework and Organization, Plan Components and Other Plan Content). In the invasive species section of the revised plan (chapter 2) there is a management approaches that states: “Strategize approaches to treat and control invasive and noxious species”. We fully recognize invasive and noxious species cover a vast range of the Tonto National Forest. With that being stated we must be objective, with each individual species as it pertains to its population spread across the forest. Objectively looking at the total acre size which we are trying to capture, as it is explained in the

plan, this may be observed on the lower end on the issue of invasive species. However, we cannot look at all invasive species as being the same in terms of their devastation and the problems they cause towards the forest; therefore, with the direction that has been set in place it gives us the opportunity to capture invasive species on the lines of their individual perspectives in terms of their complexities, and how we can better address them from the stances of integrated pest management and not so much, overall acre count per year. This does not mean that we are striving for a low acre amount or even the maximum number of acres which has been depicted in the plan, more so it means that we can be more targeted at our efforts regarding integrated pest management. This means that we can target vegetative invasive species by setting a margin, which can be followed by an integrated pest management plan determined by the species that we targeted. This strategy will give us a more sustainable program and higher acre count because projects will be formed from the margins that we have set in place. Furthermore, the margins that we have set in place will be our slingshot in establishing integrated pest management plans. Within the invasive species program at the Tonto National Forest there is no acre limit regarding invasive species, however the margins have been set to improve our focus on attaining achievable acres at the project level which can give us optimal results.

**Comment Number(s):**

2927-13

We already have this type of planning component in the Fire and Fuels section of the revised plan (chapter 2) which states: Wildland fires in the wildland-urban interface are mostly low intensity/low severity surface fires as ladder fuels are nearly absent. Firefighters are able to suppress wildfires safely and efficiently in the wildland-urban interface if needed.

**Concern Statement 103.** *Commenter suggests changes to focal species identified for forest plan monitoring.*

Response:

**Comment Number(s):**

2806-27

We view plan species that are identified as focal species that provide an essential ecological function or are indicative of essential habitat conditions. These species may provide an umbrella function for other species or represent large groups of other species; they may be viewed from the perspective as being “ecosystem engineers” in that they are responsible for the shape, form, and function of major ecological processes, and/or they may provide an efficient way to represent a planning goal – such as biodiversity protection. Reviewing the relevance of this comment, it has been considered that red brome (*Bromus rubens*) has been removed as a focal species; as it does not fit what has been mentioned in the above portion of this response. While we feel that monitoring the invasion of non-native grasses has important ecological value, especially in low deserts, there is likely more value in incorporating such monitoring as part of our invasive species program; rather than focusing on a single species related to this issue. With respect to the comment focal species should be explained as a native species which tells something about the conditions in a particular habitat. Selection of species may depend on what the species are needed to indicate – habitat condition, land-use effects, or possibly changes from natural disturbance. Such species also need to be linked to particular habitats or ecosystem types, as well as changes in those habitats and ecosystems. An ideal focal species should inform management decision-making that affects the species, other species, and the habitats in which the species lives. As simple as the selection of a focal species may be in the theoretical sense, it is quite complex in the application sense. Ideally as a course of action focal

species may be selected based on a number of criteria, which are in turn based upon the conservation planning functions that the species are intended to serve. These criteria could include many factors (such as: representative of other species, critical to function of the ecosystem, regulatory concerns, specific habitat needs, etc.), as well as criteria such as non-overlap with other focal species and responsiveness to threats and change. Ideally the choosing of a focus specie to represents an area will be an interdisciplinary approach by way of the appropriate personnel, based on what is mentioned in this comment response.

**Concern Statement 104.** *Commenter suggests using volunteers to help treat invasive species on the forest, like tamarisks.*

Response:

**Comment Number(s):**

2876-2

We agree with the commenter. In the Invasive and Noxious Species section of the revised plan (chapter 2), there's a management approach that states: "Collaborate with State and Federal agencies, universities, non-profit organizations, and volunteers to research, inventory, monitor, map, and record data on invasive and undesirable species. Work to develop educational materials for the public." We look forward to working with several groups and individuals, including the commenter, on the management of invasive and noxious species across the forest.

## **Inventoried Roadless Areas (IRAs)**

**Concern Statement 105.** *Commenter is concerned with the management of inventoried roadless areas and the impacts to new or existing airstrips.*

Response:

**Comment Number(s):**

37-22

Aircraft use is a valid use of National Forest System lands, in compliance with the Multiple Use and Sustained Yield Act that governs the Forest Service. The commenter is correct in that new road construction is prohibited within inventoried roadless areas while allowing for existing roads to remain. The Roadless Rule is silent on aviation. Additionally, the Travel Management Rule also reads that aircraft and aircraft use are exempt with regards to designation of roads, trails, and areas (36.CFR.212.51). This means that aircraft can land within inventoried roadless areas for recreational or emergency purposes. As this forest plan is programmatic, it does not address site-specific projects related to airstrips. These requests to develop airstrips would be considered at the project level and would need to be consistent with the forest plan, along with all applicable laws, regulations, and policies. We look forward to ongoing discussions related to recreational aviation on the Tonto.

**Concern Statement 106.** *Commenters are concerned with motorized use being authorized in designated inventoried roadless areas.*

Response:

**Comment Number(s):**

865-1

2001 Roadless Rule (36 CFR 294; Roadless Area Conservation Rule, as published 66 Fed. Reg. 3243 (January 12, 2001)) establishes prohibitions on road construction, road reconstruction, and timber harvesting in inventoried roadless areas on National Forest System Lands. The intent of the rule is to provide lasting protection for inventoried roadless areas within the National Forest System in the context of multiple-use management. There is nothing in the 2001 Roadless Rule nor the 2012 Planning Rule requiring inventoried roadless areas be non-motorized. Additionally, Travel Management planning on the Tonto proposes to reduce designated routes within inventoried roadless areas. While not required or directly tied to plan revision processes, some of the current inventoried roadless areas are being considered in part or in whole for inclusion as recommended wilderness (appendix D of the environmental impact statement).

**Comment Number(s):**

157-3

Education and self-regulation among user groups is an important component to build compliance and protect forest land from the effects of unauthorized off-road use. There are plan components throughout the revised plan that support these efforts. The objectives in the Recreation section of the revised plan (chapter 2) aims to educate the public on responsible use: During the 10-year period following plan approval, implement at least 3 strategies to raise awareness of discouraged practices (e.g., illegal dumping, unsafe shooting practices, driving on closed roads) to promote visitor safety and natural resource protection.

**Comment Number(s):**

86-1

2001 Roadless Rule (36 CFR 294; Roadless Area Conservation Rule, as published 66 Fed. Reg. 3243 (January 12, 2001)) establishes prohibitions on road construction, road reconstruction, and timber harvesting in inventoried roadless areas on National Forest System Lands. The intent of the rule is to provide lasting protection for inventoried roadless areas within the National Forest System in the context of multiple-use management. There is nothing in the 2001 Roadless Rule nor the 2012 Planning Rule requiring inventoried roadless areas be non-motorized. Additionally, travel management planning on the Tonto proposes to reduce designated routes within inventoried roadless areas. Some of the current inventoried roadless areas are being considered in part or in whole for inclusion as recommended wilderness (appendix D of the environmental impact statement).



**Concern Statement 107.** *Commenter is concerned with the designation of additional inventoried roadless areas.*

Response:

**Comment Number(s):**

2991-17

2001 Roadless Rule ((36 CFR 294; Roadless Area Conservation Rule, as published 66 Fed. Reg. 3243 (January 12, 2001)) required a process for designating inventoried roadless areas which the agency completed. The 2012 Planning Rule does not require additional consideration of additional inventoried roadless areas. Instead, it requires consideration of recommended Wilderness areas.

The Land Management Planning Handbook, FSH 1909.12 24.44 requires identification of inventoried roadless areas governed by the Roadless Area Conservation Rule (36 CFR 294 Subpart B.). Identification of such lands in the Tonto's plan does not establish new inventoried roadless areas.

**Concern Statement 108.** *Commenters requesting grazing permittees be exempt from restrictions in inventoried roadless areas to maintain infrastructure.*

Response:

**Comment Number(s):**

2947-16

The Forest Service must comply with Roadless Rule. Additionally, we have developed planning components for the revised plan for our existing inventoried roadless areas (revised plan, chapter 3, Inventoried Roadless Areas).

**Concern Statement 109.** *Commenter is seeking clarification or additional analysis to the be included in the final environmental impact statement.*

Response:

**Comment Number(s):**

2970-741

We appreciate your comments about inventoried roadless areas and the recreation opportunity spectrum. The Tonto National Forest has included a guideline "all project-level decisions, implementation activities, and management activities should be consistent with or move the area toward the appropriate recreation opportunity spectrum (ROS), or current protocol" (forest plan, chapter 2, Recreation). This guideline will help to achieve the desired conditions for recreation opportunities, including within the designated inventoried roadless areas. The suggested additional analysis is not necessary because the management for inventoried roadless areas is dictated by the 2001 Roadless Rule regulations and is not changing from the current plan to the revised plan. The recreation opportunity spectrum is intended to be used to help guide site-specific analysis to achieve the desired conditions. Between draft and final environmental impact statement, the Travel Management planning Record of Decision was signed, which amended the existing forest plan recreation opportunity spectrum by management area. Additionally, now that that

project has been completed, recreation opportunity spectrum and planning components that use its information have been added to many resource areas in the final plan<sup>6</sup>.

## **Lakes and Rivers Management Area**

**Concern Statement 110.** *Commenter is concerned the purpose of the Lakes and Rivers Management Area would shortcut the NEPA process.*

Response:

**Comment Number(s):**

2970-759

For the purposes of this forest plan, a management area is defined as plan components applicable to specific areas that call for management that is in addition to or different than forestwide management. A management area represents a management emphasis for an area or several similar areas on the landscape. The forest plan does not remove National Environmental Policy Act requirements for individual projects under 40 CFR 1500. The scope of projects to move the area towards the desired conditions in the forest plan are considered based on many factors including funding and the need for the project.

**Concern Statement 111.** *Commenter suggests additional information be included in the final forest plan describing the purpose of Lakes and Rivers Management Area and more clearly identifying what conflicts might arise between recreational users.*

Response:

**Comment Number(s):**

2991-29, 30

We are not sure which parts of the Lakes and Rivers Management Area description the commenter is referring to. However, the purpose of designating this management area is to provide general management direction to the Forest to manage this area with a more specific emphasis on the high use recreational experience than the forest as a whole. Any site-specific rules or projects would still be evaluated at a project level with appropriate environmental analysis and public outreach.

**Comment Number(s):**

2950-6

We are unsure what conflicts between recreational users and the Forest Service the commenter is referring to. However, the purpose of defining this management area is to direct the Forest to emphasize management of high use developed and dispersed recreation within the management area boundaries. For the purposes of this forest plan, a management area is defined as plan components applicable to specific areas that call for management that is in addition to or different than forestwide management. A management area represents a management emphasis for an area or several similar areas on the landscape. An analysis of user conflict can be found in chapter 3 of the draft environmental impact statement under the heading "Recreation".

---

<sup>6</sup> Updated recreation opportunity spectrum maps, by alternative, have been completed and can be found in Chapter 3 of the FEIS.

**Concern Statement 112.** *Commenter suggests additional plan component to consider impacts to wildlife, fish, and plants within the Lakes and Rivers Management Area.*

Response:

**Comment Number(s):**

2970-763

We appreciate your support of our planning effort. However, an additional guideline in this management area is not necessary, as this is already required by existing law, regulation, and policy. Additional information about plan components related to native wildlife can be found in chapter 2 of the final plan.

**Concern Statement 113.** *Commenters are concerned about livestock grazing in the Lakes and Rivers Management Area.*

Response:

**Comment Number(s):**

72-1, 4

The standard referenced by the commenter was removed from the revised plan. Instead, a new guideline was created: Permitted livestock grazing should not be authorized in the Lakes and Rivers Management Area except where existing infrastructure or natural boundaries prevent livestock from accessing the rivers and lakes (revised plan, chapter 3, Lakes and Rivers Management Area).

**Comment Number(s):**

2970-761

The Forest Service appreciates your support of the plan revision process per 36 CFR 219. The boundaries of this management area were modified slightly between the draft and final forest plan. Due to the locations of existing infrastructure and natural boundaries, some of this existing infrastructure falls within the new management area boundaries. However, “Permitted livestock grazing should not be authorized in the Lakes and Rivers Management Area except where existing infrastructure or natural boundaries prevent livestock from accessing the rivers and lakes” (forest plan, chapter 3 Lakes and Rivers Management Area).

**Concern Statement 114.** *Commenter is concerned with motorized recreation within the Lakes and Rivers Management Area.*

Response:

**Comment Number(s):**

2970-760

Motor vehicle use will be limited to the routes and areas designated for that use as it is defined in the final travel management record of decision. Any changes to the designated system will require further environmental analysis and would comply with the Travel Management Rule. The forest plan alone would not change the designated system. However, it would provide programmatic guidance for future route planning such as priority uses for a given area. Travel management will be implemented according

to the associated decision. It is a separate decision from forest plan revision but both will direct decision making going forward.

**Concern Statement 115.** *Commenters support minimizing litter within the Lakes and Rivers Management Area and working with partners and volunteers to educate the public.*

Response:

**Comment Number(s):**

2937-4

The Forest agrees that education is an important strategy to combat litter in this high use area and we appreciate the commenters participation and support of these efforts. The forest plan addresses this in management approaches in the Lakes and Rivers Management Area section of chapter 3 of the forest plan. A ban on disposable single-use containers could be considered outside of the forest planning process at a project level and would require additional site-specific environmental analysis.

**Concern Statement 116.** *Commenter is concerned about the ecological impacts of removing wood from rivers to enhance recreation in the Lakes and Rivers Management Area.*

Response:

**Comment Number(s):**

2970-762

Although plan components include direction that “Vegetation should be managed to compliment or enhance recreation opportunities in this management area” (forest plan, chapter 3, Lakes and Rivers Management Area), the Forest recognizes the importance of woody debris to the natural processes of lakes and rivers. The amount of woody debris removed from Lakes will be minimal and typically would only debris large enough to pose a hazard to public safety. More debris removal may be necessary in the rivers where debris tends to get tangled in existing vegetation or attached to the ground. In those cases, effects will be evaluated before ground disturbing activities are approved at a site-specific level.

## **Lands and Access**

**Concern Statement 117.** *Commenter is concerned about land exchanges, and the analysis and forest management related to that process.*

Response:

**Comment Number(s):**

2970-782, 789

All land exchange proposals will be reviewed and processed per 36 CFR 254. This information exists in current law, regulation, and policy and will not be included in the plan.

**Concern Statement 118.** *Commenter is concerned about the Bureau of Reclamation withdrawn areas and access for future forest uses.*

Response:

**Comment Number(s):**

2932-7

The Forest is committed to complying with the existing agreements between the Forest, Salt River Project, and Bureau of Reclamation. Furthermore, we appreciate this long-standing partnership. Traditionally we have made this land available and will continue to review the appropriateness of this type of action in future.

**Concern Statement 119.** *Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2970-766

According to chapter 1 of the revised plan (Forest Plan Framework and Organization), planning components “should not repeat laws, regulations, or program management policies, practices, and procedures that are in the Forest Service directive system.” A list of relevant laws related to this project can be found in the project record: Relevant Laws, Regulations, Policies, Executive Orders, and Other Sources of Information. All land exchange proposals will be reviewed and processed per 36 CFR 254.

**Comment Number(s):**

2970-764

As indicated in the first chapter of the revised plan, it is strategic in nature and does not specifically authorize any projects or activities. Site-specific decisions are made following project-specific proposals and analyses that comply with the forest plan, with opportunities for public involvement. Any actions taken based on revised plan direction will be analyzed at a project level per 36 CFR 251 and 36 CFR 220.

**Comment Number(s):**

2970-767

The information referenced by the commenter has been removed from the revised plan. A formal Land Ownership Adjustment plan does not currently exist. Land adjustment actions are primarily proponent driven, are very expensive, and typically take years to complete. To create and maintain a land ownership adjustment plan is not only not feasible but would only be useful for very small percentage of projects. The Tonto National Forest will continue to work with its partners to identify opportunities to acquire valuable properties to meet revised plan desired conditions (chapter 2).

**Comment Number(s):**

2970-765

We appreciate your attention to detail; however, we feel it is important for each standard to stand equal to one another. Land adjustments are largely proposal driven. 36 CFR 254 describes the many different factors that go into determining type of transaction and public interest of a land adjustment. Also, the plan is strategic in nature and does not specifically authorize any projects or activities. Site-specific decisions are made following project-specific proposals and analyses that comply with the forest plan, with additional opportunities for public involvement. Any actions taken based on revised plan direction will be analyzed at a project level per 36 CFR 254 and 36 CFR 220.

**Comment Number(s):**

2970-768

We appreciate your comment about future land exchange proposals. However, a standard was not included in the Lands and Access section of the final forest plan. 36 CFR 254.3(b)(1) factors to consider when determining public interest says, “give full consideration to the opportunity to achieve better management of Federal lands and resources, to meet the needs of State and local residents and their economies”. Adding a standard to require the inclusion of a quantitative assessment is not reasonable as that type of analysis is not needed for each land exchange proposal. Not including this standard does not preclude this type of analysis to be conducted on a case-by-case basis if appropriate.

**Comment Number(s):**

58-14

The planning components that the commenter is referring to is in the Lands and Access section of the revised plan (chapter 2). The Tonto National Forest is managed under the Multiple Use and Sustained Yield Act, which authorizes livestock grazing as one of these uses. As such, the Forest Service policy does not support voluntary permit retirement. According to the Forest Service Handbook (2209.13), a permittee may request additional or different base property be assigned.

**Comment Number(s):**

2938-14

The Forest is committed to providing access and any supportive services allowed by law, regulation, and policy. All proposals will be reviewed per 36 CFR 251 and will need to comply with the revised plan.

**Comment Number(s):**

2816-69

A proactive response would be documenting the issue in the Title Claims and Encroachments Management System (TCEMS), investigating the cause of the issue, then attempt to resolve the issue within regulations, policies, and administratively as permitted. For example, this could include: a letter to a private landowner asking them to remove their constructed structure from Federal land, which might include working with Law Enforcement to cite them for trespass (if necessary); or going through a Small Tracts Act sale if it meets the requirements. More information can be found in Forest Service Manuals 5510 and 5520.

**Comment Number(s):**

2925-00e

We believe the intent of the language the commenter references meets the intent of existing laws, regulations, and policies. But since there are no requirements tied to it, the desired condition the commenter references has been removed from the revised plan.

## Management Areas

**Concern Statement 120.** *Commenter is concerned with the ability to manage wildlife as outlined in the management areas plan components.*

Response:

**Comment Number(s):**

2991-13

The majority of management areas within the plan do not have plan components that directly preclude essential wildlife management actions. Of the proposed management areas, there is management direction that could restrict activities for management of wildlife within eligible wild and scenic rivers. A wild, scenic, or recreational river area eligible to be included in the Wild and Scenic Rivers System is a free-flowing stream and the related adjacent land area that possesses one or more of the values. Forest Service-identified eligible and suitable rivers must be protected sufficiently to maintain free flow and outstandingly remarkable values unless a determination of ineligibility or non-suitability is made (FSH 1909.12 Ch. 80 Sec. 84.3).

On site-specific projects that implement the plan, we will work closely with agencies and partners to meet the needs of wildlife management while still complying with all applicable law, regulation, and policy.

**Concern Statement 121.** *Commenters are concerned with the number of management areas proposed under alternative B that would be in addition to the already designated areas and the impacts they have on multiple uses.*

Response:

**Comment Number(s):**

2991-15

“Every plan must have management areas or geographic areas or both. The plan may identify designated or recommended designated areas as management areas or geographic areas” (36 CFR 219.7(d)). The use of “or” in the regulation allows us flexibility in defining areas for our plan revision process. As part of this process, the Tonto National Forest looked at where different, or additional, management could be applied to specific parcel of land to protect important resource values within the forest. Additionally, the National Environmental Policy Act (40 CFR 1500) process for an environmental impact statement requires the consideration of alternative to the proposed action. This was how alternatives that were considered in detail were developed, meeting different public needs and desired management direction of National Forest System lands. Per these National Environmental Policy Act regulations, the responsible official can choose an alternative in its entirety or parts of the alternatives. In development if the final plan the responsible official considered land use and public needs to determine final management areas.

**Comment Number(s):**

2816-86

The Tonto National Forest is managed under the Multiple-Use Sustained-Yield Act of 1960 ([16 U.S.C. 528–531](#)). As such, we are required to manage for many uses. “Every plan must have management areas or geographic areas or both. The plan may identify designated or recommended designated areas as management areas or geographic areas.” (36 CFR 219.7(d)) The use of “or” in the regulation allows us flexibility in defining areas for our plan revision process. As part of this process, the Tonto National Forest looked at where different, or additional, management could be applied to specific parcels of land to protect important resource values within the forest. In development of the final plan the responsible official considered land use and public needs to determine final management areas.

Additionally, the intent of management areas is not to create additional restrictions but to emphasize and manage for specific landscape features or opportunities that are unique to a given area. For example, some areas may have outstanding remarkable features such as wild and scenic rivers, but they can have very different management depending on the type of area - designated “wild” segments are managed to maintain the most primitive or undisturbed settings while “recreational” segments are managed to maintain scenic integrity while maximizing recreational opportunity and access. The combination of management areas and forest wide plan direction allow the most flexibility to manage for multiple uses on the Tonto National Forest.

**Comment Number(s):**

2991-26

The Tonto National Forest is managed under the Multiple-Use Sustained-Yield Act of 1960 ([16 U.S.C. 528–531](#)). As such, we are required to manage for many uses.

The 2005 Travel Management (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas. In contrast, the 2012 Planning Rule (36 CFR 219) is the overriding regulation that guides the development, amendment, and revision of land management plans for all units of the National Forest System. As such, it is programmatic in nature and does not dictate the level of specificity that project level plan implementation does. All project level specificity and decisions for the management of motor vehicle use will be done in compliance with the 2005 Travel Management Rule either forestwide (as is the case with the current travel management planning process) or on a more site-specific need, such as by district or area. This planning process provides plan components to guide management of the forest, including for motorized uses.

All future site-specific project level planning will comply with both regulations along with all applicable rules. In some instances, motorized use may be limited.

**Concern Statement 122.** *Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2950-4



Restrictions for recreational activities within management areas can be found within the specific management area's plan components. Please see the specific management area's section within the revised forest plan for the area you are concerned about. Motorized travel, in general, will be restricted to the designated road system, as indicated in the recently signed Travel Management Planning Record of Decision, and will be depicted on the upcoming motor vehicle use map (forest plan, chapter 2, Recreation).

**Concern Statement 123.** *Commenters suggest alternative language to be included in the final environmental impact statement relating to high hazard dams.*

Response:

**Comment Number(s):**

2932-20

The commentor is correct. We used updated information provided in this comment to rephrase the language in the Facilities - Affected Environment and Environmental Consequences section of the environmental impact statement (chapter 3) to read “the Tonto also has 7 “high-hazard” Federal Reclamation Project works dams constructed by Bureau of Reclamation and cared for, operated, and maintained by Salt River Project for power generation and water distribution control for the Phoenix metropolitan area. Management of the dams is covered in the Lands, and Special Use, and Access section.” In addition, we added a footnote to define “high-hazard” dams saying: “A high-hazard dam classification means that a potential dam failure or mis-operation could result in in loss of human life and/or significant property disruption” (FEMA Federal Guidelines for Dam Safety).

## **Mining, Minerals, and Abandoned Mines**

**Concern Statement 124.** *Commenter is concerned about elements of the draft forest plan that would affect mining activities.*

Response:

**Comment Number(s):**

2816-47

The Tonto National Forest is managed under the Multiple-Use Sustained-Yield Act. As such, we are required to manage for many uses including mining. The Forest Service followed the plan revision process per FSH 1909.12 to develop the forest plan and other national forests would follow the same process to revise their forest plans. As explained in revised plan, chapter 2, in Forestwide Plan Direction, the 2012 Planning Rule sets forth the direction to: “maintain and restore National Forest System land and water ecosystems while providing for ecosystem services and multiple uses. The planning rule is designed to ensure that plans provide for the sustainability of ecosystems and resources, meet the need for forest restoration and conservation, for watershed protection, and species diversity and conservation; and assist the Agency in providing a sustainable flow of benefits, services, and uses of National Forest System lands that provide jobs and contribute to the economic and social sustainability of communities.” (36 CFR 219). It is unclear which plan components in the forest plan Freeport-McMoRan is concerned about precedent setting. Additionally, the final environmental impact statement analyzes the effects each alternative has on

forest resources including water rights and groundwater. These concerns were more thoroughly responded to based on subsequent comments from the commentor.

**Concern Statement 125.** *Commenters are concerned with previous and ongoing mining activities on the forest and the impacts to natural resources.*

Response:

**Comment Number(s):**

2970-771

In compliance with 40 CFR 1502.15, the environmental impact statement has a succinct description of the environment of the area(s) to be affected or created by the alternatives under consideration. The description is no longer than is necessary to understand the effects of the alternatives. In addition to the affected environment and environmental consequences section of the environmental impact statement on mining, minerals and abandoned mines, there are details found in the watershed and watershed resources section addressing mining history and effects. An assessment of mineral resources that have historically been developed on the Tonto was made in the Final Assessment Report of Social and Economic Conditions, Trends, and Risks to Sustainability, volume II.

**Comment Number(s):**

2970-774

The Carlota Mine Operation was previously analyzed and approved under the National Environmental Policy Act, and was shown to comply with all applicable laws, regulations, and policy. Projects that already have signed decisions implementing the 1985 forest plan, as amended, will not be required to retroactively comply with the revised plan. The Tonto National Forest is managed under the Multiple Use and Sustained Yield Act. As such, we are required to manage for many uses including mining. Other laws, regulations, and policy that authorize mining on National Forest System lands can be found in the revised plan, chapter 2, Mining, Minerals, and Abandoned Mines (MMAM). The forest plan contains components aimed at minimizing adverse impacts from mineral extraction and mining activities on surface resources. Individual proposals are evaluated on a site-specific basis and mitigated under a separate environmental analysis that follows Forest Service policy for the approval of a plan of operations for mineral activity.

**Comment Number(s):**

2970-775, 781

The Tonto National Forest is managed under the Multiple-Use Sustained-Yield Act. As such, we are required to manage for many uses including mining. Other laws, regulations, and policy that authorize mining on National Forest System lands can be found in the revised plan, chapter 2, Mining, Minerals, and Abandoned Mines (MMAM). The forest plan contains standards and guidelines aimed at minimizing adverse impacts from mineral extraction and mining activities on surface resources. Individual proposals are evaluated on a site-specific basis and mitigated under a separate environmental analysis that follows Forest Service policy for the approval of a plan of operations for mineral activity.

**Concern Statement 126.** *Commenters are concerned with the forest plan recognizing mining for its economic contributions to the local, regional, and national economy and be flexible enough to not require a plan amendment for every project.*

Response:

**Comment Number(s):**

2925-88

Management of National Forest System lands is guided and constrained by laws and regulations, policies, practices, and procedures that are in the Forest Service directive system. This plan provides the vision, strategy, and constraints that guide integrated resource management, provide for ecological sustainability, and contribute to social and economic sustainability on the forest and within the broader landscape. All projects and activities authorized by the Forest Service must be consistent with the land and resource management plan (forest plan). When a proposed project or activity is inconsistent with forest plan direction, one of three actions can be taken: the proposal can be modified such that the project or activity will be consistent; the proposal can be rejected; or the plan can be amended contemporaneously with the approval of the projects so that the project or activity is consistent with the plan as amended. For locatable mineral operations regulated under 36 CFR 228, Subpart A, rejection of a plan is not an available option, therefore minerals staff would work with the proponent to either modify the Forest Plan if necessary or modify the proposal if feasible. These same regulations at 36 CFR 228.5(a)3 do allow the Forest Service to require changes in or additions to the proposed plan to meet the requirements of the regulations.

**Concern Statement 127.** *Commenters are concerned with the need for forest plan amendments if the current plan components are selected for the final forest plan.*

Response:

**Comment Number(s):**

2970-769

All projects and activities authorized by the Forest Service must be consistent with the land and resource management plan (forest plan). When a proposed project or activity is inconsistent with forest plan direction, one of three actions can be taken: the proposal can be modified such that the project or activity will be consistent; the proposal can be rejected; or the plan can be amended contemporaneously with the approval of the projects so that the project or activity is consistent with the plan as amended. For locatable mineral operations regulated under 36 CFR 228, Subpart A, rejection of a plan is not an available option, therefore minerals staff would work with the proponent to either modify the forest plan if necessary or modify the proposal if feasible. These same regulations at 36 CFR 228.5(a)3 do allow the Forest Service to require changes in or additions to the proposed plan to meet the requirements of the regulations.

**Comment Number(s):**

2925-74

All projects and activities authorized by the Forest Service must be consistent with the land and resource management plan (forest plan). When a proposed project or activity is inconsistent with forest plan direction, one of three actions can be taken: the proposal can be modified such that the project or activity will be consistent; the proposal can be rejected; or the plan can be amended contemporaneously with the approval of the projects so that the project or activity is consistent with the plan as amended. For locatable mineral operations regulated under 36 CFR 228, Subpart A, rejection of a plan is not an available option, therefore minerals staff would work with the proponent to either modify the forest plan if necessary or modify the proposal if feasible. These same regulations at 36 CFR 228.5(a)3 do allow the Forest Service to require changes in or additions to the proposed plan to meet the requirements of the regulations. Plan components definitions of desired conditions, objectives, standards, guidelines, suitability of lands, and goals are available in the revised plan (chapter 1, under Forest Plan Framework and Organization, Plan Components section). Not every project will move every resource towards their desired conditions, but all project-level management activities should be aimed at the achievement of the desired conditions for those resources in the area where the project is located.

**Comment Number(s):**

2974-2, 4

Management of National Forest System lands is guided and constrained by laws and regulations, policies, practices, and procedures that are in the Forest Service directive system. This plan provides the vision, strategy, and constraints that guide integrated resource management, provide for ecological sustainability, and contribute to social and economic sustainability on the forest and within the broader landscape. As described in Consistency of Projects with the Forest Plan, “All projects and activities authorized by the Forest Service must be consistent with the land management plan (16 USC 1604(i) and 36 CFR 219.15(b-c)). If a proposed project or activity is not consistent with a plan component, the responsible official has the following options:

- Modify the proposed project or activity to make it consistent with the applicable plan components;
- Reject the proposal or terminate the project or activity;
- Amend the plan so that the project or activity will be consistent with the plan as amended; or
- Amend the plan contemporaneously with the approval of the project or activity so that the project or activity will be consistent with the plan as amended. This amendment may be limited to apply only to the project or activity. (36 CFR 219.15(c))”

Additionally, for locatable mineral operations regulated under 36 CFR 228, Subpart A, rejection of a plan is not an available option, therefore minerals staff would work with the proponent to either modify the forest plan if necessary or modify the proposal if feasible.

**Concern Statement 128.** *Comments concerning direction in the final forest plan applying to existing mining approvals.*

Response:

**Comment Number(s):**

2816-65

As explained in the revised plan (chapter 1, under Forest Plan Framework and Organization, Plan Components), plan components guide future project and activity decision-making. Management approaches do not offer plan direction and are not required components but describe a strategy to achieve a desired condition. Projects that already have signed decisions implementing the 1985 forest plan, as amended, will not be required to retroactively comply with the revised plan.

**Concern Statement 129.** *Commenters are concerned about the impact of mining and mineral extraction activities to cultural and historic resources.*

Response:

**Comment Number(s):**

2970-783

This comment is an incorrect interpretation of the cited cultural resources information. The existing law, regulation, policy, and plan components do not prohibit disturbance. The National Historic Preservation Act directs Federal agencies to “take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register”. We are, however, committed to protection of cultural resources and design site-specific projects to avoid or minimize damage to the extent possible, including projects involving extraction of mineral resources. The Tonto National Forest will continue to comply with Federal law and policy guiding the protection of cultural resources, including the process detailed in 36 CFR 800 guiding consultation, identification, determination of effect, and resolution of adverse effect for all undertakings on a project-by-project basis.

**Concern Statement 130.** *Commenters are concerned about maintaining instream flow rights to support uses for fish, wildlife, and recreation.*

Response:

**Comment Number(s):**

2970-780

This plan provides the vision, strategy, and constraints that guide integrated resource management, provide for ecological sustainability, and contribute to social and economic sustainability on the forest and within the broader landscape. Individual proposals are evaluated on a site-specific basis and often include mitigations in separate environmental analysis that follows Forest Service policy for the approval of a plans of operation for mineral activity. Groundwater pumping and use is regulated and permitted by the Arizona Department of Water Resources and requires the National Environmental Policy Act process to evaluate adverse effects. Even though some of the previously acquired instream flow rights and potential future instream flow rights would be junior to other instream flow rights, there is still a standing of priority to ensure that the instream flow rights and needs are met according to their standing.

**Concern Statement 131.** *Commenters are seeking clarification or additional analysis in the final environmental impact statement.*

Response:

**Comment Number(s):**

2970-772

The regulatory authority is described in chapter 3 of the environmental impact statement, in the Mining, Minerals, and Abandoned Mines section, including the Agency's role and regulations in managing mineral resources.

**Comment Number(s):**

2927-21, 22

There are differing opinions regarding which alternative the responsible official should select, as is evidenced by the differing comments that we have received through this plan revision process. The responsible official will select an alternative based on the analysis presented within the environmental impact statement. Alternative B in the final environmental impact statement is one of four alternatives analyzed in full for responsible official consideration.

**Comment Number(s):**

2925-86

This comment highlights a few edits that have been made in the Ongoing and Reasonably Foreseeable Actions text (chapter 3 of the final environmental impact statement, Mining, Minerals, and Abandoned Mines, Environmental Effects, Cumulative Effects), including adding the word “or” between developed and proposed, and delete “and future”. The forest plan provides a programmatic framework that guides site-specific actions but does not authorize, fund, or carryout any project or activity. Before any ground-disturbing actions take place, they must be authorized in a subsequent site-specific environmental analysis. This plan provides the vision, strategy, and constraints that guide integrated resource management, provide for ecological sustainability, and contribute to social and economic sustainability on the forest and within the broader landscape, which includes plan components for mineral activities. An assessment of current and future mineral activity was made in the Final Assessment Report of Social and Economic Conditions, Trends, and Risks to Sustainability, volume II, which identifies the mineral resources that have historically been developed on the Tonto, as well as the potential availability of mineral resources for current and future exploration and development.

**Concern Statement 132.** *Commenters have concerns specific to plan components for mining and minerals compliance with current laws, regulations, and polices.*

Response:

**Comment Number(s):**

2970-773

The Tonto National Forest is managed under the Multiple Use and Sustained Yield Act. As such, we are required to manage for many uses including mining. Other laws, regulations, and policy that authorize mining on National Forest System lands can be found in the revised plan, chapter 2, Mining, Minerals, and Abandoned Mines (MMAM). The Forest Service directives regarding validity exams can be found in Forest Service Manual 2814.11 and directives regarding surface use determinations can be found in Forest Service Manual 2817.03a. The forest plan is programmatic and guides site-specific projects. All site-specific projects that implement the forest plan will either comply with applicable plan direction or require a project or forestwide plan amendment, as may be required by other laws the agency must also comply with.

**Comment Number(s):**

2816-46

The forest plan provides the vision, strategy, and constraints that guide integrated resource management, provide for ecological sustainability, and contribute to social and economic sustainability on the forest and within the broader landscape, while directing the coordination of multiple uses. The forest plan provides guidance for projects and activities. Plan components are the core elements of a forest plan and all projects and activities should be consistent with plan components. As described in the revised plan, chapter 1, under Forest Plan Framework and Organization, Consistency of Projects, Forest Plan section, all projects and activities authorized by the Forest Service must be consistent with the land management plan (16 USC 1604(i) and 36 CFR 219.15(b-c)). If a proposed project or activity is not consistent with a plan component, the responsible official has the following options: Modify the proposed project or activity to make it consistent with the applicable plan components; Reject the proposal or terminate the project or activity; Amend the plan so that the project or activity will be consistent with the plan as amended; or Amend the plan contemporaneously with the approval of the project or activity so that the project or activity will be consistent with the plan as amended. Additionally, for locatable mineral operations regulated under 36 CFR 228, Subpart A, rejection of a plan is not an available option, therefore minerals staff would work with the proponent to either modify the forest plan if necessary or modify the proposal if feasible. This amendment may be limited to apply only to the project or activity. (36 CFR 219.15(c)). A project is consistent with plan desired conditions, objectives, or goals when it: Maintains or makes progress toward attaining one or more plan desired conditions, objectives, or goals applicable to the project; Has no effect or only a negligible adverse effect on the maintenance or attainment of applicable desired conditions or objectives, or goals; Does not foreclose the opportunity to maintain or achieve any of the applicable desired conditions or objectives over the long term, even if the project (or an activity authorized by the project) would have an adverse short-term effect on one or more desired conditions, objectives, or goals; or Maintains or makes progress toward attaining one or more of the plan's desired conditions or objectives even if the project or activity would have an adverse but negligible effect on other desired conditions, objectives, or goals. Therefore, if a project was proposed that conflicted with the forest plan but was an activity that could occur based on Multiple Use and Sustained Yield Act and other applicable laws, we would amend the forest plan, however it requires that the project actually conflict with a plan component in a manner that would necessitate a plan amendment.

**Comment Number(s):**

2816-100

For the analysis of this programmatic plan revision, it was assumed that all standards and guidelines applicable are being complied with, as are all applicable laws, regulations, and policies. There are no standards in the effects analysis, it is a description of impacts that includes ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative. Effects may also include those resulting from actions which may have both beneficial and detrimental effects. In the first paragraph of the section the commentor refers to, states that: "Most of the direction that affects locatable mineral activities comes from Code of Federal Regulations under Title 36 CFR part 228, subpart A, Forest Service Manual and Handbook. These laws, regulations, and policies governing locatable minerals can be found in the Forest Service Manual, FSM 2800 (Mining Claims FSM 2810) and Forest Service Handbook, FSH 2809.15. This guidance is independent from forest plan direction and does not change across alternatives." Additionally, all future site-specific projects that implement the revised plan will need to comply with the applicable plan components.

**Comment Number(s):**

2925-72

Management of National Forest System lands is guided and constrained by laws and regulations, policies, practices, and procedures that are in the Forest Service directive system. This plan provides the vision, strategy, and constraints that guide integrated resource management, provide for ecological sustainability, and contribute to social and economic sustainability on the forest and within the broader landscape. Plan components that help achieve desired conditions have been designed to be consistent with existing law, policy, and regulation.

**Concern Statement 133.** *Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2970-770, 785

Although the Forest Service may reasonably regulate mining activities to protect surface resources, there are statutory limits to its discretion. The regulatory authority is described in chapter 3 of the environmental impact statement in the Mining, Minerals, and Abandoned Mines section, including the Agency's role and regulations in managing mineral resources. The Forest Service may require revision to an unreasonable plan of operations but cannot categorically prohibit mining or deny reasonable and legal mineral operations under the mining laws. The purpose of the regulations at 36 CFR 228, Subpart A, for locatable minerals, is to set forth rules and procedures through which use of the surface of National Forest System lands in connection with operations authorized by the United States mining laws, which confer a statutory right to enter upon the public lands to search for minerals, shall be conducted so as to minimize adverse environmental impacts on National Forest System surface resources. The Forest Service does have discretion to deny disposal of salable minerals, such as sand and gravel and common variety building stone, as regulated in 36 CFR 228, Subpart C.

**Comment Number(s):**

2970-800

As described in the revised plan (chapter 1, under Forest Plan Framework and Organization, Plan Components), standards are the rules we will operate within as we develop projects to accomplish objectives and move closer to realizing desired conditions. These are mandatory constraints on projects and activities that are implemented with the forest plan. We use the word “shall” for these components. Like standards, guidelines are mandatory constraints on projects and activities that are implemented with the forest plan, but unlike standards, deviations may occur as long as the intent of the guidelines is met. We use the word “should” for these components.

**Comment Number(s):**

2970-805

Forest Service reviews mineral proposals for consistency with environmental regulations and Forest Plan for the protection of public lands, uses and surface resources. We do not prescribe mining techniques or operations. Individual proposals are evaluated on a site-specific basis and mitigated under a separate



environmental analysis that follows Forest Service regulation and policy for the approval of a plan of operations for mineral activity.

**Comment Number(s):**

2970-777, 806

Forest Service reviews mineral proposals for consistency with environmental regulations and Forest Plan for the protection of public lands, uses and surface resources. We do not prescribe mining techniques or operations. Individual proposals are evaluated on a site-specific basis and mitigated under a separate environmental analysis that follows Forest Service policy for the approval of a plan of operations for mineral activity.

**Comment Number(s):**

2970-787, 793

No changes were made. This suggestion modifies the standard in a manner that changes the meaning and intent of the standard.

**Comment Number(s):**

2970-807

The intent of the forest plan is to broadly manage natural and socioeconomic resources, with more specific management of certain areas according to their unique characteristics happening at the project level. In the case of mineral resources, the economy and other constantly changing factors affect the possible land use, and in turn, the management strategy of a given area. Management of National Forest System lands is guided and constrained by laws and regulations, policies, practices, and procedures that are in the Forest Service directive system. This plan provides the vision, strategy, and constraints that guide integrated resource management, provide for ecological sustainability, and contribute to social and economic sustainability on the forest and within the broader landscape. As described in Consistency of Projects with the Forest Plan, “All projects and activities authorized by the Forest Service must be consistent with the land management plan (16 USC 1604(i) and 36 CFR 219.15(b-c)). If a proposed project or activity is not consistent with a plan component, the responsible official has the following options (subject to valid existing rights):

- Modify the proposed project or activity to make it consistent with the applicable plan components;
- Reject the proposal or terminate the project or activity;
- Amend the plan so that the project or activity will be consistent with the plan as amended; or
- Amend the plan contemporaneously with the approval of the project or activity so that the project or activity will be consistent with the plan as amended. This amendment may be limited to apply only to the project or activity. (36 CFR 219.15(c))”

Additionally, for locatable mineral operations regulated under 36 CFR 228, Subpart A, rejection of a plan is not an available option, therefore minerals staff would work with the proponent to either modify the forest plan if necessary or modify the proposal if feasible.

**Comment Number(s):**

2970-784

The Tonto National Forest is managed under the Multiple Use and Sustained Yield Act. As such, we are required to manage for many uses including mining. Other laws, regulations, and policy that authorize mining on National Forest System lands can be found in the revised plan, chapter 2, Mining, Minerals, and Abandoned Mines (MMAM). In locatable minerals operations, the Forest Service does not have discretion to deny a proposal to explore for and remove locatable minerals. The Forest Service does have discretion to deny disposal of salable minerals, such as sand and gravel and common variety building stone, as regulated in 36 CFR 228, Subpart C.

**Comment Number(s):**

2970-790

The Tonto National Forest is managed under the Multiple Use and Sustained Yield Act. As such, we are required to manage for many uses including mining. Other laws, regulations, and policy that authorize mining on National Forest System lands can be found in the revised plan, chapter 2, Mining, Minerals, and Abandoned Mines (MMAM). The Forest Service reclamation and closure bonding process is derived from 36 CFR Part 228A regulations that set forth the rules and procedures through which use of the surface of National Forest System lands are governed in connection with operations authorized by the U.S. mining laws. Mine operators required to file a plan of operations shall, when required by the authorized officer, furnish a bond conditioned upon compliance with 36 CFR 228.8(g), prior to approval of a plan of operations.

**Comment Number(s):**

2970-795

The U.S. Department of Labor's Mine Safety and Health Administration (MSHA) works to prevent death, illness, and injury from mining and promote safe and healthful workplaces for U.S. miners.

**Comment Number(s):**

2970-797

This comment recommends a specific standard for mining. Forest Service reviews mineral proposals for consistency with environmental regulations and forest plan for the protection of public lands, uses and surface resources. We do not prescribe mining techniques or operations. The proposed change is inconsistent with existing regulations at 36 CFR 228A and other laws that apply to mineral projects.

**Comment Number(s):**

2970-796

This comment recommends a standard for instream flow rights. An instream flow water right is a legal entitlement to surface water within a specified reach of a stream channel for the beneficial use of fish, wildlife, and recreation. A determination of appropriability would be required each time this occurs. Currently, the Arizona is undergoing a statewide appropriability analysis. Furthermore, standards are the rules we will operate within as we develop projects to accomplish revised plan objectives and move closer to realizing desired conditions. Plan components, including standards, do not need to reiterate existing law, regulation, or policy.

**Comment Number(s):**

2970-799

This comment recommends a standard that requires coordination among existing mining companies. Mining companies are private entities, and the Forest does not regulate or manage their interactions or require them to work together. We do not prescribe mining techniques or operations.

**Comment Number(s):**

2970-786

This comment recommends adding text to a desired condition that would make it impossible to achieve. Improvement or replacement of surface resource conditions to those existing prior to mining operations may be a desirable goal, but it is one that cannot be forced on operators as an added cost. The Forest Service may require “changes in, or additions to, the plan of operations deemed necessary to meet the purpose of the regulations [in 36 CFR 228A],” but cannot categorically prohibit mining or deny reasonable and legal mineral operations under the mining laws. Desired conditions describe the specific social, economic, and/or ecological characteristics that are desired for the plan area, or a part of the plan area. These are described in enough detail to measure progress toward their achievement, and all management activities should be aimed at achieving the desired condition. The Mining, Minerals, and Abandoned Mines (MMAM) plan components have a standard and a guideline that address reclamation to enable achievement of the desired conditions.

**Comment Number(s):**

2970-798

This comment recommends additional standards for plans of operations however, per regulations at 36 CFR 228.5, operations shall be conducted in accordance with an approved plan of operations. Exceptions to this require supplementation or modification of the approved plan of operations, which are subject to approval in the same manner as the initial plan. This standard is not necessary because it is addressed through existing law, regulation, or policy.

**Comment Number(s):**

2970-791

This comment recommends increasing a measurable objective. Objectives are mileposts along the road toward desired conditions, not limits. An objective is a concise, measurable, and time-specific statement of a desired rate of progress toward a desired condition or conditions and should be based on reasonably foreseeable budgets (revised plan, chapter 1, Plan Components). The original objective amount was intentional, considering workload and staffing for the minerals program. Generally, it takes time to find, make assessments, and to get surveys completed and documented. As we continue to implement projects and make progress, site locations become more remote and harder to access, inventory, and assess.

**Comment Number(s):**

2970-802

This comment recommends using the word shall rather than should. Guidelines are mandatory constraints on projects and activities that are implemented with the forest plan, but unlike standards, deviations may occur as long as the intent of the guidelines is met. We use the word “should” for these components. Stating this as a guideline was intentional because regulations at 36 CFR 228A, allow for mining activity that minimizes adverse environmental impacts by avoiding unnecessary and unreasonable destruction of surface resources and damage to the environment. The stage of mining activity must be required, justified,

and appropriate based on acceptable standard industry practices for, example, prospecting, exploration, development, and mining stages.

**Comment Number(s):**

2970-788, 792,794, 801

We appreciate your support of our planning effort.

**Comment Number(s):**

2970-803, 804

While we appreciate your support of our planning effort, changes and edits to management approaches were made to improve clarity and in response to other comments. One management approach was removed, one guideline became a management approach and text was added to a management approach to improve clarity (see revised plan, chapter 2, Mining, Minerals, and Abandoned Mines section, in Management Approaches).

**Comment Number(s):**

2816-58

An independent contractor is there to objectively verify well abandonment actions, and to minimize the conflict of interest inherent in the situation, which protects both the Forest and proponent in adhering to State and Federal regulations. In consideration of this comment and because guidelines are mandatory constraints on projects and activities that are implemented with the forest plan, but unlike standards, deviations may occur as long as the intent of the guidelines is met, this standard was changed to a guideline and rewritten as, “All exploration drill holes and water production or monitoring wells reasonably incident to mining operations or required mitigation and monitoring measures are abandoned in accordance with current State and Federal regulations and should be attested by a licensed Professional Engineer or Geologist on site during the abandonment.”

**Comment Number(s):**

2736-47

Arizona Game and Fish Department, along with other agencies and interested parties, are contacted during the National Environmental Policy Act process when such management actions are proposed. We work closely with Bat Conservation International during initial stages to determine appropriate mitigation for abandoned mine remediation. This includes pre-work surveys followed by recommendations of appropriate closure types if determined necessary. These recommendations follow standard protocol established by Bat Conservation International.

**Comment Number(s):**

2921-8

As explained in the revised plan (chapter 1, under Forest Plan Framework and Organization, Plan Components), guidelines are mandatory constraints on projects and activities that are implemented with the forest plan, but unlike standards, deviations may occur as long as the intent of the guidelines is met. For minerals, concurrent reclamation planning would be based on each project proposal, including project specifics such as, location, duration, types of disturbance (for example, open pit or mineral well), etc... and therefore, individual proposals are evaluated on a site-specific basis and reclamation planning is developed with the proponent under a separate environmental analysis that follows Forest Service policy

for the approval of a plan of operations for mineral activity. The guideline could be met simply by determining whether the project could accommodate concurrent reclamation; in the case of a small-sized and short-term project it may not; or identifying opportunities where concurrent reclamation works best and building that into reclamation planning. These determinations would be made for site-specific projects implementing the revised plan.

**Comment Number(s):**

2816-62

Guidelines are mandatory with some flexibility on how they are implemented in meeting the intent of the existing guideline, but unlike standards, deviations may occur as long as the intent of the guidelines is met. As described in the revised plan (chapter 1, under Forest Plan Framework and Organization, Plan Components), plan components guide future project and activity decision-making. Regulatory requirements for reclamation of locatable minerals activities are found in 36 CFR 228.8 (g) “Reclamation. Upon exhaustion of the mineral deposit or at the earliest practicable time during operations [emphasis added], or within 1 year of the conclusion of operations, unless a longer time is allowed by the authorized officer. Operator shall, where practicable, reclaim the surface disturbed in operations by taking such measures as will prevent or control onsite and off-site damage to the environment and forest surface resources including: ... (4) Reshaping and revegetation of disturbed areas, where reasonably practicable...” In general, mine planning, which includes planning for reclamation, would contain provisions for concurrent, interim, and final reclamation of project related disturbance and facilities. Concurrent reclamation during major mining phases is reasonable and logical part of mine planning. Concurrent reclamation is an industry best management practice and is part of Forest Service Policy as outlined in Forest Service Manual, Chapter 2840, Section 2841.1.d and Section 2842.4 Performance Standards. Other large-scale projects on Federal lands in the last ten years or more have focused reclamation planning on achieving concurrent reclamation where feasible (such as Midas Gold, Carlota, and others). Additionally, several states including Nevada, New Mexico, Idaho, Utah, and Montana added concurrent reclamation to their requirements, and the Bureau of Land Management already has concurrent reclamation enacted in its regulations.

**Comment Number(s):**

2816-63

In chapter 2 of the plan, in the Mining, Minerals, and Abandoned Mines section, the last paragraph, it explains that “Abandoned mines are the remains of former mining operations.” and that “...abandoned applies when there are no entities or individuals left operating the mining activity or who have financial ties to the mine.” We do not want to indicate a definition for abandoned mines as “meaning facilities that are closed without plans of reactivation,” as the commentor recommends, because the Forest can receive a proposal at any time, regardless of the status of activity at a site, even if has long been dormant.

**Comment Number(s):**

2816-64

In consideration of this comment, MMAM-MA-01 Management Approach will be deleted from the revised plan because the Forest will have difficulty maintaining a safe environment in a reclaimed area and to avoid potential liability issues.

**Comment Number(s):**

2816-56

In the last paragraph of the Mining, Minerals, and Abandoned Mines section of the revised plan, in chapter 2, it explains that “Abandoned mines are the remains of former mining operations.” and that “...abandoned applies when there are no entities or individuals left operating the mining activity or who have financial ties to the mine.” We do not want to indicate a definition for abandoned mines as “meaning facilities that are closed without plans of reactivation,” as the commentor recommends, because the Forest can receive a proposal at any time, regardless of the status of activity at a site, even if the site has long been abandoned. In response to this comment “and inactive” has been removed from DC-05 to better clarify the intent of this desired condition.

**Comment Number(s):**

2925-73, 2974-3

Management of National Forest System lands is guided and constrained by laws and regulations, regulations, and the policies, in the Forest Service directive system. This plan provides the vision, strategy, and constraints that guide integrated resource management, provide for ecological sustainability, and contribute to social and economic sustainability on the forest and within the broader landscape. Alternative D considers fewer restrictions on land uses, including mining and minerals. Any programmatic level direction that would be included in a mineral exploration management area is redundant with direction already described in the alternatives (final environmental impact statement, chapter 2, Alternatives Considered in Detail), particularly alternative D, or would be considered site-specifically at a project level. Mining cannot be constrained to any pre-designed area because minerals are found where they are found. They are unknown until discovered. Further, minerals found in one area can extend to further areas as the mineral resource is “followed”. Given the laws allowing the appropriation of minerals on Federal land, any “area” designation would be infeasible. For these reasons, consideration of these management areas was eliminated from detailed study in the final environmental impact statement, as described in chapter 2, Alternatives Considered but Eliminated from Detailed Study section.

**Comment Number(s):**

2948-24

Our stance regarding abandoned mine features places a focus on potential safety risks to the public. We conduct pre-survey work to determine habitat suitability with a focus on bat species. We not only follow wildlife friendly closure techniques when habitat is present and in need of remediation for safety, but we also contract Bat Conservation International to conduct survey work with recommendations following their own guidelines. In consideration of this comment and to better reflect our intent with this guideline, it was changed to state: “Abandoned mine features (e.g., adits, shafts, and stopes) should be closed when a feature poses a danger to the public or wildlife. If the feature is determined to contain wildlife habitat, such as maternity roosts or hibernacula for bats, at-risk species, or contain cultural resources, gating should be considered. Installed gates should conform to bat-friendly standards and be designed in such a way to allow for the safe passage of wildlife” (revised plan, chapter 2, Mining, Minerals, and Abandoned Mines section, under Guidelines).

**Comment Number(s):**

2816-53

Per the revised plan (chapter 1, under Forest Plan Framework and Organization, Plan Components), desired conditions describe the specific social, economic, and/or ecological characteristics that are desired for the plan area, or a part of the plan area. These are described in terms specific enough to allow for progress toward their achievement, and all project-level management activities should be aimed at the

achievement of the desired conditions for those resources in the area where the project is located. Desired conditions can be thought of as vision statements that help define a collective vision for the forest in the future. Plan components do not need to reiterate existing law, regulation, or policy, although some are repeated to emphasize it. Not every project will move every resource towards their desired conditions, but all project-level management activities should be aimed at the achievement of the desired conditions for those resources in the area where the project is located.

**Comment Number(s):**

2816-54, 57

Per the revised plan (chapter 1, under Forest Plan Framework and Organization, Plan Components), desired conditions describe the specific social, economic, and/or ecological characteristics that are desired for the plan area, or a part of the plan area. These are described in terms specific enough to allow for progress toward their achievement, and all project-level management activities should be aimed at the achievement of the desired conditions for those resources in the area where the project is located. Desired conditions can be thought of as vision statements that help define a collective vision for the Forest in the future. Plan components do not need to reiterate existing law, regulation, or policy, although some are repeated to emphasize it. For minerals, reclamation goals are based on each project proposal, including project specifics such as, location, duration, types of disturbance (for example, open pit or mineral well), etc... and therefore, individual proposals are evaluated on a site-specific basis and mitigated under a separate environmental analysis that follows Forest Service policy for the approval of a plan of operations for mineral activity. Reclamation on each project would to be designed to help work towards the goal of having a resilient forest ecosystem. It is not redundant but rather a goal for the Forest to work towards. Per the revised plan (chapter 1, under Forest Plan Framework and Organization, Ecological Sustainability), resiliency is the ability of an ecosystem and its component parts to absorb, or recover from the effects of disturbances through preservation, restoration, or improvement of its essential structures and functions and redundancy of ecological patterns across the landscape. In the context of climate change adaptation, strategies should Increase ecosystem resilience by minimizing the severity of climate change impacts, reducing the vulnerability, and/or increasing the adaptive capacity of ecosystem elements.

**Comment Number(s):**

2816-59

Per the revised plan (chapter 1, under Forest Plan Framework and Organization, Plan Components), guidelines describe constraints on project and activity decision-making that allow for departure from its terms, so long as the intent of the guideline is met. In other words, guidelines are mandatory with some flexibility on how they are implemented in meeting the intent of the existing guideline. Avoiding damage to riparian vegetation, degrading water quality, and negatively impacting channel stability is not inconsistent with regulations, for example, proposed mining activities, which can reasonably be expected to result in any discharges into waters of the United States are subject to compliance with Clean Water Act Sections 401, 402, and/or 404 as applicable.

**Comment Number(s):**

2816-60

Per the revised plan (chapter 1, under Forest Plan Framework and Organization, Plan Components), guidelines describe constraints on project and activity decision-making that allow for departure from its terms, so long as the intent of the guideline is met. In other words, guidelines are mandatory with some

flexibility on how they are implemented in meeting the intent of the existing guideline. However, upon further consideration of the intent of the planning component, we have changed this to a management approach because it is dependent upon the proponent's independent actions. Management approaches often convey how plan components work together to achieve the desired condition. They may also describe context, intent, priorities, partnership opportunities or coordination activities, need to survey, inventories or assessments, or approaches to risk and uncertainty.

**Comment Number(s):**

2816-61

Per the revised plan (chapter 1, under Forest Plan Framework and Organization, Plan Components), guidelines describe constraints on project and activity decision-making that allow for departure from its terms, so long as the intent of the guideline is met. In other words, guidelines are mandatory with some flexibility on how they are implemented in meeting the intent of the existing guideline. Natural species succession means the process of change in species structure of an ecological community over time and is described in Vegetation and Ecological Response Units, in chapter 2 of the plan. Regulatory requirements for reclamation are found in 36 CFR 228.8 (g) and include: Reshaping and revegetation of disturbed areas, where reasonably practicable; among other requirements. In response to this comment for added clarification, MMAM-G-04 has been written to state “Surface reclamation and revegetation plans for smaller scale mineral activities, such as drilling programs or smaller scale open pits, should plan for a natural species succession appropriate to the reclaimed landform and vegetative community for the identified Ecological Response Unit, to include identifying appropriate species to use in revegetation of disturbed areas” (see revised plan, chapter 2, Mining, Minerals, and Abandoned Mines section, under Guidelines).

**Comment Number(s):**

2816-55

The desired condition that the commentor is referencing is about mineral materials, also known as salable, or common variety minerals. The Forest Service follows regulations under 36 CFR 228, Subpart C for disposal of mineral materials. The Forest Service has discretion to deny disposal of salable minerals, such as sand and gravel and common variety building stone.

**Comment Number(s):**

2816-66

The management approach that the commentor is referencing has been rewritten to state “Seek opportunities to work with proponents to expand and share knowledge of local natural resources (e.g., proactive data collection and sharing and development of conservation measures).” and is found in chapter 2 of the plan, in the Mining, Minerals, and Abandoned Mines section, under Management Approaches for Mining, Minerals, and Abandoned Mines. A person or entity that submits a proposal, also known as an operator, is considered a proponent. Proactive data sharing means for the proponent to willingly share knowledge learned from the project, such as data on lithologies, depth to groundwater, or other scientific measurements. The Forest Service would share with the proponent publicly available knowledge of the resources in the area such as mineral reports or other resource information. The Forest Service would help develop specific voluntary and required measures with the proponent to achieve desired conditions in the affected area. A voluntary conservation measure would be something that the proponent proposes to do that would, for example, preserve or enhance the habitat, which is not required by law, regulation, or policy. Mandatory conservation measures are required by law, regulation, or policy.



**Comment Number(s):**

2816-105

Where this sentence appeared in the draft environmental impact statement, it was changed to state: “Impacts to surface water quantity and quality and groundwater quality and quantity as well as water dependent resources have occurred in the past and may occur in the future” (volume 1, chapter 3, in Watersheds and Water Resources section and also in volume 2, chapter 3, in Wildlife, Fish, and Plants). In consideration of this comment, it is appropriate to indicate that it may occur instead of likely to occur.

**Comment Number(s):**

2925-00

An independent licensed professional is there to objectively verify well abandonment actions, and to minimize the conflict of interest inherent in the situation, which protects both the Forest and proponent in adhering to State and Federal regulations. In consideration of this comment, this standard remains with the requirement that the verification occurs from someone that has appropriate licensing, which is in alignment with standards from American Society for Testing and Materials (ASTM) D5299/D5299M – 17.

**Comment Number(s):**

2925-00

As explained in the revised plan (chapter 1, under Forest Plan Framework and Organization, Plan Components), plan components guide future project and activity decision-making. Management approaches do not offer plan direction and are not required components but describe a strategy to achieve a desired condition. As explained in the revised plan, chapter 2, in Forestwide Plan Direction, the 2012 Planning Rule sets forth the direction to: “maintain and restore National Forest System land and water ecosystems while providing for ecosystem services and multiple uses. The planning rule is designed to ensure that plans provide for the sustainability of ecosystems and resources; meet the need for forest restoration and conservation, watershed protection, and species diversity and conservation; and assist the Agency in providing a sustainable flow of benefits, services, and uses of National Forest System lands that provide jobs and contribute to the economic and social sustainability of communities” (36 CFR 219).

**Comment Number(s):**

2925-00

Guidelines are mandatory with some flexibility on how they are implemented in meeting the intent of the existing guideline, but unlike standards, deviations may occur as long as the intent of the guidelines is met. As described in the revised plan (chapter 1, under Forest Plan Framework and Organization, Plan Components), plan components guide future project and activity decision-making. Regulatory requirements for reclamation of locatable minerals activities are found in 36 CFR 228.8 (g) “Reclamation. Upon exhaustion of the mineral deposit or at the earliest practicable time during operations [emphasis added], or within 1 year of the conclusion of operations, unless a longer time is allowed by the authorized officer. Operator shall, where practicable, reclaim the surface disturbed in operations by taking such measures as will prevent or control onsite and off-site damage to the environment and forest surface resources including: (4) Reshaping and revegetation of disturbed areas, where reasonably practicable...” In general, mine planning, which includes planning for reclamation, would contain provisions for concurrent, interim, and final reclamation of project related disturbance and facilities. Concurrent reclamation during major mining phases is reasonable and logical part of mine planning. Concurrent

reclamation is an industry best management practice and is part of Forest Service Policy as outlined in Forest Service Manual, Chapter 2840, Section 2841.1.d, and Section 2842.4 Performance Standards. Other large-scale projects on Federal lands in the last ten years or more have focused reclamation planning on achieving concurrent reclamation where feasible (such as Midas Gold, Carlota, and others). Additionally, several states including Nevada, New Mexico, Idaho, Utah, and Montana added concurrent reclamation to their requirements, and the Bureau of Land Management already has concurrent reclamation enacted in its regulations.

**Comment Number(s):**

2925-00

In consideration of another comment on this management approach that the commentor reference to, it will be deleted because the Forest will have difficulty maintaining a safe environment in a reclaimed area and to avoid potential liability issues.

**Comment Number(s):**

2925-00

Per the revised plan (chapter 1, under Forest Plan Framework and Organization, Plan Components), desired conditions can be thought of as vision statements that help define a collective vision for the National Forest in the future. Plan components do not need to reiterate existing law, regulation, or policy, although some are repeated to emphasize it. For minerals, reclamation goals are based on each project proposal, including project specifics such as, location, duration, types of disturbance (for example, open pit or mineral well), etc... and therefore, individual proposals are evaluated on a site-specific basis and mitigated under a separate environmental analysis that follows Forest Service policy for the approval of a plan of operations for mineral activity. Reclamation on each project would to be designed to help work towards the desired condition of having a resilient forest ecosystem. It is not necessary to repeat the existing regulation, but rather a goal for the Forest to work towards.

**Comment Number(s):**

2925-00

Per the revised plan (chapter 1, under Forest Plan Framework and Organization, Plan Components), desired conditions describe the specific social, economic, and/or ecological characteristics that are desired for the plan area, or a part of the plan area. These are described in terms specific enough to allow for progress toward their achievement, and all project-level management activities should be aimed at the achievement of the desired conditions for those resources in the area where the project is located. Desired conditions can be thought of as vision statements that help define a collective vision for the National Forest in the future. Most of the guidance for mining is governed by law, regulation, and policy, which does not need to be repeated within the forest plan however we are emphasizing it here, by having a desired condition that reflects that the management of this resource is already decided by existing law, regulation, and policy. Future projects and activities, of any kind, must be consistent with the forest plan and various laws, agency policy, and direction to manage vegetation and natural resources for multiple uses.

**Comment Number(s):**

2925-00

Per the revised plan (chapter 1, under Forest Plan Framework and Organization, Plan Components), guidelines describe constraints on project and activity decision-making that allow for departure from its terms, so long as the intent of the guideline is met. In other words, guidelines are mandatory with some flexibility on how they are implemented in meeting the intent of the existing guideline. However, upon further consideration of the intent of the planning component, we have changed this to a management approach because it is dependent upon the proponent's independent actions. Management approaches often convey how plan components work together to achieve the desired condition. They may also describe context, intent, priorities, partnership opportunities or coordination activities, need to survey, inventories or assessments, or approaches to risk and uncertainty.

**Comment Number(s):**

2925-00

Per the revised plan (chapter 1, under Forest Plan Framework and Organization, Plan Components), guidelines describe constraints on project and activity decision-making that allow for departure from its terms, so long as the intent of the guideline is met. In other words, guidelines are mandatory with some flexibility on how they are implemented in meeting the intent of the existing guideline. Regulatory requirements for reclamation are found in 36 CFR 228.8 (g) and include: Reshaping and revegetation of disturbed areas, where reasonably practicable; among other requirements. The intent of this guideline was to address smaller scale projects.

**Comment Number(s):**

2925-00

Per the revised plan (chapter 1, under Forest Plan Framework and Organization, Plan Components), standards can be thought of as the sideboards the Tonto will operate within as we develop projects to accomplish objectives and achieve desired conditions. For minerals, reclamation planning would be based on each project proposal, including project specifics such as, location, duration, types of disturbance (for example, open pit or mineral well), etc., and, therefore, individual proposals are evaluated on a site-specific basis and reclamation planning is developed with the proponent under a separate environmental analysis that follows Forest Service policy for the approval of a plan of operations for mineral activity. This standard is meant to be used to identify an ecological response unit (ERU) (detailed information about ecological response units can be found in the environmental impact statement, chapter 3, in the section on Vegetation, Ecological Response Units, Fire, and Fuels) that is achievable for the post mining landscape condition. We recognize that mining can make permanent changes to the landscape and the original ecological response unit may not be achievable. There is no intent for the plan component to require restoration. This standard gives us a rule that recognizes that for mining projects, the reclamation standard does not have to meet previous disturbance level. It is not inconsistent with existing regulations, and it allows for the deviation from original ecological response unit to a different ecological response unit that is achievable with the post mining landform. This standard enables the Forest and proponent to comply with plan components.

**Comment Number(s):**

2925-00

Per the revised plan (chapter 1, under Forest Plan Framework and Organization, Plan Components), standards can be thought of as the sideboards the Tonto will operate within as we develop projects to accomplish objectives and achieve desired conditions. These are mandatory constraints on project and activity decision-making. A deviation from a standard within a project requires a plan amendment for that

deviation. Most of the guidance for mining is governed by law, regulation, and policy, which does not need to be repeated within the forest plan however we are emphasizing it here, by having a standard that reflects that the management of this resource is already decided by existing law, regulation, and policy. Based on experience, it needs to be taken further. We've added another standard to be included in the forest plan, "A Notice of Intent per 36 CFR 228.4(a) shall be submitted to the District Ranger from any person proposing to conduct geophysical investigations, (e.g., induced polarization, gravity surveys, magnetic surveys, seismic investigations, etc.)." Evaluating the likely disturbance from geophysical surveys allows for compliance with other laws, regulations, and policies (such as National Historic Preservation Act section 106, the statewide Programmatic Agreement with the State Historic Preservation Office, and Section 7 consultations), as well as coordination of aerial surveys with regional firefighting operations.

**Comment Number(s):**

2925-00

The guideline that the commentor is referencing is about mineral materials, also known as salable, or common variety minerals. The Forest Service follows regulations under 36 CFR 228, Subpart C for disposal of mineral materials. The Forest Service has discretion regarding disposal of salable minerals, such as sand and gravel and common variety building stone. "Adequate Engineering controls" means that physical or designed controls to maintain or improve surface waters in the riparian management zone would be part of project implementation. An example of "adequate engineering controls" could be a temporary diversion of the existing channel around an active excavation area, or wildlife enclosure fencing to prevent degradation of the riparian area during the project. A footnote was added to address this comment.

**Comment Number(s):**

2925-00

This guideline has been rewritten as, "Abandoned mine features (e.g., adits, shafts, and stopes) should be closed when a feature poses a danger to the public or wildlife. If the feature is determined to contain wildlife habitat, such as maternity roosts or hibernacula for bats, at-risk species, or contain cultural resources, gating should be considered. Installed gates should conform to bat-friendly standards and be designed in such a way to allow for the safe passage of wildlife" (chapter 2, Mining, Minerals, and Abandoned Mines section, under Guidelines). There is no intent to only gate and therefore not necessary to add where practicable.

**Comment Number(s):**

2925-00

We had a guideline that was changed to a management approach that incorporates the proposed changes suggested by this comment (see revised plan, chapter 2, Mining, Minerals, and Abandoned Mines section, in Management Approaches). Additionally, as described in revised plan, chapter 1, in the Forest Plan Framework and Organization, Plan Components section, plan components guide future project and activity decision-making. Management approaches do not offer plan direction and are not required components but describe a strategy to achieve a desired condition.

**Concern Statement 134.** *Commenters are concerned with mining as a use of the Tonto National Forest.*

Response:

**Comment Number(s):**

44-6, 65-3, 262-1, 1015-1, 1884-1, 2008-1, 2394-1, 2532-2

The Tonto National Forest is managed under the Multiple Use and Sustained Yield Act. As such, we are required to manage for many uses including mining. Other laws, regulations, and policy that authorize mining on National Forest System lands can be found in the revised plan, chapter 2, Mining, Minerals, and Abandoned Mines (MMAM). The forest plan is programmatic and guides site-specific projects. All site-specific projects that implement the forest plan will comply with applicable plan direction.

**Concern Statement 135.** *Commenters are concerned with how the national environmental policy act (NEPA) applies to mining and mineral projects on the national forest.*

Response:

**Comment Number(s):**

2970-776

Individual proposals are evaluated on a site-specific basis and mitigated under a separate environmental analysis that follows Forest Service policy for the approval of a plan of operations for mineral activity. The Forest Service may require modification to an unreasonable plan of operations but cannot categorically prohibit mining or deny reasonable and legal mineral operations under the mining laws. As a Federal agency, the Forest Service must follow Federal laws and regulations as they currently exist, including the National Environmental Policy Act.

## **Monitoring**

**Concern Statement 136.** *Commenters suggest monitoring and assessment strategies for recommended wilderness to ensure forest uses are not negatively impacting wilderness characteristics.*

Response:

**Comment Number(s):**

2736-14

The forest plan guides the management actions for the Forest Service and does not directly create prohibitions or limitations for forest users. Management direction for recommended wilderness can be found in chapter 3 of the forest plan, including the following: desired condition 01 “The ecological and social characteristics that provide the basis for wilderness recommendation are protected”; guideline 01 “Motorized vehicle access use should not be authorized occur in a recommended wilderness area unless specifically authorized for emergency use, resource protection, maintenance of authorized improvements, or for the motorized retrieval of legally harvested big game”; and management approach 01 “Work with partners and volunteer groups to manage and maintain wilderness characteristics in recommended

wilderness areas and to facilitate user support and reduce user conflicts”. Additionally, in chapter 4 of the final plan, there is a monitoring topic that could be used to address these types of issues: “Progress towards meeting desired conditions and objectives.”

This plan considers the need to manage the forest in compliance with the Multiple Use and Sustained Yield Act. Consistent with agency regulation (2012 Planning Rule) and policy, the Forest Service completed an assessment of areas that meet the criteria for recommended wilderness through the wilderness recommendation process. Forest Service policy and planning direction is found in the Forest Service Manual 1920 and Forest Service Handbook 1909.12. Forest Service Handbook 1909.12, chapter 70 is the policy direction that guides the wilderness recommendations.

**Concern Statement 137.** *Commenters support adequate funding in order to accomplish proper forest plan monitoring.*

Response:

**Comment Number(s):**

2972-11

We appreciate your support of our planning efforts per 36 CFR 219. These are good suggestions for monitoring data sources and potential partnerships. The Forest will reference this information later during forest plan implementation and monitoring. As we move into project level plan implementation, we will be looking for volunteers and partners to help us with forest plan monitoring.

**Concern Statement 138.** *Commenter is concerned the draft forest plan lacks sufficient monitoring protocols to address unauthorized motorized use on the forest.*

Response:

**Comment Number(s):**

2970-753

Changes to the designated road system will comply with the forest plan and the Travel Management Rule. During the travel management process, the effects of routes and the road system is identified and analyzed on a site-specific basis. The intent of the forest plan is to provide broad overarching plan direction. The forest plan has desired conditions that the road system is sustainable and has minimal adverse impacts to resources, and objectives to decommission roads identified for decommissioning (through site-specific analysis) and or unauthorized user created routes. Roads, and motorized access, are inconsistent with the desired conditions of both recommended wilderness and inventoried roadless areas. We would not evaluate effects of allowing motorized activities in these areas because they are only authorized for specific purposes. While we do not have specific monitoring questions for roads – progress towards meeting plan objectives for all resource areas is disclosed in biennial monitoring reports after the forest plan is implemented.

**Concern Statement 139.** *Commenter suggests potential forest plan monitoring questions and indicators to help track progress towards desired conditions, and the effectiveness of the forest plan.*

Response:

**Comment Number(s):**

2970-609

All road maintenance follows best management practices (BMP) standards by improving drainage that allows water to move consistently to reduce adverse effects (e.g., erosion, increased sedimentation). Changes to the designated road system will comply with the forest plan and the Travel Management Rule. Additionally, we have monitoring elements for assessing the effectiveness of management actions to maintain or improve watershed conditions. One of the indicators used and assessed in the Watershed Condition Framework includes the road and trail system that looks at changes to the hydrologic and sediment regimes because of the density, location, distribution, and maintenance of the road and trail network. Roads, and motorized access, are inconsistent with the desired conditions of both recommended wilderness and inventoried roadless areas and we would not evaluate effects of allowing motorized activities in because they are only authorized for specific purposes. We do not have metrics for measuring habitat fragmentation and furthermore we have plan direction and monitoring elements to manage for resilient and healthy habitat conditions that support wildlife and connectivity.

**Concern Statement 140.** *Commenter suggests the Forest continue bird surveys using coordinated bird monitoring protocols.*

Response:

**Comment Number(s):**

2806-25

We appreciate your support of our planning efforts per 36 CFR 219. These are good suggestions for monitoring data sources and potential partnerships. The Forest will reference this information later during forest plan implementation and monitoring. As we move into project level plan implementation, we will be looking for volunteers and partners to help us with forest plan monitoring.

**Concern Statement 141.** *Commenters suggest incorporating other completed tools into forest plan monitoring.*

Response:

**Comment Number(s):**

2806-23

The Verde River Report card is based in large part and tied to the metrics for the Watershed Condition Framework, which as of the 2018 farm bill is not only the nationally accepted protocol for assessing watershed condition on National Forest System lands, but the required format for Forest Service assessment of watershed condition. We agree that the Verde River Scorecard is an excellent communication tool and way for the Forest Service to participate in an all-lands approach to the assessment and monitoring of watershed health. The specific monitoring protocols from the scorecards

that are facilitated by the University of Maryland actually vary significantly from place to place and are, by design, driven by local conditions, data availability, and stakeholder concerns. We agree that a scorecard developed in a similar manner for the Salt River Basin would be an excellent tool for communicating watershed health. At this time, however, the Tonto National Forest does not have the resources to lead the considerable effort it would take to develop a similar scorecard for the Salt River. The Forest Service funding for the Verde effort came from National level funds set aside for pilot projects to commemorate the 50th anniversary of the Wild and Scenic Rivers Act. If a partner in the Salt River watershed were interested in creating a similar tool for the area, much like with the Verde River Scorecard, we would be very supportive of and be an active participant in that effort.

**Comment Number(s):**

2806-24

We appreciate your support of our planning efforts per 36 CFR 219. These are good suggestions for monitoring data sources and potential partnerships. The Forest will reference this information later during forest plan implementation and monitoring. As we move into project level plan implementation, we will be looking for volunteers and partners to help us with forest plan monitoring.

*Concern Statement 142. Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2927-12

Thank you for this suggestion. We have updated this management approach to add the word “volunteers”.

*Concern Statement 143. Commenters suggest potential monitoring questions and indicators to be included in forest plan monitoring.*

Response:

**Comment Number(s):**

79-10

We appreciate your concerns about forest plan monitoring and national trails. Monitoring can be found in chapter 4 of the final forest plan. This information has been updated to reflect public comments, input during our technical partner meetings, and to provide more clarity for future management. Specific monitoring questions were not developed for our management areas, which would include national trails, because the focus is being placed on monitoring for forestwide desired conditions. The plan components for national trails, including the desired conditions, standards, and guidelines, will provide the framework for future management of the national trails that deviates from forestwide management. The additional monitoring questions are not needed in order to determine effectiveness of our management related to the recreation opportunity spectrum and the national trails.



**Concern Statement 144.** *Commenters provide suggestions for monitoring.*

Response:

**Comment Number(s):**

2806-22

Thank you for attending the technical partner meeting, and for your input and feedback on forest plan monitoring. The forest plan monitoring program (outlined in chapter 4 of the draft forest plan) is designed to address status and trends related to desired social, economic, and ecological conditions identified in the forest plan, and the effectiveness of management actions. We have included measurable metrics in the form of resource indicators, which describe a set of potential data sources that may be used to analyze the effectiveness of the forest plan (e.g., percent of streams rated as stable, or percent of surveyed streams impaired).

The specific approaches or strategies analyzing plan monitoring indicator variables, models to be used, protocols, and appropriate target thresholds/benchmarks are handled during the implementation phase of the forest plan, handled on site-specific project level planning complying with the forest plan and all applicable law, regulation, and policy. We look forward to working with other partners and groups, and opportunities for multi-party monitoring with others.

## **Motorized Recreation**

**Concern Statement 145.** *Commenters are concerned with limiting motorized access to the forest in the future.*

Response:

**Comment Number(s):**

262-4

The 2005 Travel Management Rule (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas. In contrast, the 2012 Planning Rule (36 CFR 219) is the overriding regulation that guides the development, amendment, and revision of land management plans for all units of the National Forest System. As such it is programmatic in nature and does dictate the level of specificity that project level plan implementation does. All project level specificity and decisions for the management of motor vehicle use will be done in compliance with the 2005 Travel Management Rule either forestwide (as is the case with the current travel management planning process) or on a more site-specific need, such as by district or area. This planning process provides plan components to guide management of the forest, including for motorized use. Additionally, the Tonto National Forest is managed in accordance with the Multiple Use and Sustained Yield Act, which permits many uses including motorized vehicle uses.

**Comment Number(s):**

71-1, 2

The following plan component has been revised to state: “Every 5 years, take appropriate action (e.g., close, decommission, or convert) on at least 10 miles of motorized and/or non-motorized trails that may not offer recreation value (e.g., unsustainable, low-use, or have no remarkable destination value) or are not needed for administrative use.” However, as reflected in additional plan components, the Tonto

National Forest intends to develop 1 to 4 systems of sustainable designated motorized and non-motorized trails to adequately provide groups with more access and reduce user conflicts (forest plan, chapter 2, Recreation). Our intentions are to create and modify more sustainable trails or roads as we close old ones. The 2005 Travel Management (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas. In contrast, the 2012 Planning Rule (36 CFR 219) is the overriding regulation that guides the development, amendment, and revision of land management plans for all units of the National Forest System. As such it is programmatic in nature and does dictate the level of specificity that project level plan implementation does. All project level specificity and decisions for the management of motor vehicle use will be done in compliance with the 2005 Travel Management Rule either forestwide (as is the case with the current travel management planning process) or on a more site-specific need, such as by district or area. This planning process provides plan components to guide management of the forest, including for motorized uses. When the travel management process is complete, a motor vehicle use map will be made available to display available routes.

**Comment Number(s):**

71-3

The forest plan is strategic in nature and does not include project and activity decisions such as the specific trails to be decommissioned or constructed. An objective in the Recreation section states, “Every 5 years, take appropriate action (e.g., close, decommission, or convert) on at least 10 miles of motorized and/or non-motorized trails that may not offer recreation value (e.g., unsustainable, low-use, or have no remarkable destination value) or are not needed for administrative use.” This could include any location across the forest. The same goes for another objective in the same section, which states that the Tonto National Forest intends to develop 1 to 4 systems of sustainable designated motorized and non-motorized trails to adequately provide groups with more access and reduce user conflicts (forest plan, chapter 2, Recreation). The decommissioning of trails may not necessarily be followed by constructing of new trails in the same riding area. The new or modified system trails referenced in the above objective are generally prioritized based on user demand and public input so locations may vary across the forest. However, as these projects are proposed, there will be a public involvement process specific to that project and the associated analysis under the National Environmental Policy Act. We would encourage the commenter to participate in that process.

**Comment Number(s):**

2570-1

The objectives in the Recreation section of the revised plan (chapter 2) aims to educate the public on responsible use: During the 10-year period following plan approval, implement at least 3 strategies to raise awareness of discouraged practices (e.g., illegal dumping, unsafe shooting practices, driving on closed roads) to promote visitor safety and natural resource protection. We are unsure what type of closure the commenter is referring to. However, there is currently nothing in the forest plan about closing the forest on a long-term basis; plan components throughout the document provide guidance on closing specific areas as needed for purposes such as resource protection or public safety.

**Comment Number(s):**

60-1

Thank you for interest in keeping public access and roads open. The following plan component has been revised to state: “Every 5 years, take appropriate action (e.g., close, decommission, or convert) on at least

10 miles of motorized and/or non-motorized trails that may not offer recreation value (e.g., unsustainable, low-use, or have no remarkable destination value) or are not needed for administrative use.” However, as reflected in additional plan components, the Tonto National Forest intends to develop 1 to 4 systems of sustainable designated motorized and non-motorized trails to adequately provide groups with more access and reduce user conflicts. Our intentions are to create and modify more sustainable trails or roads as we close old ones. The 2005 Travel Management (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas. In contrast, the 2012 Planning Rule (36 CFR 219) is the overriding regulation that guides the development, amendment, and revision of land management plans for all units of the National Forest System. As such it is programmatic in nature and does dictate the level of specificity that project level plan implementation does. All project level specificity and decisions for the management of motor vehicle use will be done in compliance with the 2005 Travel Management Rule either forestwide (as is the case with the current travel management planning process) or on a more site-specific need, such as by district or area. This planning process provides plan components to guide management of the forest, including for motorized uses. When the travel management process is complete, a motor vehicle use map will be made available to display available routes. Motorized use is specifically prohibited in designated wilderness areas by the Wilderness Act.

**Concern Statement 146.** *Commenters are concerned with permit zones and how to obtain permits or reservations for use of the national forest.*

Response:

**Comment Number(s):**

2950-8

Types of permits vary per activity type on the forest. For example, there are special use permits related to bicycle races, outfitting and guiding operations, constructing communication towers, and operating commercial marinas. There are also day-use permits, also known as fee-for-use permits purchased by the public to recreate in developed recreation sites and campgrounds, along with access permits such as those obtained to access the Bulldog Canyon OHV Permit Area. Information on permits including the process to obtain one can be found on our website at <https://www.fs.usda.gov/tonto>. Proposed new permit areas must go through the National Environmental Policy Act process under 40 CFR 1500 and would require a public involvement process. Any areas requiring a fee must also abide by Federal Lands Recreation Enhancement Act regulations.

**Concern Statement 147.** *Commenters are concerned with the growth of motorized recreation on the forest. This includes concerns with cross-country or off-road motorized travel and the impacts it has on natural resources.*

Response:

**Comment Number(s):**

2970-745

Between the draft and final environmental impact statement for plan revision, the Travel Management planning Record of Decision was signed, designating motor vehicle use forest wide, including designated areas for the use of a motor vehicle for the retrieval of big game. The forest plan is strategic in nature and

does not include project and activity decisions such as the Travel Management decision; the forest plan alone would not change the designated system of roads and motorized routes. Travel management is a separate decision from the forest plan revision, but both will direct decision making going forward. To go along with this, a plan component in the motorized recreation section states “Motorized vehicle travel shall be managed to occur only on the designated system of National Forest System roads, motorized trails, and motorized areas per the motor vehicle use map.” A desired condition in the general Recreation section also supports the comment about Executive Orders requiring the Forest Service to close areas and trails to off-road use if the use of off-road vehicles “will cause or is causing considerable adverse effects...” Additionally, any future changes to the designated route system would comply with the Travel Management Rule and comply with the forest plan, as well as all other laws and regulations.

**Comment Number(s):**

2970-749

Between the draft and final environmental impact statement for plan revision, the Travel Management planning Record of Decision was signed, designating motor vehicle use forestwide for roads, motorized trails, and areas. Part of that decision amended the current forest plan to remove all language allowing for cross-country travel. Sustainable recreation is an important concept incorporated into the forest plan. The forest plan, chapter 2, Recreation, Motorized Recreation, Desired Condition reads “motorized trails and staging areas are sustainable and resource damage related to these recreation areas is minimized”. There are also guidelines related to decommissioning unsustainable trails and a monitoring strategy. The assessment being referenced, and the draft environmental impact statement do indicate concerns the Forest has with unauthorized routes and the forest plan works to address those situations. Specific suggestions were not provided by the commentor for what to do in the forest plan for illegal dumping and excessive trash but there is a guideline included in the recreation section stating, “land use ethics (e.g., Leave No Trace and pack-it-in pack-it-out) should be promoted for all recreation opportunities and settings”.

**Comment Number(s):**

13-2

Many plan components address managing multiple recreational uses across the forest, including both hunting and off-highway vehicle use. We aim to reduce user conflicts and allow equal opportunity for all recreational activities in many areas. Plan components that cover this topic include “Conflicts among various recreation users and with other multiple uses are infrequent and easily resolved” (forest plan, chapter 2, Recreation); “Recreation opportunities are available for both non-motorized and motorized recreation activities throughout the forest including hiking, mountain biking, horseback riding, rock climbing, off-highway vehicle recreation, hunting, fishing and other popular recreational uses” (forest plan, chapter 2, Recreation, Dispersed Recreation); and “Access to a range of opportunities for hunting, fishing, and wildlife watching are available” (forest plan, chapter 2, Recreation, Wildlife-Related Recreation).

**Comment Number(s):**

2937-1

The 2005 Travel Management Rule (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas. In contrast, the 2012 Planning Rule (36 CFR 219) is the overriding regulation that guides the development, amendment, and revision of land management plans for all units of the National Forest System. As such it is programmatic

in nature and does dictate the level of specificity that project level plan implementation does. All project level specificity and decisions for the management of motor vehicle use will be done in compliance with the 2005 Travel Management Rule either forestwide (as is the case with the current travel management planning process) or on a more site-specific need, such as by district or area. This planning process provides plan components to guide management of the forest, including for motorized use. The Mesa Ranger District has future plans to improve conditions within the Bulldog Canyon area by increasing law enforcement patrols, improving infrastructure at access gates and along the boundaries of the permit area, and rehabilitating illegal user created routes.

**Comment Number(s):**

2907-3

The referenced sentence is a generalized statement about the existing condition of the Bulldog Canyon area over the past 30 years; conditions have generally improved since implementation of the permit system in comparison to areas without a permit system such as Lower Sycamore or The Rolls off-highway vehicle areas. We agree that over the last 5-10 years, illegal motorized use and user created trails (both motorized and non-motorized) has seen a steady increase in the Bulldog Canyon Rolls off-highway vehicle area. Enforcement strategies and infrastructure maintenance is outside the forest planning process and is managed at a local level. However, a major influencing factor for this issue is limited law enforcement staffing/patrols and poor infrastructure near the access gates and other boundaries of the Bulldog Canyon area. With the steady increase in population of the greater Phoenix area and especially the East Valley, we've also seen an increase in users in the Bulldog Canyon area, as well as all of the recreation areas on the Mesa Ranger District over the last 3 years. This has led to more demand for the area which increased the wear on existing gates and hardware, as well as increased vandalism along the boundary of the permit area. The Mesa Ranger District has future plans to increase patrols and improve infrastructure over the next 2 years, which should improve conditions rapidly. Additional signage and educational materials about how to obtain a permit, safe riding practices, Leave No Trace ethics, and other environmental related materials will be included.

**Concern Statement 148.** *Commenters request closure of national forest system lands to motorized vehicles near residential communities due to noise, dust, and erosion.*

Response:

**Comment Number(s):**

9-1

Between the draft and final environmental impact statement for plan revision, the Travel Management planning Record of Decision was signed, designating motor vehicle use forestwide for roads, motorized trails, and areas. The forest plan is strategic in nature and does not include project and activity decisions such as the travel management decision; the forest plan alone would not change the designated system of roads and motorized routes. Travel management will be implemented according to the associated environmental impact statement and is a separate decision from the forest plan revision, but both will direct decision making going forward. All future changes to the designated route system would comply with both the 2005 Travel Management Rule and the forest plan and would require additional site-specific analysis and public involvement specifically for that project.

**Concern Statement 149.** *Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2970-747, 748

We appreciate your suggested plan components for motorized recreation and ensuring their sustainability. Sustainable recreation is an important concept incorporated into the forest plan. The forest plan, chapter 2, recreation, motorized recreation desired conditions include language that reads “motorized trails and staging areas are sustainable and resource damage related to these recreation areas is minimized”. There are also guidelines related to decommissioning unsustainable trails. Cross-country travel, dispersed camping, and motorized big game retrieval are all being addressed through the travel management process and are outside the scope of the plan revision process. Including specific standards that the Forest Service comply with the travel management rule or other law, regulation, and policy is redundant. The forest plan, chapter 1, plan components and other plan content states that “plan components do not need to reiterate existing, law, regulation, or policy” in the forest plan as they are additional required management.

**Comment Number(s):**

2970-758

We appreciate your suggestions related to motorized recreation and the recreation opportunity spectrum. To ensure consistency with other forests in the region and based on guidance from the regional office the mentioned standard related to recreation opportunity spectrum has been moved to a guideline. It now reads “all project-level decisions, implementation activities, and management activities should be consistent with or move the area toward the appropriate recreation opportunity spectrum...”. This change is more in line with how future projects will be handled in relationship to the recreation opportunity spectrum. We did not include the suggested standards for managing motorized recreation. We feel the guideline previously mentioned will accomplish the same thing and will work to start bringing the areas that are not in compliance with the desired recreation opportunity spectrum in the right direction. The Forest Service is unclear about the intent behind the suggested recreation opportunity spectrum guideline as all route planning is done through travel management and not the forest plan. Sustainable recreation is an important concept incorporated into the forest plan. The forest plan, chapter 2, recreation, motorized recreation desired conditions include language similar to what was described. The desired condition reads “motorized trails and staging areas are sustainable and resource damage related to these recreation areas is minimized”. There are also guidelines related to decommissioning unsustainable trails and mitigating negative impacts to forest resources.

**Comment Number(s):**

17-2

The list of examples has been removed from the plan component. However, standards set forth in the forest plan must be followed unless that standard is amended under 36 CFR 219. This standard would apply to new trail construction.

**Comment Number(s):**

2736-30

The Recreation section of the revised plan (chapter 2) addresses the commenter's concern, including the following plan components: Recreational opportunities are successfully achieved through cooperative and collaborative engagement with our partners, individuals, organizations, and the communities we serve; Promote shared stewardship by continuing to develop partnerships and volunteer opportunities, and by taking advantage of opportunities to engage with the public; and most applicable Collaborate with Federal, State and local governments, for-profit and non-profit organizations, permit holders, communities, clubs, and individuals on topics that relate to sustainable recreation (e.g., forest stewardship, conservation education and volunteerism, visitor satisfaction, and recreation impacts). Develop interpretive materials and conservation education programs in conjunction with our partners and communities to help visitors understand their relationship with the natural environment. Use current technology and media sources to connect to forest users. We agree that a “sustainable recreation program” would include enforcement and proper signage. Decision surrounding where signs should be added and where enforcement efforts should be targeted are made at the local level outside the forest planning process in compliance with all applicable laws, regulations, and policies.

**Comment Number(s):**

2736-29

The revised plan (chapter 2, Recreation) has planning components that cover the comment's suggested content, including: Public information about the recreational opportunities on the forest as well as the rules, regulations, and expectations for visiting them is clear and informative; Trails should be marked consistent with Forest Service marking policies; and Kiosks and interpretive signs should be consistent across the forest, and should be designed to suit the scenic and cultural character of the surrounding landscape, unless reviewed and approved by the Forest. Also, the forest plan is strategic in nature as detailed in chapter 1 of the revised plan and does not include site-specific projects and activity decisions such as implementation of recently signed Travel Management Plan Record of Decision. There is nothing in the revised plan that would prevent this activity.

**Comment Number(s):**

2950-3

A footnote has been added to the environmental impact statement explaining the wording for table 3; the word “unneeded” was used as a short-hand for formatting purposes in the table. The following plan component is the full language (which has been changed in the revised plan): Every 5 years, take appropriate action (e.g., close, decommission, or convert) on at least 10 miles of motorized and/or non-motorized trails that may not offer recreation value (e.g., unsustainable, low-use, or have no remarkable destination value) or are not needed for administrative use (chapter 2, Recreation). Specific actions to decommission trails will require a separate site-specific analysis once these trails have been identified. This process will also have a public involvement component, allowing an additional opportunity to comment on individual route proposals outside of the forest planning process.

**Comment Number(s):**

69-1, 2951-3

The 2005 Travel Management Rule (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas. In contrast, the 2012

Planning Rule (36 CFR 219) is the overriding regulation that guides the development, amendment, and revision of land management plans for all units of the National Forest System. As such it is programmatic in nature and does dictate the level of specificity that project level plan implementation does. All project level specificity and decisions for the management of motor vehicle use will be done in compliance with the 2005 Travel Management Rule either forestwide (as is the case with the current travel management planning process) or on a more site-specific need, such as by district or area. This planning process provides plan components to guide management of the forest, including for motorized use. Current plan components that address the commenter's concern on a programmatic scale include: "Recreational opportunities are successfully achieved through cooperative and collaborative engagement with our partners, individuals, organizations, and the communities we serve." and "Collaborate with Federal, State and local governments, for-profit and non-profit organizations, permit holders, communities, clubs, and individuals on topics that relate to sustainable recreation (e.g., forest stewardship, conservation education and volunteerism, visitor satisfaction, and recreation impacts). Develop interpretive materials and conservation education programs in conjunction with our partners and communities to help visitors understand their relationship with the natural environment. Use current technology and media sources to connect to forest users" (forest plan, chapter 2, Recreation).

**Comment Number(s):**

2733-18

A management approach in the Recreation section of the revised plan (chapter 2) echoes the commenter's recommendation: Collaborate with Federal, State and local governments, for-profit and non-profit organizations, permit holders, communities, clubs, and individuals on topics that relate to sustainable recreation (e.g., forest stewardship, conservation education and volunteerism, visitor satisfaction, and recreation impacts). Develop interpretive materials and conservation education programs in conjunction with our partners and communities to help visitors understand their relationship with the natural environment. Use current technology and media sources to connect to forest users.

**Comment Number(s):**

2733-13

Alternative B (environmental impact statement, chapter 2) attempts to balance motorized and non-motorized uses, as seen in the draft forest plan where there are unique sections for both motorized and non-motorized dispersed recreation uses. This helps identify specific user needs and management desired conditions for each resource/activity, and places emphasis on plan components that would have normally been overlooked by lumping them together in a general recreation section. Funding, however, is determined by Congress on an annual basis and is distributed to individual programs at a national, regional, and forest level. It is not possible to know what funding will be for the life of the forest plan. Priorities change over time and can also be mandated to the Forest from the regional level, such as the "R3's 3 R's" of relationships, recreation, and restoration. With these regional priorities, the Tonto National Forest placed partnerships and recreation at the beginning of the draft forest plan. We believe the following management approach in the Motorized Recreation section of the revised plan (chapter 2, Recreation, Dispersed Recreation) supports the commentor's needs: Consider investing in the resources necessary for motorized recreation management to address user demands and resource impacts associated with motorized recreation.

**Comment Number(s):**

2733-17



Outside funding sources such as the Arizona State OHV Program and Recreational Trail Program can fluctuate over time and are not reliable sources on a year-to-year basis. While we agree that seeking external funding sources is a valuable way to support the motorized recreation program, the commenter's suggestion is outside the scope of this plan revision process. This type of work is completed at a ranger district or program specific level based on staffing levels, workloads, and current project priorities such as immediate health and safety concerns in the field. The Forest will continue to work towards successfully obtaining outside funds to support the motorized recreation program, but it will not be included as a plan component. There is nothing in the forest plan that would prevent us from accessing these programs.

**Comment Number(s):**

2733-19

The 2005 Travel Management Rule (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas. In contrast, the 2012 Planning Rule (36 CFR 219) is the overriding regulation that guides the development, amendment, and revision of land management plans for all units of the National Forest System. As such it is programmatic in nature and does dictate the level of specificity that project level plan implementation does. All project level specificity and decisions for the management of motor vehicle use will be done in compliance with the 2005 Travel Management Rule either forestwide (as is the case with the current travel management planning process) or on a more site-specific need, such as by district or area. This planning process provides plan components to guide management of the forest, including for motorized use. An objective in the Recreation section of the revised plan (chapter 2) is similar to the commenter's recommended language: Within 10 years of plan approval, develop or modify 1 to 4 systems of sustainable designated motorized trails (e.g., motorcycle, jeep, and off-highway vehicle trails) to adequately provide for these user groups and reduce user conflicts.

**Comment Number(s):**

2733-15

The commenter's recommended desired condition is addressed by the following revised plan planning components: "Recreation on the forest is sustainable and adapts to changes in science, technology, and best management practices when implementing new projects and updating or upgrading existing infrastructure."; "Recreational opportunities are successfully achieved through cooperative and collaborative engagement with our partners, individuals, organizations, and the communities we serve."; "Implement a sustainable recreation approach consistent with the most recent Tonto Sustainable Recreation Action Plan, or similar strategy, including the completion of the actions and objectives outlined in the action plan."; "Promote shared stewardship by continuing to develop partnerships and volunteer opportunities, and by taking advantage of opportunities to engage with the public."; and most applicable "Collaborate with Federal, State and local governments, for-profit and non-profit organizations, permit holders, communities, clubs, and individuals on topics that relate to sustainable recreation (e.g., forest stewardship, conservation education and volunteerism, visitor satisfaction, and recreation impacts). Develop interpretive materials and conservation education programs in conjunction with our partners and communities to help visitors understand their relationship with the natural environment. Use current technology and media sources to connect to forest users" (forest plan, chapter 2, Recreation).

**Comment Number(s):**

2733-14

The commenter's recommended desired condition is partially addressed by the following planning component in the Recreation section of the revised plan (chapter 2): Recreation on the forest is sustainable and adapts to changes in science, technology, and best management practices when implementing new projects and updating or upgrading existing infrastructure. Funding is determined by Congress on an annual basis and is distributed to individual programs at a national, regional, and forest level. It is not possible to know what funding will be for the life of the forest plan, and thus it would not be appropriate to identify a “consistently funded motorized recreation program” in any plan component.

**Comment Number(s):**

2733-5

The definition of “system (of trails)” has been added to the environmental impact statement glossary. Although we acknowledge your recommendation to replace “jeep” with “full-sized off-highway vehicle,” this instance is merely listing examples of recreation activities and modes of transportation that trails accommodate and is not all encompassing. “Jeep” is a familiar reference and serves the same purpose as the commented recommendation.

**Comment Number(s):**

2733-8

The Motorized Recreation section of the revised plan (chapter 2, recreation, Dispersed Recreation) is focused on users whose primary purpose for visiting the forest is motorized recreation, as defined in the plan. Further, non-recreation uses of our road system is primarily addressed in the Roads section of the plan. For those forest visitors who utilize motorized trails and system routes as means to get to their primary recreation activity, plan components found in the general Recreation and Dispersed Recreation sections of the revised plan (chapter 2) adequately address management of these activities and areas.

**Comment Number(s):**

2733-9

We agree with the commenter and have changed the referenced plan component to read: “Motorized trailheads and staging areas are located in areas convenient for the public and designed to minimize dust. Also, a plan component in the Dispersed Recreation section of the revised plan (chapter 2, Recreation) addresses the potential for facilities and services by stating: Consider additional facilities at high-use areas such as toilets and other recreational infrastructure when fees are supported or when the user community is willing to pay the cost of installation and maintenance through a formal partnership agreement, permit, or other contractual tool. There is nothing in the forest plan that would prohibit facilities being provided in these areas.

**Comment Number(s):**

2733-4, 10

We agree with the commenter and have changed the referenced standard to incorporate the suggested change in the revised plan.

**Comment Number(s):**

2733-20

We appreciate your support of our planning effort and also look forward to working with you and the public towards plan components such as: “Collaborate with Federal, State and local governments, for-

profit and non-profit organizations, permit holders, communities, clubs, and individuals on topics that relate to sustainable recreation (e.g., forest stewardship, conservation education and volunteerism, visitor satisfaction, and recreation impacts). Develop interpretive materials and conservation education programs in conjunction with our partners and communities to help visitors understand their relationship with the natural environment. Use current technology and media sources to connect to forest users (forest plan, chapter 2, Recreation); and use collaborative partnerships where volunteers plan, lead, and execute a majority of motorized and non-motorized trail and airstrip maintenance (forest plan, chapter 2, Recreation, Dispersed Recreation).

**Comment Number(s):**

2733-16

We believe the following management approach in the Motorized Recreation section of the revised plan (chapter 2, Recreation) supports the commentor's needs: "Consider investing in the resources necessary for motorized recreation management to address user demands and resource impacts associated with motorized recreation."

**Concern Statement 150.** *Commenter suggests that persons who are physically challenged should be allowed access opportunities to natural areas.*

Response:

**Comment Number(s):**

2811-10

Rules governing special considerations for persons with disabilities can be found in the Forest Service Outdoor Recreation Accessibility Guidelines, Forest Service Trail Accessibility Guidelines, and the Architectural Barriers Act. The forest plan does not change or further restrict these rules. Questions about access to a specific area or features can be directed to the local ranger district office.

## National Trails

**Concern Statement 151.** *Commenters are concerned with timber production suitability along or within the viewsheds of national trails.*

Response:

**Comment Number(s):**

79-8

Thank you for your concerns about the national trails on the Tonto National Forest. Suitability under the 2012 Planning Rule is only required for timber production, and it is the only included suitability analysis in the environmental impact statement. We agree that the ideal setting for the Arizona National Scenic Trail is within a primitive or semi-primitive non-motorized recreation opportunity spectrum settings on the forest. Unfortunately, this is not always the case as the Arizona Trail existed on the ground prior to its congressional designation as a National Scenic Trail. There are places where the Trail is not consistent with desired conditions and located in ROS settings other than primitive and semi-primitive non-motorized settings. The forest plan includes a guideline that "all project-level decisions, implementation

activities, and management activities will ensure consistency with Recreation Opportunity Spectrum (ROS), or current protocol”. This guideline will help the Forest implement projects to achieve the desired conditions for recreation and the Arizona National Scenic Trail. The Forest Service will continue working with the Arizona Trail Association in future site-specific projects to make more miles of the trail conform to the National Trails System Act. Potential impacts to the nature and purposes of the trail (including from timber and mining) will be analyzed at the project level, in compliance with the National Environmental Policy Act and all applicable laws, regulations, and policies. This may include efforts to better align with the National Trails System Act and the Arizona Trail Comprehensive Plan, to be made throughout the life of this forest plan. We look forward to working with you, the public and the Arizona Trail Association on projects related to the Arizona Trail.

**Concern Statement 152.** *Commenters support working together to establish visitor capacity and any other management actions for the Arizona National Scenic Trail.*

Response:

**Comment Number(s):**

2653-7

Thank you for your willingness to work alongside the Tonto National Forest. We appreciate all the hard work and volunteer hours that go into the Arizona National Scenic Trail. Our partners will continue to be involved in the development and management of their respective-interest trails and we look forward to having Arizona Trail Association represent multiple user groups.

**Concern Statement 153.** *Commenter supports the plan components related to the Arizona National Scenic Trail.*

Response:

**Comment Number(s):**

2653-3

We appreciate your support of our planning effort. Use of motorized and mechanical transportation within wilderness is handled on a site-specific, case-by-case basis in a process that considers impacts to Wilderness Character carefully, and in compliance with the Wilderness Act itself.

**Comment Number(s):**

2653-1

We appreciate your participation throughout the plan revision process. The Forest followed the 2012 Planning Rule (FSH 1909.12) to develop the forest plan and associated environmental impact statement which included management and analysis of all forest resources, like the Arizona National Scenic Trail. The forest plan, chapter 3, National Trails section covers forest management for the Arizona National Scenic Trail and discusses following the comprehensive management plan for the trail as a management approach. As we move into forest plan monitoring (FSH 1909.12-Chapter 30) and project level plan implementation, we will be looking for partners and volunteers to help us achieve our desired conditions and would appreciate your continued support.

**Concern Statement 154.** *Commenter recommends additional analysis relating to the Arizona National Scenic Trail (AZNST) comprehensive management plan*

Response:

**Comment Number(s):**

79-15

We agree that primitive and semi-primitive non-motorized recreation opportunity spectrum classes and high and very high scenic integrity allocations best protect the nature and purposes of the Arizona National Scenic Trail. The forest plan includes a desired condition to support the scenery suggestion and a standard is included to address motorized use. We disagree that additional analysis with cross tabular tables because this plan revision process is does not require the level of site-specificity that the commenter is requestion and is outside the scope of this project. Furthermore, the trail tread was established prior to the Trail being congressionally designated and as such its description in the final environmental impact statement just portrays the existing condition for this revision effort. Future efforts to address these concerns could use the suggested process and would likely propose trail realignment to better meet the needs and expectations of the trail's users.

**Concern Statement 155.** *Commenter requests expanded definitions in the final environmental impact statement glossary and a glossary in the final forest plan.*

Response:

**Comment Number(s):**

79-20

A glossary was not included in the forest plan as specific terms and unique phrases were footnoted throughout. It is not a requirement of the 2012 Planning Rule to include a glossary in the forest plan. The Forest Service does not agree that the suggested terms need to be expanded in the glossary of the final environmental impact statement or footnoted in the forest plan as they are already well established in law, regulation, or policy and are not needed for clarity.

**Concern Statement 156.** *Commenters seeking clarification or additional analysis in the final environmental impact statement.*

Response:

**Comment Number(s):**

79-17

The Forest Service appreciates the time and energy spent providing comments throughout the plan revision process per 36 CFR 219. The specific comments have all been reviewed and responded to where appropriate. The Forest Service does not feel that a supplemental environmental impact statement is needed for the analysis of the forest plan. The required analysis outlined in the National Trails System Act, National Forest Management Act (NFMA), and National Environmental Policy Act (NEPA) Council on Environmental Quality (CEQ) regulations are met in the final forest plan and final environmental

impact statement. The commentor is not specific about which aspects need updating and does not articulate what would be included in the newly suggested alternative. The final environmental impact statement has been updated to reflect public comments and best available scientific information but still only includes four alternatives.

**Comment Number(s):**

79-11, 13, 14

We believe that our final forest plan and final environmental impact statement are sufficient and meet the Council on Environmental Quality (CEQ) regulations found at 40 CFR Parts 1500-1508 and that the Tonto's forest plan does recognize the comprehensive planning requirements of the National Trails System Act. Once signed, The Arizona Trail Comprehensive Trail Management Plan will be a companion document for the management of the Arizona National Scenic Trail as indicated in the forest plan (forest plan, chapter 3, National Trails). Furthermore, the requested information can be found in chapter 12 of the Final Assessment Report of Social and Economic Conditions, Trends, and Risks to Sustainability.

**Comment Number(s):**

79-19

We believe that our final forest plan and final environmental impact statement are sufficient and meet the CEQ regulations found at 40 CFR Parts 1500-1508 and that the Tonto's Forest Plan does recognize the comprehensive planning requirements of the National Trails System Act. Once signed, The Arizona Trail Comprehensive Trail Management Plan will be a companion document for the management of the Arizona National Scenic Trail as indicated in the forest plan (forest plan, chapter 3, National Trails). We do not feel the environmental impact statement needs to include additional analysis about the nature and purposes of the Arizona National Scenic Trail because potential impacts to the nature and purposes will be analyzed at the site-specific project level, in compliance with the National Environmental Policy Act and all applicable laws, regulations, and policies, which is outside the scope of this plan revision effort.

**Concern Statement 157.** *Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

79-7

Forest-level plans together with comprehensive trail management plans, when they exist, provide overall policy for management and administration of these congressionally designated areas. Additionally, forest plans must reference the identified National Trail Right-of-Way if established, or otherwise may identify a corridor or geographic area around the trail, or use other means to identify where trail management direction applies (FSH 1909.12, chapter 20, section 24.43(1)(b[GS1])). Forest land management plan components must provide for the management of the National Trail right-of-way and for the nature and purposes for which it is designated. The revised plan (chapter 3, National Trails) provides management approaches specific to the Arizona National Scenic Trail.

**Comment Number(s):**

79-6

We disagree with the commenter's assertions and believe that the revised plan provides programmatic protection and management of the nature and purposes of the Arizona National Scenic Trail and complies with the National Trails System Act. The Arizona National Scenic Trail Comprehensive Plan, which is being worked on in parallel to the Tonto National Forest plan revision process, will be a companion document used to help with management of the Arizona National Scenic Trail. Based on a phone discussion, we have incorporated the suggested language to expand on management direction. We look forward to future opportunities to continue working with you on the Arizona National Scenic Trail.

**Comment Number(s):**

2816-90, 93

Section 7(a)(2) of the National Trails System Act (16 U.S.C. 1246 (a) (2)) requires the selection of a national trail right-of-way and publication of a notice thereof of the availability of appropriate maps or descriptions in the Federal Register. In the Forest Service, selection of a national trail right-of-way is an administrative action undertaken by the Chief (FSM 2353.04b). When used in the context of the National Trails System Act, the national trail right-of-way includes an area of land of sufficient width to encompass National Trail resources, qualities, values, and associated settings. This constitutes neither land use allocations (associated with resource management plans), nor does it share the same definition as used in the Federal Land Policy and Management Act, Title V. In other words, the legal rights and privileges typically associated with the term “right-of-way” do not apply here. The national trail right-of-way is frequently referred to as the corridor.

The 2009 national scenic trail designation gave added importance to the adequate consideration of scenery resources in the identification of the permanent location of the Trail. Alternatives for the national trail right-of-way are analyzed in the Arizona Trail Comprehensive Plan environmental assessment that accompanies this comprehensive plan. The Arizona National Scenic Trail Environmental Assessment proposes a national trail right-of-way one mile in width, or ½ mile on either side of the centerline of the trail. The national trail right-of-way width is largely based upon the Forest Service’s Scenery Management System (See chapter 5, section 5.2.2 Visual, Aural and Dark Sky Resources) and includes significant resources associated with the trail. In addition to the considerations in the first paragraph of this section, a corridor of these dimensions would allow for minor alterations of the trail alignment within it that may be necessary due to the original location being unsustainable because of its design, unstable substrate, or due to natural disturbances such as fire and erosion. It would also provide managers the ability to establish campsites, trailheads, and other trail amenities within the corridor; but at a reasonable distance away from the Trail to preserve the natural setting.

**Comment Number(s):**

2925-82

Forest plans must reference the identified National Trail Right-of-Way if established, or otherwise may identify a corridor or geographic area around the trail, or use other means to identify where trail management direction applies (FSH 1909.12, chapter 20, section 24.43(1)(b[GS1])). Development of a Trail Advisory Council is outside of the scope of this planning effort. We agree that collaboration with multiple parties is required in order to implement a comprehensive plan for successful management of the Arizona National Scenic Trail. The Arizona National Scenic Trail Comprehensive Plan is currently being drafted; we appreciate your patience while we work through publishing these draft documents for public comment.

**Comment Number(s):**

2925-83

Forest-level plans, together with comprehensive trail management plans, when they exist, provide overall policy for management and administration of these congressionally designated areas. Additionally, forest plans must reference the identified National Trail Right-of-Way if established, or otherwise may identify a corridor or geographic area around the trail, or use other means to identify where trail management direction applies (FSH 1909.12, chapter 20, section 24.43(1)(b[GS1])). Forest land management plan components must provide for the management of the National Trail right-of-way and for the nature and purposes for which it is designated. Once complete, the Tonto's forest plan will incorporate the Arizona Trail Comprehensive Plan by reference.

**Comment Number(s):**

2925-81

The forest plan provides specific management for the Tonto National Forest System lands, including the Arizona National Scenic Trail. We agree that a specific comprehensive plan is necessary, and the Arizona National Scenic Trail Comprehensive Plan is currently being drafted. Once the forest plan and the comprehensive plan are finalized, they will both be used in the management and administration of the Arizona National Scenic Trail. The Forest Service disagrees that extensive modifications are required to the draft forest plan components and have addressed National Trails consistent with the 2012 Planning Rule. Plan components in the national trails section of the forest plan have been updated to provide additional clarification and reduce redundant plan direction (forest plan, chapter 3, National Trails).

**Comment Number(s):**

2816-94

The Tonto National Forest's Trail Coordinator Position has recently been filled. We hope to build our relationships with the Trail Advisory Council, Arizona Trail Association, and other organizations, partners, groups, and volunteers interested in the Arizona National Scenic Trail to develop a successful comprehensive plan. The forest plan is overarching and provides general guidance on how to manage the forest; in-depth details about specific management actions regarding the Arizona National Scenic Trail and areas directly surrounding it would be included in a final comprehensive plan which is not part of this plan revision process. The management approaches for national trails on the forest have been updated to reduce redundancy and provide additional clarity (forest plan, chapter 3, National Trails).

**Comment Number(s):**

2816-91

This guideline (NTMA-G-O8, now NTMA-G-12) has been revised to read: “to protect scenic integrity, special use authorizations for new communication sites, utility corridors, and renewable energy sites should be avoided. Where unavoidable, design elements should be implemented to maintain scenic integrity in the trail corridor and the values for which the Arizona National Scenic Trail was established” (forest plan, chapter 3, National Trails). Design elements mitigating impacts to scenery will be handled at the project level where foreground and middle ground will be assessed. The 2009 national scenic trail designation gave added importance to the adequate consideration of scenery resources in the identification of the permanent location of the Trail. Alternatives for the national trail right-of-way are analyzed in the Arizona Trail Comprehensive Plan environmental assessment that accompanies this comprehensive plan. The Arizona National Scenic Trail Environmental Assessment proposes a national



trail right-of-way one mile in width, or ½ mile on either side of the centerline of the trail. The national trail right-of-way width is largely based upon the Forest Service's Scenery Management System (See chapter 5, section 5.2.2 Visual, Aural and Dark Sky Resources) and includes significant resources associated with the trail. The Forest Service feels the viewshed protections are appropriate and comply with the National Trail System Act and the 2012 Planning Rule.

**Comment Number(s):**

2938-25

As mentioned in transition in the implementation of the plan section of the final forest plan (forest plan, chapter 1, Plan Implementation), the “forest plan is used as a direction source for future projects...and is not expected that this new direction be used to reevaluate or change decisions that have been made under the previous plan”. For this reason, previous decisions on existing infrastructure as related to special use authorizations are not impacted. Future infrastructure authorizations will need to comply with the plan components in the final forest plan.

**Comment Number(s):**

2938-27

As mentioned in transition in the implementation of the plan section of the final forest plan (forest plan, chapter 1, Plan Implementation), the “forest plan is used as a direction source for future projects...and is not expected that this new direction be used to reevaluate or change decisions that have been made under the previous plan”. For this reason, previous decisions on existing infrastructure are not impacted. Future infrastructure projects will need to comply with the plan components in the final forest plan. Projects that negatively impact the Arizona National Scenic Trail will be analyzed with the appropriate level of the National Environmental Policy Act with site-specific analysis. The plan components outlined for the Arizona National Scenic Trail are needed to protect the nature and purpose of the trail which are the reasons for its designation.

**Comment Number(s):**

2653-6

Emergency response is outside of forest plan revision. According to Forest Service Manual 2523.4 - Suppression-Damaged Areas. Rehabilitation of suppression-caused damage is the responsibility of the fire incident commander and is charged to the incident. Suppression rehabilitation assessment, design, and implementation, including those delayed due to seasonal considerations, are charged to the incident. (FSH 6509.11g, sec. 51.34). To the extent possible, the repair and rehabilitation associated with firefighting efforts is completed to minimize future resource damage, visual disturbances, and focus on public safety. Additionally, we have identified a management approach that states: “Ensure that Incident Management teams are aware of all national trails as a resource to be protected during wildland fire management activities. Clearly identify fire-related rehabilitation and long-term recovery of the national trail corridor(s) as high priorities for fire managers, incident management teams, burned area emergency response (BAER) teams, and post-fire rehabilitation interdisciplinary teams” (forest plan, chapter 3, National Trails).

**Comment Number(s):**

2653-5

Per revised plan (chapter 1, in the Forest Plan Framework and Organization, Plan Components section), guidelines describe constraints on project and activity decision-making that allow for departure from its terms, so long as the intent of the guideline is met. In other words, guidelines are mandatory with some flexibility on how they are implemented in meeting the intent of the existing guideline. Additionally, planning components for the Scenery section of the revised plan (chapter 2) will be applied to site-specific linear utilities projects as applicable.

**Comment Number(s):**

2938-23

Thank you for your comment. Existing infrastructure is not constrained or otherwise affected by viewshed desired conditions outlined in the forest plan. On page 7, the forest plan reads: This planning framework creates a structure within which land managers and partners work together to understand what is happening on the landscape. It is intended to establish a flexible plan that allows a national forest to adapt management to changing conditions and improve management based on new information and monitoring. As defined in the forest plan, desired conditions are not the same as standards and guidelines but help to paint the picture of what we want the resource to look like into the future (forest plan, chapter 1, Forest Plan Framework and Organization). In addition, the SC-S-01 has been changed to a guideline as there were many instances where that language would hinder achieving other resource desired conditions. The language has been updated to 'management activities that result in short-term impacts inconsistent with the scenic integrity objectives should achieve or move the project towards the scenic integrity objectives over the long-term'.

**Comment Number(s):**

2816-92

The forest plan is programmatic. Site-specific design features, including mitigations to address short term visual impacts to the Arizona National Scenic Trail, may be considered depending on the actions being considered. Section 7(a)(2) of the National Trails System Act (16 U.S.C. 1246 (a) (2)) requires the selection of a national trail right-of-way and publication of a notice thereof of the availability of appropriate maps or descriptions in the Federal Register. In the Forest Service, selection of a national trail right-of-way is an administrative action undertaken by the Chief (FSM 2353.04b). When used in the context of the National Trails System Act, the national trail right-of-way includes an area of land of sufficient width to encompass National Trail resources, qualities, values, and associated settings. This constitutes neither land use allocations (associated with resource management plans), nor does it share the same definition as used in the Federal Land Policy and Management Act, Title V. In other words, the legal rights and privileges typically associated with the term "right-of-way" do not apply here. The national trail right-of-way is frequently referred to as the corridor.

The 2009 national scenic trail designation gave added importance to the adequate consideration of scenery resources in the identification of the permanent location of the Trail. Alternatives for the national trail right-of-way are analyzed in the Arizona Trail Comprehensive Plan environmental assessment that accompanies this comprehensive plan. The Arizona National Scenic Trail Environmental Assessment proposes a national trail right-of-way one mile in width, or ½ mile on either side of the centerline of the trail. The national trail right-of-way width is largely based upon the Forest Service's Scenery Management System (See chapter 5, section 5.2.2 Visual, Aural and Dark Sky Resources) and includes significant resources associated with the trail. In addition to the considerations in the first paragraph of this section, a corridor of these dimensions would allow for minor alterations of the trail alignment within it that may be necessary due to the original location being unsustainable because of its design, unstable

substrate, or due to natural disturbances such as fire and erosion. It would also provide managers the ability to establish campsites, trailheads, and other trail amenities within the corridor; but at a reasonable distance away from the Trail to preserve the natural setting.

**Comment Number(s):**

2653-4

The National Trails Act, in Sec. 3.(2) reads that National Scenic Trails are to be “so located as to provide for a maximum outdoor recreation potential and for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities on the areas through which such trails may pass.” We can appreciate the desire to consider acoustic values and “soundscapes” as they pertain to natural recreational experiences on the Tonto, and specifically the Arizona National Scenic Trail. The Tonto, being adjacent to a large metropolitan area, is the recreation destination for a wide variety of visitors participating and enjoying their preferred type of recreation and these activities occur on a spectrum of development, from the wilderness experience to the developed and modified environment. Additionally, there permitted and approved commercial and industrial users of the Tonto as well. Many parts of the Arizona Trail do provide the maximum natural recreation experience, such as in our Wilderness’. In other areas, naturalness may be “maximized” to the extent possible given the other multiple-uses legally occurring on the forest. For future projects implementing the forest plan, consideration of trail alignment and adjacent projects may consider opportunities to decrease sound disturbance to those using the trail which possible. We look forward to our continued commitment to working with the Arizona Trail Association and are always available to talk about opportunities and challenges related to projects or specific parts of the trail. Additionally, we would be happy to work with the Arizona Trail Association on identifying the most natural sections of the Arizona National Scenic Trail so we can point people to the areas with the maximum naturalness should that be desired.

**Comment Number(s):**

2938-24

We appreciate your interest regarding existing infrastructure. As mentioned in transition in the implementation of the plan section of the final forest plan (forest plan, chapter 1, Plan Implementation), the “forest plan is used as a direction source for future projects...and is not expected that this new direction be used to reevaluate or change decisions that have been made under the previous plan”. For this reason, previous decisions on existing infrastructure as related to special use authorizations are not impacted. Future infrastructure authorizations will need to comply with the plan components in the final forest plan.

**Comment Number(s):**

2925-00

In consideration of this comment, and other similar comments, this plan component was edited to remove language that delineated the foreground of the trail to 0.5 miles on either side. It now reads “Viewsheds from the Arizona National Scenic Trail have high or very high scenic integrity. The foreground of the trail is natural-appearing” (NTMA-DC-06).

**Comment Number(s):**

2925-00

Per the revised plan (chapter 1, under Forest Plan Framework and Organization, Plan Components), desired conditions describe the specific social, economic, and/or ecological characteristics that are desired for the plan area, or a part of the plan area. These are described in terms specific enough to allow for progress toward their achievement, and all project-level management activities should be aimed at the achievement of the desired conditions for those resources in the area where the project is located. Desired conditions can be thought of as vision statements that help define a collective vision for the National Forest in the future. As part of that vision for the Arizona National Scenic Trail includes that “The Arizona National Scenic Trail and corridor are well-defined and provide high-quality, primitive hiking, mountain biking, equestrian opportunities, and other compatible non-motorized trail activities. The significant scenic, natural, historic, and cultural resources within the trail’s corridor are conserved. The trail provides visitors with expansive views of the natural-appearing landscapes” (NTMA-DC-05).

**Comment Number(s):**

2925-00

Per the revised plan (chapter 1, under Forest Plan Framework and Organization, Plan Components), guidelines describe constraints on project and activity decision-making that allow for departure from its terms, so long as the intent of the guideline is met. In other words, guidelines are mandatory with some flexibility on how they are implemented in meeting the intent of the existing guideline. This plan component was updated for clarification between draft and final to read “If management activities result in short-term impacts to the scenic character of the Arizona National Scenic Trail, design elements should be included (e.g., screening, feathering, and other scenery management techniques) at the project level (NTMA-G-08).” This change identifies that the design elements to reduce impacts would be decided at the project level.

**Comment Number(s):**

2925-00

Per the revised plan (chapter 1, under Forest Plan Framework and Organization, Plan Components), guidelines describe constraints on project and activity decision-making that allow for departure from its terms, so long as the intent of the guideline is met. In other words, guidelines are mandatory with some flexibility on how they are implemented in meeting the intent of the existing guideline. The intent behind this guideline is that trail specific facilities present or constructed are for resource protection, not user comfort. This guideline would not apply to facilities or improvements that are not trail related.

**Comment Number(s):**

2925-00

Per the revised plan (chapter 1, under Forest Plan Framework and Organization, Plan Components), guidelines describe constraints on project and activity decision-making that allow for departure from its terms, so long as the intent of the guideline is met. In other words, guidelines are mandatory with some flexibility on how they are implemented in meeting the intent of the existing guideline. The Tonto National Forest may impose stricter guidelines than outlined in the comprehensive national scenic trail plan so long as it is within the bounds of existing law, regulation, and policy.

**Comment Number(s):**

2925-00

We appreciate your concerns surrounding this standard. We have changed standard 3 to clarify that it is only related to recreation special uses and we have added a guideline addressing projects to focus on single crossings while not making it mandatory.

**Concern Statement 158.** *Commenters suggest additional plan components to protect the nature and purpose of the Arizona National Scenic Trail.*

Response:

**Comment Number(s):**

79-16

The Forest Service appreciates the time and energy spent providing comments throughout the plan revision process per 36 CFR 219. The National Trails System Act does require the development of a comprehensive plan for the Arizona National Scenic Trail. That process is outside the scope of this forest plan revision process and is currently being worked on in parallel to this effort. We do not feel the environmental impact statement needs to include additional analysis about the nature and purposes of the Arizona National Scenic Trail because potential impacts to the nature and purposes will be analyzed at the site-specific project level, in compliance with the National Environmental Policy Act and all applicable laws, regulations, and policies. Efforts to better align with the National Trails System Act and the Arizona Trail Comprehensive Plan, will be made throughout the life of this Forest Plan. We look forward to working with you, the public, and the Arizona Trail Association on projects related to the Arizona National Scenic Trail.

**Comment Number(s):**

79-18

We agree that the ideal setting for the Arizona National Scenic Trail is within a Primitive or Semi-Primitive Non-Motorized Recreation Opportunity Spectrum (ROS) setting. In the case of the Arizona National Scenic Trail on the Tonto National Forest, the trail itself existed on the ground prior to its congressional designation as a National Scenic Trail. Because of this, no suitability analysis was ever performed. There are places where the Trail is not consistent with desired conditions or located in recreation opportunity spectrum settings other than primitive and semi-primitive non-motorized settings. Consequently, there are portions of the Arizona National Scenic Trail Management Area that also do not conform by default. The Forest Service continues to work with the Arizona Trail Association to make more miles of the trail conform to the National Trails System Act. We disagree that an additional alternative should be developed to protect the nature and purposes of the Arizona National Scenic Trail because potential impacts to the nature and purposes of the Trail will be analyzed at the site-specific project level, in compliance with the National Environmental Policy Act and all applicable laws, regulations, and policies. Efforts to better align with the National Trails System Act and the Arizona Trail Comprehensive Plan, will be made throughout the life of this Forest Plan. We look forward to working with you, the public, and the Arizona Trail Association on projects related to the Arizona National Scenic Trail.

## Nonmotorized Recreation

**Concern Statement 159.** *Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

17-3

Thank you for your suggestion. This plan component has been updated and changed to “minimize resource damage.”

**Comment Number(s):**

22-3

The following management approach in the Dispersed Recreation section of the revised plan (chapter 2, Recreation) addresses the commenter's concern: Consider using educational techniques (e.g., brochures, signs, websites, and social media) to enhance visitor knowledge of proper recreation etiquette. This would include information about such topics as avoiding trail riding after wet storms, protecting resources, and trail etiquette. As we move into project level plan implementation, we will be looking for volunteers and partners to help us with projects to achieve our desired conditions and would appreciate your continued support of the program.

**Comment Number(s):**

2719-1

The Tonto National Forest manages recreation for multiple uses as required by the Multiple Use and Sustained Yield Act. As stated in the Dispersed Recreation section: “Recreation opportunities are available for both non-motorized and motorized recreation activities throughout the forest including hiking, mountain biking, horseback riding, rock climbing, off-highway vehicle recreation, hunting, fishing, and other popular recreational uses” (forest plan, chapter 2, Recreation, Dispersed Recreation). As a forest, we also strive to educate the public as much as possible about safe recreating practices and trail etiquette, as detailed in the following management approach: “Consider using educational techniques (e.g., brochures, signs, websites, and social media) to enhance visitor knowledge of proper recreation etiquette” (revised plan, chapter 2, Recreation, Dispersed Recreation Management). As we move into project level plan implementation, we will be looking for volunteers and partners to help us with projects to achieve our desired conditions and would appreciate your continued support of the program.

**Comment Number(s):**

25-2

The following management approach in the Dispersed Recreation section of the revised plan (chapter 2, Recreation) addresses the commenter's concern: “Consider additional facilities at high-use areas such as toilets and other recreational infrastructure when fees are supported or when the user community is willing to pay the cost of installation and maintenance through a formal partnership agreement, permit, or other contractual tool.” This would include infrastructure such as water troughs and pumps. As we move

into project level plan implementation, we will be looking for volunteers and partners to help us with projects to achieve our desired conditions and would appreciate your continued support of the program.

**Comment Number(s):**

25-1

The following management approach in the Dispersed Recreation section of the revised plan (chapter 2, Recreation) addresses the commenter's concern: "Consider using educational techniques (e.g., brochures, signs, websites, and social media) to enhance visitor knowledge of proper recreation etiquette." This would include information about such topics as avoiding trail riding after wet storms, protecting resources, and trail etiquette.

## **Partnerships and Volunteers**

*Concern Statement 160. Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2733-3

Partnerships and volunteer efforts are very important on the Tonto National Forest and are outlined in the forest plan and in the Partnerships and Volunteer section in chapter 3 of the environmental impact statement. Management approaches do not offer plan direction and are not required components but describe a strategy to achieve a desired condition. Management approaches often convey how plan components work together to achieve the desired condition. The plan discusses the overall need to prioritize partners and volunteers in order to accomplish its mission. The ability to engage with partners and volunteers and provide resources will vary dependent on many factors within each district. These factors may include staffing, funding, timelines, clearance needs, etc. There is nothing in the plan that would restrict committing more resources to any partnership opportunities as these resources become available. However, there are national directives, authorities, and policies in place outside of the forest plan that help guide the commitment to partners and volunteers as well as prioritize interdependent projects. These include the National Forest Systems Trails Stewardship Act, Good Neighbor Authority, Volunteers in National Forest Act, Shared Stewardship Agreements, and various types of cooperative agreements. The Forest Service Partnership program is guided by the Partnership Guide developed in conjunction with the National Forest Foundation as well as Forest Service Manual 1580, Forest Service Handbook 1509.11, and Service First Authorities.

**Comment Number(s):**

2932-21

We appreciate your support and agree that partners can contribute in a variety of forms concurrently. However, there are existing national guidelines that allow the Forest Service to form and manage collaborative partnerships outside the scope of the forest plan. The partnership program on the Tonto National Forest is guided by Forest Service Manual 1580, Forest Service Handbook 1509.11, and the partnership guide developed by the Forest Service and National Forest Foundation. These documents include various types of authorities that allow cooperative agreements and prioritize our partners and

volunteers. Some of these guiding principles also include the Good Neighbor Authority, Shared Stewardship Agreements, the National Forest Systems Trails Stewardship Act, and the Volunteers in National Forest Act. There is nothing in the forest plan that would limit the extent to which we can collaborate with our partner groups.

**Comment Number(s):**

2806-2

We appreciate your support of our planning efforts per 36 CFR 219. As we move into forest plan monitoring (FSH 1909.12-Chapter 30) and project level plan implementation, we will be looking for partners and volunteers to help us achieve our desired conditions and would appreciate your continued support.

## **Plan Components**

*Concern Statement 161. Commenters are concerned that the plan components in the draft forest plan are not sufficient to meet the requirements of the 2012 Planning Rule.*

Response:

**Comment Number(s):**

2970-727

To achieve ecological integrity, the 2012 Planning Rule (36 CFR 219) emphasizes planning for resilience and managing to enhance the ability of ecosystems to adapt to change, stressors, and system drivers, including climate change. Specific plan components related to future sustainability of the forest road system can be found in the Roads section of the revised forest plan, chapter 2. They read as: Decommission 100 – 600 miles of a combination of unauthorized routes and national forest system roads identified through the travel management process every ten years.; Reconstruction and rehabilitation of existing roads should be prioritized over new construction; New or reconstructed roads should be located outside of the riparian management zone, or other important water resources (e.g., meadows, wetlands, seeps, and springs), in order to prevent resource damage. If road construction in riparian areas is unavoidable, it should be designed and implemented to minimize effects to natural waterflow, aquatic species, channel morphology, water quality, and native riparian vegetation. The number of stream crossings should be minimized to reduce negative impacts to natural resources; and Prioritize decommissioning of roads or user created routes that impact flow regimes, are redundant routes, cause mass movement of soils and sediment, are built within the riparian management zone, or have substantial negative impacts to at-risk species.

**Comment Number(s):**

2970-725

We have followed the plan revision process per 36 CFR 219 and FSH 1909.12 to develop the forest plan and the associated environmental impact statement under 40 CFR 1500. The forest plan components, specifically those in the Rangelands, Forage, and Grazing; Cultural and Historic Resources, Wildlife-related Recreation; and Watersheds and Water Resources sections address the key ecosystem services the Forest has committed to providing for through the implementation of the forest plan (see forest plan, chapter 1, Key Ecosystem Services for more information). The Environmental Coalitions is not specific



as to what the Forest Service should incorporate into the forest plan to better accomplish integrated resource management to provide for ecosystem services and multiple uses. Between draft and final, the forest plan was updated to respond to public comments, best available scientific information, update the language to reflect law, regulations, policy, and provide more clarity.

**Concern Statement 162.** *Commenters express general concerns about standards and ask the Forest Service to take a closer look to ensure best management practices.*

Response:

**Comment Number(s):**

2966-14

In the revised plan there are substantially fewer management areas compared to the current Forest Plan. As a result, the majority of plan components apply forest-wide with some management areas containing additional, specific direction that calls for management in addition to or different than forest-wide management (revised plan, chapter 3). Generally speaking, standards in the forest plan are purposely designed to be the least flexible type of plan component. Thus, many of these address health and safety or ensure compliance with significant policy. The environmental impact statement represents an interdisciplinary look at the impact of plan components on various programs on the forest.

Any substantive changes to plan components require a plan amendment per the 2012 Planning Rule, with appropriate analysis as required under the National Environmental Policy Act. Administrative changes can be used to make changes, such as updates to data and maps, management approaches, and relevant background information; to fix typographical errors; or to update other required content of a plan (content that are not plan components). The public will be notified of all administrative changes to the forest plan.

**Concern Statement 163.** *General comments about forest plan standards.*

Response:

**Comment Number(s):**

2966-15

The Forest Service appreciates your support of the plan revision process per 36 CFR 219. We have reviewed public comments and updated the language in the forest plan to ensure the redundant and conflicting plan components were cleaned up and/or removed. Adaptive management is a large piece of the 2012 Planning Rule (36 CFR 219) and that strategy has been incorporated into the development of the preferred action, a modified alternative B.

## Public Involvement

**Concern Statement 164.** *Commenter is concerned with the official newspaper of record.*

Response:

**Comment Number(s):**

2811-3

The Tonto National Forest followed the public participation requirements outlined in the National Environmental Policy Act, National Forest Management Act, and provisions of the 2012 Planning Rule to develop the draft forest plan and associated draft environmental impact statement. Each management unit of the Forest Service, including the Tonto National Forest, has an official “paper of record” that is predetermined for the unit that is proposing the project. For forest level projects, the paper of record for the Tonto National Forest is the Arizona Capitol Times. While publication in this newspaper is required and is the official means of starting officially timed comment periods, the Forest pursued an extensive variety with which to outreach and engage with the public including media announcements, social media posts, electronic mailings, and multiple public meetings on each ranger district. A summary of our public engagement and consultation can be found in appendix C of the final environmental impact statement. The Tonto National Forest also follows law, regulation, policy, guidance, and directions for Government-to-Government communication and notification to Tribes. This appendix includes a section on Tribal Consultation.

**Concern Statement 165.** *Commenter is concerned with the timing of the draft forest plan and draft environmental impact statement comment period and that it overlapped with the Gila National Forest plan revision comment period.*

Response:

**Comment Number(s):**

2986-1

The Tonto National Forest followed the public participation requirements outlined in the National Environmental Policy Act, National Forest Management Act, and provisions of the 2012 Planning Rule to develop the draft forest plan and associated draft environmental impact statement. A required 90-day comment period went from December 13, 2019, through March 12, 2020. There is no requirement that projects of similar nature in the same region need to be released at different times. A full summary of our public engagement and consultation can be found in appendix C of the final environmental impact statement. The Tonto National Forest also follows law, regulation, policy, guidance, and directions for Government-to-Government communication and notification to Tribes. This appendix includes a section on Tribal Consultation.

**Concern Statement 166.** *Commenters appreciate the plan revision process and the opportunity to engage in the development of the draft forest plan and draft environmental impact statement.*

Response:

**Comment Number(s):**

2941-2

Thank you for taking the time to participate in our process in person. We appreciate your support of our planning efforts as it relates hunting, fishing, and watchable wildlife. Federal Law, including the Dingle Act P.L. 116-9 and Forest Service regulations allow for this type of activity on National Forest System land. As we move into project level plan implementation, we will be looking for volunteers and partners to help us with projects to achieve our desired conditions and would appreciate your continued support of the program.

**Concern Statement 167.** *Commenter is concerned about permittee engagement in the plan revision process.*

Response:

**Comment Number(s):**

2944-1

While we appreciate your concerns regarding the preparation of our current forest plan, we have elicited public input for this plan revision effort on numerous occasions throughout every step of this planning process.

## **Rangelands, Forage, and Grazing**

**Concern Statement 168.** *Commenters are concerned with drought management planning for livestock grazing.*

Response:

**Comment Number(s):**

2463-24

Much of this comment is outside the scope of forest plan revision. Grazing focused guideline 3 states “Drought preparedness should be emphasized in allotment management plans and may include flexible stocking rates/livestock classes, flexible rotation schedules, and other strategies for dealing with climate variability” (revised plan, chapter 2, Rangelands, Forage, and Grazing (GRZ)).

**Comment Number(s):**

2986-89

A plan component addresses this comment: “Drought preparedness should be emphasized in allotment management plans” (revised plan, chapter 2, Rangelands, Forage, and Grazing). Allotment planning will occur at the site-specific project level.

**Comment Number(s):**

23-9

Drought preparedness is grazing strategy addressed in the revised plan: “Drought preparedness should be emphasized in allotment management plans and may include flexible stocking rates/livestock classes, flexible rotation schedules, and other strategies for dealing with climate variability” (revised plan, chapter 2, Rangelands, Forage, and Grazing).

**Comment Number(s):**

2463-22

Much of this comment is outside the scope of forest plan revision. Grazing focused guideline 3 states “Drought preparedness should be emphasized in allotment management plans and may include flexible stocking rates/livestock classes, flexible rotation schedules, and other strategies for dealing with climate variability” (revised plan, chapter 2, Rangelands, Forage, and Grazing (GRZ)).

**Comment Number(s):**

2808-26

As the commenter pointed out, the revised forest plan contains components for managing livestock grazing during drought. Previous management strategies are outside the scope of the forest plan revision process.

**Concern Statement 169.** *Commenter is concerned with the history of livestock grazing and how it has contributed to the current conditions of the American west.*

Response:

**Comment Number(s):**

2986-80

Historical land uses by Tribes, ranchers, and others have all contributed to the current conditions of the project area and the greater southwest. It would be impossible to delineate the precise effects of each. However, the cumulative effects of all past actions can be seen in the existing conditions of the project area. The analysis in this environmental impact statement analyzes the effects of the proposed action and alternatives and discloses how each is anticipated to change conditions from the existing conditions and how well or how quickly we would move toward the stated desired conditions. The discussion of current Tribal engagement efforts can be found in the Affected Environment section of Tribal Relations topic in the environmental impact statement. The Forest has engaged with Tribes throughout the planning process through a separate government-to government consultation process. As this is not a public process, these details will not be in the environmental impact statement.

**Concern Statement 170.** *Commenters are concerned about allotment management and future grazing management decisions including annual operating instructions.*

Response:

**Comment Number(s):**

58-12

The comment is outside the scope of plan revision. Livestock numbers will be determined at the project level during allotment management planning.

**Comment Number(s):**

2986-88

Grazing permit management direction is found in Forest Service Manual 2200 and Handbook 2209.13. The handbook contains provisions for when taking non-use is allowed. Comment is outside the scope of Forest Plan revision.

**Comment Number(s):**

2986-41

The commenter's request is handled on the site-specific project level, complying with all applicable laws, regulations, and policies, including the National Environmental Policy Act.

**Comment Number(s):**

23-25

Adding or removing individual range improvements, such as fences or water troughs, are handled on a project level basis and undergo environmental analysis in compliance with the National Environmental Policy Act and our regulations (36 CFR 220) as required.

**Concern Statement 171.** *Commenters are concerned that managing for safe livestock grazing is impactful to native predatory wildlife species such as coyotes, cougars, black bears, and the Mexican gray wolf.*

Response:

**Comment Number(s):**

2986-5

The Forest Service does not conduct any top predator control. For information on how large mammal populations are managed in Arizona, contact Arizona Game and Fish Department.

**Concern Statement 172.** *Commenters are concerned that the draft environmental impact statement used flawed assumptions and failed to address key aspects of livestock grazing including historical impacts to natural resources, changes to habitat of native predators, and suitability and capability.*

Response:

**Comment Number(s):**

2986-15

Animal Unit-months are simply a statistic to quantify an amount of grazing. Forest Service uses the 1,000-pound cow metric. Furthermore, we have developed the following guideline to ensure that we are analyzing the appropriate information for site-specific projects: A stock and monitor approach incorporating best available science should be used when evaluating stocking rates in grazing decisions (revised plan, chapter 2, Rangelands, Forage, and Grazing). Additionally, the revised plan has the following guideline to address trespass: When unauthorized livestock are found occupying National Forest System lands, the owner should be promptly notified to remove them and prevent them from re-entering National Forest System lands (revised plan, chapter 2, Rangelands, Forage, and Grazing). If the owner is unknown or uncooperative, impoundment procedures should be initiated addresses what the commenter refers to as “trespass livestock.”

**Comment Number(s):**

2736-38, 2986-10

Comment is addressed by the following guideline: “Livestock grazing allows for healthy, diverse plant communities, satisfactory soil conditions, and sustains the quality and quantity of fish and wildlife habitat” (revised plan, chapter 2, Rangelands, Forage, and Grazing).

**Comment Number(s):**

2986-7

The purpose of the revised plan and environmental impact statement is to provide management direction for the future. The paragraphs indicated provide a brief history of livestock grazing to provide context for the new plan components and were not meant to be a full dissertation of the history and effects of historic grazing practices.

**Comment Number(s):**

2986-11

We disagree with the commenter's assertion. In the preparation of the environmental impact statement, we used the best available scientific information that is applicable to this programmatic plan revision effort. The 2012 Planning Rule does not require capability or suitability analysis for livestock grazing as previous planning regulations required. Allotments are analyzed on a site-specific basis according to the National Environmental Policy Act and other applicable laws, regulations, and policies.

**Comment Number(s):**

2986-19

We agree with the commenter that we are required to comply with the Multiple-Use Sustained-Yield Act, along with all other laws, regulations, and policies.

**Concern Statement 173.** *Commenter is asking for litigation filed against the Forest Service.*

Response:

**Comment Number(s):**

2970-521

This question is outside the scope of the plan. Litigation filed against the Forest Service is required to be posted as a Notice of Intent in the Federal Register.

**Concern Statement 174.** *Commenter is concerned with restoration projects being done on the forest to benefit livestock grazing.*

Response:

**Comment Number(s):**

2463-25

The commenter's assertions are incorrect and outside the scope of this plan revision effort. No planning components were developed to increase forage production for cattle.

**Concern Statement 175.** *Commenter is concerned the draft forest plan and draft environmental impact statement did not correctly apply the multiple use and sustained yield act for management of livestock grazing.*

Response:

**Comment Number(s):**

2970-658

Grazing is one of the multiple uses identified in the Multiple-Use Sustained-Yield Act. Plan components related to livestock grazing can be found in revised plan (chapter 2, Riparian Areas, Seeps, Springs, Wetlands, and Riparian Management Zones) section and throughout other resource areas in chapters 2 and 3. The Forest Service believes that sustainable grazing is possible and is why it was included as a desired condition. The Forest Service believes that livestock grazing can be conducted in a sustainable manner; therefore, a desired condition was developed that expresses that.

**Concern Statement 176.** *Commenter is concerned with feral and trespass livestock.*

Response:

**Comment Number(s):**

2970-654

A plan component (revised plan, chapter 2, Rangelands, Forage, and Grazing): When unauthorized livestock are found occupying National Forest System lands, the owner should be promptly notified to remove them and prevent them from re-entering National Forest System lands. If the owner is unknown or uncooperative, impoundment procedures should be initiated. This guideline is applicable to the entire Forest, including its protected rivers.

**Concern Statement 177.** *Commenter is concerned with habitat fragmentation caused by grazing fencing and other infrastructure.*

Response:

**Comment Number(s):**

2986-82

New range improvements would be evaluated and approved at the site-specific project level, in compliance with all applicable laws, regulations, and policies, including the National Environmental Policy Act.

**Concern Statement 178.** *Commenters are concerned with how vacant allotments are addressed in the final forest plan and final environmental impact statement.*

Response:

**Comment Number(s):**

23-12, 2463-17:19, 2927-18, 2950-7, 2986-18, 20,21, 2970-665

Allotment management is handled in project level planning and analysis, complying with all applicable laws, regulations, and policies. As part of this process, one alternative for detailed analysis is one that depicts no grazing.

Vacant allotments will be evaluated on a site-specific basis for one of the options described in the following plan objective: Conversion to forage reserves to improve resource management flexibility; Grant to current or new permitted livestock producer; or Closure to permitted grazing, in whole or in part (revised plan, chapter 2, Rangelands, Forage, and Grazing).

**Comment Number(s):**

2942-2

Planning components provide direction to complete at least one evaluation every 2 years (revised plan, chapter 2, Rangelands, Forage, and Grazing). Where feasible, multiple allotments may be considered at once. The evaluation will follow the National Environmental Policy Act process and is subject to applicable laws.

**Comment Number(s):**

2991-21

Thank you for your support of our planning effort. Vacant allotments will be evaluated for one of the options on a site-specific basis: Conversion to forage reserves to improve resource management flexibility; Grant to current or new permitted livestock producer; or Closure to permitted grazing, in whole or in part (revised plan, chapter 2, Rangelands, Forage, and Grazing). Nothing precludes us from evaluating more allotments when possible, but this objective makes it a priority to work on at least that many.

**Comment Number(s):**

2947-14

The objective is to complete 1 every 2 years. Where feasible, multiple allotments may be considered at once. The evaluation will follow the National Environmental Policy Act process and is subject to applicable laws.

**Comment Number(s):**

58-2

This comment is outside the scope of plan revision and will be addressed on a project level basis and undergo environmental analysis in compliance with the National Environmental Policy Act and our regulations (36 CFR 220) as required. This process includes public participation including interested ranchers.

**Comment Number(s):**

2944-7

We appreciate your careful read of our revised plan. We have corrected the error.

**Comment Number(s):**

23-11



We are unsure where the commentor is getting this information, but it is untrue that use of grazing allotments is to be handled in the forest plan revision process. This revision process will provide broad, program-level direction for management of National Forest System lands and resources. All livestock use will be addressed in project level planning and analysis, complying with all applicable laws, regulations, and policies.

**Concern Statement 179.** *Commenters are concerned with incorporating restrictive elements from alternative A and C related to livestock grazing and incorporating them into alternative B.*

Response:

**Comment Number(s):**

2970-512

The revised forest plan contains multiple desired conditions, objectives, standards, guidelines and management approaches in the Rangelands, Forage Grazing Section of chapter 2 as well as other resource sections in chapter 2 such as the Riparian Areas, Seeps, Springs, Wetlands, and Riparian Management Zones section. We believe these new planning components will help us achieve these goals better than the former plan did.

**Comment Number(s):**

2986-22

We disagree with the commenter's assertions. The analysis of grazing in the programmatic plan revision environmental impact statement complies with the National Environmental Policy Act and analyzes the impacts of all planning components.

**Concern Statement 180.** *Commenters are concerned with livestock grazing in a portion of the Sierra Ancha Experimental Forest.*

Response:

**Comment Number(s):**

2970-655

Direction for the Sierra Ancha Experimental Forest (SAEF) has been determined to be outside the scope of this plan revision process. This area is managed by the Rocky Mountain Research Station. To help you imagine cows grazing on Reavis or Superstition Allotments, a cow on the adjacent Millsite Allotment looks very similar to one standing on the Reavis or Superstition allotments. Allotments are evaluated on a case-by-case basis according to applicable laws and policy.

**Comment Number(s):**

2944-6

Direction for the Sierra Ancha Experimental Forest (SAEF) has been determined to be outside the scope of this plan revision process.

**Concern Statement 181.** *Commenter is concerned with livestock grazing post-disturbance such as fire, flooding, and other natural disasters.*

Response:

**Comment Number(s):**

2463-20

Grazing decisions are analyzed at the project level and post disturbances such as fire, flooding, and other natural disturbances. The referenced management approach (revised plan, chapter 2, Rangelands, Forage, and Grazing Management) states, “Forest managers continually work with permittees to adjust timing, intensity, and frequency of livestock grazing to respond to changing resource conditions (e.g., fire, flooding, drought, high fuel loading)”. This Management approach will allow us as forest managers to work with permittees to adjust grazing stressors based off of natural disturbances to benefit other resources while adhering the Multiple-Use Sustained-Yield Act of 1960.

**Concern Statement 182.** *Commenter is concerned with previous livestock grazing allotment decisions.*

Response:

**Comment Number(s):**

2970-652

The forest plan is not a historical report of project level decisions. Allotments, including the sheep driveway, are evaluated on a case by case, site-specific basis according to applicable laws, regulations, and policy.

**Concern Statement 183.** *Commenters are concerned with public involvement and increased transparency in the NEPA process for allotment management decisions.*

Response:

**Comment Number(s):**

2463-12

Allotment management plans will continue to be addressed in accordance with the National Environmental Policy Act and other applicable laws, regulations, and policy, including the Endangered Species Act (ESA) and the National Historic Preservation Act (NHPA). The revised plan has many planning components in chapter 2 for several of the specific resource areas that could be incorporated into new allotment management plans (AMPs) during the project level allotment planning process.

**Comment Number(s):**

2463-14

Allowable use in riparian areas will be determined on a site-specific basis using the best available science. The 50 percent utilization guideline referenced was removed from the riparian section. Thank you for catching that error.

**Concern Statement 184.** *Commenters are concerned with the Forest issuing grazing permits and compliance with the NEPA process for site-specific analysis.*

Response:

**Comment Number(s):**

2970-519, 2986-12, 14

Allotment management plans are revised follow current plan direction and are done on a site-specific bases, complying with all applicable laws, regulations, and policies.

**Concern Statement 185.** *Commenter is concerned with the impact of climate change on forage habitat needed for livestock grazing.*

Response:

**Comment Number(s):**

2986-34

A plan component in the revised plan addresses the commenter's concern: Rangelands are resilient to disturbances, fluctuations, and extremes in the natural environment (e.g., fire, flooding, drought, climate variability) (revised plan, chapter 2, Rangelands, Forage, and Grazing).

**Concern Statement 186.** *Commenters are concerned with the impacts of livestock grazing on climate change.*

Response:

**Comment Number(s):**

2986-35, 36

A plan component in the revised plan addresses the commenter's concern: Rangelands are resilient to disturbances, fluctuations, and extremes in the natural environment (e.g., fire, flooding, drought, climate variability) (revised plan, chapter 2, Rangelands, Forage, and Grazing).

**Concern Statement 187.** *Commenter is concerned with the impacts of livestock grazing on cultural resources.*

Response:

**Comment Number(s):**

2970-621

Plan components were developed to address livestock grazing at the forest level (revised plan, chapter 2, Rangelands, Forage, and Grazing). Individual allotments undergo a site-specific analysis, following all applicable law, regulation, and policy in accordance with the National Environmental Policy Act.

**Concern Statement 188.** *Commenters are concerned with the lack of analysis in the draft environmental impact statement of grazing and other uses in the degradation of riparian and desert ecological response units and plan components to protect from those uses in the draft forest plan.*

Response:

**Comment Number(s):**

2970-508

Grazing capacity is not determined by a single year's actual use. Those figures were presented to paint the overall picture of permitted livestock and actual use. Various factors in addition to ecological factors contribute to actual use including market conditions, permittee choices, drought and weather forecasts, response to previous fires, etc.

**Comment Number(s):**

2970-507

Until the revised plan Record of Decision is signed, all site-specific projects will comply with the current plan, as amended. They will also comply with all applicable laws, regulations, and policies, including the National Environmental Policy Act and will use the best scientific information specific to the project area and the actions being analyzed.

**Concern Statement 189.** *Commenter is concerned with the monetary value of allotments that contain wilderness areas and threatened and endangered species.*

Response:

**Comment Number(s):**

2947-6

Grazing is allowed in wilderness as clarified by the Congressional Grazing Guidelines and can be authorized in areas where listed species habitat overlaps after compliance with the Endangered Species Act, which may include formal consultation. USDA Farm Service Agency calculations are outside the scope of this plan revision process.

The Tonto National Forest is managed under the Multiple Use and Sustained Yield Act. As such, we are required to manage for many uses, including permitted livestock. Grazing is allowed in wilderness as clarified by the Congressional Grazing Guidelines. The forest plan does not include plan direction that limits grazing within designated or recommended wilderness areas. The effects of designated and recommended wilderness on grazing are disclosed in chapter 3 of the environmental impact statement.

**Concern Statement 190.** *Commenters are concerned with the plan components associated with grazing in riparian areas in the final forest plan and associated analysis in the final environmental impact statement.*

Response:

**Comment Number(s):**

2970-657

A management approach was developed which states: Encourage the development of water sources in uplands (including wells) where possible to improve or restore riparian areas (revised plan, chapter 2, Rangelands, Forage, and Grazing). We believe that offstream water sources do afford some protection to riparian areas from overgrazing by livestock. Carter et al (2017) concluded off-stream water and rotational grazing didn't have an impact but that "Range science shows that to reverse this outcome and improve conditions, changes must be made, such as evaluating stocking rates and utilization rates. Malan et al. (2018) evaluated the efficacy of offstream watering points at improving livestock distribution to reduce grazing pressure in riparian areas with the key conclusion of "Out of the 37 [relevant] papers a total of seven factors and five sub-factors influencing cattle's use of offstream watering points were identified. There is evidence that offstream watering points did reduce the time cattle spent in riparian zones, however with great variation (63.7 percent) among studies. The review further highlights that substantial knowledge gaps exist within the literature linking the interaction of cattle, offstream watering points and riparian habitats indicating the need for further research. The effectiveness of offstream watering points is also likely to be highly variable and dependent on the local site conditions, ability to distribute livestock, and livestock management prescriptions. While there are data gaps in the current literature, we believe the best available science still indicates that these offstream watering points do help distribute livestock and reduce grazing pressure in riparian areas. The evaluation of stocking rates and utilization rates, offstream watering points, and impacts to riparian areas, springs, and wetlands is handled during grazing decisions for allotment management plans handled at the project level.

**Comment Number(s):**

2970-651

All previous management efforts were not addressed, but plan components for managing grazing in riparian areas were developed in the revised plan to address the commenter's concerns (revised plan, chapter 2, Riparian Areas, Seeps, Springs, Wetlands, and Riparian Management Zones).

**Comment Number(s):**

2970-510, 656

The 50 percent utilization standard was removed. A standard was added to address this issue: Livestock use in and around riparian areas will be evaluated on an allotment specific basis. Design elements (e.g., deferment, herding, and fencing) will be implemented where needed (revised plan, chapter 2, Rangelands, Forage, and Grazing).

**Comment Number(s):**

2970-480

A standard was added to address the commenter's concern: Livestock use in and around riparian areas will be evaluated on an allotment specific basis. Design elements (e.g., deferment, herding, and fencing) will be implemented where needed, in sensitive areas (revised plan, chapter 2, Rangelands, Forage, and Grazing).

**Comment Number(s):**

23-8

Capability and suitability are not being considered by this plan. Livestock capacity is handled in site-specific project level planning and analysis, complying with all applicable laws, regulations, and policies.

**Comment Number(s):**

23-2

Grazing authorizations at a pasture level are handled on a site-specific basis at the Ranger District level. Following disturbance events, pastures are evaluated before grazing an area resumes. Planning components in the revised plan provide guidance that improvements should be maintained (revised plan, chapter 2, Rangelands, Forage, and Grazing).

**Comment Number(s):**

2808-10

Multiple plan components in the revised plan (chapter 3), including in the Rangelands, Forage, and Grazing, Riparian Areas, Seeps, Springs, Wetlands, and Riparian Management Zones, and Watersheds and Watershed Resources sections, address the commenter's concerns.

**Comment Number(s):**

23-4

Riparian utilization guidelines will be addressed at a site-specific basis during allotment management planning. The riparian utilizations that the commenter is referring to were accidentally included in the draft plan. They have been removed from the revised plan.

**Comment Number(s):**

2806-10

Allotments would continue to be evaluated on a site-specific basis and would address specifics such as livestock numbers, timing, and rotations. Designated wild and scenic rivers are also managed by a site-specific plan, and the Verde Wild and Scenic River plan does not allow grazing within the designated reaches. If other reaches were designated in the future, a site-specific plan would be developed for those also.

**Concern Statement 191.** *Commenter is concerned with the potential risk of disease transmission to bighorn sheep from livestock grazing and suggested plan component changes and additions.*

Response:

**Comment Number(s):**

2986-27

We believe plan components, including those found in the Rangelands, Forage, and Grazing and Wildlife, Fish, and Plants sections of the revised plan (chapter 2) adequately provide protection to big horn sheep while providing management flexibility for range and vegetation management and other recreational opportunities.

**Concern Statement 192.** *Commenters are concerned with the range of alternatives analyzed in the draft environmental impact statement relating to livestock grazing, more specifically an alternative that drastically reduces the number of AUMs authorized or eliminates grazing forest wide.*

Response:

**Comment Number(s):**

2986-16, 23

Any changes to grazing management to incorporate new planning direction will occur during the allotment planning process. Livestock numbers will be determined at the project level during allotment management planning.

**Comment Number(s):**

2808-5,

2986-17, 2970-675

This plan revision effort is programmatic. Animal unit-months are addressed in site-specific planning efforts that implement the forest plan and are therefore outside the scope of this revision process. Permitted animal unit-months and authorized animal unit-months are statistics that provide a snapshot of grazing use at a point in time. Both permitted numbers and authorized numbers (and actual use numbers) are variable from year to year for numerous reasons (drought, fire, permittee convenience, etc.). Allotment planning occurs at the project level and a sum of animal unit-months is an output of project level planning as well as multiple other inputs.

The revised plan has many components, including desired conditions, that guide projects to maintain or improve rangelands and riparian areas. Grazing allotments would continue to be analyzed on a site-specific project level in compliance with the National Environmental Policy Act and our regulations (36 CFR 220).

**Concern Statement 193.** *Commenters are concerned with the sustainability of livestock grazing for the economy, natural resources, and for human nutrition.*

Response:

**Comment Number(s):**

2986-3, 4

We disagree with the commenter's assertions about the effects of grazing on public lands. The Tonto National Forest is managed under the Multiple Use and Sustained Yield Act. As such, we are required to manage for many uses, including permitted livestock.

**Concern Statement 194.** *Commenter is concerned with the use of barbed wire fencing on the forest.*

Response:

**Comment Number(s):**

26-1

Much of what the commentor is addressing is outside the scope of this planning effort. Planning components have been developed that provide direction for maintaining range improvements or removing them when no longer needed (revised plan, chapter 2, Rangelands, Forage, and Grazing).

**Concern Statement 195.** *Commenters are concerned with upland forage utilization guidelines for livestock grazing.*

Response:

**Comment Number(s):**

2463-13

Allotments would continue to be evaluated on a site-specific basis and utilization or other measures would be included in management plans as appropriate using the best available science.

**Comment Number(s):**

23-3, 2463- 7, 10

Utilization guidelines or other qualitative or quantitative measurements will be addressed at a site-specific project level during allotment management planning. By not including them in the revised plan, we are better able to address a project's unique vegetation. In some instances, if the area is shrub or brush dominated then the upland forage utilization is not an appropriate metric. In other instances, the upland forage may be an invasive grass or plant species that would be beneficial to graze at a rate higher than the previous plan's requirement.

**Comment Number(s):**

2463-15

Utilization guidelines or other qualitative or quantitative measurements will be addressed at a site-specific project level during allotment management planning. By not including them in the revised plan, we are better able to address a project's unique vegetation. In some instances, if the area is shrub or brush dominated then the upland forage utilization is not an appropriate metric. In other instances, the upland forage may be an invasive grass or plant species that would be beneficial to graze at a rate higher than the previous plan's requirement. All grazing management complies with the National Environmental Policy Act, as well as our regulations (36 CFR 220) for effects analysis and public involvement.



**Concern Statement 196.** *Commenters are concerned with where and how permittees receive funding for projects.*

Response:

**Comment Number(s):**

2970-517, 518

Environmental Quality Incentives Program grants, the Livestock Disaster Assistance Program and other drought related payments are not administered by the Forest Service. Range improvements are constructed and maintained using funding from various sources including Forest Service funds, fees, partners, other agencies, permittee investments, and volunteers. Comment is unclear. Without additional information or context, we believe it is outside the scope of this plan revision effort.

**Concern Statement 197.** *Commenters are concerned about the impacts of livestock grazing on the landscape and suggest the Forest focus on better management of cattle and leave the Salt River Horses alone.*

Response:

**Comment Number(s):**

41-4

The Tonto National Forest is managed under the Multiple Use and Sustained Yield Act. We have added planning components for management of the area that the Salt River Horses will occupy (revised plan, chapter 3, Salt River Horse Management Area). In contrast, the State is developing a plan for the horse herd itself. When the State is finished, this plan will be made available widely, including on the Tonto National Forest website. Additionally, the Tonto National Forest does not have any “wild horses”, as defined by the 1971 Wild Free-Roaming Horses and Burros Act.

**Comment Number(s):**

2926-2

Horses are also considered “livestock” and overgrazing by any herbivore can negatively affect rangelands and riparian areas. This plan does not address the number of salt river horses. Additionally, the revised plan has planning components dedicated to the management of the Salt River Horse area (revised plan, chapter 3, Salt River Horse Management Area).

**Concern Statement 198.** *Commenter is concerned with allotment management plans and future livestock grazing management decisions.*

Response:

**Comment Number(s):**

2922-2

Allotment management plans will continue to be revised as needed subject to all applicable laws, regulations, and policies The plan acknowledges the contribution to local economies and includes that as

a desired condition (revised plan, chapter 2, Riparian Areas, Seeps, Springs, Wetlands, and Riparian Management Zones).

**Concern Statement 199.** *Commenters are concerned with permitted livestock grazing in desert ecological response units.*

Response:

**Comment Number(s):**

2970-653

The revised plan contains direction related to grazing management forest-wide, including desert areas (revised plan, chapter 2, Rangelands, Forage, and Grazing). Additional plan direction that is specific to desert vegetation can be found in the Vegetation and Ecological Response Units (ERU) section of chapter 2.

**Comment Number(s):**

2808-20

Part of the National Environmental Policy Act process for plan revision included taking input from interested and affected stakeholders and individuals. This input was used to make changes to the actions being proposed. We are unsure where the commentor is getting this information, but it is untrue that use of grazing allotments is to be handled in the forest plan revision process. This revision process will provide broad, program-level direction for management of National Forest System lands and resources. All livestock use will be addressed in project level planning and analysis, complying with all applicable laws, regulations, and policies. Capability and suitability are no longer required for rangeland management per the 2012 Planning Rule.

**Comment Number(s):**

2991-22

Thank you for your support of our planning effort. Desired conditions for rangelands were developed and include 1 Sustainable livestock grazing contributes to the long-term socioeconomic diversity and stability of local communities among others (revised plan, chapter 2, Rangelands, Forage, and Grazing)

**Comment Number(s):**

2947-15

The only ecological unit the revised plan places increased emphasis on is riparian. Grazing in Sonoran Desert, as well as other ecological units, will continue to be evaluated on a site-specific basis as allotment management plans are revised.

**Comment Number(s):**

2808-2

The Tonto National Forest is managed under the Multiple Use and Sustained Yield Act. As such, we are required to manage for many uses, including permitted livestock. Capability and suitability are no longer a plan revision requirement per the 2012 Planning Rule.

**Concern Statement 200.** *Commenters support the stewardship of public lands.*

Response:

**Comment Number(s):**

2945-3

Ranchers are permitted to graze under specific terms and conditions detailed in a grazing permit and allotment management plan.

**Comment Number(s):**

2857-6

The desired condition is for sustainable grazing operations on the Tonto National Forest to continue into the future (revised plan, chapter 2, Rangelands, Forage, and Grazing)

**Concern Statement 201.** *Commenters question livestock grazing as a valid use on the national forest.*

Response:

**Comment Number(s):**

2986-9

The Tonto National Forest is managed under the Multiple Use and Sustained Yield Act. As such, we are required to manage for many uses, including permitted livestock. Plan components were added to address unauthorized use: When unauthorized livestock are found occupying National Forest System lands, the owner should be promptly notified to remove them and prevent them from re-entering National Forest System lands. If the owner is unknown or uncooperative, impoundment procedures should be initiated (revised plan, chapter 2, Rangelands, Forage, and Grazing)

**Comment Number(s):**

2986-8

The Tonto National Forest is managed under the Multiple Use and Sustained Yield Act. As such, we are required to manage for many uses, including permitted livestock. Multiple management areas in the revised plan (chapter 3) provide areas where permitted livestock grazing is prohibited.

**Comment Number(s):**

41-1, 42-1, 65-4, 704-2, 2619-1,2, 2986-6

The Tonto National Forest is managed under the Multiple Use and Sustained Yield Act. As such, we are required to manage for many uses, including permitted livestock.

**Comment Number(s):**

41-2

This comment is outside the scope of this revision process. Livestock grazing actual use information is available to the public through the Freedom of Information Act process.

**Comment Number(s):**

44-1, 1015-2, 2944-4

The Tonto National Forest is managed under the Multiple Use and Sustained Yield Act. As such, we are required to manage for many uses, including permitted livestock.

**Concern Statement 202.** *Commenters are concerned with livestock grazing in eligible wild and scenic river segment corridors.*

Response:

**Comment Number(s):**

58-33, 40

Grazing would still be allowed in eligible wild and scenic river segments. Lime Creek was removed from the eligible list as detailed in appendix E of the environmental impact statement.

**Concern Statement 203.** *Commenters are concerned with the economic contribution and the economic impact of livestock grazing on the national forest.*

Response:

**Comment Number(s):**

2970-522

The economic section of chapter 3 of the environmental impact statement addresses the economics of grazing, along with other factors. Maintenance of grazing infrastructure is outside the scope of this plan revision process. Environmental Quality Incentives Program (EQIP) grants, Livestock Disaster Assistance Program (LFDP) and other drought related payments are not administered by the Forest Service.

**Comment Number(s):**

23-18, 2463-26

Environmental Quality Incentives Program grants, Livestock Disaster Assistance Program and other drought related payments are not administered by the Forest Service and are outside the scope of Forest Service management. They are not analyzed in the economic effects of this document.

The type of analysis you are suggesting is more along the lines of a benefit-cost analysis or an efficiency analysis. A financial efficiency analysis might compare Forest Service expenditures and revenues throughout the life of the plan. That type of analysis, even if it were to include other government agency spending, in the form of Environmental Quality Incentives Program grants, for example, does not give a portrait of local economic consequences.

The analysis method used in the environmental impact statement to estimate economic effects (measured as jobs and income contributed to the local economy) of forage use (measured as authorized animal unit-months) is a contribution analysis. Economic “contributions” is used to describe the role Tonto National Forest natural resource management plays in the local market economy as measure by jobs and income. Using farm production expenses as estimated by USDA’s National Agricultural Statistics Service Census

of Agriculture and the number of livestock grazing authorized on National Forest System lands the model estimates the economic links between this resource use on the Tonto National Forest the contribution to local jobs and income.

**Comment Number(s):**

2857-2

Vacant allotments will be evaluated on a site-specific basis The commenter's project specific concerns will be addressed they are raised during a project level allotment planning process.

**Concern Statement 204.** *Commenter is requesting additional information or analysis about livestock grazing infrastructure projects and groundwater pumping in riparian areas, seeps, springs, and wetlands.*

Response:

**Comment Number(s):**

2970-634

We believe that offstream water sources afford some protection to riparian areas from overgrazing by livestock. Carter et al (2017) concluded off-stream water and rotational grazing didn't have an impact but that "Range science shows that to reverse this outcome and improve conditions, changes must be made, such as evaluating stocking rates and utilization rates. Malan et al (2018) evaluated the efficacy of offstream watering points at improving livestock distribution to reduce grazing pressure in riparian areas with the key conclusion of "Out of the 37 [relevant] papers a total of seven factors and five sub-factors influencing cattle's use of offstream watering points were identified. There is evidence that offstream watering points did reduce the time cattle spent in riparian zones, however with great variation (63.7 percent) among studies. The review further highlights that substantial knowledge gaps exist within the literature linking the interaction of cattle, offstream watering points and riparian habitats indicating the need for further research. The effectiveness of offstream watering points are also likely to be highly variable and dependent on the local site conditions, ability to distribute livestock, and livestock management prescriptions. Additionally, the 2021 Rangeland Water Developments at Springs: Best Practices for Design, Rehabilitation, and Restoration (General Technical Report) emphasizes new and existing approaches to improve upland spring developments while protecting sensitive riparian areas. This document provides guidance to Forest Service specialists and decision makers. While there are data gaps in the current literature, we believe the best available science still indicates that these offstream watering points do help distribute livestock and reduce grazing pressure in riparian areas. The evaluation of stocking rates and utilization rates, offstream watering points, and impacts to riparian areas, springs, and wetlands is handled during grazing decisions for allotment management plans handled at the project level.

**Concern Statement 205.** *Commenters requesting annual operating instructions be posted online each year.*

Response:

**Comment Number(s):**

23-17

Our partners at Friends of the Tonto post riparian photo points online. At this time, the Reading the Range program (overseen by the University of Arizona) is looking at options for posting data. Any monitoring data is available to the public through the Freedom of Information Act process.

**Comment Number(s):**

23-15

Posting annual operating instructions is outside the scope of the forest plan. We do not publicly post these documents as they contain personally identifiable information, which is against our policy.

**Comment Number(s):**

2463-11

Requests for monitoring information or annual operating instructions is outside the scope of the forest plan. Forest plan monitoring is not the same as rangeland management monitoring. Forest plan monitoring takes a look at how well the plan parts are working together to move the forest towards stated desired conditions (revised plan, chapter 1. Adaptive Planning and Monitoring). Similarly, rangeland management monitoring focuses on how well allotment management plans are working to achieve desired conditions, but this is site-specific monitoring.

**Concern Statement 206.** *Commenters requesting background checks for range management specialists to look for anti-grazing sentiments.*

Response:

**Comment Number(s):**

2942-1

Comment is outside the scope of this plan. We work with all permitted users of National Forest System lands.

**Comment Number(s):**

2947-12

Forest staffing requirements are outside the scope of this plan revision process.

**Concern Statement 207.** *Commenters requesting that grazing be excluded in Bonita Creek to assure domestic water supply non-contamination and includes future management suggestions.*

Response:

**Comment Number(s):**

56-19, 20

The effects to specific drainages are addressed during allotment management project level planning and undergoes environmental analysis in compliance with the National Environmental Policy Act and our regulations (36 CFR 220). Plan components to Riparian resources can be found in the revised plan (chapter 2, Riparian Areas, Seeps, Springs, Wetlands, and Riparian Management Zones).

Much of what the commentor is addressing is outside the scope of this planning effort. Allotment management planning occurs at the ranger district level in project planning and undergoes environmental analysis in compliance with the National Environmental Policy Act and our regulations (36 CFR 220). The concerns should be included when the individual allotment (in this case Diamond Rim) is evaluated in the future.

**Concern Statement 208.** *Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2970-650

The plan revision process is programmatic. Grazing authorizations are handled on a site-specific basis at the ranger district level. Utilization guidelines or other qualitative or quantitative measurements will be addressed at a site-specific project level during allotment management planning. By not including them in the revised plan, we are better able to address a project's unique vegetation. In some instances, if the area is shrub or brush dominated then the upland forage utilization is not an appropriate metric. In other instances, the upland forage may be an invasive grass or plant species that would be beneficial to graze at a rate higher than the previous plan's requirement. Riparian utilization guidelines will be addressed at a site-specific basis during allotment management planning. Capability and suitability are not being considered by this plan. Livestock capacity is handled in site-specific project level planning and analysis, complying with all applicable laws, regulations, and policies.

**Comment Number(s):**

2970-660

A guideline was developed, which states: In riparian areas (RMZ), projects and management activities should be designed and implemented to maintain or restore long-term streambank stability, native vegetation, floodplain, and soil function (for activities within the Lakes and Rivers Management Area, reference guideline MA-LRMA-G-03) (revised plan, chapter 2, Riparian Areas, Seeps, Springs, Wetlands, and Riparian Management Zones).

**Comment Number(s):**

2970-520

The revised plan has a monitoring section (chapter 4) that details monitoring for the effectiveness of the forest plan. All Forest Service funding is appropriated from Congress or is from certain fees charged to the public and authorized users of National Forest System lands.

**Comment Number(s):**

2970-525

We believe that the information in question provides substance and reason for the plan components related to grazing found throughout the revised plan (chapter 2, Rangelands, Forage, and Grazing)

**Comment Number(s):**

2816-52

Administrative changes to a Term Grazing Permit are subject to the Appeals process in 36 CFR 214. Comment is outside of the scope of the forest plan

**Comment Number(s):**

2736-43

In chapter 2 of the revised plan, a management approach was created in the Wildlife, Fish and Plants section that addresses the commenter's concerns.

**Comment Number(s):**

2806-11

Most troughs and tanks currently have wildlife escape ramps. But they can become damaged, removed, or lost. This objective provides direction to ensure all tanks and troughs have ramps. Volunteers and partnerships could assist with this objective.

**Comment Number(s):**

58-9

Per the terms of the grazing permit, range improvements are the property of the United States government and we assign the permittee the maintenance of these structures in accordance with term grazing permit.

**Comment Number(s):**

58-10, 11, 13

The desired condition that the commenter is referring to is in the Lands and Access section of the revised plan (chapter 2) and states "Land ownership adjustments (e.g., purchase, donation, exchange, or other authority) improve management activities (e.g., consolidating ownership, reducing wildlife-human conflicts, providing for wildlife habitat connectivity, improving public access, and retaining or acquiring key lands for wildlife and fish)." The Tonto National Forest is managed under the Multiple Use and Sustained Yield Act, which authorizes livestock grazing as one of these uses. As such, the Forest Service policy does not support voluntary permit retirement. According to the Forest Service Handbook (2209.13), a permittee may request additional or different base property be assigned.

**Comment Number(s):**

2736-40

The Heber-Reno sheep driveway is currently the only place domestic sheep are permitted to use on the Tonto National Forest. An existing site-specific analysis and decision has been completed and subsequent plan is in place for the driveway and addresses potential disease spread. Any future domestic livestock travel corridors will be analyzed for their impacts to wildlife in compliance with the National Environmental Policy Act and the forest plan, which includes range specific guideline 06 "Efforts (e.g., coordination with permittees, temporary fencing, increased herding, and herding dogs) should be made to prevent transfer of disease from domestic sheep and goats to bighorn sheep wherever bighorn sheep occur. Conversions to domestic sheep or goats should not be allowed in areas adjacent to or inhabited by bighorn sheep" (revised plan, chapter 2, Rangelands, Forage, and Grazing (GRZ)).



**Comment Number(s):**

58-19

The planning components that the commenter is referring has been modified to address the concern (revised plan, chapter 2, Watersheds and Water Resources)

**Comment Number(s):**

2736-41, 2948-21

There are plan components in the Wildlife, Fish, and Plants section of the revised plan (chapter 2) that address the commenter's concerns, including the following guideline: "New or reconstructed features (e.g., fences, vent pipes, stock tanks, and culverts) should be designed, constructed, and maintained to minimize wildlife mortality (e.g., capped fence posts and escape ramps)."

**Comment Number(s):**

58-8

There are planning components that provide that once closed an allotment should stay closed (revised plan, chapter 2, Rangelands, Forage, and Grazing). If warranted, a new decision that includes a site-specific Forest Plan amendment could re-open it.

**Comment Number(s):**

2948-20

We appreciate your support of our plan revision effort. We will continue to use the best available science as we add or replace wildlife escape ramps, along with working with partners.

**Comment Number(s):**

2922-5

We disagree with the commenter's assertions that there is no value to the resources when cows are prohibited from grazing the same area at the same time of year every year. The guideline that the commenter references was developed to provide direction when revising allotment management plans that livestock should not graze the same areas during the same time year after year. Rotations that stagger timing can benefit rangelands.

**Comment Number(s):**

23-22

We have added a management approach our revised plan to leave livestock waters on where feasible for wildlife. The success for implementing such an approach would depend on partnerships with organizations outside of the Forest Service to ensure they were maintained to standard.

**Comment Number(s):**

2736-39

We have added a management approach to the revised plan to leave livestock waters on where feasible for wildlife (revised plan, chapter 2, Rangelands, Forage, and Grazing). The success for implementing such an approach would depend on partnerships with organizations outside of the Forest Service to ensure they were maintained to standard.

**Comment Number(s):**

2736-42

We have added the following management approach to the revised plan: Work with agencies and partners identifying, maintaining, and implementing projects that increase water availability across the landscape for livestock and wildlife (revised plan, chapter 2, Rangelands, Forage, and Grazing).

**Comment Number(s):**

2806-9

To address the commenter's concern, we have added a management approach to the revised plan (chapter 2, Rangelands, Forage, and Grazing).

**Comment Number(s):**

2736-37

Desired Condition 03 (revised plan, chapter 2, Rangelands, Forage, and Grazing (GRZ)) includes that livestock grazing sustain wildlife habitat.

**Comment Number(s):**

58-3

Planning components provide for evaluating at least one allotment every 2 years (revised plan, chapter 2, Rangelands, Forage, and Grazing).

**Comment Number(s):**

58-4, 5

The district ranger will make the decision on a project level basis which will undergo an environmental analysis in compliance with the National Environmental Policy Act and our regulations (36 CFR 220) as required. There are planning components that provide that once closed an allotment should stay closed (revised plan, chapter 2, Rangelands, Forage, and Grazing).

**Comment Number(s):**

23-10

The only closed allotment at this time is the Goldfield Allotment located on the Mesa Ranger District.

**Comment Number(s):**

2966-10

The revised plan has a guideline which states: Efforts (e.g., coordination with permittees, temporary fencing, increased herding, and herding dogs) should be made to prevent transfer of disease from domestic sheep and goats to bighorn sheep wherever bighorn sheep occur. Allotment conversions from cattle to domestic sheep or goats should not be allowed in areas adjacent to or inhabited by bighorn sheep (chapter 2, Rangelands, Forage, and Grazing). Additionally, there are plan components in the Wildlife, Fish, and Plants section of the revised plan (chapter 2) that address the commenter's concerns, including the following guideline: "New or reconstructed features (e.g., fences, vent pipes, stock tanks, and culverts) should be designed, constructed, and maintained to minimize wildlife mortality (e.g., capped fence posts and escape ramps)."

**Comment Number(s):**

58-6, 7

There are planning components that provide that once closed an allotment should stay closed (revised plan, chapter 2, Rangelands, Forage, and Grazing). If warranted, a new decision that includes a site-specific forest plan amendment could re-open it.

**Comment Number(s):**

2972-10

We appreciate your support of our planning effort. We have developed planning components (revised plan, chapter 2, Rangelands, Forage, and Grazing) to address sustainable grazing practices.

**Comment Number(s):**

58-1

We appreciate your support of our planning effort. Part of our policy is to work directly with permittees for grazing allotment management. However, this is outside the scope of plan revision and will be addressed on a project level basis and undergo environmental analysis in compliance with the National Environmental Policy Act and our regulations (36 CFR 220) as required. This process includes public participation including interested ranchers.

**Comment Number(s):**

2463-21

We have added a management approach to revised plan to leave livestock waters on where feasible for wildlife (revised plan, chapter 2, Rangelands, Forage, and Grazing). The success for implementing such an approach would depend on partnerships with organizations outside of the Forest Service to ensure they were maintained to standard.

**Comment Number(s):**

23-19

We have not added the requested provision as grazing timing and rotations are handled at the site-specific level, complying with all applicable laws, regulations, and policies.

**Comment Number(s):**

2986-91

Comments is outside the scope of this plan revision process.

**Comment Number(s):**

2986-109

Communication with interested parties is conducted outside the scope of this process as the range management decisions are handled on a site-specific project level, in compliance with forest plan. Per the National Environmental Policy Act, all interested and affected stakeholders and individuals will be made of aware of these projects through the scoping process and the ability to comment on projects.

**Comment Number(s):**

2986-100, 101, 102, 107

Guidelines describe constraints on project and activity decision-making that allow for departure from its terms, so long as the intent of the guidelines is met. In other words, guidelines are mandatory with some flexibility on how they are implemented in meeting the intent of the existing guideline. Any deviation from the intent of a guideline requires a plan amendment. (revised plan, chapter 1, Plan Components and Other Plan Content, Plan Components). Changing “should” to “shall” makes the statement a standard rather than a guideline. The Forest prefers to retain some flexibility here to administer this as a guideline for site-specific projects that will implement this plan.

**Comment Number(s):**

2986-110

Management approaches and associated information do not offer plan direction but describe an approach or strategy to manage the unit to achieve a desired condition. Management approaches often convey how plan components work together to achieve the desired condition. They may also describe context, intent, priorities, partnership opportunities or coordination activities, need to survey, inventories or assessments, or approaches to risk and uncertainty. Not every resource topic area may have an associated management approach heading. Changes to management approaches do not require plan amendments (revised plan, chapter 1, Plan Components and Other Plan Content, Other Plan Content). Where and how livestock will be permitted to graze will be handled in site-specific project level, in compliance with forest plan.

**Comment Number(s):**

2986-97

Per the revised plan (chapter 1 Plan Components and Other Plan Content, Plan Components), objectives are concise, measurable, and time-specific statements of a desired rate of progress toward desired conditions and should be based on reasonably foreseeable budgets. Objectives, along with the strategies (from management approaches or Forest Service handbook direction) used to accomplish them, can be thought of as the tools we will use to prioritize project activities to reach desired conditions. Objectives are mileposts along the road toward desired conditions. Most troughs and open stock tanks already have wildlife escape ramps. Locating and identifying any tanks missing ramps can be time consuming. Although we are setting an objective to fit at least 2 tanks per year, as many tanks as we are able to will be fitted each year. Nothing prohibits us from accomplishing more than what we identify in plan objectives.

**Comment Number(s):**

2986-98

Per the revised plan (chapter 1 Plan Components and Other Plan Content, Plan Components), objectives are concise, measurable, and time-specific statements of a desired rate of progress toward desired conditions and should be based on reasonably foreseeable budgets. Objectives, along with the strategies (from management approaches or Forest Service handbook direction) used to accomplish them, can be thought of as the tools we will use to prioritize project activities to reach desired conditions. Objectives are mileposts along the road toward desired conditions. Typically evaluating an allotment will take at least 2 years. Where possible we would look at grouping allotments in order to move at a faster pace. Closure to permitted grazing is the same as grazing retirement. Nothing prohibits us from accomplishing more than what we identify in plan objectives.

**Comment Number(s):**

2986-93, 94

Per the revised plan (chapter 1 Plan Components and Other Plan Content, Plan Components), desired conditions describe the specific social, economic, and/or ecological characteristics that are desired for the plan area, or a part of the plan area. These are described in enough detail to measure progress toward their achievement, and all management activities should be aimed at achieving the desired condition. Desired conditions can be thought of as the set of goals that help define a collective vision for the National Forest in the future. Plan components do not need to reiterate existing law, regulation, or policy, although some are repeated to emphasize it. For projects that implement the revised plan, not every desired condition for every resource will be met. Overall, plan implementation should move resources, when possible and applicable, toward these desired conditions. Suggested edit would change statement from a desired condition to a standard, which is not the intent of the statement.

**Comment Number(s):**

2986-92

Per the revised plan (chapter 1, Plan Components and Other Plan Content, Plan Components), desired conditions describe the specific social, economic, and/or ecological characteristics that are desired for the plan area, or a part of the plan area. These are described in enough detail to measure progress toward their achievement, and all management activities should be aimed at achieving the desired condition. Desired conditions can be thought of as the set of goals that help define a collective vision for the National Forest in the future. Plan components do not need to reiterate existing law, regulation, or policy, although some are repeated to emphasize it. For projects that implement the revised plan, not every desired condition for every resource will be met. Overall, plan implementation should move resources, when possible and applicable, toward these desired conditions. We believe the term sustainable is important in this desired condition because grazing occurs in a way that allows it to continue into the future without degrading the rangelands where it occurs.

**Comment Number(s):**

2986-95, 96

Suggested edits are redundant. The commenter's suggested edits are captured in other desired conditions of the revised plan (chapter 2), including the revised plan Vegetation and Ecological Response Units (ERU).

**Comment Number(s):**

2986-111, 2970-676

The “e.g.,” is not meant to be an exhaustive list, but simply provide examples to the reader to provide for concept clarity. We chose to list those partners that we currently have agreements in place that are helping us complete rangeland monitoring. Any organization or group that would like to work with us for any resource monitoring would be encouraged to do so on the project level.

**Comment Number(s):**

2986-113

The Sonoran Desert Tortoise is not a listed species under the Endangered Species Act. Management of the species follows the Fish and Wildlife Service's Candidate Conservation Agreement or the Arizona Interagency Desert Tortoise Teams Recommended Standard Mitigation Measures. The level of specificity

that the commenter is requesting will be handled on a case-by-case basis in project level planning and analysis, complying with all applicable laws, regulations, and policies.

**Comment Number(s):**

2986-108

The Tonto National Forest is managed under the Multiple Use and Sustained Yield Act, which authorizes livestock grazing as one of these uses. As such, the Forest Service policy does not support voluntary permit retirement.

**Comment Number(s):**

2986-99

This forest plan revision will provide broad, program-level direction for management of National Forest System lands and resources. Removal of range improvements would be handled on a site-specific basis. Additionally, suggest language is redundant to Guideline 01 in the Range section of the revised plan (chapter 2)

**Comment Number(s):**

2925-00

Any new wells for grazing, mining or other uses would still be required to follow all applicable law, regulation, and policy to be approved at the site-specific project level. All interested or affected parties would be scoped according to National Environmental Policy Act policy.

**Comment Number(s):**

2925-00

The guideline was created so that closing specific allotments would be intentional. If a closed allotment was reevaluated and it was decided to reopen it, an amendment to the revised plan could be made at that time and would be conducted as part of a site-specific project analysis implementing the forest plan and all applicable laws, regulations, and policies.

**Comment Number(s):**

2970-666

A standard was added to the revised plan (chapter 2, Rangelands, Forage, and Grazing): Livestock use in and around riparian areas will be evaluated on an allotment specific basis. Design elements (e.g., deferment, herding, and fencing) will be implemented where needed. Other resources areas contain Standards that apply to livestock grazing. Guidelines describe constraints on project and activity decision-making that allow for departure from its terms, so long as the intent of the guidelines is met. In other words, guidelines are mandatory with some flexibility on how they are implemented in meeting the intent of the existing guideline. Any deviation from the intent of a guideline requires a plan amendment. (revised plan, chapter 1, Plan Components and Other Plan Content, Plan Components). Changing “should” to “shall” makes the statement a standard rather than a guideline. The Forest prefers to retain some flexibility to administer these guidelines for site-specific projects that will implement this plan.

**Comment Number(s):**

2970-671

A standard was developed to address livestock use of riparian areas: Livestock use in and around riparian areas will be evaluated on an allotment specific basis. Design elements (e.g., deferment, herding, and fencing) will be implemented where needed (revised plan, chapter 2, Rangelands, Forage, and Grazing). Management Approach 05 supports this standard by suggesting an option for managers to consider improving or restoring uplands.

**Comment Number(s):**

2970-664

All of the tanks and troughs on the Tonto National Forest have been fitted with wildlife escape ramps for many years. Like all range improvements, escape ramps require maintenance. This objective the commenter references was developed to ensure that all tanks and troughs always have functional wildlife escape ramps.

**Comment Number(s):**

2970-674

Guideline 03 (revised plan, chapter 2, Rangelands, Forage, and Grazing): Drought preparedness should be emphasized in allotment management plans and may include flexible stocking rates/livestock classes, flexible rotation schedules, and other strategies for dealing with climate variability. Management Approach 02 encourages managers to continually work with permittees to adjust timing, intensity, and frequency of livestock grazing to respond to changing resource conditions (e.g., fire, flooding, drought, high fuel loading).

**Comment Number(s):**

2970-663

Livestock grazing is managed to allow for healthy, diverse plant communities. This in no way implies livestock grazing cause it. Grazing management allows for healthy plant communities to persist.

**Comment Number(s):**

2970-661

Per the revised plan (chapter 1, Plan Components and Other Plan Content, Plan Components), desired conditions describe the specific social, economic, and/or ecological characteristics that are desired for the plan area, or a part of the plan area. These are described in enough detail to measure progress toward their achievement, and all management activities should be aimed at achieving the desired condition. Desired conditions can be thought of as the set of goals that help define a collective vision for the National Forest in the future. Plan components do not need to reiterate existing law, regulation, or policy, although some are repeated to emphasize it. For projects that implement the revised plan, not every desired condition for every resource will be met. Overall, plan implementation should move resources, when possible and applicable, toward these desired conditions. We believe the term sustainable is important in this desired condition because grazing occurs in a way that allows it to continue into the future without degrading the rangelands where it occurs. We also prefer the term “climate variability” to “climate change” in this context.

**Comment Number(s):**

2970-677

Thank you for your suggestion. At this time, we will not be including this management approach, but will continue to look at its feasibility for implementation of site-specific projects in the future.

**Comment Number(s):**

2970-667, 668

Thank you for your support of this management approach.

**Comment Number(s):**

2970-670

The management approach suggested rewording proposed by the commenter is already covered in the wording that is currently in the revised plan (chapter 2, Rangelands, Forage, and Grazing).

**Comment Number(s):**

2970-669

This management approach (revised plan, chapter 2, Rangelands, Forage, and Grazing) supports managers adjusting allotment management plans following applicable laws and regulations.

**Comment Number(s):**

2970-673

Water often becomes a limiting factor before lack of forage. Management Approach 02 (revised plan, chapter 2, Rangelands, Forage, and Grazing) encourages managers to continually work with permittees to adjust timing, intensity, and frequency of livestock grazing to respond to changing resource conditions (e.g., fire, flooding, drought, high fuel loading).

**Comment Number(s):**

2970-672

We believe that offstream water sources do afford some protection to riparian areas from overgrazing by livestock. Carter et al (2017) concluded off-stream water and rotational grazing didn't have an impact but that "Range science shows that to reverse this outcome and improve conditions, changes must be made, such as evaluating stocking rates and utilization rates. Malan et al (2018) evaluated the efficacy of offstream watering points at improving livestock distribution to reduce grazing pressure in riparian areas with the key conclusion of "Out of the 37 [relevant] papers a total of seven factors and five sub-factors influencing cattle's use of offstream watering points were identified. There is evidence that offstream watering points did reduce the time cattle spent in riparian zones, however with great variation (63.7 percent) among studies. The review further highlights that substantial knowledge gaps exist within the literature linking the interaction of cattle, offstream watering points and riparian habitats indicating the need for further research. The effectiveness of offstream watering points are also likely to be highly variable and dependent on the local site conditions, ability to distribute livestock, and livestock management prescriptions. While there are data gaps in the current literature, we believe the best available science still indicates that these offstream watering points do help distribute livestock and reduce grazing pressure in riparian areas.

**Comment Number(s):**

2970-662



While we appreciate the suggestion for modifications to planning components, we purposefully used the term variability as it considers natural weather variation and other climate related elements that are both natural and linked to mankind.

**Concern Statement 209.** *Commenters suggest best management practices for reducing predator-livestock interactions and depredation be included in the final forest plan.*

Response:

**Comment Number(s):**

2986-84, 87

All of the commenter's information is related to site-specific allotment management, which is outside the scope of this plan revision process. The revised plan (chapter 2) contains many planning components that address some of the general elements of the comment.

## **Recommended Botanical Areas**

**Concern Statement 210.** *Commenters are concerned with the Forest's management of proposed Horseshoe Botanical Area.*

Response:

**Comment Number(s):**

2932-19

This road will remain open to public. Travel and use of existing roads will be permitted in recommended and designated botanical areas. We can explore various boundary options during the formal site-specific analysis process for designation. We appreciate Salt River Project's interest in working with the Tonto to manage these botanically important areas and look forward to collaboration during the later process for designation. We will coordinate and work with Salt River Project on any future boundary adjustments for recommended or designated research natural areas.

**Comment Number(s):**

2932-18

We see no issue with Salt River Project, Arizona Game and Fish department, or Reclamation using National Forest System Road 1530 to access Lime Creek. This road will remain open to public. Travel and use of existing roads will be permitted in recommended and designated botanical areas. Thank you for bringing the inundation zone to our attention and how this might impact the area. We can explore various boundary options during the formal site-specific analysis process for designation. We appreciate Salt River Project's interest in working with the Tonto to manage this botanically important area and look forward to collaboration during the later process.

**Comment Number(s):**

2932-17

We understand that Salt River Project will need access to existing roads and trails in the recommended Horseshoe botanical area to maintain and access infrastructure for the operation of the dam. Travel and

use of existing roads will be permitted in recommended and designated botanical areas. We do have a guideline to not build new roads in these areas (forest plan, chapter 3, Designated and Recommended Research Natural Areas and Botanical Areas).

## **Recommended Wilderness**

**Concern Statement 211.** *Commenters are concerned there are systemic flaws in the wilderness recommendation process.*

Response:

**Comment Number(s):**

2970-682, 683, 693, 696

Consistent with agency regulation (2012 Planning Rule) and policy, the Forest Service completed an assessment of areas that meet the criteria for recommended wilderness through the wilderness recommendation process. Forest Service policy and planning direction is found in the Forest Service Manual 1920 and Forest Service Handbook 1909.12. Forest Service Handbook 1909.12, chapter 70 is the policy direction that guides the wilderness recommendations. This process consists of three steps: inventory of areas, evaluation of areas, and recommendation of areas.

This criteria for unique features evaluated the degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historical value. In evaluating the polygons for this wilderness characteristic, about 90 percent of the polygons had at least one unique and outstanding quality. This can be attributed to the broad range of unique features that could be identified per the Forest Service Handbook 1909.12 Chapter 70 (and the diversity of the Tonto National Forest. The additional point per polygon (as outlined in our evaluation criteria documentation released in October 2017) resulted in a skewed overall ranking of the polygons. Based on this determination, if the area had any unique or outstanding qualities, these qualities are noted in the description of the polygon, but no points were given for having a unique and outstanding quality. Unique and outstanding qualities are not required to be present in an area for the area to be recommended for inclusion in the National Wilderness Preservation System.

The Tonto National Forest System lands were thoroughly analyzed to determine which areas met the criteria for identification of recommended wilderness; these criteria can be found in appendix D of the environmental impact statement. Additionally, recommended wilderness areas were analyzed to consider the potential impact of wilderness designation on both current and future land uses and activities. Land uses and activities considered include recreation and tourism; wildlife species, population, and management needs; water availability and use; livestock operations; timber; minerals; cultural resources; authorized and potential uses; and management considerations including fire, insects, disease, and presence of lands of other ownership.

The Forest Service considered a wide range of recommended wilderness areas, from no recommended wilderness areas in alternative D to over 375,000 acres of recommended wilderness areas in alternative C. The decision maker carefully considered a range of recommended wilderness areas, as well as other allocations, to determine the mix of land and resource uses that would best meet public needs.

**Comment Number(s):**

2970-687, 690

During the evaluation the planning team adjusted boundaries due to features inconsistent with wilderness characteristics but are only located on a small portion of the overall polygon (i.e., an area with mostly high apparent naturalness with the exception of an obvious former vegetation treatment near the boundary). This helped ensure that areas were given an accurate rank for their level of wilderness characteristics. Additionally, the planning team worked to accurately identify improvements contained within the polygon, both which were considered substantially noticeable and those which were not considered substantially noticeable and ensured that the boundaries of the polygons were consistent with the improvements on the ground. Notes on these adjustments can be found within the Draft Wilderness Evaluation Rationale. In making these determinations, the planning team referenced comments received (both internally and externally) on the inventoried areas to ensure that identified improvements were noted and evaluated accordingly.

Nowhere in 36 CFR 219 nor FSH 1909.12 does it require an on the ground, acre-by-acre evaluation. The Tonto National Forest System lands were thoroughly analyzed to determine which areas met the criteria for identification of recommended wilderness; these criteria can be found in appendix D of the environmental impact statement. Additionally, recommended wilderness areas were analyzed to consider the potential impact of wilderness designation on both current and future land uses and activities. Land uses and activities considered include recreation and tourism; wildlife species, population, and management needs; water availability and use; livestock operations; timber; minerals; cultural resources; authorized and potential uses; and management considerations including fire, insects, disease, and presence of lands of other ownership.

**Comment Number(s):**

2970-694, 695

The 2012 Planning Rule requires an assessment to be conducted to determine the needs for change. This assessment (which can be found in the project record and is available on our public website) was used as the environmental baseline, with any additional information that was relevant that happened after the assessment was completed in compliance with Forest Service Handbook 1909.12. The wilderness appendix (appendix D of the environmental impact statement) discloses current conditions of these areas. Best available science we had was used in the wilderness evaluation process to identify characteristics, along with its use in the analysis of effects to recommended wilderness in chapter 3 of the environmental impact statement.

**Comment Number(s):**

2970-691

The consideration of the polygons adjacency to designated wilderness is not required when evaluating opportunities for solitude and opportunities for primitive and unconfined recreation. Per FSH 1909.12 Ch. 70 Section 72.1, the required criteria for analysis of opportunities for solitude and opportunities for primitive/unconfined recreation state:

- Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation. The word “or” means that an area only has to possess one or the other. The area does not have to possess outstanding opportunities for both elements, nor does it need to have outstanding opportunities on every acre.

- a. Consider impacts that are pervasive and influence a visitor’s opportunity for solitude within the evaluated area. Factors to consider may include topography, presence of screening, distance from impacts, degree of permanent intrusions, and pervasive sights and sounds from outside the area.

b. Consider the opportunity to engage in primitive-type or unconfined recreation activities that lead to a visitor's ability to feel a part of nature. Examples of primitive-type recreation activities include observing wildlife, hiking, backpacking, horseback riding, fishing, hunting, floating, kayaking, cross-country skiing, camping, and enjoying nature.

Although it was not part of the criteria to include all areas from the inventory and subsequent evaluation in an alternative, when we went through the mandated process outlined in FSH 1909.12 Ch. 70, 42 areas of the 49 total areas analyzed in the alternatives are adjacent to current designated wilderness.

For opportunities for solitude Tonto expanded upon the required criteria to look at:

- Is there pervasive evidence of civilization from within the area? Consider proximity of area to high use areas, trailheads, private lands, roads, and/or activities that impact opportunities for solitude. Consider frequency of impacts and seasonal variabilities.
- Describe the general topography of the area for its visual, spatial, and acoustic environment.
- Consider how people travel across the landscape.
- Consider the differences between urban and rural ideas of solitude.

For unconfined recreation the Tonto expanded upon this to look at

- Describe the types of primitive recreation activities in the area (e.g., hunting, fishing, dispersed camping, hiking, rock climbing, and horseback riding).
- Is the area relatively free of social restrictions on visitor behavior, providing an unconfined experience?
- What is the level of challenge and risk in the area?

There were instances in which the Tonto documented where the proximity to a designated wilderness may influence the opportunities for solitude or primitive and unconfined recreation. One example from the evaluation rationale documentation is Polygon 18 which states "There are abundant opportunities for engaging in primitive and unconfined recreation and these opportunities are of high quality. Horseback riding, hiking, dispersed camping. No controls on user behavior. When used in conjunction with the adjacent wilderness, opportunities are high."

The manageability for the area was also evaluated for the management of adjacent lands, which included a discussion about proximity to designated wilderness areas.

***Concern Statement 212. Comments about Gun Creek recommended wilderness area.***

Response:

**Comment Number(s):**

2951-3

We appreciate your feedback on existing uses around the Gun Creek proposed recommended wilderness area. This information will be taken into consideration when making the preliminary administrative recommendation in the draft record of decision for the revised land management plan. When developing the recommended wilderness area boundaries, Forest Service Handbook 1909, Chapter 70 (section 73 (2))

requires the Forest Service to identify boundaries that support management of the area for recommended wilderness and for other adjacent uses.

Additionally, the forest plan does not authorize site-specific prohibitions or activities, a site-specific analysis will need to be conducted in order to restrict access or prohibit motorized use and mechanized transport in these areas, such as the implementation of the Travel Management Rule (36 CFR§212). Site-specific travel management planning will use the framework set by the plan (such as desired conditions, standards, and guidelines) and will consider potential resource impacts, access needs, public input, and alternative views. These decisions would be consistent with the National Environmental Policy Act and Forest Service manual and handbook direction and would include analysis and opportunity for public involvement.

**Concern Statement 213.** *Commenters are concerned with the range of alternatives analyzed in the draft environmental impact statement.*

Response:

**Comment Number(s):**

2970-562

The Forest Service considered a wide range of recommended wilderness areas, from no recommended wilderness areas in alternative D to over 399,000 acres of recommended wilderness areas (50 polygons) in alternative C.

Per agency policy in the Forest Service Handbook, not all lands included in the inventory and subsequent evaluations are required to be carried forward in an alternative. Based on the evaluation and input from public participation opportunities, the responsible official shall identify which specific areas, or portions thereof, from the evaluation to analyze as recommended wilderness in one or more alternatives in the plan environmental impact statement (36 CFR 219, FSM 1920, and FSH 1909.15).

**Comment Number(s):**

2970-549

The Forest Service considered a wide range of recommended wilderness areas, from no recommended wilderness areas in alternative D to over 399,000 acres of recommended wilderness areas (50 polygons) in alternative C.

Per agency policy in the Forest Service Handbook, not all lands included in the inventory and subsequent evaluations are required to be carried forward in an alternative. Based on the evaluation and input from public participation opportunities, the responsible official shall identify which specific areas, or portions thereof, from the evaluation to analyze as recommended wilderness in one or more alternatives in the plan environmental impact statement (36 CFR 219, FSM 1920, and FSH 1909.15).

**Concern Statement 214.** *Commenters are concerned with the wilderness recommendation process.*

Response:

**Comment Number(s):**

2970-544

As documented in appendix D of the environmental impact statement, during the evaluation step the interdisciplinary team adjusted boundaries to remove features inconsistent with wilderness characteristics that were only located on a small portion of the overall polygon (i.e., an area with mostly high apparent naturalness except for an obvious former vegetation treatment near the boundary).

Additionally, the planning team worked to identify improvements contained within the polygon, both which were considered substantially noticeable and those which were not considered substantially noticeable and ensured that the boundaries of the polygons were consistent with the improvements on the ground.

Notes on these adjustments can be found within the Draft Wilderness Evaluation Rationale. In making these determinations, the planning team referenced comments received, both internally and externally, on the inventoried areas to ensure that identified improvements were noted and evaluated accordingly.

In determining the final recommendations within the record of decision for the forest plan, the responsible official may further refine the boundaries of the recommended areas help with boundary management and the preservation of wilderness characteristics.

**Comment Number(s):**

2970-543, 545, 547, 559, 560, 686, 692

Consistent with agency policy, the Forest Service completed an assessment of areas that meet the criteria for recommended wilderness through the wilderness evaluation process. Forest Service policy and planning direction is found in the Forest Service Manual 1920 and Forest Service Handbook 1909.12. Forest Service Handbook 1909.12, chapter 70 (January 2007) is the policy direction that guides the wilderness evaluations. The potential wilderness capability evaluation considered several basic characteristics that make an area appropriate and valuable for wilderness designation. The characteristics evaluated in this process include the following: natural, undeveloped, outstanding opportunities for solitude or primitive and unconfined recreation, special features and values, and manageability.

The criteria for rating naturalness require an evaluation of the composition of plant and animal communities in the Tonto National Forest. The purpose of this factor is to determine if plant and animal communities appear substantially unnatural (for example, past management activities have created a plantation style forest with trees of a uniform species, age, and planted in rows). When looking at this criteria component the Forest considered the following:

- Do the plant and animal communities appear substantially unnatural to the average forest visitor?
- Describe the vegetation types, associations, and plant and animal communities, including atypical vegetation associations or type changes (e.g., forest to woodland conversion from large catastrophic fires).
- How are concentrations of nonnative plants and/or animals distributed across the landscape?
- Any additional information related to the question.

When making a determination on the rank of the area, the Tonto National Forest evaluated how the area would appear to the average forest visitor. These ranking determinations are documented within appendix D of the environmental impact statement and are as follows:

- High –The composition of plant and animal communities appears natural to the average forest visitor. The presence of exotic, invasive and/or non-native plant and animal communities are sparse to absent in the area.
- Moderate – In most areas the composition of plant and animal communities would appear natural to the average forest visitor. The presence of exotic, invasive and/or non-native plant and animal communities are found in infrequent small to moderate patch sizes in the area.
- Low – The composition of plant and animal communities appears unnatural to the average forest visitor in substantial portions of the area. The presence of exotic, invasive and/or non-native plant and animal communities represent frequent small to moderate patch sizes in the area.
- No – The composition of plant and animal communities represents a departure from apparent naturalness in the majority of the area and is easily noticed by the average forest visitor. The presence of exotic, invasive and/or non-native plant and animal communities are predominant in the area.

The detailed description of criteria used for apparent naturalness can be found under the Evaluation Rank Determination Guide in appendix D of the environmental impact statement.

**Comment Number(s):**

2970-541, 681, 814

During each step of the wilderness recommendation process the Tonto National Forest provided opportunities for public participation and collaboration, intergovernmental coordination with State and local governments, and Tribal consultation, as required by the broader planning process (36 CFR 219.4 and FSH 1909.12, chapter 40). In total, the Tonto National Forest has engaged the public and other stakeholders 7 times on the Wilderness Recommendation Process. These public meetings and open comment periods allowed the public and other governments to provide feedback and input on the inventory, evaluation, and analysis steps of the process.

Specific to comments received from the Environmental Coalition informed multiple steps of the process:

- Information provided in comment letter dated June 30, 2017, was received during the comment period on the preliminary evaluation criteria. Information presented within the comment letter was considered when making changes that resulted in the draft evaluation criteria.
- Information provided in comment letter dated October 10, 2017, and November 6, 2017, was focused on the expanded evaluation criteria step of the process. Information presented within the comment letter was considered when making changes that resulted in the final evaluation criteria used in the evaluation meetings.
- Information provided in comment letter dated February 12, 2018, was received during the comment period on the draft evaluation map and associated documentation. Information presented within the comment letter was considered when making changes that resulted in the final evaluation.

An example of change made based on comments received included the addition of language to consider the average forest visitors' perception of apparent naturalness. This change was made between the expanded evaluation criteria and the final evaluation criteria used for the wilderness recommendation process.

Using the established inventory and evaluation criteria, developed based on the land management planning handbook and input from the public, the Tonto National Forest identified a range of range of recommended wilderness areas, from no recommended wilderness areas in alternative D to over 399,000 acres of recommended wilderness areas (50 polygons) in alternative C. Per agency policy in the Forest Service Handbook, not all lands included in the inventory and subsequent evaluations are required to be carried forward in an alternative. Based on the evaluation and input from public participation opportunities, the responsible official shall identify which specific areas, or portions thereof, from the evaluation to analyze as recommended wilderness in one or more alternatives in the plan environmental impact statement (36 CFR 219, FSM 1920, and FSH 1909.15).

Detailed information on public engagement during the plan revision process can be found in appendix C of the environmental impact statement.

**Comment Number(s):**

2970-542, 555, 815, 816

Per agency policy outlined in the Forest Service handbook, the responsible official shall evaluate the wilderness characteristics of lands in the inventory. For the evaluation, the responsible official shall ensure the interdisciplinary team applies the criteria set out in section 72, based on the Wilderness Act of 1964, and informed by the Eastern Wilderness Act of 1975. The responsible official may vary the scope of the evaluation of specific areas or portions of areas as described in section 72 of this Handbook.

The evaluation conducted by the Tonto National Forest was based on the criteria identified in the Forest Service Handbook (FSH 1909.12 Chapter 70, Section 72.1) and further defined by the Tonto National Forest through resource specialist and public engagement. Chapter 70, Section 72.1, of the Forest Service Land Management Planning Handbook 1909.12 outlines criteria for evaluation of lands for wilderness characteristics. In this step the Tonto National Forest evaluated the areas from the inventory for their wilderness characteristics: (1) size, (2) apparent naturalness, (3) outstanding opportunities for solitude or a primitive and unconfined type of recreation, (4) unique and outstanding qualities, and (5) manageability.

36 CFR 219 nor FSH 1909.12 does not require an on the ground, acre-by-acre evaluation. The Tonto National Forest System lands were thoroughly analyzed to determine which areas met the criteria for identification of recommended wilderness; these criteria can be found in appendix D of the environmental impact statement. Additionally, recommended wilderness areas were analyzed to consider the potential impact of wilderness designation on both current and future land uses and activities. Land uses and activities considered include recreation and tourism; wildlife species, population, and management needs; water availability and use; livestock operations; timber; minerals; cultural resources; authorized and potential uses; and management considerations including fire, insects, disease, and presence of lands of other ownership.

Using the established inventory and evaluation criteria, developed based on requirements in the land management planning handbook and input from the public, the Tonto National Forest identified a range of range of recommended wilderness areas, from no recommended wilderness areas in alternative D to over 399,000 acres of recommended wilderness areas (50 polygons) in alternative C. Per agency policy in the Forest Service Handbook, not all lands included in the inventory and subsequent evaluations are required to be carried forward in an alternative. Based on the evaluation and input from public participation opportunities, the responsible official shall identify which specific areas, or portions thereof, from the evaluation to analyze as recommended wilderness in one or more alternatives in the plan environmental impact statement (36 CFR 219, FSM 1920, and FSH 1909.15).



**Comment Number(s):**

2970-551

The 2005 Travel Management (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas. In contrast, the 2012 Planning Rule (36 CFR 219) is the overriding regulation that guides the development, amendment, and revision of land management plans for all units of the National Forest System. As such it is programmatic in nature and does dictate the level of specificity that project level plan implementation does. All project level specificity and decisions for the management of motor vehicle use will be done in compliance with the 2005 Travel Management Rule either forestwide (as is the case with the current travel management planning process) or on a more site-specific need, such as by district or area. This planning process provides plan components to guide management of the forest, including for motorized uses.

The Forest used the current road system when conducting the wilderness recommendation process. The Tonto considered motorized use on cherry stems and boundary roads as part of the manageability criteria during discussion on the non-primitive recreation activities in the area that would impede the Tonto National Forest's ability to maintain wilderness characteristics. While no part of travel management provided our baseline road system, we did take into consideration the proposed designated roads, trails, and areas documented in the draft record of decision for the travel management planning process.

**Comment Number(s):**

2970-548

The consideration of the polygons adjacency to designated wilderness is not required when evaluating opportunities for solitude and opportunities for primitive and unconfined recreation. Per FSH 1909.12 Ch. 70 Section 72.1, the required criteria for analysis of opportunities for solitude and opportunities for primitive/unconfined recreation state:

- Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation. The word “or” means that an area only has to possess one or the other. The area does not have to possess outstanding opportunities for both elements, nor does it need to have outstanding opportunities on every acre.

- a. Consider impacts that are pervasive and influence a visitor's opportunity for solitude within the evaluated area. Factors to consider may include topography, presence of screening, distance from impacts, degree of permanent intrusions, and pervasive sights and sounds from outside the area.

- b. Consider the opportunity to engage in primitive-type or unconfined recreation activities that lead to a visitor's ability to feel a part of nature. Examples of primitive-type recreation activities include observing wildlife, hiking, backpacking, horseback riding, fishing, hunting, floating, kayaking, cross-country skiing, camping, and enjoying nature.

Although it was not part of the criteria to include all areas from the inventory and subsequent evaluation in an alternative, when we went through the mandated process outlined in FSH 1909.12 Ch. 70, 42 areas of the 50 total areas analyzed in the alternatives are adjacent to current designated wilderness.

For opportunities for solitude Tonto expanded upon the required criteria to include:

- Is there pervasive evidence of civilization from within the area? Consider proximity of area to high use areas, trailheads, private lands, roads, and/or activities that impact opportunities for solitude. Consider frequency of impacts and seasonal variabilities.
- Describe the general topography of the area for its visual, spatial, and acoustic environment.
- Consider how people travel across the landscape.
- Consider the differences between urban and rural ideas of solitude.

For unconfined recreation the Tonto expanded upon this to include:

- Describe the types of primitive recreation activities in the area (e.g., hunting, fishing, dispersed camping, hiking, rock climbing, and horseback riding).
- Is the area relatively free of social restrictions on visitor behavior, providing an unconfined experience?
- What is the level of challenge and risk in the area?

There were instances in which the Tonto documented where the proximity to a designated wilderness may influence the opportunities for solitude or primitive and unconfined recreation. One example from the evaluation rationale documentation is Polygon 18 which states “There are abundant opportunities for engaging in primitive and unconfined recreation and these opportunities are of high quality. Horseback riding, hiking, dispersed camping. No controls on user behavior. When used in conjunction with the adjacent wilderness, opportunities are high.”

The manageability for the area was also evaluated for the management of adjacent lands, which included a discussion about proximity to designated wilderness areas.

**Comment Number(s):**

2970-553

The evaluation conducted by the Tonto National Forest was based on the criteria identified in the Forest Service Handbook (FSH 1909.12 Chapter 70, Section 72.1) and further defined by the Tonto National Forest through resource specialist and public engagement. Chapter 70, Section 72.1, of the Forest Service Land Management Planning Handbook 1909.12 outlines criteria for evaluation of lands for wilderness characteristics. In this step the Tonto National Forest evaluated the areas from the inventory for their wilderness characteristics: (1) size, (2) apparent naturalness, (3) outstanding opportunities for solitude or a primitive and unconfined type of recreation, (4) unique and outstanding qualities, and (5) manageability.

Following the evaluation of all lands inventoried for wilderness characteristics, the Tonto National Forest released a draft evaluation map and documentation to support assigned rankings. The Draft Evaluation Map and the Draft Wilderness Evaluation Rationale were available for public review from January 19, 2018, to February 12, 2018. The environmental coalition submitted comments during this time on the draft evaluation map and associated documentation. Information presented within the comment letter was considered when making changes that resulted in the final evaluation.

For alternative B, we referenced information gathered in the evaluation on the areas in which have the highest level of wilderness characteristics (including manageability). The following items provided a basis for recommendation in alternative B:

- High wilderness characteristics were identified across all categories in the evaluation process. This includes a high degree of apparent naturalness, high primitive recreation opportunities or ample opportunities for solitude, and a lack of developments such as roads, buildings, and other facilities;
- High manageability as recommended wilderness, including ease of boundary management, lack of private land inholdings, and/or lack of current activities or issues that would make this type of management difficult. This determination was made based on notes about manageability in the evaluation step of the process; and
- There are no tradeoffs identified in the evaluation such as major non-conforming uses or high need for restoration treatments.

Acres of recommended wilderness in alternative C were selected based upon consideration of the information within the wilderness evaluation. Alternative C includes areas in which:

- The area received a high overall wilderness characteristic ranking in the evaluation;
- The area received a moderate overall wilderness characteristic ranking and had high opportunities for primitive and unconfined recreation; or
- The area received significant public comment.

These criteria were selected because they fit into the theme of the alternative with an increase in primitive recreation opportunities and an emphasis on fire techniques for restoration, which is more in line with recommended wilderness management.

Specific to areas commented on by the environmental coalition not included in an alternative:

- Polygon 88 was not included in an alternative because the polygon received a moderate overall ranking. While hunting, hiking dispersed camping, and horseback riding opportunities exist in the area, the Tonto National Forest determined these activities were of a moderate quality within the area.
- Polygon 90 was not included in an alternative because the polygon received a moderate overall ranking for wilderness characteristics, and while there were opportunities for primitive recreation, they were only of moderate quality when compared to other primitive recreation opportunities on the forest.
- Polygon 86 was not included in an alternative because the polygon received a moderate overall ranking for wilderness characteristics, and while there were opportunities for primitive recreation, they were not outstanding when compared to other primitive recreation opportunities on the forest, with dispersed camping, horseback riding, hiking, and hunting opportunities occurring with moderate risk.

Upon review of evaluation determinations and information provided by the environmental coalition, we have included Polygon 60a in alternative C of the final environmental impact statement. The primary manageability concerns of the area included the presence of Bureau of Reclamation First Form withdrawals and at least one Salt River Project improvement and/or right of way. With the boundary adjustments within this area to remove the withdrawn areas, the manageability concerns within this area are minimized, resulting in a high ranking for manageability and a high overall ranking for this polygon. Additionally, we reevaluated all areas that overlapped with Bureau of Reclamation first form withdrawal to determine if they should be included in an alternative of the environmental impact statement. Through this evaluation we determined that no additional areas other than Polygon 60a would be analyzed in an alternative.

We appreciate the time spent on the ground looking at the wilderness characteristics within polygon 76 and polygon 36a, both included in alternative C. Where new information was provided on recommended wilderness areas analyzed within the environmental impact statement appendix D, the Tonto National Forest incorporated that information to strengthen the descriptions of the wilderness characteristics. If the area was recommended in the final plan, it will be managed to maintain those characteristics that make it eligible for inclusion in the National Wilderness Preservation System.

**Comment Number(s):**

2970-684, 685

Per agency policy outlined in the Forest Service handbook, the responsible official shall evaluate the wilderness characteristics of lands in the inventory. For the evaluation, the responsible official shall ensure the interdisciplinary team applies the criteria set out in section 72, based on the Wilderness Act of 1964, and informed by the Eastern Wilderness Act of 1975. The responsible official may vary the scope of the evaluation of specific areas or portions of areas as described in section 72 of this Handbook.

The evaluation conducted by the Tonto National Forest was based on the criteria identified in the Forest Service Handbook (FSH 1909.12 Chapter 70, Section 72.1) and further defined by the Tonto National Forest through resource specialist and public engagement. Chapter 70, Section 72.1, of the Forest Service Land Management Planning Handbook 1909.12 outlines criteria for evaluation of lands for wilderness characteristics. In this step the Tonto National Forest evaluated the areas from the inventory for their wilderness characteristics: (1) size, (2) apparent naturalness, (3) outstanding opportunities for solitude or a primitive and unconfined type of recreation, (4) unique and outstanding qualities, and (5) manageability.

Nowhere in 36 CFR 219 nor FSH 1909.12 does it require an on the ground, acre-by-acre evaluation. The Tonto National Forest System lands were thoroughly analyzed to determine which areas met the criteria for identification of recommended wilderness; these criteria can be found in appendix D of the environmental impact statement. Additionally, recommended wilderness areas were analyzed to consider the potential impact of wilderness designation on both current and future land uses and activities. Land uses and activities considered include recreation and tourism; wildlife species, population, and management needs; water availability and use; livestock operations; timber; minerals; cultural resources; authorized and potential uses; and management considerations including fire, insects, disease, and presence of lands of other ownership.

**Comment Number(s):**

2970-572

The 2005 Travel Management (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas. In contrast, the 2012 Planning Rule (36 CFR 219) is the overriding regulation that guides the development, amendment, and revision of land management plans for all units of the National Forest System. As such it is programmatic in nature and does dictate the level of specificity that project level plan implementation does. All project level specificity and decisions for the management of motor vehicle use will be done in compliance with the 2005 Travel Management Rule either forestwide (as is the case with the current travel management planning process) or on a more site-specific need, such as by district or area. This planning process provides plan components to guide management of the forest, including for motorized uses.

The Forest used the current road system when conducting the wilderness recommendation process. The Tonto considered motorized use on cherry stems and boundary roads as part of the manageability criteria during discussion on the non-primitive recreation activities in the area that would impede the Tonto

National Forest 's ability to maintain wilderness characteristics. While no part of travel management provided our baseline road system, we did take into consideration the proposed designated roads, trails, and areas documented in the draft record of decision for the travel management planning process.

**Comment Number(s):**

2970-582

All of the inventoried roadless areas were included in land evaluated for wilderness characteristics during the evaluation step of the Wilderness Recommendation Process. Inventoried roadless areas are not automatically recommended for wilderness as they may not have characteristics consistent with the criteria defined in the Forest Service Handbook (FSH 1909.12 Chapter 70, Section 72.1) and further defined in appendix D of the environmental impact statement. Polygons that overlapped with Inventoried Roadless Areas were considered in the evaluation under the manageability criteria as a positive for manageability. However, the other wilderness characteristics were also considered during the evaluation and that is reflected in the overall ranking of the polygons.

**Comment Number(s):**

2970-556

Consistent with agency policy, the Forest Service completed an assessment of areas that meet the criteria for recommended wilderness through the wilderness evaluation process. Forest Service policy and planning direction is found in the Forest Service Manual 1920 and Forest Service Handbook 1909.12. Forest Service Handbook 1909.12, chapter 70 (January 2007) is the policy direction that guides the wilderness evaluations. The potential wilderness capability evaluation considered several basic characteristics that make an area appropriate and valuable for wilderness designation. The characteristics evaluated in this process include the following: natural, undeveloped, outstanding opportunities for solitude or primitive and unconfined recreation, special features and values, and manageability.

The criteria for rating apparent naturalness consisted of an evaluation of the “the extent to which improvements included in the area represent a departure from apparent naturalness” which took into consideration how the presence or appearance of improvements detracts from apparent naturalness. The presence of improvements on the landscape considered all of the following:

- Any remaining roads, motorized trails, and known unauthorized routes.
- Airstrips, heliports, and helispots.
- Permanently installed vertical structures.
- Areas of mining activity.
- Recreation, range, or wildlife improvements that cannot be modified and depart from the apparent naturalness.
- Ground-return telephone lines, electric lines, and powerlines.
- Watershed treatment areas.
- Structures, dwellings, and other signs of past occupation.
- Consider the building materials and permanence of the improvements on the landscape.

- Consider if the improvements are similar in type and appearance to improvements that exist in current Tonto National Forest Wilderness.
- Include any additional information related to the question.

The detailed description of criteria used for apparent naturalness can be found under the Evaluation Rank Determination Guide in appendix D of the environmental impact statement.

**Comment Number(s):**

2970-557

As documented in appendix D of the environmental impact statement, during the evaluation step the interdisciplinary team adjusted boundaries to remove features inconsistent with wilderness characteristics that were only located on a small portion of the overall polygon (i.e., an area with mostly high apparent naturalness except for an obvious former vegetation treatment near the boundary).

Additionally, the planning team worked to identify improvements contained within the polygon, both which were considered substantially noticeable and those which were not considered substantially noticeable and ensured that the boundaries of the polygons were consistent with the improvements on the ground.

Notes on these adjustments can be found within the Draft Wilderness Evaluation Rationale. In making these determinations, the planning team referenced comments received, both internally and externally, on the inventoried areas to ensure that identified improvements were noted and evaluated accordingly.

In determining the final recommendations within the preferred alternative of the forest plan, the responsible official further refined the boundaries of the recommended areas help with boundary management and the preservation of wilderness characteristics.

**Comment Number(s):**

2970-558

Consistent with agency policy, the Forest Service completed an assessment of areas that meet the criteria for recommended wilderness through the wilderness evaluation process. Forest Service policy and planning direction is found in the Forest Service Manual 1920 and Forest Service Handbook 1909.12. Forest Service Handbook 1909.12, chapter 70 (January 2007) is the policy direction that guides the wilderness evaluations. The potential wilderness capability evaluation considered several basic characteristics that make an area appropriate and valuable for wilderness designation. The characteristics evaluated in this process include the following: natural, undeveloped, outstanding opportunities for solitude or primitive and unconfined recreation, special features and values, and manageability.

The criteria for rating manageability consisted of an evaluation of the “shape and configuration of the area.” The boundary, edge to interior ratio, and presence of cherry-stemmed roads considered as a component of these required criteria. This was only one component of the manageability criteria and no one component resulted in the final ranking, rather the complete picture of manageability. The remaining manageability considerations included:

- The presence and extent of legally established rights or uses within the area.
- The presence and extent of any specific Federal or State laws that may be relevant to the area.

- Large scale restoration projects planned for the area (e.g., four forests restoration initiative).
- Management of adjacent lands.
- Presence of Inventoried Roadless Area. Include percent if possible.
- Describe the amount of non-primitive recreation activities in the area.

The detailed description of criteria used for manageability can be found under the Evaluation Rank Determination Guide in appendix D of the environmental impact statement.

**Comment Number(s):**

2970-561

The consideration of the polygons adjacency to designated wilderness is not required when evaluating opportunities for solitude and opportunities for primitive and unconfined recreation. Per FSH 1909.12 Ch. 70 Section 72.1, the required criteria for analysis of opportunities for solitude and opportunities for primitive/unconfined recreation state:

- Evaluate the degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation. The word “or” means that an area only has to possess one or the other. The area does not have to possess outstanding opportunities for both elements, nor does it need to have outstanding opportunities on every acre.

a. Consider impacts that are pervasive and influence a visitor’s opportunity for solitude within the evaluated area. Factors to consider may include topography, presence of screening, distance from impacts, degree of permanent intrusions, and pervasive sights and sounds from outside the area.

b. Consider the opportunity to engage in primitive-type or unconfined recreation activities that lead to a visitor’s ability to feel a part of nature. Examples of primitive-type recreation activities include observing wildlife, hiking, backpacking, horseback riding, fishing, hunting, floating, kayaking, cross-country skiing, camping, and enjoying nature.

Although it was not part of the criteria to include all areas from the inventory and subsequent evaluation in an alternative, when we went through the mandated process outlined in FSH 1909.12 Ch. 70, 43 areas of the 50 total areas analyzed in the alternatives are adjacent to current designated wilderness.

For opportunities for solitude Tonto expanded upon the required criteria to look at:

- Is there pervasive evidence of civilization from within the area? Consider proximity of area to high use areas, trailheads, private lands, roads, and/or activities that impact opportunities for solitude. Consider frequency of impacts and seasonal variabilities.
- Describe the general topography of the area for its visual, spatial, and acoustic environment.
- Consider how people travel across the landscape.
- Consider the differences between urban and rural ideas of solitude.

For unconfined recreation the Tonto expanded upon this to look at

- Describe the types of primitive recreation activities in the area (e.g., hunting, fishing, dispersed camping, hiking, rock climbing, and horseback riding).
- Is the area relatively free of social restrictions on visitor behavior, providing an unconfined experience?
- What is the level of challenge and risk in the area?

There were instances in which the Tonto documented where the proximity to a designated wilderness may influence the opportunities for solitude or primitive and unconfined recreation. One example from the evaluation rationale documentation is Polygon 18 which states “There are abundant opportunities for engaging in primitive and unconfined recreation and these opportunities are of high quality. Horseback riding, hiking, dispersed camping. No controls on user behavior. When used in conjunction with the adjacent wilderness, opportunities are high.”

The manageability for the area was also evaluated for the management of adjacent lands, which included a discussion about proximity to designated wilderness areas.

**Concern Statement 215.** *Commenters have concerns regarding areas on the forest being managed as recommended wilderness.*

Response:

**Comment Number(s):**

62-2

The Forest Service considered a wide range of recommended wilderness areas, from no recommended wilderness areas in alternative D to over 399,000 acres of recommended wilderness areas in alternative C. The decision maker carefully considered a range of recommended wilderness areas, as well as other allocations, to determine the mix of land and resource uses that would best meet public needs.

Per the National Environmental Policy Act (40 CFR 1500), the deciding official has the ability to choose one of the alternatives analyzed in detail or a combination of those alternatives.

**Comment Number(s):**

2991-10

Consistent with agency policy, the Forest Service completed an assessment of areas that meet the criteria for recommended wilderness through the wilderness recommendation process. Forest Service policy and planning direction is found in the Forest Service Manual 1920 and Forest Service Handbook 1909.12. Forest Service Handbook 1909.12, chapter 70 is the policy direction that guides the wilderness recommendations. This process consists of three steps: inventory of areas, evaluation of areas, and recommendation of areas.

The Tonto National Forest System lands were thoroughly analyzed to determine which areas met the criteria for identification of recommended wilderness; these criteria can be found in appendix D of the environmental impact statement. Additionally, recommended wilderness areas were analyzed to consider the potential impact of wilderness designation on both current and future land uses and activities. Land uses and activities considered include recreation and tourism; wildlife species, population, and management needs; water availability and use; livestock operations; timber; minerals; cultural resources;



authorized and potential uses; and management considerations including fire, insects, disease, and presence of lands of other ownership.

The Forest Service considered a wide range of recommended wilderness areas, from no recommended wilderness areas in alternative D to over 399,000 acres of recommended wilderness areas in alternative C. The decision maker carefully considered a range of recommended wilderness areas, as well as other allocations, to determine the mix of land and resource uses that would best meet public needs.

**Comment Number(s):**

10-1

Per 36 CFR 212, we are required to evaluate Forest Service land for consideration as recommended wilderness. Forest Service Manual 1920 and Forest Service Handbook 1909.12. Forest Service Handbook 1909.12, chapter 70 is the policy direction that guides the wilderness recommendations process.

**Comment Number(s):**

2733-12, 2736-67, 2951-1

The 2005 Travel Management (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas. In contrast, the 2012 Planning Rule (36 CFR 219) is the overriding regulation that guides the development, amendment, and revision of land management plans for all units of the National Forest System. As such it is programmatic in nature and does dictate the level of specificity that project level plan implementation does. All project level specificity and decisions for the management of motor vehicle use will be done in compliance with the 2005 Travel Management Rule either forestwide (as is the case with the current travel management planning process) or on a more site-specific need, such as by district or area. This planning process provides plan components to guide management of the forest, including for motorized uses.

All future site-specific project level planning will comply with both regulations along with all applicable rules. In some instances, motorized use may be limited.

**Comment Number(s):**

399-1, 2736-68

The Tonto National Forest is managed under the Multiple Use and Sustained Yield Act. As such, we are required to manage for many uses.

**Comment Number(s):**

1665-1

This comment is outside the scope of this planning process because it appears to talk specifically about the Gila plan revision process in New Mexico.

**Comment Number(s):**

80-1, 2738-10, 2857-3, 2900-2, 2922-13, 2991-11

Consistent with agency policy, the Forest Service completed an assessment of areas that meet the criteria for recommended wilderness through the wilderness recommendation process. Forest Service policy and planning direction is found in the Forest Service Manual 1920 and Forest Service Handbook 1909.12.

Forest Service Handbook 1909.12, chapter 70 is the policy direction that guides the wilderness recommendations. This process consists of three steps: inventory of areas, evaluation of areas, and recommendation of areas.

The Tonto National Forest System lands were thoroughly analyzed to determine which areas met the criteria for identification of recommended wilderness; these criteria can be found in appendix D of the environmental impact statement. Additionally, recommended wilderness areas were analyzed to consider the potential impact of wilderness designation on both current and future land uses and activities. Land uses and activities considered include recreation and tourism; wildlife species, population, and management needs; water availability and use; livestock operations; timber; minerals; cultural resources; authorized and potential uses; and management considerations including fire, insects, disease, and presence of lands of other ownership.

The Forest Service considered a wide range of recommended wilderness areas, from no recommended wilderness areas in alternative D to over 399,000 acres of recommended wilderness areas in alternative C. The decision maker carefully considered a range of recommended wilderness areas, as well as other allocations, to determine the mix of land and resource uses that would best meet public needs.

Following analysis and review of all of the public comments, the forest plan includes the following plan components (RWA-G-01) for recommended wilderness areas that states, “Motorized vehicle access should not occur in a recommended wilderness area unless specifically authorized for emergency use, resource protection, maintenance of authorized improvements, or for the motorized retrieval of legally harvested big game.” The decision maker considered how this plan component would help the Forest achieve the desired conditions for each recommended wilderness area and multiple uses on the forest. Maintenance of range improvements would constitute as maintenance of authorized improvements, therefore where range allotments are within recommended wilderness motorized access would be permissible for transport of labor and materials so long as they do not degrade the wilderness characteristics. Because these lands have been selected as recommended wilderness, the Forest should manage them to protect their wilderness characteristics in the long term. The areas being recommended for wilderness do not currently have significant mechanized transport use or other manageability concerns in them now.

Additionally, the forest plan does not authorize site-specific prohibitions or activities, a site-specific analysis will need to be conducted in order for this plan component to prohibit motorized use and mechanized transport in these areas, such as the implementation of the Travel Management Rule (36 CFR§212). Site-specific travel management planning will use the framework set by the plan (such as desired conditions, standards, and guidelines) and will consider potential resource impacts, access needs, public input, and alternative views. These decisions would be consistent with the National Environmental Policy Act and Forest Service manual and handbook direction and would include analysis and opportunity for public involvement.

**Comment Number(s):**

2992-1

Per 36 CFR 212, we are required to evaluate Forest Service land for consideration as recommended wilderness. Forest Service Manual 1920 and Forest Service Handbook 1909.12. Forest Service Handbook 1909.12, chapter 70 is the policy direction that guides the wilderness recommendation process.

The 2005 Travel Management (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas. In contrast, the 2012 Planning

Rule (36 CFR 219) is the overriding regulation that guides the development, amendment, and revision of land management plans for all units of the National Forest System. As such it is programmatic in nature and does dictate the level of specificity that project level plan implementation does. All project level specificity and decisions for the management of motor vehicle use will be done in compliance with the 2005 Travel Management Rule either forestwide (as is the case with the current travel management planning process) or on a more site-specific need, such as by district or area. This planning process provides plan components to guide management of the forest, including for motorized uses.

**Comment Number(s):**

69-3, 2939-1, 2947-2,6

The plan revision process does not establish any new designated wilderness areas. The designation of wilderness areas is outside the scope of the plan revision process and requires an act of congress (FSM 1923 and 2320, FSH 1909.12). Per 36 CFR 212, we are required to evaluate Forest Service land for consideration as recommended wilderness. Forest Service Manual 1920 and Forest Service Handbook 1909.12. Forest Service Handbook 1909.12, chapter 70 is the policy direction that guides the wilderness recommendations process

**Comment Number(s):**

2991-12

Unlike in designated wilderness, the recommended wilderness areas have more flexibility and retain authority at the Forest level for motorized and mechanized use.

Per agency policy in the Forest Service Handbook, when developing plan components for recommended wilderness areas, the responsible official has discretion to implement a range of management options. All plan components applicable to a recommended area must protect and maintain the social and ecological characteristics that provide the basis for wilderness recommendation. To accomplish this the plan includes components for recommended wilderness that:

1. Enhance the ecological and social characteristics that provide the basis for wilderness designations;
2. Continue existing uses, only if such uses do not prevent the protection and maintenance of the social and ecological characteristics that provide the basis for wilderness designation;
3. Alter existing uses, subject to valid existing rights; and
4. Eliminate existing uses, except those uses subject to valid existing rights.

**Concern Statement 216.** *Commenters have concerns regarding the Coronado Mesa recommended wilderness area relating to suggested boundary changes, concerns about presence of existing infrastructure, visual impacts from tall towers, access, and plan components.*

Response:

**Comment Number(s):**

2932-165, 166

All future projects will be analyzed in site-specific project level environmental analysis in compliance with the National Environmental Policy Act (40 CFR 1500) and all applicable law, regulation, and policy. As part of this analysis, effects of a project on a recommended wilderness will be analyzed if appropriate. However, 36 CFR 219 does not require recommended wilderness to have a buffer zone.

**Comment Number(s):**

2938-22, 2932-11,12, 159, 164, 167, 171

We appreciate the specific information provided by Salt River Project. This information will be taken into consideration when making the final recommended wilderness determination, as part of the record of decision. When developing the recommended wilderness area boundaries, Forest Service Handbook 1909, Chapter 70 (section 73 (2)) requires the Forest Service to identify boundaries that support management of the area for recommended wilderness and for other adjacent uses.

Per agency policy in the Forest Service Handbook, when developing plan components for recommended wilderness areas, the responsible official has discretion to implement a range of management options. All plan components applicable to a recommended area must protect and maintain the social and ecological characteristics that provide the basis for wilderness recommendation. To accomplish this the plan includes components for recommended wilderness that:

1. Enhance the ecological and social characteristics that provide the basis for wilderness designations;
2. Continue existing uses, only if such uses do not prevent the protection and maintenance of the social and ecological characteristics that provide the basis for wilderness designation; and
3. Alter existing uses, subject to valid existing rights; and
4. Eliminate existing uses, except those uses subject to valid existing rights.

**Concern Statement 217.** *Commenters have concerns related to the removal of bureau of reclamation withdrawals from wilderness evaluation polygons as part of the wilderness recommendation process.*

Response:

**Comment Number(s):**

2970-550, 563, 571, 573

In order to enhance the manageability of recommended wilderness areas, while respecting the law, regulation, and policy Bureau of Reclamation operates under, we removed the land that would result in added difficulty for management for the intended purpose of Bureau of Reclamation withdrawn lands. The primary purpose for management of Bureau of Reclamation withdrawn areas is for future reclamation works, which would be inconsistent with management for protection of wilderness characteristics. The Tonto National Forest and the Bureau of Reclamation are part of an agreement for the “planning, design, construction, and maintenance of facilities and enhancements proposed by the Bureau of Reclamation” within the withdrawn areas (1988 PSA Roosevelt). The responsible official has the authority to identify which specific areas, or portions thereof, from the evaluation to carry forward as recommended wilderness in one or more alternatives in the plan environmental impact statement (FSH 1909.12 Ch. 80 Sec. 73). These boundary adjustments support management of the area for wilderness characteristics and other adjacent uses.

Other management areas on the Tonto National Forest within Bureau of Reclamation withdrawn areas were evaluated for consistency of management and it was determined that the management direction for these areas does not conflict with the management of Bureau of Reclamation withdrawn areas. These areas include the Lake and Rivers Management Area, botanical areas, and eligible wild and scenic rivers. While we acknowledge that there is overlap in the boundaries of the Bureau of Reclamation withdrawn areas and designated wilderness, the Tonto National Forest does not have authority to designate wilderness or draw the boundaries for those areas, as that is a right reserved for Congress.

**Comment Number(s):**

2970-570

Management of the Lakes and Rivers Management Area is not inconsistent with the management of Bureau of Reclamation withdrawn areas per the tri-party agreement. Standards and guidelines within this section do not conflict with bureau of reclamations intended management of the withdrawn areas. Additionally, we are still able to achieve desired conditions within this area considering the development of water resource related projects by Bureau of Reclamation within or adjacent to National Forest System lands.

**Comment Number(s):**

2970-569

Standards and guidelines for the management of research natural areas and botanical areas do not conflict with Bureau of Reclamations ability to manage their interest. While there were was comment about the management of assets within some of these areas, it was determined that where future access needs may be necessary, the presence of facilities or roads does not affect the botanical or research values of an area and water resource projects could be authorized within withdrawn areas and still allow us to move towards desired conditions within research natural areas and botanical areas. Therefore, it was not necessary to adjust the boundaries of the research natural areas or botanical areas to remove Bureau of Reclamation withdrawn lands.

**Comment Number(s):**

2970-567

The 2001 Roadless Rule establishes prohibitions on road construction, road reconstruction, and timber harvesting on 58.5 million acres of inventoried roadless areas on National Forest System lands. The intent of the 2001 Roadless Rule is to provide lasting protection for inventoried roadless areas within the National Forest System in the context of multiple-use management. Section 294.14(a) of the rule states that the rule would not suspend or modify any existing permit, contract, or other legal instrument authorizing the use and occupancy of National Forest System lands. Existing authorized uses would be allowed to maintain and operate within the parameters of their current authorization, including any provisions regarding access. This statement applies to Bureau of Reclamation withdrawn lands.

**Comment Number(s):**

2970-566

The prospecting and development of water resource projects or other utilities are inconsistent with wilderness or wilderness character, but it is a special provision that is allowed for in the Wilderness Act when it is determined that “such use or uses in the specific area will better serve the interests of the United States and the people thereof than will its denial.” Each wilderness area is managed to allow for

such special provisions within the law, including Bureau of Reclamation withdrawn lands. Bureau of Reclamation ability to manage their interests is impaired only insofar as the regulations established to allow for their special provision within wilderness.

The presence of Bureau of Reclamation withdrawals does complicate management of existing wilderness areas in differing ways, just as the presence of other nonconforming, special provisions—such as livestock grazing or mineral leases—complicates management of wilderness areas. Nonetheless, these special provisions are allowed for in the Wilderness Act, and the Forest Service is mandated to manage for them.

The presence of Bureau of Reclamation withdrawn lands or other nonconforming uses do not preclude an area from being a designated wilderness. However, when nonconforming uses are, or are expected to be, a dominant and pervasive characteristic of the landscape, it is inconsistent with wilderness character and may be unsuitable for recommendation of a wilderness designation.

**Comment Number(s):**

2970-564

To address the concerns presented in this comment we have responded to the individual questions under this overall statement. These comments are 2970-565 to 2970-571.

**Comment Number(s):**

2970-573

We appreciate you providing a map for our consideration in understanding your concerns.

**Comment Number(s):**

2970-565

While there are Bureau of Reclamation Withdrawn areas that overlap with our designated wild and scenic rivers, the Wild and Scenic River Act states that “no department or agency of the United States shall assist by loan, grant, license, or otherwise in the construction of any water resources project that would have a direct and adverse effect on the values for which such river was established.” Each designated wild and scenic river is managed consistent with the Wild and Scenic Rivers Act and Bureau of Reclamation's ability to manage their interests is impaired insofar as the regulations established. So, while these do overlap with historically withdrawn lands, the Tonto would not authorize the development of water resource projects along those segments, within their designated corridors.

**Comment Number(s):**

2970-568

While water resource projects within eligible wild and scenic rivers could impact bureau of reclamations ability to manage their interests, this would occur only if the proposed project in the withdrawn areas would impact the outstandingly remarkable value, classification, or free-flow condition of the segment. Additionally, the river corridor is a prescriptive size and defined in the Land Management Planning Handbook Chapter 80 as the geographic area generally encompassed within one-quarter mile on either side of a river studied for eligibility that contains the river and its outstandingly remarkable values. Interim protection measures for any eligible segments apply to the river and the river corridor, regardless of overlap with Bureau of Reclamation withdrawals.

**Concern Statement 218.** *Commenters are requesting reevaluation of wilderness characteristics for specific polygons and providing detailed on-the-ground review of those polygons.*

Response:

**Comment Number(s):**

2970-574, 576

We appreciate the time spent on the ground looking at the wilderness characteristics within these specific polygons and considered the recommendations made on this area. While we recognize there are opportunities within this area and presence of some wilderness characteristics, When evaluating it consistent with criteria established in criteria identified in the Forest Service Handbook (FSH 1909.12 Chapter 70, Section 72.1) and further defined by the Tonto National Forest through resource specialist and public engagement this area received a moderate ranking. Chapter 70, Section 72.1, of the Forest Service Land Management Planning Handbook 1909.12 outlines criteria for evaluation of lands for wilderness characteristics. In this step the Tonto National Forest evaluated the areas from the inventory for their wilderness characteristics: (1) size, (2) apparent naturalness, (3) outstanding opportunities for solitude or a primitive and unconfined type of recreation, (4) unique and outstanding qualities, and (5) manageability.

This area was not brought forward into analysis in chapter 3 of the environmental impact statement by resource specialists as it did not meet criteria for inclusion in an alternative as outlined by the analysis criteria in appendix D. Between draft and final the Tonto National Forest considered an alternative that included all areas from the recommended wilderness evaluation that received a moderate ranking or above, but decided not to analyze this alternative in detail. The alternative, which would have included 643,923 acres, was not analyzed in detail because it would not allow the Tonto National Forest to achieve multiple use desired conditions outlined in the revised forest plan.

**Comment Number(s):**

2970-577, 578

We appreciate the time spent on the ground looking at the wilderness characteristics within these specific polygons and considered the recommendations made on this area. While we recognize there are opportunities within this area and presence of some wilderness characteristics, When evaluating it consistent with criteria established in criteria identified in the Forest Service Handbook (FSH 1909.12 Chapter 70, Section 72.1) and further defined by the Tonto National Forest through resource specialist and public engagement this area received a moderate ranking, and this ranking stands. This area was analyzed in alternative C because of its high values for primitive recreation.

Chapter 70, Section 72.1, of the Forest Service Land Management Planning Handbook 1909.12 outlines criteria for evaluation of lands for wilderness characteristics. In this step the Tonto National Forest evaluated the areas from the inventory for their wilderness characteristics: (1) size, (2) apparent naturalness, (3) outstanding opportunities for solitude or a primitive and unconfined type of recreation, (4) unique and outstanding qualities, and (5) manageability.

Where new information was provided on recommended wilderness areas analyzed within the environmental impact statement appendix D, the Tonto National Forest incorporated that information to strengthen the descriptions of the wilderness characteristics. For example, we expanded the information around solitude and primitive and unconfined recreation opportunities to explain how the topography of

the area further enhances these opportunities and mentioned the other popular recreation activities in the area.

Additionally, these comments will be utilized and discussed when making final determinations on recommendations in the final plan. If the area is recommended in the record of decision, it will be managed to maintain the characteristics that make it eligible for inclusion in the National Wilderness Preservation System.

**Concern Statement 219.** *Commenter is requesting specific areas be included as recommended wilderness in the final forest plan.*

Response:

**Comment Number(s):**

2969-1

The Forest Service considered a wide range of recommended wilderness areas, from no recommended wilderness areas in alternative D to over 399,000 acres of recommended wilderness areas in alternative C. The decision maker carefully considered a range of recommended wilderness areas, as well as other allocations, to determine the mix of land and resource uses that would best meet public needs.

Per the National Environmental Policy Act (40 CFR 1500), the deciding official has the ability to choose one of the alternatives analyzed in detail or a combination of those alternatives.

**Comment Number(s):**

2969-5, 6, 7, 8

We appreciate the time it took to submit your comment about Parker Creek canyon. The attached photos are visual representations of the comment related to Parker Creek canyon being considered for recommended wilderness. See the areas selected as recommended wilderness in forest plan, chapter 3. Management Areas, Recommended Wilderness section and the corresponding analysis in the final environmental impact statement.

**Concern Statement 220.** *Comments seeking clarification or additional analysis in the final environmental impact statement.*

Response:

**Comment Number(s):**

2970-579

The map has been updated to include Sierra Ancha Wilderness Contiguous Recommended Wilderness Area A on the alternative B map.

**Comment Number(s):**

2970-580

Rugged Mesa (Polygon 119f) was formed as a result of a boundary adjustment made to Polygon 119b and is recommended in alternative C. The document was updated to provide clarity on the recommendation of this polygon in alternative C.



**Comment Number(s):**

2970-581

Boundary adjustments were made to Polygon 119b that resulted in the area being split into three polygons, which are referred to as 119b, 119e, and 119f in appendix D of the environmental impact statement. The evaluation ranking for each of these areas were retained for the same qualities and are described in the alternative C Recommended Wilderness Areas section of appendix D in the environmental impact statement. Polygon 119b is Mullen Mesa Recommended Wilderness area in alternative C. Polygon 119e is Dugan Recommended wilderness area in alternative C. Polygon 119f is Rugged Mesa Recommended Wilderness Area in alternative C.

**Comment Number(s):**

2932-13

Thank you for making us aware of the inconsistencies in the documented acres of recommended wilderness. We updated and verified that acres are consistent across all documents.

**Concern Statement 221.** *Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

86-2

The Forest Service Handbook (FSH 1909.12 Ch. 70 Sec. 74.1) states that when developing plan components for recommended wilderness areas, the responsible official has discretion to implement a range of management options. All plan components applicable to a recommended area must protect and maintain the social and ecological characteristics that provide the basis for wilderness recommendation.

In addition, the plan includes components for recommended wilderness areas that:

1. Enhance the ecological and social characteristics that provide the basis for wilderness designations;
2. Continue existing uses that do not prevent the protection and maintenance of the social and ecological characteristics that provide the basis for wilderness designation; and
3. Alter some existing uses, subject to valid existing rights.

The plan revision process does not establish any new designated wilderness areas. The designation of wilderness areas is outside the scope of the plan revision process and requires an act of congress (FSM 1923 and 2320, FSH 1909.12).

**Comment Number(s):**

2736-60

All plan components applicable to a recommended area must protect and maintain the social and ecological characteristics that provide the basis for wilderness recommendation (FSH 1909.12 Ch. 70 Sec. 74.1). Specifically, for recommended wilderness, the presence of native species, both desirable and non-desirable, represents an ecological characteristic that would normally be associated with the area without

human intervention or disturbance, therefore we did not update this plan component to include non-desirable species.

**Comment Number(s):**

2736-63

In consideration of the commenter's information we have updated the guideline (RWMA-G-04) to read “Management activities, including transplants (e.g., removal, reintroduction, or supplemental introduction) of wildlife and fish species, should be permitted to use motorized and mechanical means (e.g., helicopter landings) if necessary to perpetuate or recover a threatened or endangered species, to restore the population of an indigenous species, or to manage wildlife and fish populations” (forest plan, chapter 3, Recommended Wilderness Management Area, Guideline 04)

**Comment Number(s):**

2736-61, 2795-1

In consideration of the commenter's information we have updated the guideline in the forest plan to read as follows “Motorized vehicle use should not be authorized in a recommended wilderness area unless specifically authorized for emergency use, resource protection, maintenance of authorized improvements, or for the motorized retrieval of legally harvested big game” and included a footnote as defined in the travel management record of decision (forest plan, chapter 3, Recommended Wilderness Management Area, Guideline 01).

**Comment Number(s):**

2816-87

The forest plan provides the vision, strategy, and constraints that guide integrated resource management, provide for ecological sustainability, and contribute to social and economic sustainability on the forest and within the broader landscape, while directing the coordination of multiple uses. To accomplish this goal, the plan contains components applicable to specific areas that call for management that is in addition to or different than forestwide management. A management area represents a management emphasis for an area or several similar areas on the landscape and management direction is based on applicable authorities and the specific purposes for which the area was created, recommended, or designated.

Recommended wilderness areas are managed to protect and maintain the social and ecological characteristics that provide the basis for wilderness recommendation. Balancing conflicting resource needs and providing for comprehensive multi-use management, consistent with the conservation ethic, is a continuous objective in administering the resources of the Tonto National Forest and setting a standard that limits where common variety minerals are obtained in recommended wilderness areas is consistent with managing for multiple-use and the sustained yield of forest resources and follows authority provided in regulations at 36 CFR 228, Subpart C, for the disposal of mineral materials, where the Forest Service has discretion to deny disposal of salable minerals, such as sand and gravel and common variety building stone.

**Comment Number(s):**

2736-62

The revised forest plan includes the following plan components (RWA-G-01) for recommended wilderness areas that states, “Motorized vehicle use should not be authorized in a recommended

wilderness area unless specifically authorized for emergency use, resource protection, maintenance of authorized improvements, or for the motorized retrieval of legally harvested big game.” The decision maker considered how this plan component would help the Forest achieve the desired conditions for each recommended wilderness area. Because these lands have been selected as recommended wilderness, the Forest should manage them to protect their wilderness characteristics in the long term. The areas being recommended for wilderness do not currently have significant mechanized transport use in them now.

**Comment Number(s):**

2972-18

We appreciate your concerns; however, the following guideline was developed in the forest plan to address these concerns for our recommended wilderness areas “Management activities, including transplanting (e.g., removal, reintroduction, or supplemental introduction) fish and wildlife species, should be permitted to use motorized and mechanical means (e.g., helicopter landings) if necessary to perpetuate or recover a threatened or endangered species, to restore the population of an indigenous species, or to manage fish and wildlife populations.”.

The Forest Service Handbook (FSH 1909.12 Ch. 70 Sec. 74.1) states that when developing plan components for recommended wilderness areas, the responsible official has discretion to implement a range of management options. All plan components applicable to a recommended area must protect and maintain the social and ecological characteristics that provide the basis for wilderness recommendation.

In addition, the plan includes components for recommended wilderness areas that:

1. Enhance the ecological and social characteristics that provide the basis for wilderness designations;
2. Continue existing uses that do not prevent the protection and maintenance of the social and ecological characteristics that provide the basis for wilderness designation; and
3. Alter some existing uses, subject to valid existing rights.

The plan revision process does not establish any new designated wilderness areas. The designation of wilderness areas is outside the scope of the plan revision process and requires an act of congress (FSM 1923 and 2320, FSH 1909.12).

**Comment Number(s):**

2795-2

We appreciate your support on the management direction for the Tonto National Forest Plan. We look forward to continuing working together under the Memorandum of Understanding for statewide cooperation, coordination, collaboration between the U.S. Forest Service and the Department for management and conservation of fish and wildlife populations and habitats on National Forest System lands in Arizona (FS # 10-MU-11031600-019). The species you maintain and manage important to healthy and resiliency of the ecosystems on the Tonto National Forest.

**Comment Number(s):**

2736-2, 2966-11

In consideration of the commentors information we have updated the guideline in the forest plan to read as follows “Motorized vehicle use should not be authorized in a recommended wilderness area unless specifically authorized for emergency use, resource protection, maintenance of authorized improvements,

or for the motorized retrieval of legally harvested big game” and included a footnote as defined in the travel management record of decision (chapter 3. Management Areas, Recommended Wilderness Areas, Guideline 01).

Following analysis and review of all of the public comments, the forest plan includes the following plan components (RWA-G-01) for recommended wilderness areas that states, “Motorized vehicle use should not be authorized in a recommended wilderness area unless specifically authorized for emergency use, resource protection, maintenance of authorized improvements, or for the motorized retrieval of legally harvested big game.” The decision maker considered how this plan component would help the Forest achieve the desired conditions for each recommended wilderness area. Because these lands have been selected as recommended wilderness, the Forest should manage them to protect their wilderness characteristics in the long term. The areas being recommended for wilderness do not currently have significant mechanized transport use in them now.

## Recreation

**Concern Statement 222.** *Commenter suggests that air quality, rather than recreational use, is affecting recreation resources.*

Response:

**Comment Number(s):**

8-2

The forest plan is a programmatic planning document outlining management specifically for the Tonto National Forest. As such, we cannot prescribe management at the scale necessary to effectively analyze for this. However, we have included plan components designed to minimize effects on climate from recreation and all other resources in our purview. The Recreation section of the final environmental impact statement (chapter 3) details effects of the plan components on recreational users, including effects of trails.

**Concern Statement 223.** *Commenter is concerned about timber production suitability being inconsistent with certain recreation opportunity spectrum classes within the Arizona national scenic trail corridor.*

Response:

**Comment Number(s):**

79-3

We agree that the ideal setting for the Arizona National Scenic Trail is within a primitive or semi-primitive non-motorized recreation opportunity spectrum settings on the Tonto. Unfortunately, this is not always the case as the Arizona Trail existed on the ground prior to its congressional designation as a National Scenic Trail. There are places where the Trail is not consistent with desired conditions and located in recreation opportunity spectrum settings other than primitive and semi-primitive non-motorized settings. The forest plan includes a guideline that “all project-level decisions, implementation activities, and management activities will ensure consistency with recreation opportunity spectrum (ROS), or current protocol”. This guideline will help the Forest implement projects to achieve the desired conditions

for recreation and the Arizona National Scenic Trail. The Forest Service continue working with the Arizona Trail Association to make more miles of the trail conform to the National Trails System Act. Potential impacts to the nature and purposes of the trail (including from timber and mining) will be analyzed at the site-specific project level, in compliance with the National Environmental Policy Act and all applicable laws, regulations, and policies. Efforts to better align with the National Trails System Act and the Arizona Trail Comprehensive Plan, will be made throughout the life of this forest plan. We look forward to working with you, the public and the Arizona Trail Association on projects related to the Arizona Trail.

**Concern Statement 224.** *Commenters are concerned with illegal activities on the forest and having enough law enforcement.*

Response:

**Comment Number(s):**

2907-6

The following plan components aim to address education about safe, responsible recreation including promoting Leave No Trace Ethics: “Public information about the recreational opportunities on the forest as well as the rules, regulations, and expectations for visiting them is clear and informative.”; “During the 10-year period following plan approval, implement at least 3 strategies to raise awareness of discouraged practices (e.g., illegal dumping, unsafe shooting practices, driving on closed roads) to promote visitor safety and natural resource protection.”; “Land use ethics (e.g., Leave No Trace and pack-it-in pack-it-out) should be promoted for all recreation opportunities and settings.”; and “Promote established programs (e.g., Leave No Trace, Kids in the Woods, Passport in Time, Discovery Agents, and Bear Aware) and develop new conservation education programs that help connect people to nature and encourage responsible use at various locations (e.g., schools, youth activities, fairs, and volunteer events)” (forest plan, chapter 2, Recreation). The Forest also tries to consistently train volunteers and organizations who perform project work for the agency, however, not every individual can go through extensive training when it comes to large organizations performing volunteer work. The Partnerships and Volunteers section addresses this issue and states “Work to implement methods to recruit, train, and coordinate volunteers that are consistent across the Tonto National Forest” (forest plan, chapter 2, Partnerships and Volunteers).

**Comment Number(s):**

2907-1

We agree education and outreach is an effective management strategy to encourage public compliance and respect for forest lands. Since department budgets vary from year to year, it is not appropriate to include issues of staffing and budget resources in a land management plan. However, the following plan components aim to address education about safe, responsible recreation including promoting Leave No Trace Ethics: “Public information about the recreational opportunities on the forest as well as the rules, regulations, and expectations for visiting them is clear and informative.”; “During the 10-year period following plan approval, implement at least 3 strategies to raise awareness of discouraged practices (e.g., illegal dumping, unsafe shooting practices, driving on closed roads) to promote visitor safety and natural resource protection.”; “Land use ethics (e.g., Leave No Trace and pack-it-in pack-it-out) should be promoted for all recreation opportunities and settings.”; and “Promote established programs (e.g., Leave No Trace, Kids in the Woods, Passport in Time, Discovery Agents, and Bear Aware) and develop new conservation education programs that help connect people to nature and encourage responsible use at

various locations (e.g., schools, youth activities, fairs, and volunteer events)” (forest plan, chapter 2, Recreation).

**Comment Number(s):**

2907-4

We agree that a permit system is not a replacement for law enforcement presence. The plan components in the Recreation section (chapter 2) that recommend consideration of permitted areas are merely a management tool for use in conjunction with other existing management practices. So, for those areas where law enforcement or other staffing needs are currently low, we would still aim to fill those positions while also implementing a permitted area. The forest plan provides plan components that recommend consideration of permitted areas as management techniques for high-use areas. Our goal is to coordinate enforcement efforts with partner agencies and groups to increase public education and build “self-regulation” within the recreational community.

**Comment Number(s):**

2907-8

We agree that an increase in law enforcement officers on the forest would be desirable. However, funding for the forest is determined by Congress on an annual basis and is distributed to individual programs at a national, regional, and forest level. The forest plan does not affect the funding we are provided for law enforcement, and thus, what our staffing levels for law enforcement will be for any given year.

**Comment Number(s):**

2907-2

We agree that user compliance varies by location and depends greatly on social influences. We also agree that adequate signage helps encourage users to recreate responsibly. In our experience, both from an administrative standpoint, field staff, and law enforcement, we've found that permitted areas are beneficial in many aspects although they are not the solution for all resource concerns or recreation-related behavior issues. The forest plan provides plan components that recommend consideration of permitted areas as a management technique for high-use areas. Our goal is to coordinate enforcement efforts with partner agencies and groups to increase public education and build “self-regulation” within the recreational community.

**Comment Number(s):**

2907-7

While the forest planning process cannot dictate staffing levels for law enforcement, the following plan components aim to address education about safe, responsible recreation including promoting Leave No Trace Ethics: “Public information about the recreational opportunities on the forest as well as the rules, regulations, and expectations for visiting them is clear and informative.”; “During the 10-year period following plan approval, implement at least 3 strategies to raise awareness of discouraged practices (e.g., illegal dumping, unsafe shooting practices, driving on closed roads) to promote visitor safety and natural resource protection.”; “Land use ethics (e.g., Leave No Trace and pack-it-in pack-it-out) should be promoted for all recreation opportunities and settings.”; and “Promote established programs (e.g., Leave No Trace, Kids in the Woods, Passport in Time, Discovery Agents, and Bear Aware) and develop new conservation education programs that help connect people to nature and encourage responsible use at various locations (e.g., schools, youth activities, fairs, and volunteer events)” (forest plan, chapter 2,

Recreation). When funds are available, including from partner organizations, these funds can go to support temporary or seasonal positions to contact user groups in the field and increase education and compliance.

**Concern Statement 225.** *Commenters are concerned with motorized big game retrieval.*

Response:

**Comment Number(s):**

2736-15, 2970-752,

The 2005 Travel Management Rule (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas. In contrast, the 2012 Planning Rule (36 CFR 219) is the overriding regulation that guides the development, amendment, and revision of land management plans for all units of the National Forest System. As such it is programmatic in nature and does not dictate the level of specificity that project level plan implementation does. All project level specificity and decisions for the management of motor vehicle use will be done in compliance with the 2005 Travel Management Rule either forestwide (as is the case with the current travel management planning process) or on a more site-specific need, such as by district or area. This planning process provides plan components to guide management of the forest, including for motorized use. A guideline in the Wildlife-Related Recreation section of the revised plan (chapter 2) states: Motorized big game retrieval should occur only along designated routes open to the public as depicted in the Motor Vehicle Use Map. Motor vehicle use will be limited to the routes and areas designated for that use as it is defined in the final Travel Management Record of Decision. The forest plan is strategic in nature and does not include project and activity decisions such as the travel management decision as detailed in chapter 1 of the revised plan. This planning process would not change the designated system of roads and motorized routes. Travel management will be implemented according to the associated environmental impact statement and is a separate decision from the forest plan revision, but both will direct site-specific project planning and decision making going forward.

**Concern Statement 226.** *Commenter is concerned with motorized recreation suitability determinations within ROS settings.*

Response:

**Comment Number(s):**

2970-744

Motorized recreation suitability determinations are not a requirement of the 2012 Planning Rule. Timber suitability is the only required analysis and it is included in the environmental impact statement. The forest plan includes a guideline that “all project-level decisions, implementation activities, and management activities should be consistent with or move the area toward the appropriate Recreation Opportunity Spectrum (ROS), or current protocol”. This guideline will help achieve the desired conditions for recreation opportunities throughout the forest. The forest plan is strategic in nature and does not include project and activity decisions. The 2005 Travel Management Rule (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas which is the appropriate place to analyze any specific route closures or decommissioning’s.

**Concern Statement 227.** *Commenters are concerned with recreation fees in parking areas, recreation sites, and other high use areas of the forest.*

Response:

**Comment Number(s):**

10-2

The Federal Lands Recreation Enhancement Act authorizes the Forest Service to collect fees. These fees help pay for rec-site maintenance, conservation efforts, ecosystem rehabilitation, and countless hours of administration work that must be done in order to keep the Tonto National Forest sustainable for future generations. Fees and the collection of fees are outside the scope of this plan revision process. We hope you continue to use our National Forest and treasure it as much as we do.

**Comment Number(s):**

12-3

The Tonto National Forest does not have any “paid parking lots,” but does maintain multiple fee-for-use recreation sites with fee stations throughout the forest. The Federal Lands Recreation Enhancement Act authorizes the Forest Service to collect fees. These collected fees help pay for recreation site maintenance including restroom facilities, law enforcement and medical staff presence, conservation efforts, ecosystem rehabilitation, and countless hours of administration work that must be done in order to keep the Tonto National Forest sustainable for future generations. While there are many developed recreation sites that require a fee, there is also more than 95 percent of our forest that does not require a fee to recreate on. Fees and the collection of fees are outside the scope of this plan revision process.

**Concern Statement 228.** *Commenter is concerned with the final forest plan and associated final environmental impact statement providing plan components and analysis that consider and provide for sustainable recreation as required by the 2012 Planning Rule.*

Response:

**Comment Number(s):**

2970-739

The forest plan meets the 2012 Planning Rule in that it provides plan components that provide sustainable recreation. The final environmental impact statement states, “The overarching goal for the Tonto National Forest recreation program is to provide sustainable recreation opportunities for its visitors” and a desired condition in the Recreation section of the revised plan states “Recreation on the forest is sustainable and adapts to changes in science, technology, and best management practices when implementing new projects and updating or upgrading existing infrastructure.” A management approach also states, “Implement a sustainable recreation approach consistent with the most recent Tonto Sustainable Recreation Action Plan, or similar strategy, including the completion of the actions and objectives outlined in the action plan” (forest plan, chapter 2, Recreation). In relation to the comment about using the recreation opportunity spectrum, a plan component addresses this topic: “All project-level decisions, implementation activities, and management activities should be consistent with or move the area toward



the appropriate recreation opportunity spectrum (ROS), or current protocol” (forest plan, chapter 2, Recreation). Specific areas and trails, whether they are motorized or non-motorized are not a part of the forest plan; the forest plan is strategic in nature and does not include project and activity decisions such as specific trails and their recreation opportunity spectrum classifications.

**Concern Statement 229.** *Commenter is concerned with the growth of motorized recreation on the forest. This includes concerns with cross-country or off-road motorized travel and the impacts it has on natural resources.*

Response:

**Comment Number(s):**

995-1

Thank you for your concern for the health and natural condition of the forest. According to the Multiple-Use Sustained-Yield Act, “it is the policy of the Congress that the national forests are established and shall be administered for outdoor recreation, range, timber, watershed, and wildlife and fish purposes.” For this reason, eliminating or overly restricting motorized travel was not considered as part of the plan revision process because it is outside the scope of this plan revision process and is being addressed by the Tonto's travel management planning process. However, many plan components throughout the final forest plan aim to protect all natural resources ranging from wildlife, to scenery, to soils, to cultural resources, among many others. A desired condition in the Recreation section states “Recreation contributes to enhanced quality of life for all of our visitors and the communities we serve. Recreation opportunities support healthy lifestyles and local businesses and jobs, contribute to vibrant local economies, and conserve water quality, fish and wildlife habitat, landscapes, and cultural resources” (forest plan, chapter 2, Recreation). We also hope to educate the public as much as possible about how to recreate responsibly and enjoy the national forest respectfully, with plan components such as “Develop interpretive materials and conservation education programs in conjunction with our partners and communities to help visitors understand their relationship with the natural environment. Use current technology and media sources to connect to forest users.”

**Concern Statement 230.** *Commenter is concerned with the impacts of livestock grazing on recreation opportunities.*

Response:

**Comment Number(s):**

3013-2

Several desired conditions support wildlife viewing related to recreation in the Wildlife-Related Recreation section (forest plan, chapter 2, Wildlife-Related Recreation). Livestock use is also an appropriate use of the forest, and several plan components in the Rangelands, Forage, and Grazing section address management techniques to minimize impacts to other resources including recreation (forest plan, chapter 2, Rangelands Forage and Grazing).

**Concern Statement 231.** *Commenter is concerned with the recreation opportunities on the national forest.*

Response:

**Comment Number(s):**

2945-1

We too would like to see all users be respectful of National Forest System lands and not dump trash, carelessly start fires, or drive off designated roads. Existing laws already prohibit these activities. However, we have incorporated into our desired conditions, “Recreation sites are managed to standard and free of litter, graffiti, vandalism, theft, illegal activity, and trash dumping to enhance the recreation experience” (forest plan, chapter 2, Recreation). Law enforcement officers patrol dispersed areas as often as they can to monitor illegal activities, and staff maintain educational signs to encourage responsible use on the forest. As another plan component from the Recreation section states, “Information about public safety, fee information, rules, and regulations, should be posted at recreation sites and other high-visitation access points, kept up to date with relevant information, and maintained to be visually appealing.”

**Concern Statement 232.** *Commenters encourage the Forest Service to adopt alternative C, stating it would be most protective of wilderness characteristics, wildlife, and ecosystems. Commenters also suggest that alternative C would best address concerns related to off-highway vehicle use. Other commenters express opposition to alternative C based on the amount of recommended wilderness allocation, which could hinder future economic and multiple use opportunities, and inhibit active restoration activities on the forest.*

Response:

**Comment Number(s):**

2911-1, 2920-2

We appreciate your support of our planning efforts per 36 CFR 219. Alternative B has been modified to incorporate certain elements of alternatives A, C, and D in response to public comments and the best available scientific information. The Tonto National Forest experiences high visitation levels for both motorized and nonmotorized uses across the forest, and thus, the forest plan attempts to balance management of both types of recreation activities. The following plan component has been revised to state: “Every 5 years, take appropriate action (e.g., close, decommission, or convert) on at least 10 miles of motorized and/or non-motorized trails that may not offer recreation value (e.g., unsustainable, low-use, or have no remarkable destination value) or are not needed for administrative use.” However, as reflected in additional plan components, the Tonto National Forest intends to develop 1 to 4 systems of sustainable designated motorized and non-motorized trails to adequately provide groups with more access and reduce user conflicts. Our intentions are to create and modify more sustainable trails or roads as we close old ones.

**Concern Statement 233.** *Commenter is concerned about access to the forest for recreation opportunities.*

Response:

**Comment Number(s):**

62-1

We appreciate you coming out to the Payson Meeting at Julia Randall School in January and expressing your concerns regarding public access and fees. A land management plan guides and constrains Forest Service personnel and resource management, not the public. Any constraint on the public needs to be imposed by law, regulation, or through the issuance of an order by the responsible official under 36 CFR part 261, Subpart B. As mentioned in the Developed Recreation and Dispersed Recreation sections, we would consider closing a developed or dispersed recreation site or area only after reviewing all factors such as public demand, resource protection needs, partnerships, operating costs, and additional fees. Closing a campground would be the last option after exhausting all other possibilities to keep a site open, and, as mentioned, would require separate project level analysis. While plan components do state that the Tonto will take appropriate action (such as decommissioning, closing, or converting) on at least 10 miles of trails every 5 years, it also states that will be creating new ones. As mentioned in the same section (forest plan, chapter 2, Recreation) the Tonto National Forest will be developing or modifying existing systems sustainable for motorized and nonmotorized trails to adequately provide for all user groups and reduce user conflicts on a site-specific project level. Our intentions are to create and modify more sustainable trails or roads as we close old ones. Additional fees are mentioned as an option to generate more funds to keep these campsites, roads, and trails open for the public and be able to meet maintenance and administrative expectations while keeping them open.

**Concern Statement 234.** *Commenter is concerned about the recreation opportunity spectrum analysis in the draft environmental impact statement.*

Response:

**Comment Number(s):**

2970-740

We appreciate your comment about the recreation opportunity spectrum. Between the draft and final environmental impact statement, the Travel Management planning Record of Decision was signed, which amended the existing forest plan recreation opportunity spectrum by management area. The recreation opportunity spectrum provides the framework where specific recreational opportunities, activities, and expected experiences are integrated to ensure compatibility with the landscape's natural and cultural resource values. In the final environmental impact statement, each alternative has a recreation opportunity spectrum, and accompanying map, along with planning components specific to recreation opportunity spectrum.

**Comment Number(s):**

2970-742

We appreciate your comments about inventoried roadless areas and the recreation opportunity spectrum. The Tonto National Forest has included a guideline "all project-level decisions, implementation activities,

and management activities should be consistent with or move the area toward the appropriate recreation opportunity spectrum (ROS), or current protocol” (forest plan, chapter 2, Recreation). This guideline will help to achieve the desired conditions for recreation opportunities, including within the designated inventoried roadless areas. The suggested additional analysis is not necessary because the management for inventoried roadless areas is dictated by the 2001 Roadless Rule regulations and is not changing from the current plan to the revised plan. The recreation opportunity spectrum is intended to be used to help guide site-specific analysis to achieve the desired conditions. The management of the revised plan is consistent with the Roadless Rule.

**Concern Statement 235.** *Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2970-743, 756

Any reference to the word “trail” or “road” assumes the meaning of designated or National Forest System trail or road. Unauthorized or user created trails or roads are specifically named as such in plan components. Between the draft and final environmental impact statement for plan revision, the Travel Management planning Record of Decision was signed, designating motor vehicle use forestwide, including designated areas for the use of a motor vehicle for the retrieval of big game. The forest plan is strategic in nature and does not include project and activity decisions such as the Travel Management decision; the forest plan alone would not change the designated system of roads and motorized routes. Travel Management is a separate decision from the forest plan revision, but both will direct decision making going forward. The referenced plan component has been updated to say, “Every 5 years, take appropriate action (e.g., close, decommission, or convert) on at least 10 miles of motorized and/or non-motorized trails that may not offer recreation value (e.g., unsustainable, low-use, or have no remarkable destination value) or are not needed for administrative use” (forest plan, chapter 2, Recreation). This gives us more flexibility in what action we take with those trails rather than being required to decommission at least 10 miles every 5 years. The mileage is an attainable value based on current staffing, funding, and other Forest resource limitations. Because the forest plan is a long-term document, we do not want to put strict limitations on ourselves or unattainable standards when we do not know what funding Congress will grant the agency and different departments in the upcoming years. The Forest will aim to take the appropriate action, as identified in this updated plan component, on more than 10 miles, as identified by the Travel Management Plan Record of Decision, as applicable and resources are available. Also, replacing the terminology of REC-O-06 of “motorized and/or non-motorized trails” with a measurable width is not necessary because the current language includes all widths, and the intent of the plan component is not to be specific.

**Comment Number(s):**

2970-754

Motorized recreation is addressed both in the general Recreation section and specifically in the Dispersed Recreation, Motorized Recreation section of the revised plan (chapter 2). A guideline in the Recreation section states, “All project-level decisions, implementation activities, and management activities should be consistent with or move the area toward the appropriate recreation opportunity spectrum (ROS), or current protocol.” Below are responses to each recommendation:

1. These concerns are addressed in the following plan components: “Recreation contributes to enhanced quality of life for all of our visitors and the communities we serve. Recreation opportunities support healthy lifestyles and local businesses and jobs, contribute to vibrant local economies, and conserve water quality, fish and wildlife habitat, landscapes, and cultural resources” (forest plan, chapter 2, Recreation); “Conflicts among various recreation users and with other multiple uses are infrequent and easily resolved” (forest plan, chapter 2, Recreation); and “Dispersed recreation provides visitors with diverse opportunities to recreate on land and water with minimal impacts to other natural resources (e.g., riparian areas, streams, lakes, and wetlands)” (forest plan, chapter 2, Recreation, Dispersed Recreation). Additionally, all designation of motor vehicle use across the forest will comply with the Travel Management Rule, which requires consideration of all of these points.

2. “All project-level decisions, implementation activities, and management activities should be consistent with or move the area toward the appropriate recreation opportunity spectrum (ROS), or current protocol” (forest plan, chapter 2, Recreation) addresses how recreation opportunity spectrum will be included in recreation management. Specific areas and trails, whether they are motorized or non-motorized, relate to site-specific project planning and analysis and are outside the scope of this forest plan revision process; the forest plan is strategic in nature and does not include project and activity decisions such as specific trails and their recreation opportunity spectrum classifications.

3. The previous response also address the third part of the commenter’s concerns.

4. Plan components mentioned above address the relationship between fish and wildlife resources and management of recreation resources. In addition, motor vehicle use will be limited to the routes and areas designated for that use as it is defined in the Travel Management Record of Decision. The forest plan is strategic in nature and does not include project and activity decisions such as the travel management decision; the forest plan alone would not change the designated system of roads and motorized routes. Travel management will be implemented according to the record or decision as supported by the environmental impact statement and project record separately from this plan revision process. However, both will influence management of motor vehicle use across the forest moving forward.

5. The forest plan does not address specific best management practices for design, management, and maintenance of motorized trails and roads. However, it is implied in several plan components when sustainable recreation practices and maintenance are addressed (see forest plan, chapter 2, Recreation, Dispersed Recreation, Motorized Recreation). Also, a desired condition in the Recreation section states: “Recreation on the forest is sustainable and adapts to changes in science, technology, and best management practices when implementing new projects and updating or upgrading existing infrastructure” (forest plan, chapter 2, Recreation).

6. This is partially addressed by the current plan component, “Recreation on the forest is sustainable and adapts to changes in science, technology, and best management practices when implementing new projects and updating or upgrading existing infrastructure.” Funding is determined by Congress on an annual basis and is distributed to individual programs at a national, regional, and forest level. It is not possible to know what funding will be for the life of the forest plan, and thus not appropriate to describe a plan component based on “long term funding expectations.”

**Comment Number(s):**

2970-755

We appreciate your comments about incorporating the recreation opportunity spectrum into the forest plan. The Tonto National Forest has included a guideline “all project-level decisions, implementation

activities, and management activities should be consistent with or move the area toward the appropriate recreation opportunity spectrum (ROS), or current protocol” (forest plan, chapter 2, Recreation). This guideline will help to achieve the desired conditions for recreation opportunities. The suggested objective is redundant with the mentioned desired condition and guideline. The Tonto National Forest has included objectives that address decommissioning routes on the forest as identified in the most current travel management decision. The recreation opportunity spectrum is intended to be used to help guide site-specific analysis, included management of current and future motor vehicle use across the forest.

**Comment Number(s):**

2970-757

We appreciate your suggestions related to motorized recreation and the recreation opportunity spectrum. To ensure consistency with other forests in the region and based on guidance from the regional office the mentioned standard related to recreation opportunity spectrum has been moved to a guideline. It now reads “all project-level decisions, implementation activities, and management activities should be consistent with or move the area toward the appropriate recreation opportunity spectrum...”. This change is more in line with how future projects will be handled in relationship to the recreation opportunity spectrum. We did not include the suggested standards for managing motorized recreation that are inconsistent with the recreation opportunity spectrum. We feel the guideline previously mentioned will accomplish the same thing and will work to start bringing the areas that are not in compliance with the recreation opportunity spectrum in the right direction. The same is true for not building new roads or trails. Between the draft and final environmental impact statement, the Travel Management Planning Record of Decision was signed, which amended the existing forest plan to remove all reference to cross country travel, prohibiting it forestwide. With the signing of that decision, and the subsequent release of the motorized vehicle use map (MVUM), all motorized travel will be restricted to designated roads, trails, and areas.

**Comment Number(s):**

79-1, 2

A land management plan guides and constrains Forest Service personnel and resource management, not the public. Management of National Forest System lands is also guided and constrained by laws, regulations, policies, practices, and procedures that are in the Forest Service directive system. These are generally not repeated in land management plans. The following plan component addresses how recreation opportunity spectrum will be included in recreation management: “All project-level decisions, implementation activities, and management activities should be consistent with or move the area toward the appropriate recreation opportunity spectrum (ROS), or current protocol” (forest plan, chapter 2, Recreation). Specific areas and trails, whether they are motorized or non-motorized are not a part of the forest plan; the forest plan is strategic in nature and does not include project and activity decisions such as specific trails and their recreation opportunity spectrum classifications.

**Comment Number(s):**

2736-21

Specific management and development plans will be addressed in future travel management plans but is not within the scope of the forest plan. By assigning the Tonto a set number of trails to decommission, we are holding ourselves accountable to follow through every five years and make an improvement to our National Forest System trails and/or roads. The following plan component has been revised to state: “Every 5 years, take appropriate action (e.g., close, decommission, or convert) on at least 10 miles of

motorized and/or non-motorized trails that may not offer recreation value (e.g., unsustainable, low-use, or have no remarkable destination value) or are not needed for administrative use.” However, as reflected in additional plan components, the Tonto National Forest intends to develop 1 to 4 systems of sustainable designated motorized and non-motorized trails to adequately provide groups with more access and reduce user conflicts. Our intentions are to create and modify more sustainable trails or roads as we close old ones.

**Comment Number(s):**

2736-24

Thank you for suggesting alternative approaches to handling preservation issues and overcrowding. Permitting and reservations are useful tool used to preserve and maintain desired areas. Guidance in the forest plan outlines the types of situations where these things may be considered. However, management of potential permitting and reservations systems would be considered at a site-specific level and require additional analysis, including the consideration of the effects to adjacent areas.

**Comment Number(s):**

2972-37

We agree that one of the main challenges for recreation management on the Tonto National Forest is balancing high use with quality experiences. There are several plan components throughout the recreation section that aim to address this issue (forest plan, chapter 2, Recreation).

**Comment Number(s):**

2570-2

We appreciate the commentors concerns about decommissioning trails on the forest. The plan component referenced in this comment has been updated in the final forest plan to read “every 5 years, take appropriate action (e.g., close, decommission, or convert) on at least 10 miles of motorized and/or non-motorized trails that may not offer recreation value (e.g., unsustainable, low-use, or have no remarkable destination value) or are not needed for administrative use” (forest plan, chapter 2, Recreation). This change provides more clarity on the intent behind the objective and is more consistent with future management decisions. Specific routes will be addressed in site-specific project level planning, in compliance with the National Environmental Policy Act and all applicable laws, regulations, and policies.

**Comment Number(s):**

2933-1

We appreciate your recommendation to add the 10-year Trail Shared Stewardship Challenge to the forest plan. Several plan components already address prioritizing sustainable efforts and management actions, including “Recreation on the forest is sustainable and adapts to changes in science, technology, and best management practices when implementing new projects and updating or upgrading existing infrastructure” and Recreation Management Approach #6 “Promote shared stewardship by continuing to develop partnerships and volunteer opportunities, and by taking advantage of opportunities to engage with the public” (forest plan, chapter 2, Recreation).

**Comment Number(s):**

2927-3, 14, 15, 25

We appreciate your support of our planning efforts per 36 CFR 219 and in our recreation program. As we move into project level plan implementation, we will be looking for volunteers and partners to help us with projects to achieve our desired conditions for recreation and would appreciate your continued support of the program.

**Comment Number(s):**

25-5

We believe this comment is referring to potential changes to the uses of motorized versus non-motorized use of trails. Signs are an important education and regulatory tool necessary for the successful functionality of multi-use recreation areas and trails. As user trends and technology changes, the Forest must adapt as well and update signs and kiosks to reflect new uses. Funding is determined by Congress on an annual basis and is distributed to individual programs at a national, regional, and forest level. It is not possible to know what funding will be for the life of the forest plan, but each department within the agency plans their budget accordingly each year. The signs located throughout our National Forest were not all created at the same time since trails, roads, recreation, and land-use sites have been created periodically. The Tonto only replaces signs as it is needed. We work alongside partnership and volunteer groups to replace signs, educate the public on right-of-way issues, and general stewardship between user groups.

**Comment Number(s):**

2736-22

We have added the definition of “rehabilitate” it to the glossary which can be found in the final environmental impact statement. The definition of rehabilitate is as follows; reestablish the natural landscape, ecosystem, or artificial improvements through sustainable ecological, social, or economic management practices based off the activity and use in the area. Examples include planting seed and small vegetation in an area that has experienced soil compaction and vegetation trampling from vehicles where there are no designated roads or motorized trails.

**Comment Number(s):**

2733-6

We see your perspective and value the alternative wording that you provided. The descriptive paragraphs of the Recreation section in the forest plan, chapter 2, define sustainable recreation as being a combination of all three of the following: ecological, economical, and social. A plan component in the Recreation section states, “Recreation Development and improvements should be planned, designed, and managed for activities and capacities that minimize resource damage (e.g., soil erosion and vegetation trampling) and minimize adverse impacts to landscape” (forest plan, chapter 2, Recreation). This component does not prioritize ecological resources over the others; it simply states that it should be considered when planning for recreation development. Ideally, we could mention all three aspects of sustainable recreation here but sustainable recreation has been mentioned in several other plan components. The intent of this plan component is to reiterate the need to evaluate ecological resources when developing recreation resources.



## Recreational Shooting

**Concern Statement 236.** *Commenters are concerned with restrictions on recreational shooting on the national forest.*

Response:

**Comment Number(s):**

2923-22

Alternative A reflects the current management under the existing forest plan. While this alternative is not legally selectable, it does provide a baseline to show how the effects of the other alternatives would be different. We agree that by providing plan components for recreational shooting, we will be able to better manage for recreational shooting and engage with our partners to better reach our desired conditions. We appreciate the commenter's support of this program as we move into the implementation phase of the forest plan.

**Comment Number(s):**

70-1

Our goal is to provide safe recreational shooting opportunities and address user demand as stated in the first desired condition for recreational shooting in the forest plan. We agree that the majority of recreational shooters act responsibly and appreciate the public's participation in educating others that are not aware of responsible shooting practices. One of the management approaches identified in the forest plan to reach our desired conditions is to build on this, specifically, "Work with partners to expand public education on safe recreational shooting practices and 'Leave No Trace' standards. Coordinate enforcement efforts with law enforcement agencies to increase public education and build 'self-regulation' within the recreational shooting community" (forest plan, chapter 2, Dispersed Recreation, Recreational Shooting).

**Comment Number(s):**

68-1

The areas identified by the commenter are some of the most heavily used areas for recreational shooting on the forest. As such, any effects from recreational shooting tend to be magnified in these areas. These areas were called out for analysis purposes and are areas, because of their popularity, where the Forest Service has more information about use and therefore misuse. Projects that implement the plan will determine specific sites for management, which may or may not include the listed areas, but there are no recreational shooting plan components that would only apply to the listed areas. We agree that the majority of recreational shooters act responsibly and appreciate the public's participation in educating others that are not aware of responsible shooting practices. One of the management approaches identified in the forest plan is to build on this, specifically, "Work with partners to expand public education on safe recreational shooting practices and 'Leave No Trace' standards. Coordinate enforcement efforts with law enforcement agencies to increase public education and build 'self-regulation' within the recreational shooting community" (forest plan, chapter 2, Dispersed Recreation, Recreational Shooting).

**Comment Number(s):**

68-3, 262-3

The Tonto National Forest, like most national forests, is currently open to recreational shooting in all areas where there is not an existing closure order in place and where it can be done safely per 36 CFR 261.10 (d). Additionally, the Forest Service is governed by the Multiple Use and Sustained Yield Act, which allows for many different types of uses, including recreational shooting. A land management plan guides and constrains Forest Service personnel and resource management, not the public. Closing of any area to recreational shooting would require a site-specific project proposal, including an analysis of the effects of such a proposal. The direction in the forest plan would provide guidance to the Forest about the types of situations where additional closures would be considered if those proposals were made. Our goal is to provide safe recreational shooting opportunities and address user demand as stated in the first desired condition for recreational shooting in the forest plan. We agree that the majority of recreational shooters act responsibly and appreciate the public's participation in educating others that are not aware of responsible shooting practices. One of the management approaches identified in the forest plan to reach our desired conditions is to build on this, specifically, "Work with partners to expand public education on safe recreational shooting practices and 'Leave No Trace' standards. Coordinate enforcement efforts with law enforcement agencies to increase public education and build 'self-regulation' within the recreational shooting community" (forest plan, chapter 2, Dispersed Recreation, Recreational Shooting).

**Comment Number(s):**

66-5, 70-3

The Tonto National Forest, like most national forests, is currently open to recreational shooting in all areas where there is not an existing closure order in place and where it can be done safely per 36 CFR 261.10 (d). Existing laws prohibit littering on the forest, and target type restrictions prohibit using some types of targets such as large appliances that would otherwise be left behind. Closing additional areas to recreational shooting would require additional project level analysis. The direction in the forest plan would provide guidance where additional closures would be considered if those proposals were made. However, we have included a management approach in the forest plan to consider the use of designated shooting areas to accommodate the growing demand, as well as a management approach to "Consider permitted and developed shooting ranges and other management tools to meet demands for recreational shooting while also meeting public safety and natural resource protection objectives" (forest plan, chapter 2, Dispersed Recreation, Recreational Shooting).

**Comment Number(s):**

67-1

We agree that the majority of recreational shooters act responsibly and appreciate the public's participation in educating others that are not aware of responsible shooting practices. One of the management approaches identified in the forest plan is to build on this, specifically, "Work with partners to expand public education on safe recreational shooting practices and 'Leave No Trace' standards. Coordinate enforcement efforts with law enforcement agencies to increase public education and build 'self-regulation' within the recreational shooting community" (forest plan, chapter 2, Dispersed Recreation, Recreational Shooting).

**Concern Statement 237.** *Commenter suggests focusing on education as a management strategy for recreational shooting.*

Response:

**Comment Number(s):**

70-5

We appreciate your suggestions for shooter education and strategies for outreach. When our Forest Order with an approved list of target types was signed in November of 2017, many of these organizations were contacted along with a media announcement. Signs were posted in popular shooting areas and contact was made on the forest with recreational shooters to educate them about the new order and ask them to help spread the word. We agree that education and outreach is an important management strategy. A desired condition, guidelines, and management approaches have been included in the forest plan to support and expand these efforts moving forward. Clean up events occur regularly in popular shooting areas, organized by partner groups and volunteers, and supported by the local ranger district personnel. We would welcome the involvement of additional volunteer groups moving forward.

**Concern Statement 238.** *Commenter is concerned about the increase in recreational shooting use on the national forest.*

Response:

**Comment Number(s):**

70-4

The existing forest plan is silent on recreational shooting and provided no direction about how to accommodate the growing demand on the forest. We are including this direction in this revised forest plan, such as our desired condition “Recreational shooting opportunities are available and address user demand while minimizing public safety concerns, environmental impacts, resource damage, and litter” (forest plan, chapter 2, Dispersed Recreation, Recreational Shooting). While site-specific activities would require additional analysis at a project level, we have included a management approach in the forest plan to “Consider permitted and developed shooting ranges and other management tools to meet demands for recreational shooting while also meeting public safety and natural resource protection objectives” (forest plan, chapter 2, Dispersed Recreation, Recreational Shooting).

**Concern Statement 239.** *Commenter is concerned with recreational shooting as a use on the national forest.*

Response:

**Comment Number(s):**

2970-611

A land management plan guides and constrains Forest Service personnel and resource management, not the public. Management of National Forest System lands is also guided and constrained by laws, regulations, policies, practices, and procedures that are in the Forest Service directive system, including the Multiple Use and Sustained Yield Act, which allows for many different types of uses, including recreational shooting. These are generally not repeated in land management plans. Any project that

implements a land management plan would be required to comply with all laws, regulations, and policies, including the John D. Dingell, Jr. Conservation, Management, and Recreation Act (Dingle Act). The direction in the forest plan would provide guidance to the Forest about the types of situations where additional closures would be considered if those proposals were made. The first standard for recreational shooting is “Recreational shooting is prohibited in areas where risks to public health and safety and conflicts with other National Forest uses are not able to be mitigated” (forest plan, chapter 2, Dispersed Recreation, Recreational Shooting). Discussion of fire risk, litter, and resource concerns can be found in the Recreational Shooting section of the final environmental impact statement (chapter 3, Recreational Shooting, Affected Environment).

**Concern Statement 240.** *Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2736-34

A botanical area is an area that contains plant specimens, plant groups, or plant communities that are significant because of their form, color, occurrence, habitat, location, life history, arrangement, ecology, rarity, or other features. (Forest Service Manual 2372) There are four different recommended botanical areas in the forest plan totaling about 3,630 acres. There are many activities, such as overnight camping, campfires, recreational shooting, and livestock grazing, that would be prohibited within botanical areas to maintain the unique characteristics of the area for which it would be designated. More information can be found in the Designated and Recommended Research Natural Areas and Botanical Areas (RNBAMA) section of the revised plan. Additionally, research activities often occur in these areas so research equipment may be present in the area which could easily be damaged. A separate process would be required to designate botanical areas. This process would consider affected resources on a site-specific level and identify potential conflicts of uses as the commenter requests as well as comply with all law, regulation, and policy, including the forest plan. The specific guideline the commenter references has been revised to avoid confusion. It now reads only, “Within designated or proposed botanical areas” “(forest plan, chapter 2, Dispersed Recreation, Recreational Shooting).

**Comment Number(s):**

2923-5, 6, 2932-23

A land management plan guides and constrains Forest Service personnel and resource management, not the public. Management of National Forest System lands is also guided and constrained by laws, regulations, policies, practices, and procedures that are in the Forest Service directive system. These are generally not repeated in land management plans. However, any project that implements a land management plan would be required to comply with all laws, regulations, and policies, including the Dingle Act (P.L. 116-9). Some of the elements of the referenced Guideline 03 would require project level analysis to implement, as they are not already decided in an existing law (i.e., “Within any permit zones and designated off highway vehicle area, including “tot lots,” as identified through travel management”). Both Sections of the Dingle Act referenced by the commenter include provisions that the sections may be applied for “compliance with applicable laws.” One of the standards in the forest plan is “Management of recreational shooting will be consistent with Federal and State laws regarding the use of firearms” (forest plan, chapter 2, Dispersed Recreation, Recreational Shooting). The quarter mile limit was chosen to be

consistent with the Arizona Game and Fish Department section of State law. Under Title 17 the distance you must be from a residence or occupied structure to legally be able to discharge a firearm (without permission) is one quarter mile. Depending on how someone is shooting and what they are shooting they could still be considered unsafe and in violation of 36 CFR 261.10 (d)2. "...or in any manner or place whereby and person or property is exposed to injury or damage as a result in such discharge..." There will invariably be some officer discretion when it comes to enforcement. The officer would have to determine distance, how it was a safety threat, and whether the standard of "occupied" has been met. As per the example, under the State law, if there is no house, business, or other structure that would reasonably be expected COULD be occupied even intermittently and there is no person within one quarter mile, then the discharge would not be in violation of the one quarter mile intent.

**Comment Number(s):**

2736-35

Management approach "Work with partners to expand public education on safe recreational shooting practices and 'Leave No Trace' standards. Coordinate enforcement efforts with law enforcement agencies to increase public education and build 'self-regulation' within the recreational shooting community" (forest plan, chapter 2, Dispersed Recreation, Recreational Shooting) serves the purpose the commenter identifies. This management approach also supports the guideline "An approved list of target types and target shooting restrictions should be posted online and provided at entrances for areas that are frequently used for shooting by the public" (forest plan, chapter 2, Dispersed Recreation, Recreational Shooting). An approved list of target types has been established with Forest Order 03-12-00-18-317. Identifying specific areas for sign placement and enforcement strategies would be done at the local, likely district level, outside of this planning process. There is nothing in the forest plan that would prohibit these activities.

**Comment Number(s):**

2927-5

Thank you for bringing this to our attention. This standard was developed to be consistent with 36 CFR 261.10 (d). The text in the forest plan has been updated to reflect this change (forest plan, chapter 2, Dispersed Recreation, Recreational Shooting).

**Comment Number(s):**

2923-7

The commenter quotes the correct current Federal direction for minimum distances. However, one of the standards in the forest plan is "Management of recreational shooting will be consistent with Federal and State laws regarding the use of firearms" (forest plan, chapter 2, Dispersed Recreation, Recreational Shooting). The quarter mile limit was chosen to be consistent with the Arizona Game and Fish Department section of State law. Under Title 17 the distance you must be from a residence or occupied structure to legally be able to discharge a firearm (without permission) is one quarter mile. We believe the dove season and shotguns shooting shot were the driving force for the law. The ballistics on shotguns shooting shot are such that they determined at 440 yards, or one quarter mile, the pellets would lack the velocity and energy to pose a safety threat.

**Comment Number(s):**

2923-8, 10, 18

The Dingle Act requires the Forest Service to communicate with the MOU roundtable and the Arizona Game and Fish Department for any project that seeks to close areas to recreational shooting. To that extent, it is unnecessary to include that requirement in the forest plan, as it is already required by law. However, there is nothing in the forest plan that would limit the extent to which we can collaborate with our partner groups to improve the recreational shooting program, including promoting existing stewardship campaigns. There are existing national guidelines that allow the Forest Service to form and manage collaborative partnerships outside of the forest plan. The partnership program on the Tonto is guided by Forest Service Manual 1580, Forest Service Handbook 1509.11, and the partnership guide developed by the Forest Service and National Forest Foundation. These documents include various types of authorities that allow cooperative agreements and prioritize our partners and volunteers.

**Comment Number(s):**

70-2

The third desired condition for recreational shooting identified in the forest plan is that “Approved target types and other restrictions are clearly communicated to forest users” (forest plan, chapter 2, Dispersed Recreation, Recreational Shooting). The guideline “An approved list of target types and target shooting restrictions should be posted online and provided at entrances for areas that are frequently used for shooting by the public” (forest plan, chapter 2, Dispersed Recreation, Recreational Shooting), was developed for this purpose. We depend on partner groups and the shooting public to help us get the message out, and we have received many new offers to help through this planning process. The Tonto National Forest has developed several management approaches in the forest plan to continue these efforts and support building on these successes as we move into the implementation phase.

**Comment Number(s):**

2923-3

We appreciate your support of our planning effort. We have added this information to the final environmental impact statement (chapter 3, Recreational Shooting, Affected Environment.)

**Comment Number(s):**

2923-4, 9, 23

We appreciate your support of our planning efforts as it relates recreational shooting. Federal Law, including the Dingle Act P.L. 116-9 and Forest Service regulations allow for this type of activity on National Forest System land. As we move into project level plan implementation, we will be looking for volunteers and partners to help us with projects to achieve our desired conditions for recreational shooting and would appreciate your continued support of the program.

**Comment Number(s):**

2653-8

We believe the suggested guideline is not necessary because the potential for user conflict between these two uses would be low. Discharging a firearm is already prohibited “Across or on a National Forest System Road or a body of water adjacent thereto, or in any manner or place whereby any person or property is exposed to injury or damage as a result in such discharge (i.e., suitable backstop)” (36 CFR 261.10(b)). Many sections of national trail segments follow motorized routes across the forest. Many other sections for those seeking a more primitive experience are located a good distance from roads. As described in the final environmental impact statement, the majority of recreational shooters choose to

shoot within one quarter mile from a road or parking area (final environmental impact statement, chapter 3, Recreational Shooting, Affected Environment).

**Comment Number(s):**

2733-11

As indicated in chapter 1 of the revised plan, a land management plan guides and constrains Forest Service personnel and resource management, not the public. Management of National Forest System lands is also guided and constrained by applicable laws, regulations, policies, practices, and procedures that are in the Forest Service directive system. These are generally not repeated in land management plans. However, any project that implements a land management plan would be required to comply with all applicable laws, regulations, and policies. Some of the elements of the referenced guideline would require project level analysis to implement, as they are not already decided in an existing law (i.e., “Within any designated off highway vehicle area, including tot lots”). One of the standards in the revised plan (chapter 2, Recreation, Recreational Shooting) states: Management of recreational shooting will be consistent with Federal and State laws regarding the use of firearms. The quarter mile limit was chosen to be consistent with the Arizona Game and Fish Department section of State law. Under Title 17 the distance you must be from a residence or occupied structure to legally be able to discharge a firearm (without permission) is one quarter mile. Depending on how someone is shooting and what they are shooting they could still be considered unsafe and in violation of 36 CFR 261.10 (d)2. “...or in any manner or place whereby and person or property is exposed to injury or damage as a result in such discharge...” Most recreational shooters use our road system to access areas to shoot. As described in the environmental impact statement (chapter 3, Recreational Shooting), most shooters choose to shoot within one quarter mile from a road to avoid carrying their gun, targets, etc. too far from their vehicle. Existing regulation already prohibits discharging a firearm across a road or trail.

## **Riparian Areas, Seeps, Springs, and Riparian Management Zones (RMZs)**

*Concern Statement 241. Commenter is concerned that the draft forest plan failed to create a framework for integrated management of riparian resources.*

Response:

**Comment Number(s):**

2970-474

In response to the statement “The Draft Plan fails to provide a framework for systematically and comprehensibly decreasing risks.” The forest plan does in fact provide an adaptive framework for systematically and comprehensibly decreasing risks to riparian ecosystems and other resources through a continuous process that includes: (1) assessment; (2) plan development, amendment, and revision; and (3) monitoring. The intent of this forest planning framework is to create an integrated approach to the management of resources and uses, incorporate the landscape-scale context for management, allow the Forest Service to adapt to changing conditions, and improve management based on monitoring and new information.

We have included a number of desired conditions with the desire of having healthy resilient riparian ecosystems. Standards and guidelines for riparian areas were developed to ensure we meet these desired

conditions. The forest plan addresses mitigating stressors in riparian areas, that are within Forest Service management jurisdiction. Specifically, “in riparian management zones, projects and management activities should be designed and implemented to maintain or restore long-term streambank stability, native vegetation, floodplain, and soil function” (forest plan, chapter 2, Riparian Areas, Seeps, Springs, Wetlands, and Riparian Management Zones). To ensure livestock grazing in riparian areas is adequately addressed in the forest plan, an additional standard was incorporated in the Range section of the forest plan “livestock use in and around riparian areas will be evaluated on an allotment specific basis, design elements (e.g., deferment, herding, and fencing) will be implemented where needed.”

We have provided numerical targets that are time specific to improve riparian conditions though riparian plan objectives – by completing active and passive restoration projects on at least 125 miles of streams every 10 years to improve the ecological integrity of perennial and intermittent riparian ecosystems rated as nonfunctioning and functioning-at-risk. The objective is intentionally broad and not specific to riparian ecological response units to allow for flexibility in where plan objectives are completed. Furthermore, efforts should be focused where conditions are most impaired, such as those areas rated as “non-functioning” and “functioning-at-risk.”

The monitoring chapter of the forest plan is continuous and provides feedback to the planning cycle by testing relevant assumptions, tracking relevant conditions over time, and measuring management effectiveness. Monitoring questions and indicators (metrics to measure conditions/key attributes) have been developed for riparian areas; including percentage of surveyed streams in non-impaired condition, amount of riparian area improved, abundance and diversity of riparian obligate species in treatment areas. See the monitoring chapter of the forest plan for the complete list of monitoring questions and indicators for riparian areas. Information from monitoring (published in biennial reports) will inform the responsible official on progress towards meeting desired conditions in the forest plan, status of accomplishing plan objectives, and identify any necessary changes to plan direction.

**Concern Statement 242.** *Commenter opinion about plan components related to roads and motorized trails within riparian management zones in the future.*

Response:

**Comment Number(s):**

2806-4

We appreciate your support for the guidelines for future roads and trails being located outside of riparian areas. The plan components in the forest plan have been updated to reflect public comments and to provide additional clarity. These guidelines still remain in the forest plan but as number 02 and 03 in the Dispersed Recreation section and guideline 05 in the Roads section (forest plan, chapter 2).

**Concern Statement 243.** *Commenters are concerned with riparian management zones, how they are defined, if ephemeral streams are included, and management at the project level.*

Response:

**Comment Number(s):**

2970-495



We appreciate your support of our planning efforts per 36 CFR 219. As we move into forest plan monitoring (FSH 1909.12-Chapter 30) and project level plan implementation, we will be looking for partners and volunteers to help us achieve our desired conditions and would appreciate your continued support.

**Comment Number(s):**

2970-486

The Forest will use riparian ecological response units for the first approximation of the riparian management zone (RMZ). Riparian ecological response units were developed from the Riparian Mapping Project (2014). The Riparian Mapping Project leveraged recently developed technical capabilities to map riparian plant communities across forests and grasslands of the US Forest Service Southwestern Region (Arizona and New Mexico). Valley bottom models provided spatial hypotheses from which to base photo interpretation of riparian vegetation types and to map the total extent of riparian communities at the scale of 1:12,000, with a map legend of 24 map units and four subclass themes across. High resolution infrared photography and other ancillary references were used to develop and corroborate inferences of riparian settings. Local partners provided riparian data, field validation, and review as a key part of map development.

The following are the riparian ecological response units on the forest that make up the riparian management zone: Arizona Alder-Willow, Arizona Walnut, Desert Willow, Fremont Cottonwood-Conifer, Fremont Cottonwood-Oak, Fremont Cottonwood / Shrub, Herbaceous, Narrowleaf Cottonwood / Shrub, Ponderosa Pine / Willow, and Sycamore – Fremont Cottonwood. Any updates to the riparian ecological response units or any new mapping effort based on the best available science should be incorporated as the first approximation of the riparian management zone. Further modifications to the riparian management zone may be replaced by site-specific delineations during project-level planning and implementation. See the revised riparian management zone description in the forest plan.

Defining an absolute width (e.g., 300 feet) is not consistent with the planning directives. Plans must establish width(s) for riparian management zones around all lakes, perennial and intermittent streams, and open water wetlands, within which the plan components will apply, giving special attention to land and vegetation for approximately 100 feet from the edges of all perennial streams and lakes.

Southwest riparian ecosystems are dynamic and can range from narrow settings (e.g., less than 10 meters wide) to settings with wide floodplain widths greater than 300 feet. Changes or modifications should be based on site potential and other riparian features as cited in the planning directives; areas containing aquatic flora and fauna or supporting substantial riparian vegetation; considering the extent and location of riparian and wetland vegetation, riparian soils, geomorphology, topography, and other relevant information; fluvial geomorphic indicators of riparian areas; the 100-year recurrence interval flood stage; any other existing site-specific riparian area delineations; ordinary high water mark or bankfull flow; dry washes or channels with minimal or no riparian vegetation that support riparian vegetation downstream due to subsurface flow through the stream channel or adjacent alluvial sediments (FSH 1909.12 (23.11e)).

**Comment Number(s):**

2970-475

We have included numerical benchmarks for desired conditions for those desired conditions that lend themselves to quantitative measures. For desired conditions that do not lend themselves to a quantitative measure, they are included because they describe a collective desired vision of the forest. Not all desired conditions are required to have quantitative measures.

Tracking progress towards desired conditions is implemented in the Forest Plan Monitoring Program (chapter 4 of the forest plan). The monitoring chapter of the forest plan is continuous and provides feedback to the planning cycle by testing relevant assumptions, tracking relevant conditions over time, and measuring management effectiveness. Monitoring questions and indicators (metrics to measure conditions/key attributes) have been developed for riparian areas; including percentage of surveyed streams in non-impaired condition, amount of riparian area improved, abundance and diversity of riparian obligate species in treatment areas. See the monitoring chapter of the forest plan for the complete list of monitoring questions and indicators for riparian areas. Information from monitoring (published in biennial reports) will inform the responsible official on progress towards meeting desired conditions in the forest plan, status of accomplishing plan objectives, and identify any necessary changes to plan direction.

**Comment Number(s):**

2970-479

The riparian management zone does include riparian areas that are on drier reaches of intermittent channels. These areas may have little to no surface flow but are distinct in that they support riparian species that require sub-surface flow and or groundwater for persistence, even if their abundance is sparse. These areas have often been referred to as xeroriparian – mesic to xeric habitat-types with average annual moisture higher than the surrounding uplands but provided with surface moisture in excess of local rainfall only on infrequent occasions (usually for less than one month per year). Vegetation, when present, consists of a mixture of preferential, facultative, and non-riparian plants (Johnson et al. 1984). Note, that this definition includes a mixture of preferential or riparian obligates (e.g., cottonwood, willow), facultative (e.g., mesquite, desert willow), and non-riparian or upland species (e.g., desert brome). These areas have also been referred to as Sonoran riparian scrublands – areas found along Intermittent and perennial stream channels, along flood channels, where stream flows are irregular and often occur in the form of flash floods. Riparian scrub may exhibit a dense “chaparral” aspect or very open desert scrub appearance. Typical species include desert willow (*Chilopsis linearoides*), mesquite (*Prosopis* sp.), catclaw (*Acacia* sp.), seepwillow (*Baccharis salicifolia*), desert broom (*Baccharis sarothroides*), and arrowweed (*Pluchea sericia*) (Brown 1980). These drier desert riparian areas are also recognized and defined in the Southwest Region Forest Service Riparian Handbook (FSH 2509.23 (3.31)) – the Desert Subtropical Scrub riparian community that includes mesquite (*Prosopis* sp.), ironwood (*Olneya tesota*), and burrobrush (*Hymenoclea monogrya*).

These plant community descriptions are also consistent with how riparian areas have been mapped and described in the Forest Service Riparian Mapping Project. Riparian ecological response units are included in the riparian management zone (see the riparian management zone description in the forest plan). The following riparian ecological response units on the Tonto best represent xeroriparian areas: Desert Willow Ecological Response Unit, and the Mesquite Bosque subtype of the Fremont Cottonwood/Shrub Ecological Response Unit (see the Riparian Ecological Response Units section). The key distinction is that these xeroriparian areas always have either facultative and or riparian obligate species present (even though they may be sparse), and they have access to subsurface flow, groundwater flow, or surface flow (even though it may be minimal and sporadic from year to year).

The riparian management zone does not include dry washes that only flow in direct response to a precipitation event and therefore do not support distinctive riparian plant communities described above. The exception specified in the definition of the riparian management zone are those dry washes or channels with minimal or no riparian vegetation that have riparian vegetation downstream due to

subsurface flow through the stream channel or adjacent alluvial sediments as described in FSH 1909.12 (23.11e). These areas are evaluated and defined at the project level.

**Comment Number(s):**

2970-724

The Forest Service appreciates your support of the plan revision process per 36 CFR 219. The planning rule does require the Forest Service to establish riparian management zones and plan components to support them. The Forest Service believes that each action alternative (B, C, and D) reflects that requirement as each alternative is analyzed to demonstrate to which degree and length of time it would take to achieve the desired conditions for the riparian management zones. The commentor is not specific about what plan components might be missing from the final forest plan or what might be updated in the final environmental impact statement. The Forest Service believes they are consistent with the 2012 Planning Rule.

**Comment Number(s):**

2816-97

Thank you for bringing this to our attention. A definition of these terms has been added to the forest plan and the final environmental impact statement.

**Comment Number(s):**

2970-468

For clarity, we will include the definition of riparian areas as it is cited in the Forest Service manual in the final environmental impact statement.

**Comment Number(s):**

2925-77

The description of the riparian management zones has been revised in the final plan. The 2012 Planning Rule (36 CFR Part 219) recognizes that groundwater and associated water resources are integral to forest health and sustainability. The 2012 Planning Rule requires the forest plan to include plan components for riparian areas and establish riparian management zones around all lakes, perennial, and intermittent streams, and open wetlands, within which the plan components in this section will apply, giving special attention to land and vegetation for approximately 100 feet from the edges of all perennial streams and lakes (36 CFR 219.8(a)(3)). Riparian area plan direction in the forest plan is consistent with the planning rule requirements, which includes seeps and spring ecosystems. The 2012 Planning Rule requires that the forest plan includes plan components for riparian areas and establish riparian management zones around all lakes, perennial, and intermittent streams, and open wetlands (36 CFR 219.8(a)(3)(ii)). Open wetlands or wetlands belong to a classification of groundwater-dependent ecosystems (FSH 1909.12 – zero code) of which include a community of plants, animals, and other organisms whose extent and life processes depend on groundwater – which includes springs and seep ecosystems. Furthermore, seeps and springs included in the Forest Service Riparian handbook definition: riparian ecosystems are distinguished by the presence of free water within the common rooting depth of native perennial plants at least seasonally (10 percent of the time or more). Riparian ecosystems are normally associated with seeps, springs, streams, marshes, ponds, or lakes. They commonly comprise a mixture of water (aquatic) and land (phreatic) ecosystems (FSH 2509.23, chapter 2). We have revised the riparian management zone description to

provide clarity on criteria used to establish the riparian management zone and when modifications are made. See the forest plan for more information.

**Concern Statement 244.** *Commenters are concerned with the plan components associated with grazing in riparian areas in the final forest plan and associated analysis in the final environmental impact statement. This includes concerns with grazing infrastructure and groundwater pumping.*

Response:

**Comment Number(s):**

2970-636, 659

The majority of the land area of the Tonto National Forest is also part of one of the numerous grazing allotments permitted. Grazing has been identified under many laws, regulations, and Forest Service policies as an acceptable use of forest lands. Excluding livestock from all riparian areas, where even possible, would require an exorbitant amount of infrastructure, all of which would require separate environmental analysis at a site-specific level. While it would be impractical to exclude cattle from all riparian areas, the forest plan provides plan direction for the protection of riparian areas. For example, some of these plan components include “Livestock management practices should allow riparian vegetation to recover...Plant development or recovery sufficient to sustain healthy riparian areas should occur following each livestock use period” and “projects and activities should be designed and implemented to promote a diversity of age classes and natural succession of native riparian and wetland obligate species (e.g., cottonwood, willow, sycamore, ash, alder, sedges, grasses, and other wetland plants).” Additionally, we have incorporated an additional standard in the Range section that livestock use in and around riparian areas will be evaluated on an allotment specific basis and design elements (e.g., deferment, herding, and fencing) will be implemented where needed.

**Comment Number(s):**

2970-514, 635

We believe that offstream water sources do afford some protection to riparian areas from overgrazing by livestock. Carter et al. (2017) concluded off-stream water and rotational grazing didn’t have an impact but that “Range science shows that to reverse this outcome and improve conditions, changes must be made, such as evaluating stocking rates and utilization rates. Malan et al. (2018) evaluated the efficacy of offstream watering points at improving livestock distribution to reduce grazing pressure in riparian areas with the key conclusion that out of the 37 [relevant] papers a total of seven factors and five sub-factors influencing cattle’s use of offstream watering points were identified. There is evidence that offstream watering points did reduce the time cattle spent in riparian zones, however with great variation (63.7 percent) among studies. The review further highlights that substantial knowledge gaps exist within the literature linking the interaction of cattle, offstream watering points and riparian habitats indicating the need for further research. The effectiveness of offstream watering points is also likely to be highly variable and dependent on the local site conditions, ability to distribute livestock, and livestock management prescriptions. Additionally, the 2021 Rangeland Water Developments at Springs: Best Practices for Design, Rehabilitation, and Restoration (a General Technical Report) emphasizes new and existing approaches to improve upland spring developments while protecting sensitive riparian areas. This document provides guidance to Forest Service specialists and decision makers. While there are data gaps in the current literature, we believe the best available science still indicates that these offstream watering

points do help distribute livestock and reduce grazing pressure in riparian areas. The evaluation of stocking rates and utilization rates, offstream watering points, and impacts to riparian areas, springs, and wetlands is handled during grazing decisions for allotment management plans handled at the project level.

**Comment Number(s):**

2970-481

We have included desired conditions, standards, and guidelines in the draft forest plan to ensure that livestock grazing does not adversely impact riparian areas on the Tonto. Specifically, the following standard in the range section of chapter 2 states that “livestock use in and around riparian areas will be evaluated on an allotment specific basis and design elements (e.g., deferment, herding, and fencing) will be implemented in sensitive areas.” See the Range and Riparian section of the forest plan for additional standards and guidelines pertaining to livestock grazing in riparian areas.

The Tonto uses an adaptive management strategy to manage the rangeland resources. Allotment management plans are reviewed and revised as needed in conformance with National Environmental Policy Act (NEPA) and Rescissions Act of 1995 (Public Law 104-19) Section 504(a). In general, the Tonto manages grazing at conservative use levels. This grazing intensity (based on percent use of forage by weight) should provide for plant integrity, density, diversity, and regeneration over time. Allotment management plans involving new or modified fences, corrals, salt locations, and artificial water sources are designed to make progress towards the desired conditions in the plan and promote healthy soil and watershed and riparian conditions, wildlife interactions, and wildlife movement.

**Comment Number(s):**

66-7

Thank you for your comment. We have included desired conditions, standards, and guidelines in the draft forest plan to ensure that livestock grazing does not adversely impact riparian areas on the Tonto. Specifically, we have included the following standard “Livestock use in and around riparian areas will be evaluated on an allotment specific basis... mitigation measures (e.g., deferment, herding, and fencing) will be implemented in sensitive areas.” See the Riparian section of the forest plan for additional standards and guidelines pertaining to livestock grazing in riparian areas.

**Comment Number(s):**

2255-4

Thank you for your comment. We have included desired conditions, standards, and guidelines in the draft forest plan to ensure that livestock grazing does not adversely impact riparian areas on the Tonto. Specifically, we have included the following standard “Livestock use in and around riparian areas will be evaluated on an allotment specific basis... design features (e.g., deferment, herding, and fencing) will be implemented in sensitive areas.” See the Range and Riparian section of the forest plan for additional standards and guidelines pertaining to livestock grazing in riparian areas. We have removed the language “wildlife management practices” from the plan as wildlife management is the responsibility of the Arizona Game and Fish Department. However, the Wildlife, Fish, and Plants section of the forest plan (chapter 2) has many plan components related to forest management of wildlife habitats.

**Comment Number(s):**

23-7

There is evidence that offstream water sources do afford some protection to riparian areas from overgrazing by livestock. Carter et al (2017) concluded off-stream water and rotational grazing didn't have an impact but that "Range science shows that to reverse this outcome and improve conditions, changes must be made, such as evaluating stocking rates and utilization rates. Malan et al. (2018) evaluated the efficacy of offstream watering points at improving livestock distribution to reduce grazing pressure in riparian areas with the key conclusion that out of the 37 [relevant] papers a total of seven factors and five sub-factors influencing cattle's use of offstream watering points were identified. There is evidence that offstream watering points did reduce the time cattle spent in riparian zones, however with great variation (63.7 percent) among studies. The review further highlights that substantial knowledge gaps exist within the literature linking the interaction of cattle, offstream watering points and riparian habitats indicating the need for further research. The effectiveness of offstream watering points is also likely to be highly variable and dependent on the local site conditions, ability to distribute livestock, and livestock management prescriptions. While there are data gaps in the current literature, we believe the best available science still indicates that these offstream watering points do help distribute livestock and reduce grazing pressure in riparian areas. The evaluation of stocking rates and utilization rates, offstream watering points, and impacts to riparian areas, springs, and wetlands is handled during the site-specific analysis for grazing authorizations and implemented through allotment management plans.

**Concern Statement 245.** *Commenters request plan components from alternative C relating to riparian areas in non-functioning condition be included in alternative B.*

Response:

**Comment Number(s):**

2911-2, 2927-26

All alternatives would move the forest toward the desired conditions. In all alternatives we have included standards and guidelines to protect riparian areas. The alternatives to the proposed action were developed to respond to public input and compare the effects of different levels of management and emphasis for different resource areas. Specifically, we have desired conditions that riparian areas (including streams, seeps, springs, and wetlands) exhibit low departure from reference conditions, are properly functioning, and therefore are resilient to disturbances and guidelines that projects and management activities should be designed and implemented to maintain or restore long-term natural streambank stability, native vegetation, floodplain, and soil function. See the Riparian section of the forest plan for all relevant plan components.

**Comment Number(s):**

2712-2

We acknowledge the increasing demands and pressures that will be placed on our resources and ecosystems as Maricopa County and the Phoenix metropolitan area continues to grow. All alternatives would move the forest toward the desired conditions. In all alternatives we have included standards and guidelines to protect riparian areas. The alternatives to the proposed action were developed to respond to public input and compare the effects of different levels of management and emphasis for different resource areas. This plan component was analyzed in the final environmental impact statement under alternative B and C. All future projects will be required to comply with the forest plan, including standards and guidelines.

**Concern Statement 246.** *Commenters request that grazing be excluded in Bonta Creek to assure domestic water supply non-contamination and includes future management suggestions.*

Response:

**Comment Number(s):**

56-17, 18

The forest plan includes desired conditions, standards, and guidelines to ensure that livestock grazing does not adversely impact riparian areas on the Tonto. We have incorporated the additional standard “Livestock use in and around riparian areas will be evaluated on an allotment specific basis... design elements (e.g., deferment, herding, and fencing) will be implemented where needed.” See the Range and Riparian section of the forest plan for additional standards and guidelines pertaining to livestock grazing in riparian areas. The Tonto uses an adaptive management strategy to manage rangeland resources. Allotment management plans are reviewed and revised as needed in conformance with the National Environmental Policy Act (NEPA) and Rescissions Act of 1995 (Public Law 104-19) Section 504(a). In general, the Tonto manages grazing at conservative use levels. This grazing intensity (based on percent use of forage by weight) should provide for plant integrity, density, diversity, and regeneration over time. Allotment management plans involving new or modified fences, corrals, salt locations, and artificial water sources are designed to make progress towards the desired conditions in the forest plan and promote healthy soil and watershed and riparian conditions, wildlife interactions, and wildlife movement.

The following guideline in the grazing section addresses your concern regarding cattle congregating at undesirable locations “Salt or mineral supplements should not be placed near riparian, wetland, or other areas where livestock concentrations are undesired”, and “Livestock use in and around riparian areas will be evaluated on an allotment specific basis...mitigation measures (e.g., deferment, herding, and fencing) will be implemented in sensitive areas”, and through the following management approach “Encourage the development of water sources in uplands (including wells) where possible to improve or restore riparian areas.”

Within the scope of the allotment grazing decisions, fine-tune adjustments are made annually through the annual operating instructions. Information from monitoring such as frequency plots, canopy cover, pace frequency transects, photo points, and allotment inspections inform appropriate adjustments. Grazing intensity in combination with other factors such as weather patterns, likelihood of plant regrowth, and previous years’ utilization levels, is used in determinations. Authorized numbers may be adjusted up and down according to the grazing decision, implemented through the term grazing permit. The annual operating instructions may also adjust season of use, salt locations, and pasture rest periods.

**Concern Statement 247.** *Commenter is seeking clarification or additional analysis to the be included in the final environmental impact statement.*

Response:

**Comment Number(s):**

2970-471

We acknowledge that livestock grazing can be a significant stressor in riparian ecosystems. This has been disclosed in the final environmental impact statement in the riparian section in the affected environment. The analysis in the final environmental impact statement by alternative evaluates how the plan direction

addresses those effects and how each alternative meets the desired conditions. We have included desired conditions, standards, and guidelines in the draft forest plan to ensure that livestock grazing does not adversely impact riparian areas on the Tonto. See the Riparian section of the forest plan. Any future projects will comply with the forest plan.

**Concern Statement 248.** *Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2970-484

We have removed the utilization guideline in the Riparian section of the draft forest plan. The Tonto uses an adaptive management strategy to manage the rangeland resources. Allotment management plans are reviewed and revised as needed in conformance with National Environmental Policy Act (NEPA) and Rescissions Act of 1995 (Public Law 104-19) Section 504(a). In general, the Tonto manages grazing at conservative use levels. This grazing intensity (based on percent use of forage by weight) should provide for plant integrity, density, diversity, and regeneration over time. Allotment management plans involving new or modified fences, corrals, salt locations, and artificial water sources are designed to make progress towards the desired conditions in the forest plan and promote healthy soil and watershed and riparian conditions, wildlife interactions, and wildlife movement.

Within the scope of the allotment grazing authorization, adjustments are made annually through the annual operating instructions. Information from monitoring such as frequency plots, canopy cover, pace frequency transects, photo points, and allotment inspections inform appropriate adjustments. Grazing intensity in combination with other factors such as weather patterns, likelihood of plant regrowth, and previous years' utilization levels, is used in determinations. Authorized numbers may be adjusted up and down according to the grazing decision, implemented through the term grazing permit. The annual operating instructions may also adjust season of use, salt locations, and pasture rest periods.

**Comment Number(s):**

2970-476

The following forest-wide plan objective for riparian areas is included in the forest plan: complete active and passive restoration projects on at least 125 miles of streams every 10 years to improve the ecological integrity of perennial and intermittent riparian ecosystems rated as nonfunctioning and functioning-at-risk. By focusing restoration efforts at "functioning-at-risk" and "non-functioning" areas, we are addressing the most impaired areas, which will be the most effective at making meaningful progress towards the desired conditions for riparian areas.

Progress towards accomplishing plan objectives is identified by forest plan monitoring. The monitoring chapter of the forest plan (chapter 4) is continuous and provides feedback to the planning cycle by testing relevant assumptions, tracking relevant conditions over time, and measuring management effectiveness. Monitoring questions and indicators (metrics to measure conditions/key attributes) have been developed for riparian areas; including percentage of surveyed streams in non-impaired condition, amount of riparian area improved, abundance and diversity of riparian obligate species in treatment areas. See the monitoring chapter of the forest plan for the complete list of monitoring questions and indicators for



riparian areas. Information from monitoring (published in biennial reports) will inform the responsible official on progress towards meeting desired conditions in the forest plan, status of accomplishing plan objectives, and identify any necessary changes to plan direction.

**Comment Number(s):**

2970-477

We have revised the riparian plan objective to better clarify the intent of the objective, which does include both passive and active restoration projects and activities (forest plan, chapter 2, Riparian Areas, Seeps, Springs, Wetlands, and Riparian Management Zones). Additionally, we determined that miles restored is a more meaningful target than acres restored because many riparian area widths can vary substantially; some areas less than 50 meters wide, and so an acre accomplishment may not be a meaningful measure of riparian areas improved. This change does not change the analysis in final environmental impact statement, the analysis does in fact consider passive and active restoration activities and actions in meeting plan objectives.

The target for riparian objectives was based on the number and extent of impaired riparian areas, considering a desired rate of progress, and the staff capacity and fiscal capability of the Forest to accomplish plan objectives. Plan objectives are designed to make progress toward attaining desired conditions and help set the basis for priority areas or activities. However, plan objectives must be attainable within the fiscal capability of the unit, determined through a trend analysis of the recent past budget obligations for the unit (3 to 5 years) (36 CFR 219.1(g)). We have determined the target of “at least 125 miles restored” would make a meaningful progress towards desired conditions over a 10-year period with current staff and resources, and that a target greater than this would be outside the fiscal capability of the Forest. However, we do note that the number of miles chosen represents a minimum. There is nothing in the forest plan that would preclude additional restoration efforts over this amount if resources are available.

**Comment Number(s):**

2970-478

Spring improvement or maintenance refers to work that improves or maintains the ecological integrity of a spring ecosystem. We have updated the guideline in the forest plan to provide clarity. An additional management approach has been added to the riparian section: To mitigate any adverse impacts to the spring ecosystem in spring development and maintenance projects, consider conducting a hydrological analysis that includes required flow rate and water table depth to support obligate flora and fauna during the planning and design stages.

When developing the target for spring objectives we considering a desired rate of progress, and the capacity and fiscal capability of the Forest to accomplish plan objectives. Plan objectives are designed to make progress toward attaining desired conditions and help set the basis for priority areas or activities. However, plan objectives must be attainable within the fiscal capability of the unit, determined through a trend analysis of the recent past budget obligations for the unit (3 to 5 years) (36 CFR 219.1(g)). We have determined the target of “improve or maintain 10-15 springs” would make a meaningful progress towards desired conditions over a 10-year period with current staff and resources, and that a target greater than this would be outside the fiscal capability of the Forest. However, we do note that the number chosen represents a minimum. There is nothing in the forest plan that would preclude additional efforts over this amount if resources are available.

**Comment Number(s):**

2970-483

The intent of the cited guideline is not to develop or re-develop springs solely for livestock purposes. We recognize the ecological importance of spring ecosystems and their essential habitat for native species. Spring development or spring re-development will consider the ecological function of these ecosystems while providing water to livestock and wildlife. Thoughtful design of sustainable developments will be considered that supply water to livestock and wildlife while maintaining the intrinsic ecological functions and values of springs. We have revised the guideline in the forest plan to better reflect and communicate how we manage these important spring ecosystems with specific reference to the 2020 Government Technical Report “Rangeland Water Developments at Springs: Best Practices for Design, Rehabilitation, and Restoration” (forest plan, chapter 2, Riparian Areas, Seeps, Springs, Wetlands, and Riparian Management Zones).

**Comment Number(s):**

2816-78

Consistent with the 2012 Planning Rule, we have included a definition of the riparian management zones for which plan components apply – the planning rule requires the forest plan to include plan components for riparian areas and establish riparian management zones around all lakes, perennial, and intermittent streams, and open wetlands, within which the plan components in this section will apply, giving special attention to land and vegetation for approximately 100 feet from the edges of all perennial streams and lakes (36 CFR 219.8(a)(3)). In the strict sense, ephemeral streams are not included in the riparian management zone except at dry washes or channels with minimal or no riparian vegetation that support riparian vegetation downstream due to subsurface flow through the stream channel or adjacent alluvial sediments as described in FSH 1909.12 (23.11e).

Ponds are part of Southwest riparian ecosystems and plant communities and is included in the definition of riparian ecosystems in the Forest Service Riparian handbook (FSH 2509.23, Chapter 2): riparian ecosystems are distinguished by the presence of free water within the common rooting depth of native perennial plants at least seasonally (10 percent of the time or more). Riparian ecosystems are normally associated with seeps, springs, streams, marshes, ponds, or lakes. They commonly comprise a mixture of water (aquatic) and land (phreatic) ecosystems. Furthermore, in addition to the required plan content, a forest plan may also include “optional plan content” (36 CFR 219.7(f)(2)), such as background information, explanatory narrative, general management principles, potential management approaches, management challenges, performance history, performance risks, contextual information, or referenced material. Optional content is not labeled or worded in a way that suggests it is a plan component and does not imply or constitute management direction, but it may help clarify plan direction and how it may be applied. A change to “other required plan content” or “optional content” does not require a plan amendment; instead, such changes may be made using an administrative correction process.

**Comment Number(s):**

2736-20

In reviewing the referenced plan component, we agree that wildlife management practices are not an appropriate description for or actionable management in this guideline. We have revised this plan component in the forest plan.

**Comment Number(s):**

23-16

Riparian ecological response units are nested with the other ecological response units because riparian ecological response units describe different plant communities. The riparian area section describes riparian areas as a whole. The riparian section more broadly includes riparian areas, seeps, springs, and wetlands - not specific to certain plant communities.

**Comment Number(s):**

23-20

Riparian restoration projects include work such as stream channel recontouring, bank stabilization work, vegetation planting, and addressing stressors (e.g., limiting or removing uses).

**Comment Number(s):**

23-21

Spring improvement or maintenance refers to work that improves or maintains the ecological integrity of a spring. We have updated the forest plan with definitions for spring improvement and maintenance.

**Comment Number(s):**

2736-19

Thank you for bringing this to our attention. The final environmental impact statement has been modified to reflect this change.

**Comment Number(s):**

2927-24

Thank you for your comment, we have corrected the typo in the final environmental impact statement.

**Comment Number(s):**

23-5

The existing 1985 forest plan riparian guidelines were developed through internal and external collaboration and the use of the latest science back when the plan was developed.

**Comment Number(s):**

2816-79, 98

Restoration referred to the process of assisting the recovery of an ecosystem that has been degraded, damaged, or destroyed. Ecological restoration focuses on reestablishing the composition, structure, pattern, and ecological processes necessary to facilitate terrestrial and aquatic ecosystems sustainability, resilience, and health under current and future conditions (36 CFR 219.19).

Examples of restoration actions that could restore habitat or riparian conditions are described in the final environmental impact statement. Riparian restoration objectives include restoring impaired conditions (stream channel, vegetation, etc.), aquatic habitat restoration, spring restoration, and invasive species treatments in riparian areas. Treatment objectives include (but are not limited to) planting vegetation, restoring stream channel conditions, alleviating stressors, and invasive species treatments. Treatment

objectives for aquatic habitat restoration (e.g., enhancing pool habitat and maintaining stream temperature for species) also benefits riparian conditions by improving species diversity, plant cover, and biotic integrity. Treatment objectives for invasive species in riparian areas improve species diversity, ecological function, and riparian health.

Desired conditions are supported by the available literature, technical reports, and other best available science. The forest plan assessment Volume I: Ecological Risks, Trends, and Sustainability describes the best available science for structure, composition, connectivity, and process for riparian and aquatic ecosystems on the Tonto.

While reference conditions can be difficult to describe for riparian areas, we have used the best available science to approximate the natural range of variability for key attributes. Among other sources for desired conditions, we use the Forest Service Terrestrial Ecological Unit Inventory data that describes site potential based on soils, vegetation, climate, and geology. In order to promote ecological integrity, projects are designed to restore ecological function. Functional restoration focuses on the underlying processes that may be degraded, regardless of the structural condition of the ecosystem. Functionally restored ecosystem may have a different structure and composition than the historical reference condition. As contrasted with ecological restoration that tends to seek historical reference condition, the functional restoration focuses on the dynamic processes that drive structural and compositional patterns. Functional restoration is the manipulation of interactions among process, structure, and composition in a degraded ecosystem to improve its operations. Functional restoration aims to restore functions and improve structures with a long-term goal of restoring interactions between function and structure. It may be, however, that a functionally restored system will look quite different than the reference condition in terms of structure and composition and these disparities cannot be easily corrected because some threshold of degradation has been crossed or the environmental drivers, such as climate, that influenced structural and (especially) compositional development have changed (FSH 1909.12).

The terms “non-functioning” and “functioning-at-risk” are based on the proper functioning condition riparian assessment protocol developed by the BLM (see Dickard et al. 2015). Functioning at risk are areas that have limited functioning conditions and existing hydrologic, vegetative, or geomorphic attributes make them susceptible to impairment. Non-functioning areas are not providing adequate vegetation, landform, or woody material to dissipate stream energy associated with moderately high flows, and thus are not reducing erosion or improving water quality. We have provided definitions for these terms in the forest plan.

This forest plan provides the vision, strategy, and constraints that guide integrated resource management, provide for ecological sustainability, and contribute to social and economic sustainability on the forest and within the broader landscape. Following the multiple use mandate act, the forest plan allows for multiple uses by balancing uses, including human uses. Water for consumption and for recreation are two of five key ecosystem services identified in the forest plan. Riparian ecosystems can function properly without the complete exclusion of all human activity. Completely removing one use or stressor will not always result in improved conditions as there can be compounding stressors and not all activities and stressors equally impact riparian areas the same way (see the analysis in the final environmental impact statement).

**Comment Number(s):**

2816-80

The riparian management zone is defined internally. Additional language has been added to the forest plan for clarity.

**Comment Number(s):**

23-1

Deferment or resting an impacted riparian area from grazing will be analyzed for and addressed at a site-specific level, whether the riparian area has been impacted by fire, flood, or other events. We have plan direction to address this concern - specifically the standard in the range section of the forest plan that states “livestock grazing in an around riparian areas will be evaluated on an allotment specific basis and design elements (e.g., deferment, herding, and fencing) will be implemented where needed.”

Additionally, within the scope of the allotment grazing authorization decision, adjustments are made annually through the annual operating instructions. Information from monitoring such as frequency plots, canopy cover, pace frequency transects, photo points, and allotment inspections inform appropriate adjustments. Grazing intensity in combination with other factors such as weather patterns, likelihood of plant regrowth, and previous years’ utilization levels, is used in determinations. Authorized numbers may be adjusted up and down according to the grazing decision, implemented through the term grazing permit. The annual operating instructions may also adjust season of use, salt locations, and pasture rest periods.

**Comment Number(s):**

2463-3, 5, 6

The forest plan includes desired conditions, standards, and guidelines to ensure that livestock grazing does not adversely impact riparian areas on the Tonto. We have incorporated the additional standard “Livestock use in and around riparian areas will be evaluated on an allotment specific basis... design elements (e.g., deferment, herding, and fencing) will be implemented where needed.” See the Range and Riparian section in chapter 2 of the forest plan for this and additional standards and guidelines pertaining to livestock grazing in riparian areas.

We have removed the utilization guideline in the Riparian section of the forest plan. The Forest does not intend to abandon the use of riparian exclosures or open existing ones to grazing. The Tonto uses an adaptive management strategy to manage the rangeland resources. Allotment management plans are reviewed and revised as needed in conformance with National Environmental Policy Act. In general, the Tonto manages grazing at conservative use levels. This grazing intensity (based on percent use of forage by weight) should provide for plant integrity, density, diversity, and regeneration over time. Allotment management plans involving new or modified fences, corrals, salt locations, and artificial water sources are designed to make progress towards the desired conditions in the forest plan and promote healthy soil and watershed and riparian conditions, wildlife interactions, and wildlife movement.

Within the scope of the allotment grazing authorizations, adjustments are made annually through the annual operating instructions. Information from monitoring such as frequency plots, canopy cover, pace frequency transects, photo points, and allotment inspections inform appropriate adjustments. Grazing intensity in combination with other factors such as weather patterns, likelihood of plant regrowth, and previous years’ utilization levels, is used in determinations. Authorized numbers may be adjusted up and down according to the grazing decision, implemented through the term grazing permit. The annual operating instructions may also adjust season of use, salt locations, and pasture rest periods.

**Comment Number(s):**

23-6, 2463-4

We acknowledge the utility and effectiveness of riparian exclosures to improve riparian conditions. The practice of creating new exclosures to protect streams from livestock grazing would not be abandoned

with the direction or implementation of the forest plan. We acknowledge the confusion or misinterpretation of the management approach in the riparian section of the draft plan. The intent was not to say that exclosures should not be maintained or used, rather that management should strive to restore those systems that can simply recover passively by removing stressors. For clarity, we have revised this management approach in the forest plan.

We believe that offstream water sources do afford some protection to riparian areas from overgrazing by livestock. Carter et al. (2017) concluded off-stream water and rotational grazing didn't have an impact but that "Range science shows that to reverse this outcome and improve conditions, changes must be made, such as evaluating stocking rates and utilization rates. Malan et al. (2018) evaluated the efficacy of offstream watering points at improving livestock distribution to reduce grazing pressure in riparian areas with the key conclusion that out of the 37 [relevant] papers a total of seven factors and five sub-factors influencing cattle's use of offstream watering points were identified. There is evidence that offstream watering points did reduce the time cattle spent in riparian zones, however with great variation (63.7 percent) among studies. The review further highlights that substantial knowledge gaps exist within the literature linking the interaction of cattle, offstream watering points and riparian habitats indicating the need for further research. The effectiveness of offstream watering points are also likely to be highly variable and dependent on the local site conditions, ability to distribute livestock, and livestock management prescriptions. While there are data gaps in the current literature, we believe the best available science still indicates that these offstream watering points do help distribute livestock and reduce grazing pressure in riparian areas. The evaluation of stocking rates and utilization rates, offstream watering points, and impacts to riparian areas, springs, and wetlands is handled during grazing decisions for allotment management plans handled at the project level.

The intent of the cited guideline "New spring developments and redeveloped springs (not including maintenance) should leave some water behind to support riparian obligate vegetation and wildlife species" is not to develop or re-develop springs solely for livestock purposes or "cattle watering sites." We recognize the ecological importance of spring ecosystems and their essential habitat for native species. Spring development or spring re-development will consider the ecological function of these ecosystems while providing water to livestock and wildlife. Thoughtful design of sustainable developments will be considered that supply water to livestock and wildlife while maintaining the intrinsic ecological functions and values of springs. We have revised the guideline in the forest plan to better reflect and communicate how we manage these important spring ecosystems with specific reference to the 2020 general technical report "Rangeland Water Developments at Springs: Best Practices for Design, Rehabilitation, and Restoration."

Thank you for your comments and involvement with the forest plan revision process.

**Comment Number(s):**

2808-18

We cannot create a policy statement - that is outside the scope of forest planning. However, we do have desired conditions for important riparian attributes, such as sufficient groundcover, diversity of plant and wildlife species, structural diversity among others (see the desired conditions outlined in the Riparian Ecological Response Unit and Riparian Areas section in chapter 2 of the forest plan). These desired attributes or conditions cannot be achieved if riparian areas are used as significant livestock forage areas. Additionally, we have a guideline in the Riparian Ecological Response Unit section that addresses your concern and would prohibit riparian areas from being overgrazed: livestock practices should allow riparian vegetation to recover. Plant development or recovery sufficient to sustain healthy riparian areas

should occur following each livestock use period. Any future projects, including grazing authorizations, will be required to comply with the forest plan.

**Comment Number(s):**

58-20

Management approaches are not standards and guidelines, but rather approaches or ways in which we may accomplish work. The intent of this management approach is to obtain information on “Source Water Protection Areas.” During project level analyses (authorized uses, and activities) information on the location of source water protection areas is used to inform management decisions.

**Comment Number(s):**

58-21

The requested change to the plan objective “USFS will coordinate and work with permittees...” describes how the work might be accomplished. The “how” is more appropriate as a management approach and not a plan objective. The plan objective is specific to spring improvement/restoration and not routine maintenance of range infrastructure - see the updated plan objective in the forest plan which reads “Improve 10-15 individual springs during each 10-year period” (forest plan, chapter 2, Riparian Areas, Seeps, Springs, Wetlands, and Riparian Management Zones). The Forest already coordinates and works with permittees on a routine basis and will continue to do so. We have referenced the 2020 Forest Service general technical report “Rangeland Water Developments at Springs: Best Practices for Design, Rehabilitation, and Restoration” under management approaches for riparian areas (including springs) to ensure that springs are maintained and restored appropriately.

**Comment Number(s):**

2927-11

When the final record of decision for the Tonto's travel management process has been signed and a motor vehicle use map has been made available, motor vehicle use will be restricted to designated routes. Exceptions for emergency uses such as wildland fires are already allowed under existing laws, regulations, and Forest Service policies.

**Comment Number(s):**

2925-00

Desired conditions do not assume uniform management prescriptions, rather they describe the aspirations or visions of what the plan area (or portions thereof) should look like in the future. The inherent capability of an area or the site potential is considered when site-specific projects or management is proposed.

**Comment Number(s):**

2925-00

Per revised plan, chapter 1, in the Forest Plan Framework and Organization, Plan Components section, guidelines describe constraints on project and activity decision-making that allow for departure from its terms, so long as the intent of the guideline is met. In other words, guidelines are mandatory with some flexibility on how they are implemented in meeting the intent of the existing guideline. The guideline identifies when motorized vehicle use exceptions could occur, and individual mineral proposals that may be undertaken as part of notice level operations and/or approved mine plans of operations, with this kind

of activity would be evaluated on a site-specific basis to determine whether the intent of the guideline is met.

**Comment Number(s):**

2925-00

Per revised plan, chapter 1, in the Forest Plan Framework and Organization, Plan Components section, guidelines describe constraints on project and activity decision-making that allow for departure from its terms, so long as the intent of the guideline is met. In other words, guidelines are mandatory with some flexibility on how they are implemented in meeting the intent of the existing guideline. Individual proposals are evaluated on a site-specific basis and mitigated under a separate environmental analysis that follows Forest Service policy for the approval of a plans of operation for mineral activity. Therefore, on a site-specific basis, a mineral project proposal would have to be proposed to modify a properly functioning stream channel and result in a non-functioning system. The proposal would then be evaluated in the context of this guideline, and other applicable forest plan components, such as See MMAM-S-02 requiring reclamation activities be designed to establish resilient post-mining ecosystems consistent with the pre-disturbance ecological response unit or to an ecological response unit identified as achievable to the post-mining landscape condition, and a determination would be made whether the activity is inconsistent with forest plan direction, and if so, what action should be taken to address that. A change to this guideline is not necessary.

**Comment Number(s):**

2925-00

The description of the riparian management zone has been updated and is compliant with the 2012 Planning Rule (revised plan, chapter 2, Riparian Areas, Seeps, Springs, Wetlands, and Riparian Management Zones).

**Comment Number(s):**

2925-00

The plan direction is consistent with the 2012 Planning Rule requirements. Specifically, to maintain the ecological integrity of riparian areas, the plan must include plan components, including standards or guidelines, designed to maintain, restore, or promote riparian areas. This provision does not prohibit projects that may have short-term adverse effects to water conditions and fish habitat, but that will maintain or restore structure, function, composition, and connectivity of riparian areas over the long term as stated in FSH 1909.12 chapter 20.

**Comment Number(s):**

2925-00

The Tonto National Forest recognizes the rights under the Mining Law and applicable regulations for each project proposed with plans of operations (see Mining, Minerals, and Abandoned Mines section in chapter 2 of the forest plan. The intent of desired conditions is to describe the aspirations or visions of what the plan area (or portions thereof) should look like in the future - they are not standards or guidelines.



## Riparian Ecological Response Units (ERUs)

*Concern Statement 249. Comment of general support for the desired conditions in the draft forest plan.*

Response:

**Comment Number(s):**

2806-16

Thank you for your comment regarding desired conditions for Mesquite bosques, a very important ecosystem on the Tonto and in the Southwest.

*Concern Statement 250. Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2736-57

In reviewing the referenced plan component, we agree that wildlife management practices are not an appropriate description for or actionable management in this guideline. We have revised this plan component to refer grazing management and only refer to wildlife grazing effects.

*Concern Statement 251. Commenters suggest clarification to plan components and future right-of-way management.*

Response:

**Comment Number(s):**

2938-18

The Forest understands Arizona Public Service's legal requirement to maintain its corridors to provide safe and reliable power. Existing laws govern management of right of way corridors, and the new forest plan would not amend existing authorizations.

**Comment Number(s):**

2938-19

You cited RERU-G-02 "Livestock management practices should allow riparian vegetation to recover. Plant development or recovery sufficient to sustain healthy riparian areas should occur following each livestock use period," but this does not relate to the management of rights-of-way. We believe you may have been referring to guideline 02 in the Riparian Management Zone section "Motorized vehicle use should be limited to designated routes and/or areas, except when short-term uses are required for restoration activities or maintain infrastructure" (forest plan, chapter 2, Riparian Areas, Seeps, Springs, Wetlands, and Riparian Management Zones). We appreciate hearing that guidelines in the riparian section of the forest plan are in line with Arizona Public Service management of rights-of-way.

## Roads

**Concern Statement 252.** *Commenter suggests additional plan components to restrict motorized use in inventoried roadless areas and recommended wilderness.*

Response:

**Comment Number(s):**

2165-1

We appreciate your review of the forest plan and interest in the plan revision process. Motorized use and motorized recreation are a popular use of the forest and is incorporated into future management. However, there are instances where motorized use is not authorized, such as in designated wilderness areas. The forest plan, chapter 3, Inventoried Roadless Areas (IRAMA) section includes desired conditions to sustain and conserve the roadless characteristics for which those areas were designated (see the Roadless Rule, 36 CFR 294.11). In addition, there is a standard stating that roads shall not be constructed or reconstructed unless there is an absolute need for the road to be there. Unlike designated wilderness there can be roads in inventoried roadless areas and that is why we have the plan component as a guideline and not a standard. During the recommended wilderness process, roads, and other linear features (e.g., powerlines) were buffered and used to create the boundaries of the areas to be analyzed. Each of the recommended wilderness areas have no roads in them currently and no motorized use. Guideline 01 in that section states that motorized vehicle access should not occur in a recommended wilderness area (forest plan, chapter 3, Recommended Wilderness). There is also an objective, which is a commitment from the Forest of work we are going to do to achieve our desired conditions, indicating we are going to be decommissioning roads and/or unauthorized user created routes on the forest (forest plan, chapter 2, Roads).

**Concern Statement 253.** *Commenters are concerned with the impact of forest system road networks and associated infrastructure on watersheds and water resources.*

Response:

**Comment Number(s):**

2970-715

FSM 7712.1 provides reference to the “scale and scope of Travel Analysis”. The 2005 Travel Management (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas. In contrast, the 2012 Planning Rule (36 CFR 219) is the overriding regulation that guides the development, amendment, and revision of land management plans for all units of the National Forest System. As such it is programmatic in nature and does dictate the level of specificity that project level plan implementation does. All project level specificity and decisions for the management of motor vehicle use will be done in compliance with the 2005 Travel Management Rule either forestwide (as is the case with the current travel management planning process) or on a more site-specific need, such as by district or area. This planning process provides plan components to guide management of the forest motorized designations and sedimentation related to roads to meet plan desired conditions.

**Comment Number(s):**

2970-716, 717

FSH 7709.59 - Road System Operations and Maintenance Handbook provides policy for maintenance of Forest Roads. Road maintenance plans and road work are developed and updated annually. Maintenance items to prepare a road for use are normally brushing, removing and/or repairing minor slides or slumps, cleaning roadside ditches and drainage devices, and grading traveled way. All work is conducted using best management practices. The 2012 Planning Rule (36 CFR 219) is the overriding regulation that guides the development, amendment, and revision of land management plans for all units of the National Forest System. As such it is programmatic in nature and does dictate the level of specificity that project level plan implementation does. All project level decisions for the maintenance of roads and culverts will be done in compliance with existing manuals following site-specific analysis and utilizing best management practices.

**Concern Statement 254.** *Commenter requests additional language in the forest plan and final environmental impact statement about maintenance level 1 and temporary roads and when they are appropriate to use.*

Response:

**Comment Number(s):**

2932-49

The use, closure, rehabilitation, and/or decommissioning of roads is all done following forest plan direction and best management practices as listed in Forest Service Handbook 7700 and 2509.22. For a road to be a National Forest System Road, it must be designated under the 2007 Travel Management Rule in a project level analysis. If there is a need to keep a road open after a project is completed, it would need to be re-designated.

**Concern Statement 255.** *Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2970-723, 728

We have followed the plan revision process per 36 CFR 219 and FSH 1909.12 to develop the forest plan and the associated environmental impact statement. The forest plan components, including roads, facilities, and motorized recreation are supported by the environmental analysis and help to address the ecological integrity and sustainability goals of the Forest. The commenters are not specific as to what the Forest Service should incorporate into the forest plan to better accomplish ecological integrity and sustainability goals. Between draft and final, the forest plan has been updated to respond to public comments, best available scientific information, update the language to reflect law, regulations, policy, and provide more clarity.

**Comment Number(s):**

2857-5

This plan revision process is programmatic in nature, as detailed in the chapter 1 of the revised plan. The commenter is bringing up site-specific concerns that are outside the scope of this planning process. Gated roads not in use by the general public are considered “administrative use only” per FSM 7715.75 (3). Some private roads are not forest roads or temporary roads but are still authorized. These roads may be included in a forest transportation atlas but are not National Forest System roads and may not be designated for motor vehicle use. Use of these private roads under the terms of their written authorization is exempt from the prohibition on motor vehicle use other than in accordance with designations (36 CFR 261.13(h)). Decommissioning of specific roads would be identified through Travel Management Rule (36 CFR 212) which is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas.

**Comment Number(s):**

86-3

The Forest recognizes the need to decommission un-needed roads. Direction provided in the 2005 Travel Management Rule (36 CFR 212.1) states “the responsible official must identify a road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System lands.” This rule is the overriding regulation that directs the Tonto National Forest for designating a system of motorized trails, roads, and areas. The 2012 Planning Rule (36 CFR 219) is the overriding regulation that guides the development, amendment, and revision of land management plans for all units of the National Forest System. This plan revision process is programmatic in nature and does dictate the level of specificity required for site-specific projects implementing the forest plan. The revised plan (chapter 2, Roads) has an objective stating: “Decommission at least 10 miles of roads identified for decommissioning and/or unauthorized user created routes every five years.” We believe this objective, along with the other plan components for roads address the commenter's concern.

**Comment Number(s):**

2816-67

Guidelines are mandatory constraints on projects and activities that are implemented with the forest plan, but unlike standards, deviations may occur as long as the intent of the guidelines is met. All projects and activities authorized by the Forest Service must be consistent with the land and resource management plan (revised plan, chapter 1, Forest Plan Framework and Organization, Plan Components). When a proposed project or activity is inconsistent with forest plan direction, one of three actions can be taken: the proposal can be modified such that the project or activity will be consistent; the proposal can be rejected; or the plan can be amended contemporaneously with the approval of the project so that the project or activity is consistent with the plan as amended. Individual proposals are evaluated on a site-specific basis and mitigated under a separate environmental analysis that follows Forest Service policy for the approval of a plans of operation for mineral activity. Therefore, on a site-specific basis, a mineral project proposal would have to occur in an area designated as primitive in the recreation opportunity spectrum. The proposal would then be evaluated in the context of this guideline and a determination would be made whether the activity is inconsistent with forest plan direction, and if so, what action should be taken to address that. A change to this guideline is not necessary.

**Comment Number(s):**

2816-68

The planning component the commenter is referencing is a management approach and not a guideline. As detailed in chapter 1 of the revised plan (Forest Plan Framework and Organization, Plan Components), management approaches do not offer plan direction and are not required components but describe a strategy to achieve a desired condition. Management approaches often convey how plan components work together to achieve the desired condition. Changes to management approaches do not require plan amendments. This management approach does not restrict access as incorrectly stated by the commenter. A change to this management approach is not necessary.

**Comment Number(s):**

2941-6

Off-highway vehicles and other vehicle use are considered under separate Travel Analysis. FSM 7712.1 provides reference to the “scale and scope of Travel Analysis”. The 2005 Travel Management Rule (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas. In contrast, the 2012 Planning Rule (36 CFR 219) is the overriding regulation that guides the development, amendment, and revision of land management plans for all units of the National Forest System. As such it is programmatic in nature and does dictate the level of specificity that project level plan implementation does. All project level specificity and decisions for the management of motor vehicle use will be done in compliance with the 2005 Travel Management Rule either forestwide (as is the case with the current travel management planning process) or on a more site-specific need, such as by district or area. This planning process provides plan components to guide management of the forest, including for motorized designation and sedimentation related to roads. Furthermore, plan components in the Recreation section of the revised plan (chapter 2) align with travel management in that motorized travel shall be managed to occur only on the designated system of National Forest System roads, motorized trails, and motorized areas per the motor vehicle use map.

**Comment Number(s):**

2966-5, 2736-48

The 2005 Travel Management Rule (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas. Forest plan components such as objectives, standards and guidelines provide for consistency with travel management decisions. As detailed in chapter 1 of the revised plan (Forest Plan Framework and Organization, Plan Components), “Objectives are concise, measurable, and time-specific statements of a desired rate of progress toward desired conditions and should be based on reasonably foreseeable budgets. Objectives, along with the strategies (from management approaches or Forest Service handbook direction) used to accomplish them, can be thought of as the tools we will use to prioritize project activities to reach desired conditions. Objectives are mileposts along the road toward desired conditions.” The referenced objective is consistent with existing agency direction in “Determining the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System (NFS) lands” (36 CFR 212.5(b)(1)). Appendix B of the environmental impact statement provides further input as to potential sources for decommissioning that align existing policy and plan objectives.

**Comment Number(s):**

2932-45

The Forest appreciates the desire for partners to further foster relationship and engage in restoration efforts. Existing regulation found in FSM 7711.2 - “Do not include in a forest transportation atlas inventories of temporary roads and trails, which are tracked by the project or activity authorizing the

temporary road or trail and decommissioned at the conclusion of the project or activity.” In addition, FSM 7711.2(4) “Storage of this information does not make these routes part of the forest transportation system. Addition of routes to the Transportation Atlas and System of Roads and Trails is achieved through Separate Travel Analysis.” The 2005 Travel Management Rule (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas. All project level specificity and decisions for the management of motor vehicle use will be done in compliance with the 2005 Travel Management Rule either forestwide (as is the case with the current travel management planning process) or on a more site-specific need, such as by district or area.

**Comment Number(s):**

2719-4

The Forest recognizes needs for commercial uses of the National Forest System roads. 36 CFR 261.54(c) provides restrictions for using a road for commercial uses. Additionally, the revised plan has a standard (chapter 2, Roads) which states: Commercial users must maintain roads commensurate with their use to PREVENT resource damage and deterioration of the road system. All road construction and maintenance utilizes existing best management practices and requires consistency with the 2005 Travel Management Rule (36 CFR 212), where applicable.

**Comment Number(s):**

2938-13

The term “commensurate with their use” is defined in Forest Service Handbook 7709.59, Chapter 60, Section 63. Road improvement and maintenance would be expected if the primary use/need of the road were an Arizona Public Service authorization as defined in permitting process.

**Comment Number(s):**

2925-00

“Per revised plan (chapter 1, under Forest Plan Framework and Organization, Plan Components section), guidelines describe constraints on project and activity decision-making that allow for departure from its terms, so long as the intent of the guideline is met. In other words, guidelines are mandatory with some flexibility on how they are implemented in meeting the intent of the existing guideline. Avoiding damage to riparian vegetation, degrading water quality, and negatively impacting channel stability is not inconsistent with regulations.

Individual proposals are evaluated on a site-specific basis and mitigated under a separate environmental analysis that follows Forest Service policy for the approval of a plans of operation for mineral activity. Therefore, on a site-specific basis, a mineral project proposal would be evaluated in the context of applicable plan components and a determination would be made whether the activity is inconsistent with forest plan direction, and if so, what action should be taken to address that. A change to this guideline is not necessary.”

**Comment Number(s):**

2925-00

Per revised plan (chapter 1, under Forest Plan Framework and Organization, Plan Components section), desired conditions describe the specific social, economic, and/or ecological characteristics that are desired for the plan area, or a part of the plan area. These are described in terms specific enough to allow for progress toward their achievement, and all project-level management activities should be aimed at the

achievement of the desired conditions for those resources in the area where the project is located. Desired conditions can be thought of as vision statements that help define a collective vision for the National Forest in the future. In consideration of this comment, this desired condition was updated to provide clarification specific to unauthorized routes and now reads “Unauthorized routes are not apparent on the landscape” (RD-DC-05).

**Comment Number(s):**

2925-00

The intent of this guideline can be interpreted to only authorize the construction of temporary roads within the semi- primitive non-motorized recreation opportunity spectrum if required by other law, regulation, and policy. The guideline identifies when temporary road construction exceptions could occur, and individual mineral proposals that may be undertaken as part of notice level operations and/or approved mine plans of operations, with this kind of activity would be evaluated on a site-specific basis to determine whether the intent of the guideline is met. Future projects and activities, of any kind, must be consistent with the forest plan and various laws, agency policy, and direction to manage mining operations.

**Comment Number(s):**

2925-00

The Tonto National Forest recognizes the rights under the Mining Law and applicable regulations for each project proposed with plans of operations (see Mining, Minerals, and Abandoned Mines section in chapter 2 of the forest plan. Per revised plan (chapter 1, under Forest Plan Framework and Organization, Plan Components section), guidelines describe constraints on project and activity decision-making that allow for departure from its terms, so long as the intent of the guideline is met. In other words, guidelines are mandatory with some flexibility on how they are implemented in meeting the intent of the existing guideline. Most of the guidance for mining is governed by law, regulation, and policy, which does not need to be repeated within the forest plan. Future projects and activities, of any kind, must be consistent with the forest plan and various laws, agency policy, including direction related to access for exploration or mining operations.

**Comment Number(s):**

2925-00

The Tonto National Forest recognizes the rights under the Mining Law and applicable regulations for each project proposed with plans of operations (see Mining, Minerals, and Abandoned Mines section in chapter 2 of the forest plan). Per revised plan (chapter 1, under Forest Plan Framework and Organization, Plan Components section), guidelines describe constraints on project and activity decision-making that allow for departure from its terms, so long as the intent of the guideline is met. In other words, guidelines are mandatory with some flexibility on how they are implemented in meeting the intent of the existing guideline.

The intent of this guideline can be interpreted to only authorize the construction of temporary roads within semi- primitive non-motorized recreation opportunity spectrum if required by other law, regulation, and policy. The guideline identifies when temporary road construction exceptions could occur, and individual mineral proposals that may be undertaken as part of notice level operations and/or approved mine plans of operations, with this kind of activity would be evaluated on a site-specific basis to determine whether the intent of the guideline is met. Future projects and activities, of any kind, must be

consistent with the forest plan and various laws, agency policy, and direction to manage mining operations.

**Comment Number(s):**

2925-00

Tonto National Forest resource specialists edited this comment to provide clarification, which removed the word “unnecessary,” which was the commentors concern. The plan component now reads “Decommissioned roads should be returned to their natural condition” (RD-G-03).

**Comment Number(s):**

2925-00

Per revised plan (chapter 1, under Forest Plan Framework and Organization, Plan Components section), desired conditions describe the specific social, economic, and/or ecological characteristics that are desired for the plan area, or a part of the plan area. These are described in terms specific enough to allow for progress toward their achievement, and all project-level management activities should be aimed at the achievement of the desired conditions for those resources in the area where the project is located. Desired conditions can be thought of as vision statements that help define a collective vision for the Forest in the future. Most of the guidance for mining is governed by law, regulation, and policy, which does not need to be repeated within the forest plan. Future projects and activities, of any kind, must be consistent with the forest plan and various laws, agency policy, including direction to manage exploration or mining operations.

## **Rock Climbing<sup>7</sup>**

*Concern Statement 256. Commenters have concerns about rock climbing in designated wilderness areas, including the use of fixed anchors.*

Response:

**Comment Number(s):**

18-1,4, 28-2,5, 30-2, 31-3,5, 39-1, 51-1:2, 52-1, 53-1, 3, 7, 8, 61-1,2, 1705-1, 1714-1, 1729-1, 1740-1, 1751-1, 1753-1, 1763-3, 1769-1, 1784-1, 2, 1792-1, 2, 1808-1, 1832-1, 1833-2, 1861-1, 1907-1, 1912-1, 1915-1, 1944-1, 1955-1, 1967-1, 2082-1, 2098-1, 2523-1, 2537-2, 2542-1, 4, 2662-1,

In response to public comments, we have modified the direction in the forest plan regarding rock climbing and associated infrastructure and summarized these changes in the Rock Climbing and Fixed Anchors section beginning on page 360.

The activities of rock climbing and rappelling are managed the same in designated wilderness areas as they are in non-wilderness areas. Thus, these activities are not mentioned in the Designated Wilderness section of the forest plan (chapter 3) because any plan components related to rock climbing and rappelling are found in the Recreation section. However, management of permanent fixed anchors and bolts is specifically mentioned in plan components found in the Non-Motorized Recreation section (forest plan,

---

<sup>7</sup> To address many of these comments, we have developed a document to show the changes to planning components between the DEIS and the FEIS. This document can be found in the project record.



chapter 2, Recreation, Dispersed Recreation, Non-Motorized Recreation), which is unique to non-Wilderness areas versus designated wilderness areas.

The Wilderness Act of 1964 directs management of permanent fixed anchors, and thus it is not necessary to mention plan components for fixed anchors and bolts in designated wilderness. Plan components related to structures and developments in the wilderness include, “Modern, human-made developments are rare, substantially unnoticeable, and use natural or complementary materials”; “Nonconforming structures that are no longer in use, and do not meet the desired conditions, will be removed from designated wilderness” and “A minimum requirements analysis will be completed when considering new activities and instances that will authorize non-conforming activities, including research, in designated wilderness, and any adverse effects shall be mitigated” (forest plan, chapter 3, Designated Wilderness Management Areas).

**Concern Statement 257.** *Commenter is concerned the draft forest plan violates the multiple use sustained yield act of 1960 by restricting rock climbing.*

Response:

**Comment Number(s):**

2753-1

The forest plan does not violate the Multiple Use Sustained Yield Act of 1960 as it provides for management of all resources, including multiple forms of recreation. Rock climbing and rappelling are not prohibited and are considered an appropriate activity on the majority of the Tonto National Forest. In response to public comments, we have modified the direction in the forest plan regarding rock climbing and associated infrastructure and summarized these changes in the Rock Climbing and Fixed Anchors section beginning on page 360.

**Concern Statement 258.** *Commenter suggests future rock-climbing areas being determined at the district level to ensure site-specific community needs are considered and addressed.*

Response:

**Comment Number(s):**

2116-4

In response to public comments, we have modified the direction in the forest plan regarding rock climbing and associated infrastructure and summarized these changes in the Rock Climbing and Fixed Anchors section beginning on page 360. Rock climbing is an appropriate recreational activity on most National Forest System lands. There are some instances where rock climbing may not be appropriate, such as locations with endangered species habitat, sensitive riparian ecosystems, cultural resources, or where public safety is a concern such as on the immediate shoulder of a major highway or roadway. In some cases, certain measures can be taken to mitigate resource damages (e.g., seasonal closures, stay on the trail restrictions, etc.) or protect public safety so that the recreational activity can proceed. A plan component in the Non-motorized Recreation section (forest plan, chapter 2, Recreation, Dispersed Recreation, Non-Motorized Recreation) includes utilizing partners, cooperators, organizations, and local clubs to assist in developing management plans for climbing areas. Collaborating with these groups will

help the Forest develop the best recreation opportunities for the public while protecting the natural resources. If district staff are available, they will participate in the collaboration efforts whenever possible.

**Concern Statement 259.** *Commenters are concerned with plan components in the final forest plan restricting areas currently used for rock climbing.*

Response:

**Comment Number(s):**

18-2, 19-1, 31-2, 39-2, 51-3, 53-4, 2476-3, 2521-1,

In response to public comments, we have modified the direction in the forest plan regarding rock climbing and associated infrastructure and summarized these changes in the Rock Climbing and Fixed Anchors section beginning on page 360. To our knowledge, there are currently numerous undocumented permanent fixed anchors and bolts installed throughout the Tonto National Forest. This infrastructure is not permitted and did not undergo environmental analysis required under the National Environmental Policy Act (40 CFR 1500) for approval before installation. Because we do not have a complete list of where this infrastructure is and have not performed the National Environmental Policy Act analysis to evaluate resource impacts, the forest plan cannot identify a plan component that “grandfathers” existing permanent fixed anchors and bolts. For more plan components related to permanent fixed anchors, rock climbing, and rappelling, see the forest plan, chapter 2, Recreation, Dispersed Recreation, Non-Motorized Recreation section.

**Comment Number(s):**

1811-1

The forest plan is strategic in nature and does not include project and activity decisions such as the Resolution Copper mine project. We acknowledge that rock climbing use will potentially increase in nearby areas; the general Recreation, Dispersed Recreation, and Non-Motorized Dispersed Recreation sections address managing climbing and rappelling activities across the forest. In response to public comments, we have modified the direction in the forest plan regarding rock climbing and associated infrastructure and summarized these changes in the Rock Climbing and Fixed Anchors section beginning on page 360.

**Comment Number(s):**

2097-1, 2529-3

In response to public comments, we have modified the direction in the forest plan regarding rock climbing and associated infrastructure and summarized these changes in the Rock Climbing and Fixed Anchors section beginning on page 360.

**Concern Statement 260.** *Commenters are concerned with plan components related to rock climbing in the draft forest plan and seeking prior authorization for use.*

Response:

**Comment Number(s):**

18-5, 28-1,6, 30-3, 31-1, 2116-2, 3, 2842-1

The activity of rock climbing/rappelling itself on a non-commercial, recreational basis does not require prior authorization or a special use permit. In response to public comments, we have modified the direction in the forest plan regarding rock climbing and associated infrastructure and summarized these changes in the Rock Climbing and Fixed Anchors section beginning on page 360.

The forest plan is strategic in nature and does not include step by step instructions for the public to obtain permits or authorizations; its intent is to be used as a management tool for the agency and cooperators to manage the land. Instructions on how to obtain written authorization for such use can be found online at <https://www.fs.usda.gov/main/tonto/passes-permits> or by calling a local Forest Service office.

**Concern Statement 261.** *Commenters are concerned with rock climbing as a valid use of the forest and include suggestions for future forest management related to plan components in the draft forest plan, replacing bolts, prior authorization, fixed anchors in wilderness, and access.*

Response:

**Comment Number(s):**

2005-1, 2028-1, 2031-1, 2040-1, 2066-1, 2076-1, 2, 2088-1, 2, 2089-1, 2092-3, 5, 2510-1

The activities of rock climbing and rappelling are managed the same in designated wilderness areas as they are in non-wilderness areas. Thus, these activities are not mentioned in the designated wilderness section of the forest plan because any plan components related to rock climbing and rappelling are found in the Recreation section. However, management of permanent fixed anchors and bolts is specifically mentioned in the Non-Motorized Recreation section (forest plan, chapter 2, Recreation, Dispersed Recreation, Non-Motorized Recreation), which is unique to non-wilderness areas versus designated wilderness areas. In all designated wildernesses, permanent fixed anchors and bolts are in violation of the Wilderness Act of 1964, a Federal law, and thus it is not necessary to mention the prohibition in this forest plan. Plan components related to structures and developments in the wilderness include, “Modern, human-made developments are rare, substantially unnoticeable, and use natural or complementary materials”; “Nonconforming structures that are no longer in use, and do not meet the desired conditions, will be removed from designated wilderness” and “A minimum requirements analysis will be completed when considering new activities and instances that will authorize non-conforming activities, including research, in designated wilderness, and any adverse effects shall be mitigated” (forest plan, chapter 3, Designated Wilderness Management Areas). In response to public comments, we have modified the direction in the forest plan regarding rock climbing and associated infrastructure and summarized these changes in the Rock Climbing and Fixed Anchors section beginning on page 360. Please see this section for more information on plan components related to permanent fixed anchors and bolts in non-wilderness areas.

**Comment Number(s):**

2099-1,3, 5, 6, 2106-2, 4, 2116-5, 2117-1, 2118-1, 2122-1, 2384-1, 2476-1, 4, 2519-1, 2523-2, 2529-1, 2, 2537-3, 2543-1, 2546-1, 2549-1, 2740-1, 2740-3, 8, 2755-1, 2757-1, 2789-1, 2794-2, 4, 2882-1, 2931-1,

In response to public comments, we have modified the direction in the forest plan regarding rock climbing and associated infrastructure and summarized these changes in the Rock Climbing and Fixed Anchors section beginning on page 360.

**Comment Number(s):**

1713-1, 1932-1, 2011-1, 2111-1, 2122-2, 2125-1, 2522-1, 2532-1, 2523-3, 2660-1, 2767-1, 2776-1, 2789-2

Climbing is an appropriate activity on the majority of the Tonto National Forest; several plan components in the Recreation, Dispersed Recreation, and Non-Motorized Dispersed Recreation sections cover management of this activity. In response to public comments, we have modified the direction in the forest plan regarding rock climbing and associated infrastructure and summarized these changes in the Rock Climbing and Fixed Anchors section beginning on page 360.

**Concern Statement 262.** *Commenters support the management approaches related to working with partners for future rock-climbing opportunities.*

Response:

**Comment Number(s):**

61-3, 2368-1, 2523-4, 2842-5

We agree that collaboration is important to ensure a successful recreation experience for the public. As several plan components in the Non-Motorized Recreation section state: “Collaborate with established local and national climbing, caving, and canyoneering organizations to monitor popular and desirable climbing areas and develop best practices and management plans for these areas (e.g., cave management plans, climbing zones, vertical trails, individual route applications, and canyoneering routes)”; “Coordinate with local partners and climbing groups to either remove or implement maintenance and replacement of existing fixed anchors and bolts and to consider new areas when necessary to meet demands for rock climbing and rappelling while meeting public safety and natural resource desired conditions and where compatible with other National Forest uses”; and “Work with partner organizations and user groups to expand public education on safe recreational climbing practices and the use of permanent fixed anchors and bolts. Coordinate enforcement efforts with partner agencies, user groups, clubs, and local organizations to increase public education and build “self-regulation” within the recreational climbing community” (forest plan, chapter 2, Recreation, Dispersed Recreation, Non-Motorized Recreation). In response to public comments, we have modified the direction in the forest plan regarding rock climbing and associated infrastructure and summarized these changes in the Rock Climbing and Fixed Anchors section beginning on page 360.

**Concern Statement 263.** *Commenter is concerned with the process of obtaining permits for commercially guided climbing.*

Response:

**Comment Number(s):**

19-2

As it states in our revised plan (chapter 3, Special Uses): “Outfitting and guiding authorization can be issued for a variety of activities including, but not limited to...”. This sentence is then followed by a variety of our most popular recreational opportunities but is not limiting the opportunities for the Tonto National Forest to that list. Climbing groups, along with all appropriate recreation organizations, will always be encouraged to apply for a special use permit, as required by Forest Service regulations. Current and future outfitting and guiding groups for any activity are required to have insurance in order to operate and maintain their permit. Any outfitting and guiding permit issued in the future, including climbing, will continue to require insurance. Your suggestions for additional instructor qualification would fit well into a future management plan, which will be developed with a focus on climbing individuals, groups, and organizations for this type of expertise. The Tonto National Forest appreciates your feedback and will continue to work hard toward permitting inclusive, diverse, and safe outfitting and guiding groups.

**Concern Statement 264.** *Commenter suggests changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

1995-1

We appreciate your recommendation of allowing fixed anchors and bolts at belay and repel stations only. However, due to the high demand of rock-climbing locations across the forest and the current lack of management plans for such locations, multiple plan components in the Non-Motorized Recreation section (forest plan, chapter 2, Recreation, Dispersed Recreation, Non-Motorized Recreation) have been updated accordingly. In response to public comments, we have modified the direction in the forest plan regarding rock climbing and associated infrastructure and summarized these changes in the Rock Climbing and Fixed Anchors section beginning on page 360.

**Concern Statement 265.** *Commenters suggest an additional plan component in the final forest plan related to allowing the replacement of old and/or potentially unsafe bolts for rock climbing.*

Response:

**Comment Number(s):**

30-1, 53-6, 1707-1, 1763-1, 1833-1, 1843-1, 1869-1, 1968-1, 1969-1, 1971-1, 2034-1, 2062-1, 2099-4, 2106-3, 2538-1, 2551-1, 2789-3,

In response to public comments, we have modified the direction in the forest plan regarding rock climbing and associated infrastructure and summarized these changes in the Rock Climbing and Fixed

Anchors section beginning on page 360. Non-motorized recreation plan components address how rock climbing areas should be managed, including maintenance of existing permanent fixed anchors and bolts and have been updated to read: “Collaborate with established local and national climbing, caving, and canyoneering organizations to monitor popular and desirable climbing areas and develop best practices and management plans for these areas (e.g., cave management plans, climbing zones, vertical trails, individual route applications, and canyoneering routes)”; “Coordinate with local partners and climbing groups to either remove or implement maintenance and replacement of existing fixed anchors and bolts and to consider new areas when necessary to meet demands for rock climbing and rappelling while meeting public safety and natural resource desired conditions and where compatible with other National Forest uses”; and “Work with partner organizations and user groups to expand public education on safe recreational climbing practices and the use of permanent fixed anchors and bolts. Coordinate enforcement efforts with partner agencies, user groups, clubs, and local organizations to increase public education and build “self-regulation” within the recreational climbing community” (forest plan, chapter 2, Recreation, Dispersed Recreation, Non-Motorized Recreation). If a climber comes across an existing fixed anchor that they feel is unsafe, they should notify the Forest of the unsafe condition so the Forest can take the appropriate action to remove or repair it, whether it be with agency staff or partners and volunteers.

**Comment Number(s):**

28-4, 2550-1, 2779-1

Non-motorized recreation plan components address how rock climbing areas should be managed, including maintenance of existing permanent fixed anchors and bolts and have been updated to read: “Collaborate with established local and national climbing, caving, and canyoneering organizations to monitor popular and desirable climbing areas and develop best practices and management plans for these areas (e.g., cave management plans, climbing zones, vertical trails, individual route applications, and canyoneering routes)”; “Coordinate with local partners and climbing groups to either remove or implement maintenance and replacement of existing fixed anchors and bolts and to consider new areas when necessary to meet demands for rock climbing and rappelling while meeting public safety and natural resource desired conditions and where compatible with other National Forest uses”; and “Work with partner organizations and user groups to expand public education on safe recreational climbing practices and the use of permanent fixed anchors and bolts. Coordinate enforcement efforts with partner agencies, user groups, clubs, and local organizations to increase public education and build “self-regulation” within the recreational climbing community” (forest plan, chapter 2, Recreation, Dispersed Recreation, Non-Motorized Recreation). If a climber comes across an existing fixed anchor that they feel is unsafe, they should notify the Forest of the unsafe condition so the Forest can take the appropriate action to remove or repair it, whether it be with agency staff or partners and volunteers. In response to public comments, we have modified the direction in the forest plan regarding rock climbing and associated infrastructure and summarized these changes in the Rock Climbing and Fixed Anchors section beginning on page 360.

**Comment Number(s):**

1952-1, 2088-3, 2106-1

In response to public comments, we have modified the direction in the forest plan regarding rock climbing and associated infrastructure and summarized these changes in the Rock Climbing and Fixed Anchors section beginning on page 360.

**Concern Statement 266.** *Commenters suggest clarification about fixed anchors be included in the final forest plan and environmental impact statement.*

Response:

**Comment Number(s):**

18-3, 28-3, 31-4, 39-3, 53-5

The language has been adjusted in the appropriate plan components (forest plan, chapter 2, Recreation, Dispersed Recreation, Non-Motorized Recreation) to also identify ascending. In response to public comments, we have modified the direction in the forest plan regarding rock climbing and associated infrastructure and summarized these changes in the Rock Climbing and Fixed Anchors section beginning on page 360.

**Comment Number(s):**

2476-2, 2537-1, 2740-2

To our knowledge, there are currently numerous undocumented permanent fixed anchors and bolts installed throughout the Tonto National Forest. This infrastructure is not permitted and did not undergo environmental analysis required under the National Environmental Policy Act (40 CFR 1500) for approval before installation. Because we do not have a complete list of where this infrastructure is and have not performed the National Environmental Policy Act analysis to evaluate resource impacts, the forest plan cannot identify a plan component that “grandfathers” existing permanent fixed anchors and bolts. In all designated wildernesses, permanent fixed anchors and bolts are in violation of the Wilderness Act of 1964, a Federal law, and thus it is not necessary to mention the prohibition in this forest plan. Plan components related to structures and developments in the wilderness include, “Modern, human-made developments are rare, substantially unnoticeable, and use natural or complementary materials”; “Nonconforming structures that are no longer in use, and do not meet the desired conditions, will be removed from designated wilderness” and “A minimum requirements analysis will be completed when considering new activities and instances that will authorize non-conforming activities, including research, in designated wilderness, and any adverse effects shall be mitigated” (forest plan, chapter 3, Designated Wilderness Management Areas). For more plan components related to permanent fixed anchors, rock climbing, and rappelling, see the Non-Motorized Recreation section (forest plan, chapter 2, Recreation, Dispersed Recreation, Non-Motorized Recreation). Additionally, in response to public comments, we have modified the direction in the forest plan regarding rock climbing and associated infrastructure and summarized these changes in the Rock Climbing and Fixed Anchors section beginning on page 360.

## **Saguaro Wild Burro Management Area**

**Concern Statement 267.** *Commenters are concerned with the management outlined in the Saguaro Wild Burro Management Area.*

Response:

**Comment Number(s):**

2970-529

Planning components were developed to address management of the designated wild territory: the area shall be managed for zero burros, and no burros shall be re-introduced to the area (revised plan, chapter 3, Saguaro Wild Burro Management Area).

**Concern Statement 268.** *Comments concerning the Federal Land Policy Management Act (FLPMA) of 1976 regarding the management of wild burros.*

Response:

**Comment Number(s):**

2934-19,20,22, 25

Since there are no designated wild horses or designated wild burros on the Tonto National Forest, this comment does not apply to plan direction for the Tonto National Forest.

**Concern Statement 269.** *Comments related to the boundary of the saguaro wild burro management area.*

Response:

**Comment Number(s):**

2934-13, 2806-21, 2934-14, 18

Since there are no designated wild burros in the Tonto National Forest, this comment does not apply to plan direction for the Tonto National Forest.

**Concern Statement 270.** *Commenter suggests changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2934-28

The revised plan contains a guideline which states: “When unauthorized livestock are found occupying National Forest System lands, the owner should be promptly notified to remove them and prevent them from re-entering National Forest System lands. If the owner is unknown or uncooperative, impoundment procedures should be initiated” (revised plan, chapter 2, Rangelands, Forage, and Grazing). This includes any unauthorized horses or burros. There are currently no authorized domestics burros or wild burros occupying the Tonto National Forest.



## Salt River Horses

**Concern Statement 271.** *Commenters are concerned with forest user conflicts in the areas the Salt River Horses occur.*

Response:

**Comment Number(s):**

2838-2, 2840-4, 2983-7, 2983-2,6, 10

We appreciate your support of our planning efforts per 36 CFR 219. The Salt River Horse Management Area section of the forest plan provides guidance and plan components directing the Forest on how to manage for this management area. This direction includes a desired condition to “The area provides a safe environment for both the Salt River Horses and forest users” (forest plan, chapter 3, Salt River Horse Management Area). The Salt River Horse Herd is protected in the lower Salt River by State law, HB 2340, and managed by the Arizona Department of Agriculture and the precured 3rd party management group, Salt River Wild Horse Management Group. Additionally, “The Salt River Horse herd shall only be located and managed within the Salt River Horse Management Area” (forest plan, chapter 3, Salt River Horse Management Area). The forest plan is programmatic in nature, and specific projects to implement the plan will require site-specific environmental analysis through the National Environmental Policy Act process. The project level analysis will consider the effect of the proposed project to affected resources, including to the Salt River Horse Management Area, recreational resources, and resources managed by our partners including the herd, and be consistent with the forest plan. The Forest Service will continue to work with the Arizona Department of Agriculture for the humane management and sustainability of the herd. Coordination efforts continue to improve among the parties. However, as is related to the forest plan, plan components have been added to the Salt River Horse Management Area section of the forest plan and include management approaches to coordinate and collaborate with the Arizona Department of Agriculture and partners.

**Concern Statement 272.** *Commenters are concerned with the protection of the Salt River Horses on the national forest.*

Response:

**Comment Number(s):**

763-1, 2579-1, 2581-1, 2,4, 2582-3, 2591-1, 2611-1, 2618-1, 3, 2620-1, 2621-1, 2622-1, 2, 2630-2, 2631-1, 2613-1, 2654-1, 2657-1, 2667-3, 2674-2, 2677-1, 2678-1, 2682-1, 2684-1, 2688-3, 2701-3, 2717-1, 2720-1, 2833-1, 2838-1, 2841-1, 2855-1, 2856-1, 2924-1, 2934-6,8,11, 2949-1, 2960-1

We appreciate your support of our planning efforts per 36 CFR 219. The Salt River Horse Management Area section of the forest plan provides guidance and plan components directing the Forest on how to manage for this management area. This direction includes a desired condition to “The area provides a safe environment for both the Salt River Horses and forest users” (forest plan, chapter 3, Salt River Horse Management Area). The Salt River Horse Herd is protected in the lower Salt River by State law, HB 2340, and managed by the Arizona Department of Agriculture. Additionally, “The Salt River Horse herd shall only be located and managed within the Salt River Horse Management Area” (forest plan, chapter 3, Salt River Horse Management Area). The management plan brought forward by the Arizona Department of Agriculture includes humane birth control for population size, and designated management areas in

which the horses are protected. HB 2340 and ARS 3-1491 states “A person shall not harass, shoot, injure, kill or slaughter a horse that is part of the Salt River Horse Herd.”

**Comment Number(s):**

1587-1, 2574-1, 2578-1, 2701-1, 2722-1, 3

We appreciate your support of our planning efforts per 36 CFR 219. The Salt River Horse Management Area section of the forest plan provides guidance and plan components directing the Forest on how to manage for this management area (forest plan, chapter 3, Salt River Horse Management Area). The Salt River Horse Herd is protected in the lower Salt River by State Law HB 2340, and the population control of the horses will be addressed in the Salt River Horse management plan by the Arizona Department of Agriculture. The horses are currently being managed by the joint agreement between the Forest Service and the Arizona Department of Agriculture. This includes the use of a humane birth control, PZP, and a safe and secure habitat for the horses. Safe birth control, PZP, is included in the management plan by the Arizona Department of Agriculture. HB 2340 and ARS 3-1491 states “A person shall not harass, shoot, injure, kill or slaughter a horse that is part of the Salt River Horse Herd.” Furthermore, any adoption plan for these horses would be through the management plan composed by the Arizona Department of Agriculture. Maricopa County Department of Transportation mandates the speed on Bush highway but has installed speed radars and “watch for horses” signs in areas of high concentration.

**Concern Statement 273.** *Commenters are concerned with the salt river horse management area analysis in the environmental impact statement.*

Response:

**Comment Number(s):**

2736-17

The plan components for the Salt River Horse Management Area have been updated from the time the draft environmental impact statement was released (forest plan, chapter 3, Salt River Horse Management Area). The final environmental impact statement has also been updated to reflect these changes and address the commenter's concerns.

**Concern Statement 274.** *Commenters believe the Salt River Horses do not belong on the Tonto National Forest and should be removed.*

Response:

**Comment Number(s):**

1-1, 40-1, 2992-2

We appreciate your support of our planning efforts per 36 CFR 219. The Salt River horse herd is not classified as “wild” under the Wild and Free-Roaming Horses and Burros Act of 1971, but are a protected herd under Arizona State law, HB 2340 and the population control of the horses will be addressed in the Salt River Horse management plan by the Arizona Department of Agriculture. Currently, the population is being managed by the birth control PZP. The Salt River Horse Management Area section of the forest plan provides guidance and plan components directing the Forest on how to manage for this management area (forest plan, chapter 3, Salt River Horse Management Area).

**Concern Statement 275.** *Commenter recommends increasing communication between the Forest Service and Arizona department of agriculture regarding the Salt River Horses.*

Response:

**Comment Number(s):**

2983-1

We appreciate your support of our planning efforts per 36 CFR 219. The Salt River Horse Management Area section of the forest plan provides guidance and plan components directing the Forest on how to manage for this management area. This direction includes a desired condition that “The area provides a safe environment for both the Salt River Horses and forest users” (forest plan, chapter 3, Salt River Horse Management Area). The Salt River Horse Herd is protected in the lower Salt River by State law, HB 2340, and managed by the Arizona Department of Agriculture and the precured 3rd party management group, Salt River Wild Horse Management Group. The Forest Service will continue to work with the Arizona Department of Agriculture for the humane management and sustainability of the herd. Coordination efforts continue to improve among the parties. However, as is related to the forest plan, plan components have been added to the Salt River Horse Management Area section of the forest plan and include management approaches to coordinate and collaborate with the Arizona Department of Agriculture and partners. There is nothing in the forest plan that would prevent better communication between parties.

**Concern Statement 276.** *Commenters see potential economic benefit of wildlife watching opportunities of the Salt River Horses.*

Response:

**Comment Number(s):**

2934-7, 12, 27

We appreciate your support of our planning efforts per 36 CFR 219. The Salt River Horse Management Area section of the forest plan provides guidance and plan components directing the Forest on how to manage for this management area. Though we do not have specific information to quantify the economic and other values of the herd, the plan components were developed in response to public comment. This direction includes a management approach to consider developing recreational opportunities that are related to viewing the Salt River Horse herd” (forest plan, chapter 3, Salt River Horse Management Area). The Salt River Horse Herd is protected in the lower Salt River by State law, HB 2340, and managed by the Arizona Department of Agriculture. The Forest Service will continue to work with the Arizona Department of Agriculture for the humane management of the herd.

**Concern Statement 277.** *Comments related to the Salt River Horse management plan.*

Response:

**Comment Number(s):**

2970-678, 680

The Forest Service will continue to monitor range and riparian areas along the lower Salt River and will continue to work with the Arizona Department of Agriculture on achieving a sustainable herd size for the area provided. The Tonto National Forest received numerous comments from the public to provide more specific direction about the management of the area the herd currently occupies. The Salt River Horse Management Area section of the forest plan was developed based on this need. However, the forest plan is programmatic in nature and does not discuss site-specific projects to implement the plan such as projects to construct, maintain, or remove fencing. These projects would be considered outside of this process. There is nothing in the revised plan that would prohibit these actions.

**Comment Number(s):**

2582-1, 2909-2, 2966-20,25,

The forest plan only addresses the forest management areas where the Salt River horse herd is found, which consist of the Goldfield and Bulldog allotments along the lower Salt River. The management plan from the Arizona Department of Agriculture will cover the actual management of the herd. Although the Salt River horse herd is not protected under the Federal Wild and Free-Roaming Horse and Burro Act of 1971, they are safeguarded under State law HB 2340, which enacts ARS 3-1491. This statute required the Arizona Department of Agriculture to enter into an intergovernmental agreement with the US Forest Service to protect and manage the herd. The Arizona Department of Agriculture procured a 3rd party contracting group to implement a management plan which included population control, management areas, supplemental feeding, and any other issue related to the Salt River herd. The Forest Service will continue to monitor range and riparian areas along the lower Salt River and will continue to work with the Arizona Department of Agriculture on achieving a sustainable herd size for the area provided. The Tonto National Forest received numerous comments from the public during the forest plan revision process to provide more specific direction about the management of the area the herd currently occupies. The Salt River Horse Management Area section of the forest plan was developed based on this need and provides guidance and plan components directing the Forest on how to manage for this management area. This direction includes a management approach to consider developing recreational opportunities that are related to viewing the Salt River Horse herd” (forest plan, chapter 3, Salt River Horse Management Area) and “Collaborate with the Arizona Department of Agriculture and the Salt River Horse Collaborative to develop and implement a management plan for the Salt River Horses” (SRHMA\_MA-1). The Salt River Horse Herd is protected in the lower Salt River by State law, HB 2340, and managed by the Arizona Department of Agriculture. Additionally, “The Salt River Horse herd shall only be located and managed within the Salt River Horse Management Area” (forest plan, chapter 3, Salt River Horse Management Area).

**Comment Number(s):**

2966-22, 23

This comment address site specificity, which is outside the scope of this plan revision effort. No site-specific National Environmental Policy Act analysis of Salt River Horses being in the Tonto National Forest has been completed.

**Comment Number(s):**

2581-3, 2590-1, 2592-2, 2628-1, 2630-1, 2664-1, 2680-1, 2706-1, 2806-12, 2827-1, 2840-1, 3, 2909-1,

We appreciate your support of our planning efforts per 36 CFR 219. The Salt River Horse Management Area section of the forest plan provides guidance and plan components directing the Forest on how to manage for this management area (forest plan, chapter 3, Salt River Horse Management Area). The Salt

River Horse Herd is protected in the lower Salt River by State law, HB 2340, and the population control of the horses will be addressed in the Salt River Horse management plan by the Arizona Department of Agriculture. The horses are currently being managed by the joint agreement between the Forest Service and the Arizona Department of Agriculture. This includes the use of a humane birth control, PZP, and a safe and secure habitat for the horses. The fencing allows the separation of the protected Salt River Horse management areas from recreation, roads, and reservation areas.

**Comment Number(s):**

2926-4

The Forest Service must comply with all law, regulation, and policy when managing for the multiple uses on the forest, including grazing. For example, "...it is the policy of the Congress that the national forests are established and shall be administered for outdoor recreation, range, timber, watershed, and wildlife and fish purposes." We are unsure which National Academy of Science report the commenter is referring to. However, the Tonto National Forest is unable to manage the Salt River Horses as a wild horse herd, as this is a term that has been legally defined under the Wild Horse and Burro Act. Instead, the Salt River Horse Herd is protected in the lower Salt River by State law, HB 2340, and managed by the Arizona Department of Agriculture. The Salt River Horse Management Area section of the forest plan provides guidance and plan components directing the Forest on how to manage for this management area. Under the forest plan direction, certain activities will be prohibited within the Salt River Horse Management Area. This direction includes a standard that "Permitted livestock grazing shall not be authorized" within the management area (forest plan, chapter 3, Salt River Horse Management Area). Additionally, "The Salt River Horse herd shall only be located and managed within the Salt River Horse Management Area" (forest plan, chapter 3, Salt River Horse Management Area). The forest plan is programmatic in nature, and specific projects to implement the plan will require project level, site-specific environmental analysis through the National Environmental Policy Act process.

**Comment Number(s):**

63-1, 3

We appreciate your support of our planning efforts per 36 CFR 219 and continued support for the Salt River Horse Herd. The Salt River Horse Management Area section of the forest plan provides guidance and plan components directing the Forest on how to manage for this management area. A description of the Salt River Horse Management Area and a map can be found in the forest plan. "The Salt River Horse herd shall only be located and managed within the Salt River Horse Management Area" (forest plan, chapter 3, Salt River Horse Management Area). We appreciate your opinion on a management plan and the Arizona Department of Agriculture will select a plan that not only positively affects the forest, but also encourages the sustainability of the herd. The areas to the east of Bush Highway are not part of the designated management areas for the Salt River horse herd and horses found in these areas will be classified as "strays". The management areas for the herd include the Goldfield and Bulldog allotments along the lower Salt River.

**Comment Number(s):**

2960-4, 2960-11, 12

We appreciate your support of our planning efforts per 36 CFR 219. The Salt River Horses are humanely managed by the Intergovernmental Agreement between the Forest Service and the Arizona Department of Agriculture as a result of HB 2340. Per this agreement, the Forest Service created the Salt River Horse Collaborative whose duty was to present 3 proposals for a long-term management plan of the horses.

These proposals were then used to create management plans by the Arizona Department of Agriculture for the governor to approve. In accordance with the management plan from the Arizona Department of Agriculture, the east side of Bush highway, including the seeps, are not within the approved horse areas and are not protected under the State law. Additionally, under the revised forest plan for the Tonto National Forest, “The Salt River Horse herd shall only be located and managed within the Salt River Horse Management Area” (forest plan, chapter 3, Salt River Horse Management Area).

The plan from the Arizona Department of Agriculture also calls for the use of a humane birth control, PZP, to manage the population size. Any removal done in the forest by the 3rd party management group must be approved beforehand by the Arizona Department of Agriculture and horses cannot be returned to the forest per Forest Service regulations. As of right now, no other rescue is authorized to take a horse from the Salt River Horse herd. The use of supplemental feeding during extreme summer months is done to keep the herd in good health. Each feed location is approved before the start of supplemental feedings, and the 3rd party group will feed in multiple spots on each location with only certified “weed free” hay. This is all done under supervision from the Arizona Department of Agriculture. Presently, the Salt River Wild Horse Management Group has the contract with the Arizona Department of Agriculture to be the 3rd party management group, although all volunteer help is welcomed and appreciated.

The Forest Service also supports equestrian use, including staging in authorized areas. There is nothing in the forest plan that would prohibit this continued use.

**Comment Number(s):**

2697-4

We appreciate your support of our planning efforts per 36 CFR 219. The Salt River Horse Management Area section of the forest plan provides guidance and plan components directing the Forest on how to manage for this management area. This direction includes a desired condition that “The area provides a safe environment for both the Salt River Horses and forest users” (forest plan, chapter 3, Salt River Horse Management Area). The Salt River Horse Herd is protected in the lower Salt River by State law, HB 2340, and managed by the Arizona Department of Agriculture. Additionally, “The Salt River Horse herd shall only be located and managed within the Salt River Horse Management Area” (forest plan, chapter 3, Salt River Horse Management Area). The forest plan is programmatic in nature, and specific projects to implement the plan will require project level, site-specific environmental analysis through the National Environmental Policy Act process. The comment periods for the National Environmental Policy Act process can be found in 36 CFR 220 and correspond to the “level” of analysis appropriate for the action being proposed. The project level analysis will consider the effect of the proposed project to affected resources, including to the Salt River Horse Management Area, and will be consistent with the forest plan. The fencing being installed at this time has been authorized by existing decisions and complies with the forest plan of 1985. This fence will help separate the herd from roadways, reservation, and recreational areas. This was done to help minimize user conflicts with the herd and roadway accidents involving the horses. The Forest Service will continue to work with the Arizona Department of Agriculture for the humane management of the herd.

**Comment Number(s):**

2722-4

We appreciate your support of our planning efforts per 36 CFR 219. The Salt River Horse Management Area section of the forest plan provides guidance and plan components directing the Forest on how to manage for this management area (forest plan, chapter 3, Salt River Horse Management Area). The Salt

River Horse Herd is protected in the lower Salt River by State law, HB 2340, and the population control of the horses will be addressed in the Salt River Horse management plan by the Arizona Department of Agriculture. The horses are currently being managed by the joint agreement between the Forest Service and the Arizona Department of Agriculture. This includes the use of a humane birth control, PZP, and a safe and secure habitat for the horses. Safe birth control, PZP, is included in the management plan by the Arizona Department of Agriculture. Maricopa County Department of Transportation mandates the speed on Bush highway but has installed speed radars and “watch for horses” signs in areas of high concentration.

***Concern Statement 278. Comments related to the Taylor Grazing Act.***

Response:

**Comment Number(s):**

2934-23

The Taylor Grazing Act does not apply to lands administered by the US Forest Service. Since there are no designated wild horses or designated wild burros on the Tonto National Forest, this comment is outside the scope of this plan revision process and will not be further considered.

***Concern Statement 279. Comments relating to the 1971 Wild Free-Roaming Horses and Burros Act and the Salt River Horses.***

Response:

**Comment Number(s):**

2934-24,25,29, 2966-21

Thank you for your support of our plan revision efforts. The history of these horses, now known as Salt River Horses, as presented is accurate. They are not considered “wild horses” under the 1971 Wild Free-Roaming Horses and Burro Act.

The revised forest plan applies to National Forest System lands administered by Tonto National Forest, not Bureau of Land Management Lands. Since there are no designated wild horses or designated wild burros on the Tonto National Forest, this comment is outside the scope of this plan revision process and will not be further considered.

***Concern Statement 280. Commenters requesting all activities authorized under the National Environmental Policy Act (NEPA) related to the Salt River Horses have a 30-day comment period, and not be categorical exclusions.***

Response:

**Comment Number(s):**

2641-1, 2667-1, 2674-1, 2676-1, 2688-1, 2838-3, 2934-9, 2690-1, 2696-1, 2831-2, 2901-1, 2909-3, 2930-1, 2934-3, 4, 2983-11,

The forest plan is programmatic in nature, and specific projects to implement the plan will require project level, site-specific environmental analysis through the National Environmental Policy Act process under

40 CFR 1500. Site-specific analysis will consider the effect of the proposed project to affected resources, including to the Salt River Horse Management Area, and will be consistent with the forest plan. The comment periods for the National Environmental Policy Act process can be found in 36 CFR 220 and correspond to the “level” of analysis appropriate for the action being proposed. The project level analysis will consider the effect of the proposed project to affected resources, including to the Salt River Horse Management Area, and will be consistent with the forest plan. The US Forest Service will continue to work with the Arizona Department of Agriculture for the humane management of the herd.

**Concern Statement 281.** *Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2724-1, 2929-1, 2983-8, 9

The Forest Service will continue to work with the Arizona Department of Agriculture and our identified partners to move the Salt River Horse Management Area toward the desired conditions. The Tonto National Forest received numerous comments from the public to provide more specific direction about the management of the area the herd currently occupies. The Salt River Horse Management Area section of the forest plan was developed based on this need. This direction includes a management approach to “Collaborate with the Arizona Department of Agriculture and the Salt River Horse Collaborative to develop and implement a management plan for the Salt River Horses” (forest plan, chapter 3, Salt River Horse Management Area). There are always opportunities to improve this communication, and the Forest will be a sincere partner in that effort. Much of this communication will continue to occur at the local level as site-specific needs arise. The Forest must also communicate with other interested and affected parties when planning site-specific projects to implement the forest plan under 40 CFR 1500.

**Comment Number(s):**

2582-2, 2934-2,

We appreciate your support of our planning efforts per 36 CFR 219. The Salt River Horse Management Area section of the forest plan provides guidance and plan components directing the Forest on how to manage for this management area. Though we do not have specific information to quantify the economic and other values of the herd, the plan components were developed in response to public comment. This direction includes a desired condition that “The area provides a safe environment for both the Salt River Horses and forest users” (forest plan, chapter 3, Salt River Horse Management Area). The Salt River Horse Herd is protected in the lower Salt River by State law, HB 2340, and managed by the Arizona Department of Agriculture. Additionally, “The Salt River Horse herd shall only be located and managed within the Salt River Horse Management Area” (forest plan, chapter 3, Salt River Horse Management Area). The forest plan is programmatic in nature, and specific projects to implement the plan will require site-specific environmental analysis through the National Environmental Policy Act process under 40 CFR 1500 and conducted as appropriate for the action being proposed. The project level analysis will consider the effect of the proposed project to affected resources, including to the Salt River Horse Management Area, and will be consistent with the forest plan. The fencing being installed at this time has been authorized by existing decisions and complies with the forest plan of 1985. This fence will help separate the herd from roadways, reservation, and recreational areas, but will not prevent them from accessing the river. This was done to help minimize user conflicts with the herd and roadway accidents



involving the horses. The Forest Service will continue to work with the Arizona Department of Agriculture for the humane management of the herd. This includes the use of a humane birth control, PZP, and a safe habitat for the herd.

**Comment Number(s):**

2791-1

We appreciate your support of our planning efforts per 36 CFR 219. The Salt River Horse Management Area section of the forest plan provides guidance and plan components directing the Forest on how to manage for this management area. This direction includes a desired condition that “The area provides a safe environment for both the Salt River Horses and forest users” (forest plan, chapter 3, Salt River Horse Management Area). The Salt River Horse Herd is protected in the lower Salt River by State law, HB 2340, and managed by the Arizona Department of Agriculture. Additionally, “The Salt River Horse herd shall only be located and managed within the Salt River Horse Management Area” (forest plan, chapter 3, Salt River Horse Management Area). The forest plan is programmatic in nature, and specific projects to implement the plan will require site-specific environmental analysis through the National Environmental Policy Act process. The comment periods for the National Environmental Policy Act process can be found in 36 CFR 220 and correspond to the “level” of analysis appropriate for the action being proposed. The project level analysis will consider the effect of the proposed project to affected resources, including to the Salt River Horse Management Area, and will be consistent with the forest plan.

**Comment Number(s):**

2960-5, 8,10

We appreciate your support of our planning efforts per 36 CFR 219. The Salt River Horses are humanely managed by the Intergovernmental Agreement between the Forest Service and the Arizona Department of Agriculture as a result of HB 2340. Per this agreement, the Forest Service created the Salt River Horse Collaborative whose duty was to present 3 proposals for a long-term management plan of the horses. These proposals were then used to create management plans by the Arizona Department of Agriculture for the governor to approve. In accordance with the management plan from the Arizona Department of Agriculture, the east side of Bush highway, including the seeps, are not within the approved horse areas and are not protected under the State law. Additionally, under the revised forest plan for the Tonto National Forest, “The Salt River Horse herd shall only be located and managed within the Salt River Horse Management Area” (forest plan, chapter 3, Salt River Horse Management Area).

The plan from the Arizona Department of Agriculture also calls for the use of a humane birth control, PZP, to manage the population size. Any removal done in the forest by the 3rd party management group must be approved beforehand by the Arizona Department of Agriculture and horses cannot be returned to the forest per Forest Service regulations. As of right now, no other rescue is authorized to take a horse from the Salt River Horse herd. The use of supplemental feeding during extreme summer months is done to keep the herd in good health. Each feed location is approved before the start of supplemental feedings, and the 3rd party group will feed in multiple spots on each location with only certified “weed free” hay. This is all done under supervision from the Arizona Department of Agriculture. Presently, the Salt River Wild Horse Management Group has the contract with the Arizona Department of Agriculture to be the 3rd party management group, although all volunteer help is welcomed and appreciated.

The Forest Service also supports equestrian use, including staging in authorized areas. There is nothing in the forest plan that would prohibit this continued use.

## Scenery

**Concern Statement 282.** *Commenter is concerned about light pollution and recommends including dark sky association policy be included in the final forest plan.*

Response:

**Comment Number(s):**

2192-3

The forest plan is a guiding document as detailed in chapter 1 of the revised plan. Site-specific design features including for light pollution will be addressed at the project level and should comply with AZ Revised Statutes Title 49.1101, 1102, 1103, and 1104 (Light Pollution).

**Concern Statement 283.** *Commenter notes the need to replace the visual management system with the scenery management system in the final forest plan.*

Response:

**Comment Number(s):**

79-5

Per FSM 1909.12, which states, “The Scenery Management System is the framework for developing plan components related to scenic character, unless an exception is established per FSM 1921.03” the Forest completed this requirement in early 2020 and the revised plan and environmental impact statement have been updated accordingly.

**Concern Statement 284.** *Commenter requests an explanation of how scenery plan components are going to be used in future forest projects.*

Response:

**Comment Number(s):**

2921-7

In the revised plan (chapter 1, Plan Components), guidelines describe constraints on project and activity decision-making that allow for departure from its terms, so long as the intent of the guidelines is met. In other words, guidelines are mandatory with some flexibility on how they are implemented in meeting the intent of the existing guideline. Any deviation from the intent of a guideline requires a plan amendment. All site-specific proposed projects that may impact visual quality must comply with standards and should comply with guidelines unless there is a clearly articulated reason for it not to.

**Concern Statement 285.** *Commenter suggests changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2938-12

The standard the commenter references has been changed and now states: “The Scenery Management System (SMS), or other protocol, is considered into the design, planning, and implementation of all resource management decisions” (revised plan, chapter 2). Additionally, as stated in the first chapter of the revised plan, guidelines are described as constraints on projects and activity decision-making that allow for departure from its terms, so long as the intent of the guideline is met. Per FSM 1909, chapter 20, any deviation from the intent of a guideline requires a plan amendment. These decisions are made at the project level. A project or activity must be consistent with all guidelines applicable to the type of project or activity and its location in the plan area, otherwise the plan would require an amendment. A project or activity can be consistent with a guideline in either of two ways:

- a. The project or activity is designed exactly in accord with the guideline, or
- b. A project or activity design varies from the exact words of the guideline but is as effective in meeting the purpose of the guideline to contribute to the maintenance or attainment of relevant desired conditions and objectives.

## **Significant Caves**

**Concern Statement 286.** *Commenter notes an error in the description for the final forest plan.*

Response:

**Comment Number(s):**

2825-5

Thank you for bringing this clerical error to our attention. The text has been changed to read “Federal Cave Resources Protection Act (FCRPA) of 1988 (16 U.S.C. 4301-4309; 102 Stat. 4546)”.

**Concern Statement 287.** *Commenters suggest changes to the tables and language of the final environmental impact statement.*

Response:

**Comment Number(s):**

2825-7, 15

Thank you for bringing this clerical error to our attention. The text has been changed to read “There are currently 17 significant caves on the Tonto National Forest” (forest plan, chapter 2, Caves and Karsts). Mining and mineral activities comply with law, regulation, and policy in the development of minerals resources. The objective is to minimize adverse environmental impacts to surface and groundwater

resources, watershed and forest ecosystem health, wildlife and wildlife habitat, scenic character, and other desired conditions applicable to the area. Specific caves that could potentially be impacted and necessary mitigations for ground disturbance, vegetation management, and other impacts will be addressed on a case-by-case basis.

The other suggestion is addressed in the “Vegetation Ecological Response Units and Fire and Fuels sections” in chapter 2. (Timber harvest and vegetation manipulation shall only occur where soil, slope, and watersheds will not be irreversibly damaged, and protection must be provided for streams, streambanks, riparian, shorelines, lakes, wetlands, other waterbodies, fish, wildlife, recreation, cave and karst formations, cultural, and aesthetic resources).

The text in the document has been changed to read “Salt or mineral supplements should not be placed near riparian, wetland, karst features, or other areas where livestock concentrations are undesired” in the guidelines for Grazing section (forest plan, chapter 2, Rangelands, Forage, and Grazing).

## **Socio-Economics**

**Concern Statement 288.** *Commenter is requesting citations for the economic contribution tables.*

Response:

**Comment Number(s):**

2736-12

We appreciate your comments about the socioeconomic analysis in the environmental impact statement. The Forest Service compiled the information needed for this analysis; it can be viewed in the plan revision administrative record. The visitation changes across alternatives provided by the Forest were adjusted by the regional economist for several reasons to arrive at the percent changes across alternatives reported in the econ section. First, it was decided to use the more recent national visitor use monitoring results for the economic modeling. Secondly, the categories used by the Forest reported changes were deconstructed and reconstructed into the categories that are used in the economic modeling. Fishing makes up the vast majority of wildlife related visitation.

**Concern Statement 289.** *Commenter suggests that the outdoor recreation opportunities occurring on the national forest have a disproportionately large impact on the economic well-being and economic development of Gila County.*

Response:

**Comment Number(s):**

2991-2

We appreciate your comments about the impact of recreation on Gila County. The contribution of recreation visitors to National Forest system lands in and around Gila County is captured in the economic model. The model estimates the total economic contribution to all counties in the planning area and does not break out the contribution to Gila County separately. Unfortunately, we are not able to do additional analysis to further break this down quantitatively as the National Visitor Use Monitoring data which supplies recreation visitor and expenditure data does not break out this out by county. The land use

section of the final environmental impact statement also captures much of the information the commentor mentions about land ownership. The Tonto National Forest understands the importance of the Tonto National Forest on the economic well-being of Gila County.

**Concern Statement 290.** *Commenter are concerned about the economic analysis and failure to address aspects of grazing.*

Response:

**Comment Number(s):**

2970-523

Payments In-Lieu of Taxes are Federal payments to local governments that help counties offset losses in property taxes associated with nontaxable Federal land located within a county's boundary. Payments In-Lieu of Taxes are distributed by the Department of the Interior for tax-exempt Federal land administered by the BLM, the Forest Service, the National Park Service, U.S. Fish and Wildlife Service, and for Federal water projects and some military installations. Payments In-Lieu of Taxes has historically been a stable and dependable revenue source because it is a flat per-acre payment that is not tied to levels of revenue generated by Forest Service land. Payments In-Lieu of Taxes are distributed to counties based solely on the amount of Federally managed acres and are not related to the cattle industry.

Historically, counties received revenue sharing payments from commercial activities on Federal lands, such as oil and gas leasing, livestock grazing, and timber harvesting. Beginning in 1908 the payment was 25-percent of the moneys received annually. Since 2008 the payments are based on 25-percent of the 7-year rolling average annual receipts. These payments are commonly called 25-percent payments. However, in 2000, the Secure Rural Schools and Community Self-determination Act was passed which offered a guaranteed source of payments that was not tied to annual commercial revenue on National Forests. Pinal and Gila counties have elected to receive the Secure Rural Schools payments and not the 25-percent payments and therefore these payments are not tied to the annual revenue of the cattle industry.

**Comment Number(s):**

2808-29, 2986-43

Forest Service management follows the Multiple Use Sustained Yield Act "with consideration being given to the relative values of the various resources, and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output." Congress has recognized the value of providing forage to feed livestock, for use by the American People, and further economic analysis in this plan would not change our mandate to follow this law and policy. In addition, the 2012 Planning Rule does not require specific information to be included in the economic contribution analysis. The information provided in the final environmental impact statement is the best available scientific information.

**Concern Statement 291.** *Commenter requesting changes to the analysis of alternative C for motorized recreations impact to the local economy.*

Response:

**Comment Number(s):**

2736-13

We appreciate your comments about the socioeconomic analysis in the environmental impact statement. The Forest Service compiled the information needed for this analysis; it can be viewed in the plan revision administrative record. The visitation changes across alternatives provided by the Forest were adjusted by the regional economist for several reasons to arrive at the percent changes across alternatives reported in the economic section. The 2005 Travel Management Rule (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas. All project level specificity and decisions for the management of motor vehicle use will be done in compliance with the 2005 Travel Management Rule either forestwide (as is the case with the current travel management planning process) or on a more site-specific need, such as by district or area. For the economic analysis it was decided to use the more recent national visitor use monitoring results for the economic modeling. Secondly, the categories used by the Forest reported changes were deconstructed and reconstructed into the categories that are used in the economic modeling.

## Soils

**Concern Statement 292.** *Commenters offer general comments about soils.*

Response:

**Comment Number(s):**

17-5

We agree with the commenter. Erosion can be natural process, more so the agents of soil erosion are the same as the agents of all types of erosion: water, wind, ice, or gravity. Water is the leading cause of soil erosion, because water is abundant and has a lot of power. Wind is also a leading cause of soil erosion because wind can pick up soil and blow it far away. This plan revision process is programmatic, guiding the Tonto National Forest in fulfilling its stewardship responsibilities to best meet the current and future needs of the American people. This plan provides the vision, strategy, and constraints (revised plan, chapter 1) that guide integrated resource management, provide for ecological sustainability, and contribute to social and economic sustainability on the forest and within the broader landscape. For site-specific projects, we develop actions that decrease erosion whenever possible.

**Comment Number(s):**

2927-19

We appreciate your support of our planning effort. Alternative B proposes vegetation management in frequent-fire ecosystems / ecological response units and focuses on restoring fire as a key ecosystem process. This will be accomplished through a balance of mechanical treatments and wildland-fire. The revised plan also contains objectives (chapter 2) to restore grass and herbaceous cover are established for highly departed ecological response units (pinyon juniper grass and juniper grass) with the emphasis of using fire with some mechanical thinning. With increased ground disturbance, there could be an increased impact to soils.

**Concern Statement 293.** *Commenter suggests changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2925-00

A soil contaminant is any substance in the soil that exceeds naturally-occurring levels and poses a human health and environmental risk. It should be noted that there are many naturally occurring substances in the soil depending on geographic location and makeup of the landscape that could be contaminants (arsenic would be a great example of this). The desired condition is focused on human health and ecosystem integrity that can be achieved through mitigation and appropriate management. What was meant by the soil statement in question is the rationale that some contaminated sites pose little risk to human health and the environment because the level of contamination is low and the chance of exposure to toxic or hazardous contaminants is also low. However, in some cases contaminated sites are of greater concern because the chemicals that may be present may persist in or move through the environment, exposing humans or the environment to hazards. These sites must be carefully managed and mitigated to prevent hazardous materials from causing harm to humans, wildlife, or ecological systems, both on- and offsite.

## Special Uses

**Concern Statement 294.** *Commenter suggests attaching protections and mitigations in conjunction with special use permits.*

Response:

**Comment Number(s):**

2970-779

We appreciate your interest in the resources across the Tonto National Forest. All current and future permits are developed, and comply with applicable laws, regulations, and policy, including the National Environmental Policy Act which requires the analysis of impacts associated with the activities involved in the permitted activities. These rules and regulations have been created to evaluate all environmental impacts from the proposal, and we do our best to mitigate any of those impacts that might negatively impact natural resources.

**Concern Statement 295.** *Commenter suggests including caving to the list of activity examples in the description.*

Response:

**Comment Number(s):**

2825-1

As it states in our revised plan (chapter 3, Special Uses): “Outfitting and guiding authorization can be issued for a variety of activities including, but not limited to....” This sentence is then followed by a variety of our most popular recreational opportunities but is not limiting the opportunities for the Tonto

National Forest to that list. Caving groups will always be welcome to apply for a special use permit, as required by Forest Service regulations.

**Concern Statement 296.** *Commenter recommends changing user days in the forest plan.*

Response:

**Comment Number(s):**

2937-3

Thank you for your ongoing partnership with the Tonto National Forest as one of our valued outfitting and guiding permittees. This comment does not fall within the scope of the forest plan because it is a specific recreation permit request and would be better suited for your permit administrator and future activity-specific management plan.

**Concern Statement 297.** *Commenter is concerned about management of Forest Service leases.*

Response:

**Comment Number(s):**

41-3

The forest plan is a programmatic guiding plan as detailed in chapter one of the revised plan. Implementation of any leases is outside of this plan revision process, and it is addressed in compliance with agency code of regulations, forest handbook and manual, as appropriate.

**Concern Statement 298.** *Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2816-51

For a specific description of what a water resource is, please see the revised plan (chapter 3, Watersheds and Water Resources (WAT)). Regarding the concerns with consistency and conflict, the Tonto follows all applicable laws, regulations, and policies. The environmental analysis review, in compliance with the National Environmental Policy Act, of a proposal determines the types of impacts from the proposal and allows us to scientifically develop mitigations measures appropriate to address all impacts, including those for possible water resource implications. The operating plan will then reflect these measures.

**Comment Number(s):**

2816-50

Thank you for your interest in how the Tonto National Forest addresses new proposals for utility corridors and communication sites. The Tonto follows all applicable laws, regulations, and policies to decipher whether a new proposal offers better social, economic, and ecological benefit. We have amended the



planning component that the commenter references (revised plan, chapter 3, Special Uses) to reflect that the Tonto National Forest coordinates this discussion and not the applicant.

**Comment Number(s):**

2932-25

Thank you for your suggestion on adding a definition to clarify what the Tonto National Forest means by “conflicting uses.” There are a wide variety of conflicting uses that have to do with resource management, current permitted uses, need, demand, and even the agency’s mission statement. Explaining each one of these conflicting uses does not fall within the scope of the forest plan and can be found in the Forest Service Handbook, Manual, and Code of Federal Regulations.

**Comment Number(s):**

2932-24

The desired condition that the commenter references already includes “multiple use purposes” with the verbiage “authorization and administration of lands special uses”. All land uses are covered in this plan component.

## **Species of Conservation Concern (SCC)**

*Concern Statement 299. Commenter is requesting collaboration with the Forest on potential changes to the list of species of conservation concern.*

Response:

**Comment Number(s):**

2736-4, 5

A species of conservation concern is a species--other than federally recognized threatened, endangered, proposed, or candidate species--that is known to occur in the plan area and for which the regional forester has determined that the best available scientific information indicates substantial concern about the species' capability to persist over the long-term in the plan area (36 CFR 219.9). As requested, the Forest has further consulted with the Arizona Game and Fish Department, and we have updated our list of species of conservation concern and included those species of greatest conservation need (SGCN) that meet the criteria of species of conservation concern as defined in (36 CFR 219.9).

While a number of species did not meet the criteria we used in evaluating potential species of conservation concern, we note that the 2012 Planning Rule (§ 219.10(a)) requires that a plan include components including standards or guidelines for integrated resource management to provide for ecosystem services and multiple use (including wildlife and fish). Additionally, we are directed to consider plants, wildlife and fish, and related uses; that contribute to local, regional, and national economies in a sustainable manner (§ 219.8(b)(3)); and consider fish and wildlife species, and habitat and habitat connectivity (§ 219.10 (a)(1)).

In part, we have worked to meet these requirements by including planning components in the revised plan for Wildlife-Related Recreation (chapter 2). In this section we provide guidance that is specifically applicable to species of economic importance as well as their habitats. In response to your comments, we have included the following management approach: “Work closely with the Arizona Game and Fish

Department to address habitat and other conservation needs of State priority species (e.g., Species of Greatest Conservation Need, Species of Economic and Recreational Importance).” Also included is a management approach to, “Work in collaboration with Arizona Game and Fish Department to: A) maintain and/or enhance habitat for species of economic and recreational importance, B) reintroduce species of interest into historical home ranges, C) coordinate fish and wildlife management activities (e.g., reintroductions, introductions, or transplants; control or eradication of nonnative species; habitat enhancement; and the management of sport and native fishes), D) plan and prioritize projects that achieve desired conditions for hunting, fishing, and watchable wildlife species and habitats on the forest, E) establish short- and long-term goals consistent with agency missions to foster healthy and productive populations of native and non-native sportfish and game species.”

**Concern Statement 300.** *Commenters provide general information about at-risk species and species of conservation concern and request best available scientific information be used in determining these species.*

Response:

**Comment Number(s):**

2969-2

A full assessment of the biodiversity on the Tonto National Forest can be found in our Final Assessment Report of Ecological Conditions, Trends, and Risks to Sustainability Volume I. Arizona agave (*Agave arizonica*) was not identified as an at-risk species on the forest. While not specifically addressed in the plan, we do have plan direction for the management of rare plants (revised plan, chapter 3, Wildlife, Fish, and Plants). Additionally, should information be submitted that identifies a significant threat to persistence to any species found on the forest, this information can be submitted to the regional forester and considered for inclusion as a species of conservation concern.

**Comment Number(s):**

2925-78

Information documenting the identification of species of conservation concern is not included in the revised plan; however, this information can be found in the Final Assessment Report of Ecological Conditions, Trends, and Risks to Sustainability, volume I, chapter 7, At-risk Species Identifying and Assessing At-risk Species in the Plan Area. This report provides documentation of occurrences for species analyzed (see table 111, page 333). However, additional details regarding species occurrences are generally contained in the individual accounts of proposed species of conservation concern (beginning page 392).

Direction from FSH 1909.12, chapter 10, section 12.5 on Identifying and Assessing At-risk Species does not require that the Forest prove species are known to occur in the plan area (36 CFR 219.9), nor does it require surveys for such determinations; rather, we are instructed to rely on the best available scientific information (36 CFR 219.3) as defined in FSH 1909.12, zero code, sec. 07. We further note that the directives instruct the Forest to use “... a variety of sources, including Federal and State agencies, literature, local information on occurrence and population status, subbasin analyses, broad-scale assessments, and information available from local species experts and other organizations” (FSH 1909.12, chapter 10, section 12.53). We have used a number of these sources in identifying and assessing at-risk species.

While we have used the term “occurrence,” we have defined such occurrences as those meeting the definition outlined by the FSH 1909.12, chapter 10, section 12.52c. for species “native to, and known to occur in, the plan area.” As such, individual occurrences deemed merely “accidental” or “transient,” or are well outside the species’ existing range at the time of plan development were removed from further consideration per the best available scientific information we at the time.

**Concern Statement 301.** *Commenter has concerns regarding the process used to develop the list of species of conservation concern (SCC) and the plan components associated with those species.*

Response:

**Comment Number(s):**

2925-80

In the Final Assessment Report of Ecological Conditions, Trends, and Risks to Sustainability, volume I we used the term “secure” in our description of various filtering mechanisms to identify species of conservation concern. However, we do not view this as a deviation from the outlined directives.

FSH 1909.12, chapter 20, section 12.52c – Criteria for Identifying a Species of Conservation Concern states, “If the species is secure and its continued long-term persistence in the plan area is not at risk based on knowledge of its abundance, distribution, lack of threats to persistence, trends in habitat, or responses to management that species cannot be identified as a species of conservation concern.”

Species that appeared demonstrably secure in the planning area were eliminated from further consideration. However, remaining species were then considered within the current ecological conditions and key ecosystem characteristics described within ecological response units for terrestrial species or within watersheds for aquatic species on each of the Tonto National Forest local zones. The Forest then conducted a risk analysis on federally listed and potential species of conservation concern with their associated habitats. Thus, all species included as species of conservation concern have an identified substantial concern about the species’ capability to persist over the long term in the plan area. An explanation of risk to persistence by species is provided in the Final Assessment Report of Ecological Conditions, Trends, and Risks to Sustainability, volume I, chapter 7. At-risk Species.

Threats to persistence are addressed in each section of analysis for the Wildlife, Fish, and Plants section of this environmental impact statement (chapter 3). Additionally, we have provided a plan crosswalk of species, threats, and related plan components in appendix G of the environmental impact statement.

**Comment Number(s):**

2925-79

Many species identified as species of conservation concern were listed in the past as regional forester’s sensitive species, but not all. Per FSH 1909.12, chapter 10, section 12.52, the Forest was directed to conduct a specific assessment of species of conservation concern during plan revision process in accordance with the distinct process and criteria outlined in these directives. When finalized, species of conservation concern replaces the list of regional forester’s sensitive species for the Tonto National Forest. The regional forester is responsible for designating species of conservation concern (36 CFR 219.9(c)).

Some species on this list have changed as part of other updates. Some bird species considered under the Migratory Bird Treaty Act have been updated as more recent assessments have become available. Additionally, there have been updates to our list of species of conservation concern in response to comments and new information between the release of the draft plan and draft environmental impact statement and the revised plan and final environmental impact statement.

In our assessment of bird species as potential species of conservation concern, we used eBird as part of our initial determination of species occurrence. We agree that use of such data should be approached with caution in making ecological inferences; however, our primary use was to quickly assess presence or absence, which was then confirmed via other sources. Further information on the occurrence, status, and life history of bird species came from a variety of other sources, including: Corman and Wise-Gervais (2005); Rosenberg et al (2016); Rodewald (2016 <https://birdsna.org>); and NatureServe (Accessed: July 11, 2017). In addition, we have consulted with avian experts at the Arizona Game and Fish Department for their input on the occurrence and status of birds in the planning area.

We acknowledge that, for some species, there is very little information on their distribution, life-history, or conservation needs. In such cases we are directed to use the best available scientific information from a range of potential sources. One such source named explicitly in the planning directives is NatureServe, a leader in assessing species status and extinction risk. In determining what categories of species should be considered as SCC, the FSH 1909.12, chapter 10, section 12.52d, 2a. states, “Species with NatureServe G/T1 or G/T2 status ranks are expected to be included unless it can be demonstrated and documented that known threats for these species, such as those threats listed for the species by NatureServe, are not currently present or relevant in the plan area.” In the case of species where there is a gap in local information, we have included species with a G/T1 or G/T2 as species of conservation concern. While rarity is not always a risk factor, extreme endemism or disjunct distribution can be a concern as a stochastic event could impact long-term persistence. We also note that the standard for evaluating risk to persistence applies locally to the planning area and not to the overall extinction risk of a given species.

Upon further review, we have removed Verde breadroot (*Pedimelum verdiensis*) per your request as we cannot confirm the presence of any voucher specimens from within the forest boundaries. While we have used generally geographic ranges to establish the presence of some species, this may not be an appropriate approach for highly endemic plant species.

**Concern Statement 302.** *Commenters recommend adding several bat species to the list of species of conservation concern.*

Response:

**Comment Number(s):**

2948-1,3,4, 6,8,10,12

We have conducted additional review on the best available scientific information for *C. townsendii*, *Idionycteris phyllotis*, *Myotis thysanodes*, and *Myotis velifer*, including the supporting information provided by the commenter. As a result, we have concluded that there is a substantial threat to the long-term persistence of two of these species on the forest and added *M. townsendii* and *Myotis thysanodes* to our list of species of conservation concern as requested. The Wildlife, Fish, and Plants section of the environmental impact statement (chapter 3) includes analysis of effects from the proposed action. Appendix G of the environmental impact statement contains a list of plan components that provide the ecological conditions for each species.

While we have identified conservation issues and potential threats to *Idionycteris phyllotis* and *Myotis velifer*, we are unable to characterize these as substantial concerns for the species' ability to persist over the long term in the plan area based on the guidance of FSH 1909.12, chapter 10, section 12.52c. As more information becomes available for these species, and how particular concerns may affect them on forest, we will reevaluate their status as needed.

Generally, the revised forest plan contains programmatic guidance to provide for a diversity of plant and animal communities. Additionally, there is programmatic direction specific to bats and bat roosts that directs the Forest to protect these vital habitats. Finally, the revised plan directs the Forest to work with partners to conserve and protect wildlife and wildlife habitat. We look forward to continued collaboration as we move forward with implementing the forest plan and work to conserve bat species on the Tonto National Forest.

**Comment Number(s):**

2948-5,7,9, 11,

In response to your comments, we have edited a guideline in the Mining, Minerals, and Abandoned Mines section of the revised plan (chapter 2) to state: "Abandoned mine features (e.g., adits, shafts, and stopes) should be closed when a feature poses a danger to the public. If the feature is determined to contain wildlife habitat (e.g., maternity roosts or hibernacula for bats) or contain cultural resources, gating should be considered. Installed gates should conform to bat-friendly standards and be designed in such a way to allow for the safe passage of wildlife." This change clarifies the intent of our minerals program to close features when needed for public safety, rather than close all abandoned mine sites. In this way, we hope such features will continue to provide habitat for cave myotis (*Myotis velifer*) as well as other species that use them.

In addition, we have added the following footnote: "Closed abandoned mine features are features that have blocked openings (e.g., fences, warning signs, sealed mine openings with bat gates, expanding foam, or backfill) to prevent access and exposure to associated hazards that may include falls into openings, rotten timbers, bats, toxic air, and forgotten explosives." Please note, that not all these forms of closure may have impacts on bats, and some may serve to protect bats from human disturbances.

We have conducted additional review on the best available scientific information for *Myotis velifer*, including the supporting information provided by the commenter. While we have identified conservation issues and potential threats to this species, we are unable to characterize these as substantial concerns for the species' ability to persist over the long term in the plan area based on the guidance of FSH 1909.12, chapter 10, section 12.52c. As more information becomes available on this species, and how particular concerns may affect it on the forest, we will reevaluate its status as needed.

Generally, the revised forest plan contains programmatic guidance to provide for a diversity of plant and animal communities. Additionally, there is programmatic direction specific to bats and bat roosts that directs the Forest to protect these vital habitats. Finally, the revised plan directs the Forest to work with partners to conserve and protect wildlife and wildlife habitat. We look forward to continued collaboration as we move forward with implementing the forest plan and work to conserve bat species on the Tonto National Forest.

**Concern Statement 303.** *Commenters request the bighorn sheep be included in the list of species of conservation concern (SCC).*

Response:

**Comment Number(s):**

2986-25

We have reviewed the best available scientific information on bighorn sheep (*Ovis canadensis*). While we have found conservation issues and potential threats to this species, we are unable to characterize these as substantial concerns about the species' capability to persist over the long term in the plan area based on the guidance of FSH 1909.12, chapter 10, section 12.52c. While we recognized that disease transmission from domestic sheep and goats is a potential threat to wild sheep, bighorn sheep on the Tonto are carefully managed to reduce this risk. For example, we are unaware of major die-offs attributed to contracted disease from domestic animals. Notwithstanding, we have incorporated specific plan direction for bighorn sheep in the revised plan to continue to protect them from this potential threat. As more information becomes available on this species, and how particular concerns may affect it on forest, we will re-evaluate its status as needed. Generally, the revised plan contains programmatic guidance to provide for a diversity of plant and animal communities. In this way, forest programs are guided to work with our public and partners to conserve all species in our jurisdiction.

**Comment Number(s):**

2972-4, 2986-25

A species of conservation concern is defined as a species, other than federally recognized threatened, endangered, proposed, or candidate species, that is known to occur in the plan area and for which the regional forester has determined that the best available scientific information indicates substantial concern about the species' ability to persist over the long-term in the plan area (36 CFR 219.9). While domestic disease poses a threat to our native bighorn sheep, we did not identify it as a substantial threat to the long-term persistence due to the diligent work of the Arizona Game and Fish Department in collaboration with local permittees and Forest Service staff. As you know, most of our wild sheep populations reside in wilderness areas, where threats from domestic disease are largely reduced. At present there are no sheep allotments on the forest and permits for the grazing of sheep and goats are not currently available. The Tonto National Forest does authorize use of the Heber-Reno Sheep Driveway to move sheep between private land in Chandler AZ and grazing allotments on the Apache-Sitgreaves National Forest (approximately 80 miles of driveway on the Tonto National Forest). When the driveway is used, mitigations outlined by the decision help reduce potential impacts to wild sheep, and additional mitigations may be implemented by the Arizona Game and Fish Department.

While we have not identified bighorn sheep as a species of conservation concern, we have included specific direction in the revised plan (chapter 2, Rangelands, Forage, and Grazing) to prevent the spread of domestic disease to our native sheep. Because bighorn sheep are considered a species of significant economic and recreational importance by the Arizona Game and Fish Department and are highly valued, we have included direction in the revised plan (chapter 2, Wildlife-Related Recreation) that applies to such species. These revised plan components have been designed to increase collaborative efforts with the Arizona Game and Fish Department to maintain and enhance habitat for these species, including bighorn sheep.

Should additional information become available that suggests a substantial concern for persistence for bighorn sheep in the planning area, we will reevaluate its status. Generally, the revised plan contains programmatic guidance to provide for a diversity of plant and animal communities. In this way, forest programs are directed to work with our public and partners to conserve all species habitat under our jurisdiction.

**Concern Statement 304.** *Commenter requests the mule deer be included in the list of species of conservation concern (SCC).*

Response:

**Comment Number(s):**

2972-3

A species of conservation concern is defined as a species, other than federally recognized threatened, endangered, proposed, or candidate species, that is known to occur in the plan area and for which the regional forester has determined that the best available scientific information indicates substantial concern about the species' ability to persist over the long term in the plan area (36 CFR 219.9). In our assessment of at-risk species on the forest, we were not able to identify a substantial threat to their persistence on the forest. However, mule deer are considered a species of significant economic and recreational importance by the State of Arizona, and we recognize the importance of mule deer habitat on the forest that supports this species. As such we have included direction in the revised plan (chapter 2, Wildlife-Related Recreation) that applies to this and other such species. This section also provides direction to maintain and improve habitats, provide for wildlife activities and access, and work in conjunction with the Arizona Game and Fish Department to achieve common goals in wildlife management.

**Concern Statement 305.** *Commenter requests the Sonoran desert tortoise be included in the list of species of conservation concern (SCC).*

Response:

**Comment Number(s):**

2970-506, 649

We have conducted additional review on the best available scientific information for Sonoran desert tortoise, including the supporting information provided by the commenter. As a result, we have concluded that there is a substantial threat to the long-term persistence of this species on the forest and added the tortoise to our list of species of conservation concern as requested. Chapter 3 of the environmental impact statement (Wildlife, Fish, and Plants) includes the analysis of effects from the proposed action. Appendix G of the environmental impact statement provides a list of plan components that provide the ecological conditions for each species. We look forward to continued collaboration as we move forward with implementing the forest plan and work to conserve the tortoise on the Tonto National Forest.

**Concern Statement 306.** *Commenters request the species of greatest conservation need and significant economic and recreational importance be included in the revised forest plan and associated final environmental impact statement.*

Response:

**Comment Number(s):**

2966-26

Pursuant to 36 CFR § 219.9, the Tonto National Forest has adopted a complimentary approach to maintaining the diversity of plant and animal communities and the persistence of native species in the plan area, including species commonly enjoyed and used by the public (36 CFR § 219.10(a)(5)). Components in the revised forest plan direct the Forest to provide the ecological conditions needed to support species on the Tonto National Forest, including both common and uncommon native species (revised plan, chapter 2, Wildlife, Fish, and Plants and Wildlife-Related Recreation and the environmental impact statement chapter 3, Wildlife, Fish, and Plants). Numerous plan components also direct the Forest to engage with and coordinate species and habitat conservation with partners, including the Arizona Game and Fish Department: PV-MA-2, REC-DIS-WB-MA-1, REC-DIS-WB-MA-1, WFP-MA-1, WFP-MA-5.

At-risk species consist of 1) federally recognized threatened, endangered, proposed, and candidate species, as well as 2) species of conservation concern. Federally-listed species are managed by all Federal agencies in consultation with and with the assistance of the U.S. Fish and Wildlife Service under the authority of the Endangered Species Act (7 U.S.C. § 136, 16 U.S.C. § 1531 et seq. PL 93-205, as amended), and by the U.S. Forest Service under the authority of the National Forest Management Act (PL 94-588). A species of conservation concern is a species, other than federally recognized threatened, endangered, proposed, or candidate species, that is known to occur in the plan area and for which the regional forester has determined that the best available scientific information indicates substantial concern about the species' capability to persist over the long term in the plan area (36 CFR 219.9). As requested, the Forest has further consulted with the Arizona Game and Fish Department, and we have updated our list of species of conservation concern and included those species of greatest conservation need that meet the criteria of species of conservation concern as defined in (36 CFR 219.9).

While a number of species did not meet the criteria we used in evaluating potential species of conservation concern, we note that the 2012 Planning Rule (§ 219.10(a)) requires that a plan include components including standards or guidelines, for integrated resource management to provide for ecosystem services and multiple use (including wildlife and fish). Additionally, we are directed to consider plants, wildlife and fish, and related uses; that contribute to local, regional, and national economies in a sustainable manner (§ 219.8(b)(3)); and consider fish and wildlife species, and habitat and habitat connectivity (§ 219.10 (a)(1)).

We acknowledge the importance of collaboration with the Arizona Game and Fish Department in conserving species of greatest conservation need and species of economic and recreational importance. In response to your comments, we have included the requested management approach (revised plan, chapter 2, Wildlife, Fish, and Plants): Work closely with the Arizona Game and Fish Department to address habitat and other conservation needs of State priority species (e.g., species of greatest conservation need, species of economic and recreational importance)."



**Comment Number(s):**

2991-32

We fully recognize the importance of species of greatest conservation need and significant economic and recreational importance as part of Arizona's long-term management strategy and feel that the forest plan accommodates collaborative work in managing these importance species. The revised forest plan includes a Wildlife-Related Recreation Section (chapter 2) which includes direction to support the management of related species and habitat in partial fulfillment of our obligations under 36 CFR § 219.10 (a)(5) for multiple-use.

Species of conservation concern are defined as "...a species, other than federally recognized threatened, endangered, proposed, or candidate species, that is known to occur in the plan area and for which the regional forester has determined that the best available scientific information indicates substantial concern about the species' capability to persist over the long-term in the plan area" (36 CFR 219.9). While some species of greatest conservation need have been included as species of conservation concern during our assessment, the various categories of species of greatest conservation need have distinct criteria that do not always align with that defined above.

As a cooperative agency in forest plan revision, we have consulted the Arizona Game Fish Department to determine which species meets the definition of species of conservation concern and what if any additional analysis would be informative for the management of species of greatest conservation need and significant economic and recreational importance. Because of the broad programmatic nature of the forest plan the number of species involved in such an analysis, we have concluded that such additional review would yield little useful information and is likely more commensurate with project level analysis.

**Comment Number(s):**

2816-82

The Planning Rule defines species of conservation concern as: "A species of conservation concern is a species, other than federally recognized threatened, endangered, proposed, or candidate species, that is known to occur in the plan area and for which the regional forester has determined that the best available scientific information indicates substantial concern about the species' capability to persist over the long-term in the plan area (36 CFR 219.9)." Because the forest plan is primarily a guiding document for managers, much of the information regarding development and effects is contained in accompanying documents. For information on the identification process of species of conservation concern on the Tonto National Forest, please see the Final Assessment Report of Ecological Conditions, Trends, and Risks to Sustainability, volume I, chapter 7. At-risk Species: Identifying and Assessing At-risk Species in the Plan Area.

## **Tribal Relations and Areas of Tribal Importance**

*Concern Statement 307. Commenter is concerned with public and Tribal input in Forest Service projects and processes.*

Response:

**Comment Number(s):**

2986-81

This land management planning effort provides general direction which will guide range management as well as all other forest resources during the life of the forest plan. Grazing authorization projects are evaluated at a project level with site-specific environmental analysis through the National Environmental Policy Act process. All interested and affected parties are welcome and encouraged to participate in any project. Tribes are also contacted for every project to provide Tribal perspectives if they choose to participate. However, as Government-to-Government consultation is not a public process, this may not be reflected in the environmental analysis document. For this forest plan revision process, public input and input from Tribal communities and other groups was identified as a key component of the National Environmental Policy Act process. From the development of the assessment to the draft plan and draft environmental impact statement the Tonto National Forest continually provided opportunity for the general public, Tribes, and others to be involved in the process. Public meetings were held in the many small rural communities within and around the forest, as well as in urban community centers. The Forest advertised these meetings on local radio, television, and newspapers. Flyers were hung up at post offices, libraries, and other community buildings. The Forest had a Spanish translator available early in the process to assist non-English speakers, and advertisements for some meetings were available in both English and Spanish. Due to lack of need, translation services were not provided at every meeting, but could be requested. During comment periods, paper comment forms were provided, and maps were displayed at district offices and community buildings such as libraries to ensure those without computer or internet access could still participate. Verbal comments at public meetings and mailed in comments were also considered, even outside of formal comment-request periods. This ensured that even those who could not make it to a meeting, or could not get a comment form, were still able to have their voices heard. Moreover, throughout the planning process the Forest worked closely with community leaders of land grants, grazing associations, Tribes, and local government officials to ensure the voices of the rural, traditional, and Tribal communities were represented in the planning process. Many of these communities have high proportions of members who identify with a minority ethnic or racial group (e.g., Hispanic or Latino, or Native American). Even members of these communities who may not identify with government categories of race or ethnicity have strong social, cultural, historical, and economic ties to the land the Tonto National Forest manages and are therefore considered particularly vulnerable to impacts due to forest planning, management, and decision-making. See final environmental impact statement for the land management plan, volume 1, chapters 1-2. The Forest Service continues to receive comments from the public and Indigenous communities, and we strive to address those comments where appropriate.

**Concern Statement 308.** *Commenter is requesting additional information be included in the environmental impact statement relating to Tribal meetings and Tribal Consultation.*

Response:

**Comment Number(s):**

2811-4

The Tonto National Forest began outreach and Government-to-Government consultation with the 13 Tribes in 2015. Government-to-Government consultation is not a public process, and these details would not be found in the draft environmental impact statement. However, consultation has identified properties of traditional, cultural, or religious significance on the Tonto National Forest. Since 2015 the Tonto National Forest has attended 13 consultation meetings with the Tribes to discuss forest plan revision. During consultation the Tribes expressed concerns regarding access to sacred sites, traditional cultural properties, and forest land for traditional ceremonies and rituals; adverse effects to archeological sites; management of springs, seeps, and wetlands; forest products for traditional uses; preservation of forest

products including Emory oak, agave, mesquite, and saguaro fruit; and opportunities for partnerships and youth involvement. Comments were incorporated into the draft forest plan and draft environmental impact statement and management direction was developed to address these concerns. Resolution Copper is one project within the larger lands managed by Tonto National Forest. Consultation on that project is ongoing, but specific details are outside of the scope of this larger forest plan revision.

**Comment Number(s):**

2811-2

When addressing Tribal concerns, the Tonto National Forest is guided by, and adheres to, the stipulations of the National Historic Preservation Act for considering effects to historic properties as per the Act. There are other laws, executive orders, and regulations that guide Tribal relations as well. The programmatic agreement with the Arizona State Historic Preservation Officer lays out more precisely how the National Historic Preservation Act is applied within the specific circumstances of management within the Tonto National Forest. Tribes are notified as early as possible in the planning process, as directed by the National Environmental Policy Act and the National Historic Preservation Act, but no later than the identification stage. From the initiation of the forest plan revision process in 2014, the Tonto National Forest has notified Tribes of the project and consulted with those Tribes that expressed interest in Tonto National Forest System lands. The 13 Tribes consulted have identified numerous historic properties of traditional, cultural, or religious significance. Those sites will be evaluated within the appropriate laws and regulations and managed within the allowable legal framework and in partnership with Tribes where appropriate. The 13 Tribes identified in the revised forest plan receive quarterly National Environmental Policy Act project lists (schedules of proposed actions). The Tonto National Forest and the 13 Tribes affiliated with the lands managed by the Forest have consulted on a Government-to-Government basis numerous times since 2014. During Government-to-Government and staff meetings with Tribes, they have identified concerns of interest to them and the Forest, with Tribal participation where appropriate, have, or are in the process of addressing those concerns. The Tonto National Forest does not generally include details of the consultation process within National Environmental Policy Act analysis documents as it is not always appropriate to share this with the general public. Government-to-Government consultation is not a public process.

**Concern Statement 309.** *Commenter is requesting updates to the final environmental impact statement to clarify the difference between sacred lands and historical properties.*

Response:

**Comment Number(s):**

2811-1

The issue of sacred lands and historic properties is central to the Tribal Relations program for the Tonto Nations Forest. The consideration of Tribal values is a core component of the Forest Service analysis in the forest plan revision environmental impact statement. The Forest Service plan provides for site analysis under the appropriate authorities and analytical methodologies. Government-to-Government consultation is a cornerstone to creating a forest plan that considers impacts and implications of forest activities upon sites of significance, be they sites that qualify for listing under the National Historic Preservation Act, or sites that are better considered under the American Indian Religious Freedom Act, Religious Freedom Restoration Act, Executive Order 13007 or some other authority. Under Section 106 of the National Historic Preservation Act the Secretary of the Interior has established criteria for

eligibility to listing on the National Register of Historic Places. Tribal sacred areas can fall within one or more of those criteria. Should a Tribe reveal a place of Tribal concern and it does not meet the Secretary's standards, there are other instruments for evaluating and protecting sites. The environmental impact statement for the revised forest plan is a planning document addressing future activities on the Tonto National Forest. All permitted activities will be reviewed within the context of the plan and evaluated for potential impacts through the National Environmental Policy Act process on a project level basis where Tribal concerns will be addressed.

**Concern Statement 310.** *Commenter recommends the American Indian Religious Freedom Act (AIRFA) be included in the list of laws, regulations, and policies used in the plan revision process.*

Response:

**Comment Number(s):**

2811-6

The American Indian Religious Freedom Act is one among several laws, executive orders, regulations, and policies that the Forest Service is legally obligated to consider in land management decisions. Though the Tonto National Forest is required to comply with all law, regulation, and policy, listing all of them in the environmental impact statement would not be practicable or particularly helpful for the purposes of disclosing the effects of the proposed action and its alternatives to the public. The Forest Service has a Federal Trust Responsibility to federally-recognized American Indian Tribes. Several laws, executive orders, and policies require the Forest Service to consult with federally-recognized Tribes. Specifically, Executive Order 13175 requires consultation with Tribes when proposed policies or management actions may affect their interests. The National Environmental Policy Act mandates consultation with Tribes, as well as Section 106 of the National Historic Preservation Act. See also Forest Service Handbook 1509.13-2016-1, and Forest Service Manual 100-2016-1. Government-to-Government consultation is a cornerstone to creating a forest plan that considers impacts and implications of forest activities upon sites of significance, be they sites that qualify for listing under the National Historic Preservation Act, or sites that are better considered under the American Indian Religious Freedom Act, the Religious Freedom Restoration Act, Executive Order 13007, or some other authority. Under Section 106 of the National Historic Preservation Act the Secretary of the Interior has established criteria for eligibility to listing on the National Register of Historic Places. Tribal sacred areas can fall within one or more of those criteria. Should a Tribe reveal a place of Tribal concern and it does not meet the Secretary's standards, there are other instruments for evaluating and protecting sites such as the American Indian Religious Freedom Act which mandates that the Federal undertaking will not prevent Tribes from accessing places of religious use and significance, nor unnecessarily impact those areas.

**Concern Statement 311.** *Commenter recommends changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2811-7

The specific passage the commenter mentions is found within a recommended guideline. “Shall” denotes a mandatory requirement or obligation, denoted in standards. Instead, “should” refers to a guideline or recommendation. Therefore, the word “should” is appropriate for the guideline in this section.

**Concern Statement 312.** *Commenter suggests changes in the final environmental impact statement including additional language, more analysis, or changed information.*

Response:

**Comment Number(s):**

2921-1

We acknowledge the ongoing activities the commenter lists to benefit relations with our Tribal neighbors as well as forest and Tribal resources. However, in cumulative effects, the Forest analyzes how outside projects and ongoing actions will significantly affect Tribal relations when added to the effects of the alternative being analyzed. Although the actions the commenter listed will mitigate some of these impacts, the total effect of the Resolution Copper project, when added to the forest planning project is anticipated to be significant and must be disclosed as such.

## Utilities

**Concern Statement 313.** *Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2938-5

All project level proposals for use of the National Forest System lands, including energy facilities and transmission corridors, are reviewed for consistency with law (including the Multiple Use-Sustained Yield Act of 1960), regulation, and policy.

**Comment Number(s):**

2938-2

All project level proposals must be reviewed per 36 CFR 251 and 36 CFR 220 to determine compliance with all applicable laws, regulations, and policies. Existing use, legal responsibilities to comply with all Federal, State, and local laws, and previous analysis are part of the review.

**Comment Number(s):**

2938-3, 4

Per the 2012 Planning Rule, a guideline describes constraints on a project's or activity's actions. As indicated in the revised plan (chapter 1), guidelines allow for departure, as it is written, providing the intent of the guidelines is met and rationale is given for the departure. In other words, while guidelines are mandatory, they provide some flexibility on how they are implemented. Any deviation from the intent of a guideline would require a plan amendment, which would be addressed in project level planning.

**Comment Number(s):**

2938-1

The standard the commenter references was removed from the Special Uses section (revised plan, chapter 2). In the Energy Production and Delivery section (revised plan, chapter 2), the following management approach has been added: Work with partners to design utility and transmission line corridors to be designed to blend with the existing character of the landscape.

Colocation is a best management practice and is encouraged per existing regulation 36 CFR 251.54 (e)(v) states “The proposed use will not unreasonably conflict or interfere with administrative use by the Forest Service, other scheduled or authorized existing uses of the National Forest System, or use of adjacent non-National Forest System lands.” If co-location is determined to conflict during review of the project proposal, other locations will be reviewed per 36 CFR 251.

## **Vegetation and Ecological Response Units (ERUs)**

*Concern Statement 314. Commenters are concerned with forest management of grassland ecological response units.*

Response:

**Comment Number(s):**

2736-56, 2932-48

The plan revision is a programmatic document that provides a framework for the management of all resources across the forest. The entire Partnerships and Volunteers section of the revised plan (chapter 2) talks directly to what the commenter is requesting. As such, we do not need to write resource-specific planning components for each resource or every group that we will work with as we implement the plan. The level of specificity that the commenter is requesting will be addressed at site-specific project level through project planning consistent with the National Environmental Policy Act, revised plan components, and all applicable laws, regulations, and policies.

**Comment Number(s):**

2736-55

The suggested guideline is unnecessary. This revised plan is programmatic and forestwide, as applicable. Short leguminous trees, such as mesquite and acacia, are commonly associated with semi-desert grasslands. Historically, tree abundance was less than 10 percent, while some areas may have had over 10 percent shrub cover. Fire has been noted as one of the most important factors in maintaining open productive grasslands and limiting shrub encroachment. The revised land management plan for the Tonto focuses on moving to or toward a desired condition for vegetation. Although there is no guideline specifically identifying undesirable woody species or their abundance in the semi-desert grassland ecological response unit, the desired conditions for this ecological response unit are described as open grasslands with generally less than 10 percent shrub and tree cover.

Landscape Scale Desired Conditions for Semi-Desert Grasslands (revised plan, chapter 2) includes a table that displays the desired seral stage distribution across the ERU. Working toward this distribution will result in a reduction of the amount of catchlaw, mesquite and juniper you mention, as well as many of the desert scrub species that commonly encroach from the lower desert ecological response units. Woody

species encroachment and species diversity is also addressed in several of the bullets found in the Landscape Scale Desired Conditions (revised plan, chapter 2): Bullet 03 mentions the use of fire to maintain productivity and reduce woody species encroachment; Bullet 05 focuses on non-native species and their potential to affect fire behavior or effects; and Bullet 06 focuses on non-native species affecting native species diversity and composition. By working toward these desired conditions, the amounts of undesirable woody species and non-native species should be reduced, and the system will function within its historic range of variability. If an “undesirable species” is identified as an invasive or noxious species it will be addressed following the planning components in the revised plan (chapter 2, Invasive and Noxious Species).

**Comment Number(s):**

2736-53

This plan revision process is programmatic and will give the direction for all site-specific projects that implement it. The plan is designed to manage for ecological desired conditions, as well as social and economic desired conditions. The term “restore” as defined in Forest Service Handbook 1909.12 Land Management Planning Handbook, Chapter- Zero Code is to renew by the process of restoration. Ecological Restoration, as defined in Forest Service Handbook 1909.12 Land Management Planning Handbook, Chapter- Zero Code, is defined as the process of assisting the recovery of an ecosystem that has been degraded, damaged, or destroyed. Ecological restoration focuses on reestablishing the composition, structure, pattern, and ecological processes necessary to facilitate terrestrial and aquatic ecosystems sustainability, resilience, and health under current and future conditions (36 CFR 219.19).

The revised forest plan attempts to achieve ecological restoration by moving toward (restoring) a desired condition for each ecological response unit. The desired condition for each ecological response unit defines the desired composition, structure, pattern, and ecological processes necessary to facilitate terrestrial and aquatic ecosystems sustainability, resilience, and health under current and future conditions.

Desired conditions for the semi-desert grasslands can be found in the revised plan (chapter 2, Semi-Desert Grasslands). Depending on the ecological response unit, a variety of treatments, such as thinning and/or burning, invasive species treatments, or reseeding native species and grazing management may be necessary to meet plan objectives.

**Comment Number(s):**

2922-12

A complete analysis on current conditions, trends, and risks to sustainability for desert ecosystems is provided in the forest plan assessment report (Final Assessment Report of Ecological Conditions, Trends, and Risks to sustainability). We have reviewed the best available science as it pertains to desert ecosystems. We are happy to review any current science or data – but it is unclear what specific long-term data, site-specific data, or recommendations the commenter is referring to. We acknowledge the various stressors and disturbances in desert ecosystems. We have included plan components (desired conditions, standards, and guidelines) to address these concerns – see the standards and guidelines in the Rangelands, Forage, and Grazing (GRZ); Vegetation and Ecological Response Units (ERU); and Watersheds and Water Resources (WAT) sections of the forest plan.

Post-fire assessment and monitoring is handled through the Forest Service burned area emergency response (BAER) program. The program establishes mitigation and rehabilitation efforts to ensure the safety of The commenter's statements related to recent fires on the Tonto National Forest are opinion and

are unsubstantiated. Forest visitors and employees and protecting Federal property, water quality, and critical natural or cultural resources from further damage is one of our focuses after the fire is out. Information collected by the Forest Service burned area emergency response teams is shared with other Federal, State, and local emergency response agencies so they can provide assistance to communities and private landowners who may also be affected by potential post-fire damage.

Monitoring for specific fire areas on the forest is handled at a project level and not the forest plan. See chapter 4 of the forest plan for a complete description of the monitoring program – which assesses management effectiveness of the forest plan and conditions forest-wide. The monitoring plan does include monitoring elements for wildland fire to assess to what extent wildland fire is used to achieve desired ecological, social, or economic conditions.

All existing management direction (1985 forest plan), including livestock grazing, was evaluated to determine if changes in management were needed. A “needs for change” report was released describing the management direction that is currently working and the management direction in need of change to adapt to new science or changed conditions.

Desired conditions for ecological response units or ecosystems have been developed regionally (for Arizona and New Mexico), however adjustments based on local conditions are made where we have scientific data to support those changes. The desired conditions for ecological response units on the Tonto National Forest represent the best available science. Analysis of projects or authorized uses are always handled at the project level.

**Concern Statement 315.** *Commenter is concerned with vegetation manipulation, sometimes using herbicides, to increase herbaceous cover.*

Response:

**Comment Number(s):**

2808-37

The comment is outside the scope of the project and an opinion. This plan revision process is programmatic, guiding the Tonto National Forest in fulfilling its stewardship responsibilities to best meet the current and future needs of the American people. What the commenter is referencing are site-specific project actions that would implement the forest plan. Because infestations from invasive plant species are dynamic, an adaptive management strategy must be used to provide direction for noxious weed management activities on the forest. Within this program we specifically target invasive and noxious weed species in site-specific projects, when applicable.

**Concern Statement 316.** *Commenter recommends increasing the number of acres for mechanical treatment within the range of alternatives.*

Response:

**Comment Number(s):**

2932-155, 157

Per the revised plan (chapter 1, Forest Plan Framework and Organization, Plan Components and Other Plan Content, Plan Components) objectives are concise, measurable, and time-specific statements of a desired rate of progress toward desired conditions and should be based on reasonably foreseeable budgets.



Objectives, along with the strategies (from management approaches or Forest Service handbook direction) used to accomplish them, can be thought of as the tools we will use to prioritize project activities to reach desired conditions. Objectives are mileposts along the road toward desired conditions. We provided a range because of limited budgets, personnel, shifting forest, regional, and national priorities, and industry capacity. Nothing in the 2012 Planning Rule prohibits the Forest from accomplishing more than what is identified in our objectives, so long as site-specific project level planning complies with all applicable laws, regulations, and policy. As we move into project level plan implementation, we will be looking for volunteers and partners to help us with projects to achieve our desired conditions on all ecological response units as applicable.

**Comment Number(s):**

2932-158

This plan revision process is programmatic and will give the direction for all site-specific projects that implement it. We believe that we have addressed the need to accelerate the pace and scale of forest restoration to reduce the risk of uncharacteristic fire in this revision process. As such, under this revised plan we have modeled that we will potentially treat 3,000 more acres annually over the life of the plan.

Alternative A is the Tonto National Forest's current 1985 forest plan, which has few articulated desired conditions for vegetation or fire, so it uses the desired conditions from the draft proposed plan (modified version of the preliminary proposed plan). There would be no changes in current management and the current forest plan would continue to be implemented. Alternative A is the point of reference for assessing action alternatives B through D (environmental impact statement, chapter 3, Vegetation, Ecological Response Units, Fire, and Fuels / Environmental Effects / Description of Alternatives for Vegetation and Fire).

Under the Tonto National Forest's 1985 forest plan the forest mechanically treated approximately 1,000 to 2,000 acres annually or from 10,000 to 20,000 acres per decade. Under the Tonto National Forest revised forest plan (alternative B), Treatment objectives are considerably higher increasing both mechanical treatment and fire only treatments. Objectives for the frequent fire ecological response units include treating 50,000 to 122,000 acres over a ten-year period with both mechanical and fire treatments and 105,000 to 325,000 acres over a ten-year period with fire only treatments. This is an increase in mechanical treatments of 3,000 acres or more per year. See Tonto National Forest revised land management plan, chapter 2, Vegetation and Ecological Response Units (ERU), All Upland Ecological Response Units (ERU), Objectives (ERU-O) for a complete listing of objectives for the frequent fire ecological response units on the Tonto National Forest.

Of the alternatives analyzed in the draft environmental impact statement both alternative B and D show the need to accelerate the pace and scale of restoration with alternative A increasing mechanical and fire treatments as shown above and alternative D increasing mechanical and fire treatments to 50,000 to 190,000 acres over a ten-year period and 16,000 to 62,000 acres over a ten-year period with fire only treatments. For a complete description and comparison of all alternatives analyzed see the environmental impact statement volume 1, chapter 3, Vegetation, Ecological Response Units, Fire, and Fuels / Environmental Effects.

**Comment Number(s):**

2932-154

We appreciate your support of our planning effort. Per the National Environmental Policy Act (40 CFR 1500) the deciding official has the ability to choose one alternative in whole, or parts of all alternatives when making the decision for this process.

**Concern Statement 317.** *Commenters request clarification about the landscape scale metrics and how they would apply to a project such as utility rights-of-way.*

Response:

**Comment Number(s):**

2938-17

Per the revised plan (chapter 1, Plan Components and Other Plan Content, Plan Components) desired conditions describe the specific social, economic, and/or ecological characteristics that are desired for the plan area, or a part of the plan area. These are described in enough detail to measure progress toward their achievement, and all management activities should be aimed at achieving the desired condition. Desired conditions can be thought of as the set of goals that help define a collective vision for the Tonto National Forest in the future. Plan components do not need to reiterate existing law, regulation, or policy, although some are repeated to emphasize it and all plan components are consistent with existing regulatory framework. For projects that implement the revised plan, not every desired condition for every resource will be met. Overall, plan implementation should move resources, when possible and applicable, toward these desired conditions.

**Comment Number(s):**

2938-15

The first desired condition that the commenter is referencing is intended to offer an alternative fuel loading guide to promote low intensity / low severity fire where private lands or infrastructure are adjacent to National Forest System lands. The second desired condition that the commenter references as nine subsections, all designed to modify fire behavior in the urban interface or infrastructure. Project-specific analysis will determine which of these or what combination of subsections will best achieve the desired conditions near the powerlines. One of these subsections addresses the dead down fuel loads by providing a range that runs from 1 to 40 tons per acre depending on the ecological response unit. Again, for projects that implement the revised plan, not every desired condition for every resource will be met. Overall, plan implementation should move resources, when possible and applicable, toward these desired conditions while allowing for the protection of the wildland-urban interface and protecting critical infrastructure.

**Concern Statement 318.** *Commenter is requesting clarification on how the uneven aged management approach in the draft forest plan is compatible with the flexible toolbox approach in the Four Forests Restoration Initiative.*

Response:

**Comment Number(s):**

2932-37

This plan revision process is programmatic and will give the direction for all site-specific projects that implement it. The Four Forest Restoration Initiative's Rim Country Project, although it covers a very large area and several forests, is a site-specific project which must comply with the direction provided in applicable forest plans, unless these plans are amended. The Rim Country Project complies with the Tonto National Forest's current forest plan and would also comply Tonto's revised forest plan once the decision is signed.

When speaking about uneven-aged management approaches or systems, there are two basic silvicultural management systems: even-aged management and uneven-aged management. A management system for the purposes of the land management planning regulation at 36 CFR Part 219 is a timber management system including even aged management and uneven-aged management (36 CFR 219.19) (FSH 1909.12 Land Management Planning Handbook Chapter Zero Code).

Even-aged methods are a planned sequence of treatments designed to maintain and regenerate a stand with predominately one age class (FSM 2400 Forest Management, Chapter 2470 Silvicultural Practices, 2407.5 Definitions).

The uneven-aged method is the regeneration and maintenance of stands with a multi-aged structure by removing some trees in all size classes either singly or in groups or in strips (FSM 2400 Forest Management, Chapter 2470 Silvicultural Practices, 2407.5 Definitions). The uneven-aged silvicultural system is a planned sequence of treatments designed to regenerate or maintain a stand with three or more age classes and includes single-tree selection, and group selection regeneration methods (FSM 2400 Forest Management, Chapter 2470 Silvicultural Practices, 2407.5 Definitions). The defining characteristic of an uneven-aged stand is that it has three or more age classes at all times.

The flexible toolbox approach in the Rim Country draft environmental impact statement is a condition-based management framework that allows for consistent selection of the most appropriate treatment for any given set of existing conditions by applying an "if/then" approach. For example, if condition "X" exists on the ground, then treatment "Y" will be applied as the most appropriate means of moving a resource towards desired conditions (draft environmental impact statement 4FRI Rim Country Project, appendix F Glossary). The flexible toolbox is site-specific and based on actual stand conditions on the ground. Regardless of the treatment chosen the intent is to always move the stand toward the desired condition.

Most importantly is that the desired conditions identified in the Rim Country draft environmental impact statement and the desired conditions described in the Tonto National Forest revised forest plan for ponderosa pine are almost identical with only small differences in the way they are described. Desired conditions for Rim Country can be found in the Rim Country draft environmental impact statement, appendix D, section B-Management Direction, Desired Conditions, and Treatment Design, Ponderosa Pine Forest, Outside of Mexican Spotted Owl Habitat and Landscapes Outside of Goshawk Post-fledging Areas section. Desired conditions for ponderosa pine can be found in Tonto National Forest revised forest plan, chapter 2.-Forestwide Direction, Vegetation and Ecological Response Units (ERU), Ponderosa Pine Forest (ERU-PPF).

**Concern Statement 319.** *Commenter is seeking clarification or additional analysis to the be included in the final environmental impact statement.*

Response:

**Comment Number(s):**

2806-13

Table 3 is not intended to be inclusive of all vegetation types on the Tonto National Forest. Interior chaparral is a fire regime IV category, with fire return intervals between 35 and about 100 years. There is a description of interior chaparral in chapter 2 of the revised plan (Vegetation and Ecological Response Units), though that particular description is somewhat general and has no discussion of the fire regime.

Prior to the initiation of the Tonto National Forest plan revision, an extensive assessment was done on each ecological response unit to determine the ecological trends and sustainability of each ecological response unit (USDA Forest Service, 2017: Final Assessment Report of Ecological Conditions, Trends, and Risks to Sustainability: volume 1, Tonto National Forest). This assessment was heavily referenced in the analysis process for the plan revision. That assessment concluded that, across the Tonto National Forest, interior chaparral has a low overall departure from what would have been the historic conditions. At that time, the overall fire return interval was about 128 years, and that was prior to the Woodbury and Bush Fires. While we have not rerun the analysis, we can conclude that, across the forest, the condition of fire frequency in interior chaparral has low departure from historic norms.

In the environmental impact statement, volume 1, chapter 3, Vegetation, Ecological Response Units, Affected Environment, under 'Other Ecological Response Units', there is a thorough description of interior chaparral, and describes the current state as per the assessment referenced above, while including more recent references.

Desired conditions for fire and fuels (revised plan, chapter 2), while they align well with the desired conditions for the ecological response units (revised plan, chapter 2), were written separately with fire management considerations in mind. We specifically wrote desired conditions for the revised plan (chapter 2, Fire and Fuels) that would account for the type of fire that is natural in chaparral and related ecological response units, and how it would be managed to reduce the threat to public safety, property, infrastructure, habitat, watersheds, and other values.

**Concern Statement 320.** *Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2932-46

Per the revised plan (chapter 1, Forest Plan Framework and Organization, Plan Components and Other Plan Content, Plan Components) objectives are concise, measurable, and time-specific statements of a desired rate of progress toward desired conditions and should be based on reasonably foreseeable budgets. Objectives, along with the strategies (from management approaches or Forest Service handbook direction) used to accomplish them, can be thought of as the tools we will use to prioritize project activities to reach desired conditions. Objectives are mileposts along the road toward desired conditions.

We provided a range because of limited budgets, personnel, shifting forest, regional, and national priorities, and industry capacity. As we move into project level plan implementation, we will be looking for volunteers and partners to help us with projects to achieve our desired conditions all of the ecological response units as applicable.

**Comment Number(s):**

2816-70

We have revised the Riparian Areas, Seeps, Spring, Wetlands, and Riparian Management Zones (RMZs), and Riparian Ecological Response Units (RERU) sections in the forest plan to provide clarity regarding how riparian ecological response units are defined, how they relate to the riparian management zone and meet the planning rule directives. To clarify – there is no planning rule directive for riparian ecological response units and the riparian management zone. We believe you are referring to and citing the planning rule directives for the riparian management zone. There is no requirement in the planning directives that the riparian management zone must be in close proximity to lakes, streams, or open water wetlands. Rather, 36 CFR 219.8(a)(3) states that “plans must establish width(s) for riparian management zones around all lakes, perennial and intermittent streams, and open water wetlands...” Riparian ecosystems are dynamic and their boundaries can shift based on disturbance and flow regimes (e.g., a large flood event can dramatically widen the floodplain and extent of riparian vegetation). For these reasons, the riparian management zone is not restricted solely to current riparian vegetation in close proximity to the water edge, rather the width may extend some distance and include areas that have the potential to support riparian vegetation (presence of distinct soils, geomorphology, or fluvial properties). Recognizing the dynamic nature of riparian areas and the variability in riparian widths, the directives further state in Forest Service Handbook 1909.12, 23.11e “when establishing riparian management zones the interdisciplinary team should consider; available information on the location and extent of surface waterbodies, springs, wetlands, vegetation, soils, geomorphology, topography, and other relevant information; soil and vegetation indicators of riparian areas that include regionally distinctive riparian soils and vegetation, or the soil potential to support regionally distinctive vegetation; fluvial geomorphic indicators of riparian areas such as break in slope or evidence of fluvial deposition; the 100-year recurrence interval flood stage; existing site-specific riparian area delineations, if available; and the effects of climate change on stream flows that may affect the size of riparian management zones.”

We are using riparian ecological response units as a first approximation of the riparian management zone because the ecological response unit framework for mapping riparian areas considers many of the same criteria cited in the planning rule directives to delineate the riparian management zone. Specifically, in that riparian ecological response units are mapped riparian plant communities contiguous to and affected by surface and subsurface hydrologic features of perennial or intermittent lotic and lentic water bodies, and are areas that have distinctively different vegetative species than adjacent areas; specifically, riparian mapping was conducted where riparian/wetland plant species were common. Additionally, where indicator plants may not be present riparian ecological response units were identified by signs of fluvial processes and/or fluvial features created under the current flow and climatic regimes (See Triepke 2014 for more information). For these reasons, riparian ecological response units are an appropriate first approximation of the riparian management zone at the planning level. Recognizing that riparian areas are dynamic and the coarseness of the mapping, there are situations in which the riparian management zone width may need to be adjusted based on local site conditions. This is handled the site-specific project level through an interdisciplinary team of specialists to assess if there are any needed adjustments to the riparian management zone (by evaluating criteria outlined in the Forest Service handbook direction cited in this response and in the forest plan). The riparian ecological response unit dataset can be found in the project record.

**Comment Number(s):**

2806-14

Per the revised plan (chapter 1, Forest Plan Framework and Organization, Plan Components and Other Plan Content, Plan Components) objectives are concise, measurable, and time-specific statements of a desired rate of progress toward desired conditions and should be based on reasonably foreseeable budgets. Objectives, along with the strategies (from management approaches or Forest Service handbook direction) used to accomplish them, can be thought of as the tools we will use to prioritize project activities to reach desired conditions. Objectives are mileposts along the road toward desired conditions. We are unable to commit to objectives for every ecological response unit because of limited budgets, personnel, and shifting forest, regional, and national priorities. As we move into project level plan implementation, we will be looking for volunteers and partners to help us with projects to achieve our desired conditions all of the ecological response units as applicable.

**Comment Number(s):**

2806-15

The information in the assessment was completed in compliance with 36 CFR 219 and used to inform the plan revision needs for change. This document is not all inclusive nor was it intended to be. However, desired condition 9 for midscale and desired condition 11 for fine scale (revised plan, chapter 2, Vegetation and Ecological Response Units, Interior Chaparral) speak directly to the important plant association the commenter is requesting.

**Concern Statement 321.** *Commenter is suggesting additional analysis or clarifying language be included in the final environmental impact statement.*

Response:

**Comment Number(s):**

2932-43

Surveying for goshawks can have a “large logistical impact” to achieving forest objectives in several ways. Depending on the survey protocol, surveys must be completed from June through August, during the breeding season. This is a very limited amount of time in which to complete surveys of project areas. There is also the financial burden of additional personnel and equipment needed to complete the surveys in such a short time frame. As the Forest attempts to increase the pace and scale of restoration, the ability of the Forest Service to complete the required surveys within this limited time frame and with limited budgets and personnel may result in fewer acres getting surveyed. This can delay project implementation and adversely affect the ability of the Forest to meet objectives. Increasing the number of surveys that can be completed will require the Forest to shift resources from other areas and reduce the available resources and funding for project implementation which can also adversely affect the ability of the Forest to meet objectives. Furthermore, the northern goshawk was not identified as a species of conservation concern in the Final Assessment Report of Ecological Conditions, Trends and Risk to Sustainability. Alternative A and alternative D, however, include plan components specifically for northern goshawks that direct the Forest to survey for and establish post-fledging family areas and nest areas. Alternative B and C do not include plan components requiring surveys before project implementation.

## Water-based Recreation

**Concern Statement 322.** *Commenters are concerned with access for water-based recreation on the lower Salt River.*

Response:

**Comment Number(s):**

2763-1, 2876-1

As detailed in chapter 1 of the revised plan, the forest plan is strategic in nature and does not authorize site-specific projects and decisions such as site expansion, construction of new parking lots, or access points. The following plan component addresses water-based recreation and access points: Designated water access points and amenities within developed sites reflect user demands, site capacity, and water accessibility (forest plan, chapter 2, Recreation, Dispersed Recreation, Water-Based Recreation). As we move into project level plan implementation, we will be looking for volunteers and partners to help us with projects to achieve our desired conditions and would appreciate your continued support of the program. As a frequent user of these facilities, your input on future projects would be much appreciated.

**Concern Statement 323.** *Commenter is concerned with fencing along the lower Salt River and visual impacts to recreation.*

Response:

**Comment Number(s):**

2697-1

As detailed in chapter 1 of the revised plan, the forest plan is strategic in nature and does not authorize site-specific projects and decisions such as the installation of specific fences. The fence the commenter is referring to was authorized under a separate project level decision outside of the current programmatic level planning effort, in compliance with all applicable laws, regulations, and policy, including complying with the current forest plan, as amended.

**Concern Statement 324.** *Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2932-22

A desired condition in the Recreation section (revised plan, chapter 2) addresses the relation between recreation and wildlife, stating: Recreation contributes to enhanced quality of life for all of our visitors and the communities we serve. Recreation opportunities support healthy lifestyles and local businesses and jobs, contribute to vibrant local economies, and conserve water quality, fish and wildlife habitat, landscapes, and cultural resources. This references that all recreation, not just water-based recreation, should support sensitive habitats. Additional plan components (revised plan, chapter 2, Recreation) that address this topic include: Newly developed and dispersed recreation sites, facilities, and authorized

activities should be designed and located in places so as not to degrade water quality, sensitive environments, or prevent wildlife access to water; and recreation facilities and improvements should be designed to minimize conflicts between forest users and wildlife (e.g., bear-proof dumpsters or capped pipe used for fences and sign posts). These plan components are all in the general recreation section, addressing all forms of recreation and not any specific type of recreation. Because of this, we feel it is unnecessary to repeat it in the Water-based Recreation section.

**Comment Number(s):**

2736-31

Current plan components in the Water-Based Recreation section of the revised plan (chapter 2) address water-based recreation, specifically water access points and developed sites, that reflects public demands. These include designated water access points and amenities within developed sites reflect user demands, site capacity, and water accessibility; and Sustainable water-based recreation opportunities are provided on the Tonto, while riparian areas remain largely undisturbed from recreational impacts (e.g., camping and access points) with the exception of the Lakes and Rivers Management Area (forest plan, chapter 2, Recreation, Dispersed Recreation, Water-based Recreation).

**Comment Number(s):**

2736-32

Plan components specific to angling and fishing are in the Wildlife-related Recreation section of the revised plan (chapter 2), including the following desired conditions: “Ecological conditions on the forest support plentiful and diverse opportunities for hunting, fishing, and wildlife watching, and contribute to local economies;” “Access to a range of opportunities for hunting, fishing, and wildlife watching are available;” and “Forest visitors have a variety of opportunities to view, experience, appreciate, and learn about the fish and wildlife resources of the forest.” Because these planning components address the commenter's concerns, we believe is not necessary to add plan components to the Water-Based Recreation section of the revised plan (chapter 2) specific to angling, as the Water-based section is general and inclusive for all water-based recreation activities.

**Comment Number(s):**

2736-33

We appreciate your input. Invasive species has been added to the referenced management approach (forest plan, chapter 2, Recreation, Dispersed Recreation, Water-Based Recreation).

## **Watersheds and Water Resources**

*Concern Statement 325. Commenter requests clarification about the alternatives as they related to watersheds and water resources.*

Response:

**Comment Number(s):**

2932-50

The alternative comparison of expected outputs table in the environmental impact statement succinctly outlines the main differences by alternative for fuelwood and mechanical treatment. Alternative B uses a



combination of mechanical and wildland fire treatments while alternative C emphasizes wildland fire and alternative D emphasizes mechanical treatments. The total acres by alternative for treatment is actually highest in alternative C and lowest in alternative D, not including alternative A. The text within the Watersheds and Water Resources section of the environmental impact statement has this outlined accordingly and for that reason was not updated to reflect this request.

**Concern Statement 326.** *Commenters request clarification about water rights and the related plan direction in the final forest plan.*

Response:

**Comment Number(s):**

2816-72

The Tonto National Forest complies with the Southwestern Region Forest Service Manual Chapter 2540, Water Uses and Development.<sup>8</sup> Although new state-based instream flow right claims would be junior to existing uses they would be protected from additional uses in the future. What was originally the Watershed and Water Resources Objective 06, but is now Objective 05, has been updated to read: “Apply for state-based water rights for instream flow use for at least two streams threatened with dewatering, supporting highly valued resources (e.g., threatened or endangered species, species of conservation concern, river-based recreation) or containing unique qualities (e.g., a perennial stream in the Sonoran Desert) within each ten-year period.”

**Comment Number(s):**

2857-1

The Tonto National Forest recognizes that it is the purview of the State to regulate groundwater wells. Acquisition of state-based water rights is pursuant to 16 U.S.C. 526, which authorizes appropriations for Forest Service investigation, establishment, purchase, and protection of water rights needed or beneficial for Forest Service administration and public use and more generally 16 U.S.C. 475 provides general authority for the Forest Service to manage watersheds. For any new wells, the site-specific projects will comply with the revised plan and be analyzed in compliance with the National Environmental Policy Act. The Tonto National Forest complies with the Southwestern Region Forest Service Manual Chapter 2540<sup>9</sup>. Although new state-based instream flow right claims would be junior to existing uses they, would be protected from additional uses in the future.

**Concern Statement 327.** *Commenters are concerned with the use of the watershed condition framework to measure long-term conditions of watersheds on the forest and to set priority watersheds.*

Response:

**Comment Number(s):**

2925-75

---

<sup>8</sup> R3 Regional Supplement, No. 2500-2001-1 (effective date September 5, 2001).

<sup>9</sup> Ibid

Implementation of the Watershed Condition Framework is an ongoing and iterative process that has 5 distinct steps:

- classify all watersheds,
- prioritize watersheds for restoration,
- write watershed restoration action plans for priority watersheds,
- implement restoration projects, and
- monitor watershed condition.

The first step, classifying watershed condition, is based on a nationally consistent rubric outlined in the Watershed Condition Framework as well as USDA Forest Service 2004a, Forest Service Manual 2521.1 and is intended to be an exercise based on existing data. The watershed conditions used in the plan are based on that rubric and were determined through an interdisciplinary team. It is within the subsequent steps that more detailed analysis and planning are undertaken. The revised plan is a programmatic document that provides the framework to accomplish exactly what the commentor refers to by collaborating with our State, Tribal, other Federal agencies, and interest groups when identifying priority watersheds. The revised plan has been modified to clarify Watershed and Water Resources Management Approach 01 to: “Work with forest leadership and partners to identify priority watersheds, develop watershed restoration action plans as well as other restoration activities to leverage resources, and to implement and monitor projects that improve vegetative composition, reduce erosion, and/or otherwise improve watershed function.”

**Comment Number(s):**

2816-49

The Forest Service National Watershed Condition Framework is a nationally set objective for watershed programs and provides agency-wide direction that all forest and grasslands follow. Within the Watershed Condition Framework, the definitions for impaired, functioning at risk, and properly functioning watersheds are defined as found in the Forest Service Manual 2521.1. According to the manual Class 1 (functioning) watersheds exhibit high geomorphic, hydrologic, and biotic integrity relative to their natural potential condition. Class 2 (functioning-at-risk) watersheds exhibit moderate geomorphic, hydrologic, and biotic integrity relative to their natural potential condition. Class 3 (impaired) watersheds exhibit low geomorphic, hydrologic, and biotic integrity relative to their natural potential condition.

As stated within the Watershed Condition Framework (USFS 2011) “The FSM classification defines watershed condition in terms of “geomorphic, hydrologic and biotic integrity” relative to “potential natural condition.” In this context, integrity relates directly to functionality. Geomorphic functionality or integrity can be defined in terms of attributes such as slope stability, soil erosion, channel morphology, and other upslope, riparian, and aquatic habitat characteristics. Hydrologic functionality or integrity relates primarily to flow, sediment, and water-quality attributes. Biological functionality or integrity is defined by the characteristics that influence the diversity and abundance.”

**Comment Number(s):**

2925-76

There is no statement enumerated by Congress within those six statements that limits or prohibits the use of the Watershed Condition Framework to evaluate long-term conditions of watersheds within our forest.

**Concern Statement 328.** *Commenter is concerned with water use specific to the large mines currently on the forest.*

Response:

**Comment Number(s):**

2921-2

We appreciate your input specifying the water uses specific to Resolution Copper. This planning effort is programmatic and provides the framework for all projects on the Tonto National Forest. Our statement, keeping within the scope of the revised plan, was to point out that larger mines primarily use some sort of combination of wells and pipelines on National Forest System lands. If people have an interest in site-specific projects, such as Resolution Copper, they would be able to find the environmental analysis for the project on the Tonto National Forest schedule of proposed actions website. Because the land management plan is programmatic rather than site-specific, this paragraph targets the overall scope of mining water uses and demands on our forest.

**Concern Statement 329.** *Commenter is concerned about the best available scientific information used to determine groundwater trends on the forest.*

Response:

**Comment Number(s):**

2816-109

During the land management plan analysis process, long-term observation wells were, and are continually, monitored by the Arizona Department of Water Resources in order to obtain an overall impression of ground water trends on the forest. Since groundwater is continually monitored by Arizona Department of Water Resources, additional modelling was not needed. One thing that is acknowledged through the long-term available data provided by Arizona Department of Water Resources, is that the State of Arizona has been and continues to be in a long-term drought, and with that, long-term trends suggest water tables are receding.

**Concern Statement 330.** *Commenter is requesting access to information used to develop the forest plan and environmental impact statement.*

Response:

**Comment Number(s):**

2816-107

The document the commentor is referring to is the 2017 Final Assessment Report of Ecological Conditions, Trends, and Risks to Sustainability in the project record. We have updated this in the environmental impact statement, appendix B, Watersheds and Water Resources, Method for Analysis, Water Quantity - Surface Water.

**Concern Statement 331.** *Commenter is requesting additional information or analysis about livestock grazing infrastructure projects and groundwater pumping in riparian areas, seeps, springs, and wetlands.*

Response:

**Comment Number(s):**

2970-516

Groundwater pumping near streams or springs can have a range of impacts, from minimal effects to adversely affecting the water quantity for the streams and springs, depending on how much is being pumped. For example, some noticeable effects from overpumping could be a lowered groundwater table, which would adversely affect the hydrologic connectivity between surface water and groundwater.

**Comment Number(s):**

2970-489

As a rangeland management approach, we encourage developing water sources in uplands, where possible, to improve or restore riparian areas, and there is no direction in the revised plan that states an increase in drilling wells for livestock purposes. Any new development of water resources for livestock would still have to undergo National Environmental Policy Act analysis and approval. Additionally, the 2021 Rangeland Water Developments at Springs: Best Practices for Design, Rehabilitation, and Restoration (General Technical Report) emphasizes new and existing approaches to improve upland spring developments while protecting sensitive riparian areas. This document provides guidance to Forest Service specialists and decision makers. We do discuss overall trends of groundwater in the environmental impact statement, as well as incorporating groundwater regulations into our desired conditions, standards, guidelines, and management approaches for watersheds and water resources. If drilling for a well were to happen, we would have to apply for a permit from Arizona Department of Water Resources as well as conduct environmental analysis in compliance with the National Environmental Policy Act.

**Concern Statement 332.** *Commenter is requesting information about previous mining activity on the forest and the testing and clean up that occurs following the mine closing.*

Response:

**Comment Number(s):**

2969-4

There were two mines that have gone through the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). One can find the CERCLA analysis of the Red Bluff Uranium Mine Sites by following <https://www.fs.usda.gov/detail/tonto/home/?cid=fseprd560414>. As well, for the Workman Creek Uranium Mine site by following <https://www.fs.usda.gov/detail/tonto/landmanagement/resourcemanagement?cid=stelprdb5327298>. The Arizona Department of Environmental Quality does water quality management.

**Concern Statement 333.** *Commenter is requesting plan components from alternative C relating to ecosystem protections from stressors be included in alternative B.*

Response:

**Comment Number(s):**

2970-487

We appreciate your support of our planning effort. The alternative analyzed displayed a range of actions consistent with all regulated law and policy per 40 CFR-1500 and 36 CFR 220. Alternative C emphasizes passive restoration. Watersheds across the forest, including in higher and lower elevations, have experienced impacts and have existing conditions that cannot be easily generalized to determine where a passive restoration approach will be most successful.

**Comment Number(s):**

2970-488

We appreciate your support for our planning effort. We disagree with some of the conclusions reached by the commenter related to our analysis. The Forest Service operates under the multiple use and sustained yield act, which authorizes many uses on National Forest System land, including livestock grazing and mining. We appreciate your suggestions to include additional elements to alternative C. However, as detailed in chapter 1 of the revised plan, the forest plan is strategic in nature and does not authorize site-specific projects and decisions such as what you are suggesting.

**Concern Statement 334.** *Commenters are seeking clarification or additional analysis to the be included in the final environmental impact statement.*

Response:

**Comment Number(s):**

2816-104

Stewardship of groundwater resources here refers to the groundwater direction for the Southwestern Region (which includes Arizona) in the Region 3 specific Forest Service Manual, Chapter 2540: Water Uses and Development) established in 2001; as such it is not a national directive.

**Comment Number(s):**

2816-101

At the time when the draft environmental impact statement was written, the best available data was utilized. While this newer data has come out, some of the data represents approximately 100 years and some of it represents approximately 70 years. This additional recent data does not significantly change the overall trend presented; thus, the environmental impact statement will not be updated to specifically include it.

**Comment Number(s):**

2927-27

Federally reserved water rights and State water rights do hold different standards as far as what can be applicable. For the forest plan, we do include in the Watershed and Water Resources: Desired Condition 09 “Water rights to support water dependent resources and uses on the forest have been acquired.” This incorporates State water rights or Federal reserved water rights where applicable. We also do include a portion regarding water rights as well as instream flow water rights in the environmental impact statement, Watersheds and Water Resources.

**Comment Number(s):**

2816-106

Population growth within this paragraph is referring to communities within and surrounding the forest boundary as those communities would have an anthropogenic (human caused) impact on the resources.

**Comment Number(s):**

2927-17

The Forest Service acknowledges the typo and the suggestion for changing the sentence in the final environmental impact statement, volume 1. The sentence now reads as “This alternative would have the greatest impact on watersheds where the range or soil conditions are fair or poor.”

**Comment Number(s):**

2816-102

The Pinal Creek Water Quality Assurance Revolving Fund group constructed a grout cutoff wall across the alluvium and down to bedrock in Pinal Creek to intercept polluted groundwater moving downgradient through the alluvium. The cutoff wall was constructed on National Forest System land. The intercepted groundwater was pumped to the water treatment plant next to Hwy 188 and treated to remove contaminants. A portion of the treated water was sent to the mines for their use and a portion of it was released back into Pinal Creek below the cutoff wall. The data collected is not ours, yet it is the best available data for this area and was used in the environmental impact statement.

**Comment Number(s):**

2816-103

Within the environmental impact statement, Watersheds and Water Resources: Water Rights, we do state that instream flow water rights are a type of water right recognized by the State of Arizona specifically for supporting the beneficial uses of wildlife, including fish, and recreation. Such instream flow rights can be junior to other instream flow rights, yet at the same time can have a senior appropriability status. Water right acquisition is also a desired condition within the revised plan, Watershed and Water Resources Desired Condition 09, as well as an objective, Watershed and Water Resources Objective 05. Within the objectives we state that acquisition for State-based water rights for instream flows would be for streams that are threatened with dewatering, supporting highly valued resources or contain unique qualities.

**Comment Number(s):**

2932-51

In response to the commenter, we have added additional information regarding fire and the hazards associated with erosion, debris, and increased peak flows to reservoirs on this forest in the environmental impact statement volume 1, Watershed and Water Resources: Water Yield.

**Concern Statement 335.** *Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2970-490

We do account for the commentor's suggestion in portions of the revised forest plan, such as Watershed and Water Resources Objective 05 and Management Approach 03.

**Comment Number(s):**

2970-492

We do not feel that an additional guideline needs to be added as new water supplies for Forest Service uses would have to undergo a project level, site-specific National Environmental Policy Act analysis. Through this process, if it is found that any water supply would have adverse impact on groundwater-dependent ecosystems or surface water changes would be made to what will be implemented on the ground related to that water source.

**Comment Number(s):**

2970-493

We have modified the guideline that the commenter is referring to, Watersheds and Water Resources Guideline 07, to now read as, "Consistent with existing water rights; permitted water uses, water diversions, or obstructions should allow sufficient water to pass downstream to preserve minimum levels of water flow that maintain riparian and aquatic desired conditions."

**Comment Number(s):**

2970-491

We have modified the objective that the commenter is referencing, which upon reviewing other comments is now Watershed and Water Resources (WAT) Objective 05, to include the term "river-based recreation".

**Comment Number(s):**

2970-494

Withdrawals from the forest are pursuant to special use permits. These special use permits are periodically reviewed and can be terminated or revoked if the permit holder is not in compliance with their permit or authorization. Permit holders are evaluated regularly to ensure they are in compliance with these regulations and clauses listed in their individual permits.

**Comment Number(s):**

58-17

Any new development of wells or pipelines within National Forest System lands would have to undergo a site-specific project level analysis, in compliance with all applicable laws, regulations, and policies, including the National Environmental Policy Act, as well as Arizona Department of Water Resource's.

Depending on the level of complexity of the project, the time for completion is variable, and could take less than 6 months or up to 3 years.

**Comment Number(s):**

58-15, 16

The revised forest plan provides management guidance for the Tonto National Forest to follow in project level implementation. All applicable plan guidance, including standards, will be followed for projects implementing the plan as defined in the Code of Federal Regulations, Title 36 Part 219. Any new development of wells or pipelines within National Forest System Lands would have to undergo a site-specific project level analysis, in compliance with all applicable laws, regulations, and policies, including the National Environmental Policy Act, as well as Arizona Department of Water Resource's process.

**Comment Number(s):**

58-18

Per 36 CFR 214 (Post-decisional Administrative Review Process for Occupancy or Use of National Forest System Lands and Resources), only “holders, operators, and solicited applicants may appeal certain written decisions issued by responsible officials involving written instruments authorizing the occupancy or use of National Forest System lands and resource” (§ 214.1(a)).

**Comment Number(s):**

2932-52

In response to the commenter, we have added information regarding fire and the hazards associated with erosion, debris, and increased peak flows to reservoirs on the Tonto National Forest in the environmental impact statement volume 1, Cumulative Effects: Four Forest Restoration Initiative.

**Comment Number(s):**

2816-74

The referenced guideline WAT-G-01 (revised plan, chapter 2, Watersheds and Water Resources) to read as, “When existing groundwater wells on National Forest System lands are proposed for improvement that increase the amount of water pumped or deepen the well, adverse impacts to groundwater dependent ecosystems (e.g., wetlands, riparian areas, springs, streams, and fens) should be evaluated, and measures to eliminate, mitigate, or reduce impacts should be implemented”.

**Comment Number(s):**

2816-108

The 2017 Final Assessment Report of Ecological Conditions, Trends, and Risks to Sustainability was incorporated into the environmental impact statement in chapter 3 about water yield and availability within the Watershed and Water Resources section. Even though the 2017 Final Assessment Report was incorporated into the environmental impact statement, some additional information that wasn't in the report was used in the environmental impact statement as it was more current. For example, some additional information and data which were not already within the 2017 Final Assessment but are in the environmental impact statement are, figure 41 (Subwatershed ratings for each watershed condition indicator), table 92 (Percentage of stream and river miles by assessment category in 2010, 2012/2014 and 2016), and specifically figure 47 (Effect of elevation on average annual precipitation).



**Comment Number(s):**

58-23

All projects would have to undergo a site-specific project level analysis, in compliance with all applicable laws, regulations, and policies, including the National Environmental Policy Act. This includes involvement with range permittees and other stakeholders. Management approaches describe an approach or strategy to manage the unit to achieve a desired condition, but do not constitute plan components and thus are not mandates. This applies to management approach to assess opportunities to reintroduce beavers to riparian ecosystems (Tonto National Forest land management plan, chapter 2, Riparian Areas, Seeps, Springs, Wetlands, and Riparian Management Zones, RMZ-MA-4). The Arizona Game and Fish Department is the primary agency responsible for management of wildlife and any future projects would be coordinated with the department, including any problems with nuisance animals.

**Comment Number(s):**

2927-8, 9

As per the national program of the Forest Service Watershed Condition Framework, it is required that up to five (5) watersheds should be identified as locations to work with external partners and stake holders in order to improve the overall watershed condition. For us, this means that we will identify at least two watersheds every year in which we will evaluate, address, and collaborate with partners or private landowners in order to improve the condition class of the overall watershed. Site-specific projects related to this will be analyzed and will need to comply with the revised plan.

**Comment Number(s):**

2816-73

Plan components developed for watershed and riparian health should focus on the sustainable stewardship of groundwater and groundwater-dependent ecosystems and their interconnections in order to ensure stream channels and floodplains are dynamic and resilient to disturbances. Groundwater dependent ecosystems are communities of plants and animals whose extent and life processes are dependent on access to or discharge of groundwater and can include springs, wetlands, and perennial, intermittent or ephemeral streams. Examples include springs and seeps, caves, and riparian areas which can also be habitats for threatened or endangered species. Groundwater-dependent ecosystems are further discussed in the environmental impact statement for the land management plan volume 1 Watershed and Water Resources: Groundwater. Where pipelines occur on National Forest System lands and wells originate on private land; according to Forest Service Manual 2500 Chapter 2540 (Section 2541.35 Paragraph 4); the transport of ground water across National Forest System lands through a pipeline requires an analysis that considers the potential impact of the pipeline on forest resources and construction for the pipeline. These effects could include impacts to neighboring landowners or water uses.

**Comment Number(s):**

2736-58

It is assumed that native wildlife, including threatened endangered species, can also utilize such constructed water features. We found it important to recognize in this plan component, that the commenter cites, that such water features do have the potential to also harbor invasive aquatic species which can prey on or compete with native species.

**Comment Number(s):**

2255-5

Our intent in Watersheds and Water Resources management approaches 01 was to include partners in the development of restoration projects completed through watershed restoration action plan. This management action will be revised to read as, “Work with forest leadership and partners to identify priority watersheds, develop watershed restoration action plans as well as other restoration activities to leverage resources, and to implement and monitor projects that improve vegetative composition, reduce erosion, and/or otherwise improve watershed function”. Additionally, there are other planning components that speak directly to partnership, which can be found in the revised plan chapter 2, Partnerships and Volunteers.

**Comment Number(s):**

2816-71

Per the revised plan (chapter 1, Forest Plan Framework and Organization, Plan Components), “Desired conditions are specific social, economic, and ecological conditions of the forest plan area, or a portion of the forest plan area, that are described in terms specific enough to allow for progress toward their achievement. Desired conditions are what drive the plan. All project-level management activities should be aimed at the achievement of the desired conditions for those resources in the area where the project is located. Desired conditions can be thought of as vision statements that help define a collective vision for the National Forest in the future.” Not every site-specific project will meet every desired condition for every resource. We do accept your comment and will change WAT-DC 02 to read as, “Surface water and groundwater quality, meets or exceeds applicable State water quality standards, fully supports designated beneficial uses, maintains or moves ecological conditions to low departure from reference conditions and meets the needs of downstream water users”. While the Tonto National Forest recognizes that it may not be possible to meet or exceed State water quality standards, this is a desired condition which can be thought of as a vision statement that helps define our vision as the Watershed managers further define a collective vision for the Tonto National Forest in the future.

**Comment Number(s):**

2808-38

Projects designed as a part of the Watershed Condition Framework, in order to improve the overall condition of a watershed, are specific to issues within a watershed acknowledged by an interdisciplinary team of resource specialists and are site-specific. The purpose of the Watershed Condition Framework is not to improve forage for cattle, but instead “to protect National Forest System watersheds or improve watershed condition” (FSM 2520.2) which includes enhancing coordination and projects with external agencies and partners.

**Comment Number(s):**

2738-9, 2738-3

The final forest plan includes a more comprehensive description of the riparian management zones (forest plan, chapter 2, Riparian Areas). In addition, the riparian management zone does include riparian areas that are on drier reaches of intermittent channels. These areas may have little to no surface flow but are distinct in that they support riparian species that “require sub-surface flow and or groundwater for persistence”, even if their abundance is sparse. These areas have often been referred to as xeroriparian – mesic to xeric habitat-types with average annual moisture higher than the surrounding uplands but

provided with surface moisture in excess of local rainfall “only on infrequent occasions” (usually for less than one month per year). Vegetation, when present, “consists of a mixture of preferential, facultative, and non-riparian plants” (Johnson et al. 1984). Note, that this definition includes a mixture of preferential or riparian obligates (e.g., cottonwood, willow), facultative (e.g., mesquite, desert willow), and non-riparian or upland species (e.g., desert brome). These areas have also been referred to as Sonoran riparian scrublands – areas found along intermittent and perennial stream channels, along flood channels, where stream flows are irregular and often occur in the form of flash floods. Riparian scrub may exhibit a dense “chaparral” aspect or “very open desert scrub appearance”. Typical species include desert willow (*Chilopsis linearoides*), mesquite (*Prosopis* sp.), catclaw (*Acacia* sp.), seepwillow (*Baccharis salicifolia*), desert broom (*Baccharis sarothroides*), and arrowweed (*Pluchea sericia*) (Brown 1980). These drier desert riparian areas are also recognized and defined in the Southwest Region Forest Service Riparian Handbook (FSH 2509.23 (3.31)) – the Desert Subtropical Scrub riparian community that includes mesquite (*Prosopis* sp.), ironwood (*Olneya tesota*), and burrobush (*Hymenoclea monogrya*). Management for healthy and resilient riparian areas has been prioritized on the forest and is captured in many sections of the final forest plan, but especially in the riparian areas, seeps, springs, wetlands, and riparian management zones section.

**Comment Number(s):**

2816-75

The guideline of protecting nearby wells on adjoining private lands from impacts of new wells on National Forest System lands and pipelines across National Forest System lands is derived from the Forest Service Manual Southwestern Region Chapter 2540 (Section 2541.35 Paragraph 4). All site-specific projects, including new wells, that implement the forest plan will require compliance with all applicable laws, regulations, and policies, including the National Environmental Policy Act. As part of the analysis process, consideration of impacts from the proposed actions on other resources, including adjacent non-federal lands, as appropriate.

**Comment Number(s):**

2927-10, 3011-2

The Tonto National Forest is managed under the Multiple Uses and Sustained Yield Act. In the arid southwest, we recognize the importance of water resources. Management of these are in concert with all of the uses and resources that we manage across the forest.

**Comment Number(s):**

2927-2, 7

The U.S. Supreme Court established Federal reserved water rights in the 1908 case of *Winters v. United States*, 207 U.S. 568. Federal water rights are specific water rights associated with public land agencies for the primary purpose of the reservation for said public lands. Federal water rights can have a senior standing over State water rights if the priority date of the federally reserved water right predates the establishment of the State. Groundwater as well as surface water is reserved, if needed to fulfill or protect the purposes of the reservation. Lastly, Federal reserved water rights, unlike State water rights, are not lost by nonuse and may provide for future needs.

**Comment Number(s):**

2736-59

To better incorporate the intent provided by the commenter, we have updated the Watershed and Water Resources management approach 01 to state: “Work with forest leadership and partners to identify priority watersheds, develop watershed restoration action plans as well as other restoration activities to leverage resources, and to implement and monitor projects that improve vegetative composition, reduce erosion, and/or otherwise improve watershed function.” Additionally, there are other planning components that speak directly to partnership, which can be generally found in the revised plan (chapter 2, Partnership and Volunteers). Furthermore, the National Environmental Policy Act process requires us to incorporate outside information to reduce redundancy.

**Comment Number(s):**

2816-76

Water resource features can include, but are not limited to, perennial and intermittent streams, springs, wetlands, and riparian areas. A floodplain is the area of a stream route that is formed mainly of riparian obligate species and deposited river sediments and is subject to flooding events during storm events. The basis of the 300-foot limit is derived from the Idaho Forest, Wildlife and Range Policy Analysis Group, Report No. 8, “Design of Forest Riparian Buffer Strips for the Protection of Water Quality: Analysis of Scientific Literature” (Belt et. al, 1992). This guideline does not address road maintenance; thus, it is not included.

**Comment Number(s):**

2738-1

We appreciate your support for our planning effort. For watersheds that are already recognized as properly functioning, as per the Watershed Condition Framework guidelines, we would manage to maintain that status. For other watersheds, which are recognized as functioning at risk or impaired, their definitions have been outlined in the environmental impact statement, Watersheds and Water Resources Affected Environment: Watersheds. We have outlined in the revised plan aspects of how we would utilize the Watershed Condition Framework in the revised plan (chapter 2, Watershed and Water Resources: Objective 03, Desired Conditions 03, and Management Approaches 11 and 12). River recreation is one of the many biproducts of healthy watershed systems, but in order to ensure that such recreation opportunities exist it is important to improve watersheds at a finer scale which in turn are also a part of a larger watershed system.

**Comment Number(s):**

2816-77

Groundwater dependent ecosystems are defined in the Forest Service’s 2012 and 2022 General Technical Reports on Inventorying and Monitoring Groundwater Dependent Ecosystems as communities of plants, animals, and other organisms whose extent and life processes are dependent on access to or discharge of groundwater (USFS 2022). This interaction between ground water and surface water may be critical for sustaining aquatic and riparian ecosystems along with numerous resources and activities that are dependent upon them. Therefore, we must manage groundwater and surface water on National Forest System lands as a hydrologically connected system. This management approach has been re-established in the Watersheds and Water Resources Guidelines as, “Groundwater and surface water on National Forest System lands should be managed as one hydrologically connected system.”

**Comment Number(s):**

2925-00

As per the Region 3 Forest Service Manual, Chapter 2540 Water Uses and Development, the Forest is required to look at ground water and surface water as hydrologically connected. The guideline (revised forest plan, chapter 2 Watershed and Water Resources) the commenter references, as currently stated, is a guideline as an expression of the Tonto National Forest's intent to be good neighbors to adjacent landowners. Guidelines, as stated in the revised plan (chapter 1, Forest Plan Framework and Organization, Plan Components), "are mandatory with some flexibility on how they are implemented in meeting the intent of the existing guideline. Any deviation from the intent of a guideline requires a plan amendment."

**Comment Number(s):**

2925-00

As per the Region 3 Forest Service Manual, Chapter 2540 Water Uses and Development, the Forest is required to look at ground water and surface water as hydrologically connected. As such, we will not incorporate the commenter's suggested edits. As a guideline, we believe it is important to incorporate the statement within this guideline as development of groundwater resources could impact groundwater dependent ecosystems as well as surface water resources which are also valuable resources for other specialists or varying multiple use purposes.

**Comment Number(s):**

2925-00

Implementation of the Watershed Condition Framework is an ongoing and iterative process that has 5 distinct steps: classify all watersheds, prioritize watersheds for restoration, write watershed restoration action plans for priority watersheds, implement restoration projects, and monitor watershed condition. The first step, classifying watershed condition, is based on a nationally consistent rubric outlined in the Watershed Condition Framework as well as USDA Forest Service 2004a, Forest Service Manual 2521.1 and is intended to be an exercise based on existing data. The watershed conditions used in the plan are based on that rubric and were determined through an interdisciplinary team. It is within the subsequent steps that more detailed analysis and planning are undertaken. The revised plan is a programmatic document that provides the framework to accomplish exactly what the commentor refers to by collaborating with our State, Tribal, other Federal agencies, and interest groups when identifying priority watersheds. We will clarify in the management approach to read: "Work with forest leadership and partners to identify priority watersheds, develop watershed restoration action plans as well as other restoration activities to leverage resources, and to implement and monitor projects that improve vegetative composition, reduce erosion, and/or otherwise improve watershed function" (revised forest plan, chapter 2 Watershed and Water Resources).

**Comment Number(s):**

2925-00

Per revised plan (chapter 1, under Forest Plan Framework and Organization, Plan Components), guidelines describe constraints on project and activity decision-making that allow for departure from its terms, so long as the intent of the guideline is met. These plan components guide future project and activity decision-making, and do not require relocation of existing roads. All projects and activities authorized by the Forest Service must be consistent with the land and resource management plan (forest plan). When a proposed project or activity is inconsistent with forest plan direction, one of three actions can be taken: the proposal can be modified such that the project or activity will be consistent; the proposal can be rejected; or the plan can be amended contemporaneously with the approval of the project so that the project or activity is consistent with the plan as amended. Individual proposals are evaluated on a site-

specific basis and mitigated under a separate environmental analysis that follows Forest Service policy for the approval of plans of operation for mineral activity. Therefore, on a site-specific basis, a mineral project proposal would be analyzed for its potential impact on a floodplain, groundwater dependent ecosystem, or water resource feature, as appropriate and in compliance with the National Environmental Policy Act. The proposal would then be evaluated in the context of this guideline and a determination would be made whether the activity is inconsistent with forest plan direction, and if so, what action should be taken to address that. A change to this guideline is not necessary.

**Comment Number(s):**

2925-00

Per the revised plan (chapter 1, Forest Plan Framework and Organization, Plan Components), “Desired conditions are specific social, economic, and ecological conditions of the forest plan area, or a portion of the forest plan area, that are described in terms specific enough to allow for progress toward their achievement. Desired conditions are what drive the plan. All project-level management activities should be aimed at the achievement of the desired conditions for those resources in the area where the project is located. Desired conditions can be thought of as vision statements that help define a collective vision for the National Forest in the future.” We do not agree with the commentor's suggestion as the use of reference conditions would take into account the inherent potential of the area in question.

**Comment Number(s):**

2925-00

Per the revised plan (chapter 1, Forest Plan Framework and Organization, Plan Components), “Desired conditions are specific social, economic, and ecological conditions of the forest plan area, or a portion of the forest plan area, that are described in terms specific enough to allow for progress toward their achievement. Desired conditions are what drive the plan. All project-level management activities should be aimed at the achievement of the desired conditions for those resources in the area where the project is located. Desired conditions can be thought of as vision statements that help define a collective vision for the National Forest in the future.” We do not agree with the commentor's suggestion as the use of reference conditions would take into account the inherent potential of the area in question. Further, the statements enumerated by congress regarding the Watershed Condition Framework does not limit or prohibit the use of the Watershed Condition Framework as a way to monitor ecological conditions of multiple uses on National Forest System lands.

**Comment Number(s):**

2925-00

The standard the commenter references has been revised to read as, “New authorizations for wells and pipelines on National Forest System lands shall only be considered where the water removed and/or transported by these facilities would not adversely impact springs, wetlands, riparian areas, surface flows, and other groundwater dependent ecosystems on National Forest System lands” (revised forest plan, chapter 2 Watershed and Water Resources). Within the Region 3 Forest Service Manual, Chapter 2540, Section 2541.35, it states “Upon completion of the analysis, special use authorizations for water developments on National Forest System lands should be approved using the appropriate decision document only when the long-term protection of National Forest System streams, springs, seeps, and associated riparian and aquatic ecosystems can be assured.” Other water developments classified as range improvements are authorized and managed through the administration of term grazing permits. The term

“adverse” encompasses the long-term protection of National Forest System streams, springs, seeps, and associated riparian and aquatic ecosystems.

**Comment Number(s):**

2925-00

We have incorporated the commentor's suggestion to include “where feasible” into the forest plan's chapter 2, Watershed and Water Resources Guideline 13. The guideline will be revised as such; “Where Forest Service management contributes to designation of a water body as an impaired water body, recommendations in Total Maximum Daily Load (TMDL) assessments should be implemented to enable the Tonto to assist with meeting or exceeding water quality standards for the water body. Best management practices, watershed condition improvement treatments, or other identified water quality improvement practices should be utilized to improve water quality in impaired or non-attaining streams and water bodies without completed TMDL assessments where feasible.”

**Comment Number(s):**

2925-00

We have incorporated the commentor's suggestion to include mining in the examples of the mentioned desired condition (revised forest plan, chapter 2, Watershed and Water Resources). However, we will not incorporate the suggestion to omit how we would measure and monitor the multiple uses as the statements enumerated by congress regarding the Watershed Condition Framework because it does not limit or prohibit the use of the Watershed Condition Framework as a way to monitor ecological conditions of multiple uses on National Forest System lands. As science and literature would develop as well, and that this is a desired condition, if a more appropriate tool is found we would also incorporate it into the process of monitoring and measuring adverse impacts from multiple uses within watersheds.

**Comment Number(s):**

2925-00

We have incorporated the commentor's suggestion to include the term “where feasible” within the revised forest plan (chapter 2, Watersheds and Water Resources). However, we have not included the commentor's suggestion to include, “recognizing inherent capability of the plan” as reference conditions and previously collected data would take into the account of expected recovery and improvement to the watershed conditions based on best available science and data. The updated guideline 11 now reads as, “Where stressors degrading watershed condition can be identified, they should be eliminated or reduced, where feasible. Natural recovery of watershed conditions should be prioritized where it can be expected to occur.”

**Comment Number(s):**

2925-00

We have incorporated the commentor's suggestion, to include the term “National Forest System Lands” in the guideline (revised forest plan, chapter 2 Watershed and Water Resources). However, we do not see it fit to incorporate the statement of “actual casual effect” because the National Environmental Policy Act process is used to ensure that future effects are minimized for projects and therefore to include this statement could be interpreted as pre-decisional. Guideline 01 has further been revised to now read as, “When existing groundwater wells on National Forest System lands are proposed for improvement that increase the amount of water pumped or deepen the well, adverse impacts to groundwater dependent

ecosystems (e.g., wetlands, riparian areas, springs, streams, and fens) should be evaluated, and measures to eliminate, mitigate, or reduce impacts should be implemented.” Additionally, for project level analysis, in compliance with the National Environmental Policy Act, consideration of wells outside off National Forest System lands may be necessary, as appropriate.

**Comment Number(s):**

2925-00

We have not incorporated the commentor's suggested addition. As defined in the revised forest plan (chapter 1, Plan Components and Other Plan Content), management approaches “do not offer plan direction, but describe an approach or strategy to manage the unit to achieve a desired condition.... They may also describe context, intent, priorities, partnership opportunities or coordination activities, need to survey, inventories or assessments, or approaches to risk and uncertainty.”

**Comment Number(s):**

2925-00

We will not include the commentor's suggested change to guideline 05, as it is intended to help the Forest in decision-making through better understanding the connection to downstream users within a given watershed. It does not dictate that an activity cannot occur in a source water protection area. As stated in the revised forest plan (chapter 1, Forest Plan Framework and Organization, Plan Components), “guidelines are mandatory with some flexibility on how they are implemented in meeting the intent of the existing guideline”. Unlike a municipal watershed designation, use of this guideline in forest decision-making would not preclude or prohibit activities in source water protection areas.

**Comment Number(s):**

2925-00

In the draft environmental impact statement under Watersheds and Water Resources, Water Quality, we do identify different sources of known pollutants to water quality on the National Forest system lands covering the majority of the commentors suggestions. Therefor we do not see a justification to adapt the suggestion in the final environmental impact statement.

**Comment Number(s):**

2925-00

Within the Region 3 Forest Service Manual 2500, Chapter 2540 Water Uses and Development, we are directed to manage groundwater and surface water on National Forest System lands as a hydrologically connected system. As defined in the revised forest plan's Plan Components and Other Plan Content, management approaches “do not offer plan direction, but describe an approach or strategy to manage the unit to achieve a desired condition.... They may also describe context, intent, priorities, partnership opportunities or coordination activities, need to survey, inventories or assessments, or approaches to risk and uncertainty.” Therefore, we will not include the commentor's suggestion.



## **Wildlife Related Recreation (Hunting, Trapping, Fishing, Wildlife Viewing)**

*Concern Statement 336. Commenter is suggesting wildlife habitat connectivity be addressed in an integrated manner sufficient to conserve ecological integrity.*

Response:

**Comment Number(s):**

2972-5

Hunting, fishing, and watching wildlife are deeply valued activities for many users on the Tonto National Forest, and management of wild places to provide quality habitat for these species is considered a key ecosystem service on the forest. The revised plan (chapter 2, Wildlife-related Recreation) provides direction to maintain and improve habitats, provide for wildlife activities and access, and work in conjunction with the Arizona Game and Fish Department to achieve common goals in wildlife management.

Much of the plan direction concerning habitat connectivity is found throughout various sections of the revised forest plan because of the integrated nature of the issue. Due to interest in this topic, we have included a crosswalk of plan components that serve to provide for connected habitats across and range of activities and ecosystems in the final environmental impact statement.

In general, plan direction concerning species movement does not designate specific areas of concern, but instead allows for consideration wherever there may be concerns. In this way, the plan is flexible enough to react to changes in species movement patterns and habitat issues/challenges while allowing for consultation with other lead agencies (namely the Arizona Game and Fish Department).

*Concern Statement 337. Commenters are concerned with hunting and trapping on the national forest.*

Response:

**Comment Number(s):**

44-5, 65-1, 262-2

The Tonto National Forest is required under the National Forest Management Act (P.L. 94-588) and the Multiple Use Sustained Yield Act (PL 86-517) to manage for the diverse needs of forest users and sustainable resource management. The State manages the fish and wildlife under Arizona Revised Statute Title 17, State of Arizona Proclamation on Hunting and Fishing, the State trust doctrine. The Wildlife, Fish and Plants section of the forest plan describes the components designed to support the sustainability of wildlife habitat.

**Comment Number(s):**

66-6

This comment is outside the scope of the plan revision process. Existing laws prohibit littering on the forest. The Tonto National Forest acknowledges and continues to provide outreach and education regarding the leave no trace principles and the State hunting regulations State laws regarding the types of

arms and ammunition and littering. Law enforcement provides outreach as well as enforcement during patrols as well to educate the public.

**Concern Statement 338.** *Commenter is concerned with important bird areas located on the national forest.*

Response:

**Comment Number(s):**

2806-1

The Tonto National Forest recognizes these areas across the forest as valuable and will include reference in the final documents where applicable.

**Concern Statement 339.** *Commenters expressing support for the plan components in the draft forest plan.*

Response:

**Comment Number(s):**

2923-15, 24, 2941-1,3

We appreciate your support of our planning efforts as it relates hunting, fishing, and watchable wildlife. As detailed in chapter 1 of the revised plan, this revision process is programmatic and does not in any site-specific actions like those the commenter mentions. Federal Law, including the Dingle Act P.L. 116-9 and Forest Service regulations allow for this type of activity on National Forest System land. As we move into project level plan implementation, we will be looking for volunteers and partners to help us with projects to achieve our desired conditions and would appreciate your continued support of the program.

**Concern Statement 340.** *Commenter has recommendations related to economically important species on the forest.*

Response:

**Comment Number(s):**

2972-2

The State manages the fish and wildlife under Arizona Revised Statute Title 17, State of Arizona Proclamation on Hunting and Fishing, the State trust doctrine. The forest plan describes the many plan components designed to support the sustainability of wildlife habitat. The Tonto National Forest recognizes the importance of working with partners and has incorporated language into the management approaches specifically to work in collaboration with the Arizona Game and Fish Department and other partners to promote wildlife related recreation.

**Comment Number(s):**

2972-6

While a number of species did not meet the criteria we used in evaluating potential species of conservation concern, we note that the 2012 Planning Rule (§ 219.10(a)) requires that a plan include

components including standards or guidelines, for integrated resource management to provide for ecosystem services and multiple use [including wildlife and fish]. Additionally, we are directed to take into account plants, wildlife and fish, and related uses that contribute to local, regional, and national economies in a sustainable manner (§ 219.8(b)(3)); and consider fish and wildlife species, and habitat and habitat connectivity (§ 219.10 (a)(1)).

In part, we have worked to meet these requirements by including planning components in the revised plan for Wildlife-Related Recreation (chapter 2). In this section we provide guidance that is specifically applicable to Species of Economic Importance as well as their habitats. In response to your comments, we have included the following management approach: Work closely with the Arizona Game and Fish Department to address habitat and other conservation needs of State priority species (e.g., species of greatest conservation need, species of economic and recreational importance). Also included is a management approach to “Work in collaboration with Arizona Game and Fish Department to:

- A) maintain and/or enhance habitat for species of economic and recreational importance,
- B) reintroduce species of interest into historical home ranges,
- C) coordinate fish and wildlife management activities (e.g., reintroductions, introductions, or transplants; control or eradication of nonnative species; habitat enhancement; and the management of sport and native fishes),
- D) plan and prioritize projects that achieve desired conditions for hunting, fishing, and watchable wildlife species and habitats on the forest,
- E) establish short and long-term goals consistent with agency missions to foster healthy and productive populations of native and non-native sportfish and game species.”

**Concern Statement 341.** *Commenters are seeking clarification or additional analysis to the be included in the final environmental impact statement.*

Response:

**Comment Number(s):**

2966-3, 2970-750, 751, 2972-9

The 2005 Travel Management (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas. In contrast, the 2012 Planning Rule (36 CFR 219) is the overriding regulation that guides the development, amendment, and revision of land management plans for all units of the National Forest System. As such it is programmatic in nature and does dictate the level of specificity that project level plan implementation does. All project level specificity and decisions for the management of motor vehicle use will be done in compliance with the 2005 Travel Management Rule either forestwide (as is the case with the current travel management planning process) or on a more site-specific need, such as by district or area. This planning process provides plan components to guide management of the forest, including for motorized uses. When the travel management process is complete, a motor vehicle use map will be made available to display available routes. The desired conditions described in the Wildlife Related Recreation section include providing opportunities for hunting, fishing and wildlife watching that are accessible to a variety of users. The guidelines for motorized big game retrieval are consistent with the implementation of the Travel

Management Plan through the designated system of roads, motorized trails, and motorized areas according to the motor vehicle use map. Motorized big game retrieval was analyzed under the travel management National Environmental Policy Act process.

**Comment Number(s):**

2736-7, 11

The draft environmental impact statement and plan included the most current scientific information available during the process and development of the documents. We will work with the Arizona Game and Fish Department to ensure the most current applicable scientific information is in the final analysis and plan. Tables in the final environmental impact statement (chapter 3, Wildlife-Related Recreation) have been updated with the most current information as requested by the commenter.

**Comment Number(s):**

2736-8, 9

The draft environmental impact statement and draft plan included the most current scientific information available during the process and development of the documents. We will work with the Arizona Game and Fish Department to ensure the most current applicable scientific information is in the final analysis and plan. The information has been updated in the final environmental impact statement (chapter 3, Wildlife-Related Recreation) as requested by the commenter.

**Comment Number(s):**

2736-10, 2923-21

The Tonto National Forest appreciates the comments provided by the Arizona Game and Fish Department. We agree that this statement was confusing and have removed it from the environmental impact statement (chapter 3, Wildlife-Related Recreation).

**Concern Statement 342.** *Commenter is seeking coordination on future projects related to stream restoration to enhance trout fishing on the national forest.*

Response:

**Comment Number(s):**

2941-4

The forest plan is a programmatic document (as detailed in chapter 1 of the revised plan), and as such, does not have the site specificity of project level design and decisions. There is nothing in the forest plan that would prohibit or discourage the type of project the commenter is suggesting.

**Concern Statement 343.** *Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2736-25

We agree that wildlife related recreation is an important use of the Tonto National Forest. The Wildlife Based Recreation section contains three desired conditions related to this topic, among other plan components, thus it is unnecessary to repeat in the Dispersed Recreation analysis.

**Comment Number(s):**

2972-38

Hunting, fishing, and watching wildlife are deeply valued activities for many users on the Tonto National Forest, and management of wild places to provide quality habitat for these species is consider a key ecosystem service of the forest. The revised plan (chapter 2, Wildlife-Related Recreation) provides direction to maintain and improve habitats, provide for wildlife activities and access, and work in conjunction with the Arizona Game and Fish Department to achieve common goals in wildlife management.

**Comment Number(s):**

2966-9

For most of the proposed special management areas (revised plan, chapter 3), including recommended wilderness and eligible wild and scenic rivers, activities within these areas are permitted so long as the actions do not negatively impact the qualities for which the areas are recognized. The level of specificity the commenter is asking for will be handled at the site-specific project level, in compliance with all applicable laws, regulations, and policies. If a mandatory planning component cannot be met in these areas to meet the needs of the department, a plan amendment (as described in chapter 1 of the revised plan) is an option that may be considered.

**Comment Number(s):**

2923-11

The Dingle Act requires the Forest Service to communicate with the Memorandum of Understanding (MOU) roundtable for any project that seeks to close areas to hunting or fishing. To that extent, it is unnecessary to include that requirement in the forest plan, as it is already required by law. However, we are encouraged and appreciative that the MOU roundtable would like to participate to identify opportunities and improve this program on the forest. As the revised plan is designed to guide management for 15 years, we do not want to discourage other groups or new groups that may form that also may want to help improve this program by naming specific groups to work with in our plan. As such, we have not modified the referenced management approach.

**Comment Number(s):**

2923-14

The State manages the fish and wildlife under Arizona Revised Statute Title 17, State of Arizona Proclamation on Hunting and Fishing, the State trust doctrine. The forest plan describes the many plan components designed to support the sustainability of wildlife habitat. The Tonto National Forest recognizes the importance of working with partners and has incorporated language into the management approaches specifically to work in collaboration with the Arizona Game and Fish Department and other partners to promote wildlife related recreation.

**Comment Number(s):**

2972-14

The Tonto National Forest supports coordination across all boundaries to provide for a diversity of users and through the vision of the plan for integrated resource management, ecological sustainability, and contribution of social and economic sustainability. The revised plan reflects working with the Arizona Game and Fish Department on several of these topics to ensure that wildlife-related recreation is providing a diversity of opportunities for the forest users.

**Comment Number(s):**

2941-7, 2946-6

The Tonto National Forest supports the needs for a diversity of users including those who desire a more primitive experience. The inventoried roadless areas do not permit building new roads. These areas have been recognized for being undisturbed and they serve as reference areas to measure the effects of development on other parts of the forest landscape. Any management activities are limited in these areas to sustain the social and ecological roadless characteristics of each area and preserve the roadless character in compliance with the Roadless Rule. There are 264,876 acres managed as inventoried roadless areas on the forest. There is nothing in the forest plan that would restrict hunting within inventoried roadless areas.

**Comment Number(s):**

2966-2

We appreciate your support of our planning efforts as it relates hunting, fishing, and watchable wildlife. Unfortunately, the commenter's suggestion is too vague to specifically address. However, the revised plan (chapter 2, Wildlife-Related Recreation) has incorporated modifications based on specific comments received and additional information.

**Comment Number(s):**

2736-36

We have considered the commenter's request and have modified the referenced desired condition (revised plan, chapter 2, Wildlife-Related Recreation) to add "is accessible" as suggested.

**Comment Number(s):**

2923-12

We have considered the commenters request and have modified the referenced guideline to add "habitat" as suggested in the revised plan (chapter 2, Wildlife-Related Recreation).

**Comment Number(s):**

2923-13, 19

We have considered the commenters request and have modified the referenced management approach as suggested in the revised plan (chapter 2, Wildlife-Related Recreation).

**Comment Number(s):**

2806-7

The Tonto National Forest recognizes the value to the wildlife watching opportunities to a variety of users and has incorporated language to include the bald eagle, as recommended, in the revised plan (chapter 2, Wildlife-Related Recreation).

**Comment Number(s):**

59-1

The commenter is correct. Fishing and stocking of fish is the jurisdiction of the State through Arizona Revised Statute, Title 17, managed by the Arizona Game and Fish Department. The 2005 Travel Management (36 CFR 212) is the overriding regulation that directs the Tonto National Forest on how to designate a system of motorized trails, roads, and areas. In contrast, the 2012 Planning Rule (36 CFR 219) is the overriding regulation that guides the development, amendment, and revision of land management plans for all units of the National Forest System. As such it is programmatic in nature and does not dictate the level of specificity that project level plan implementation does. All project level specificity and decisions for the management of motor vehicle use will be done in compliance with the 2005 Travel Management Rule either forestwide (as is the case with the current travel management planning process) or on a more site-specific need, such as by district or area. This planning process provides plan components to guide management of the forest, including for motorized uses. When the travel management process is complete, a motor vehicle use map will be made available to display available routes.

**Comment Number(s):**

2972-7

The Tonto National Forest acknowledges the productivity of native fish and warm water fisheries providing a diversity of fishing opportunities on the forest. The desired conditions for wildlife recreation (revised plan, chapter 2, Wildlife-Related Recreation) broadly included providing plentiful and diverse opportunities for fishing, desirable nonnative species for fishing opportunity, and accessibility to these areas. Management approaches in the revised plan (chapter 2, Wildlife-Related Recreation) also include maintaining and enhancing conditions for species of economic importance; reintroducing species into historical home ranges; coordinating management of fish and wildlife; planning and prioritizing projects; and establishing long-term goals consistent with missions to foster healthy and productive populations of native and nonnative sportfish in collaboration with the Arizona Game and Fish Department. In addition, the riparian management zones include buffers for motorized vehicle use and camping near streams in alternatives B, C and D in the environmental impact statement (chapter 2). In addition, the width of these riparian buffers can be modified during project planning and implementation on a site-specific basis.

**Comment Number(s):**

2941-5

The Tonto National Forest recognizes the planning and management of fisheries by the Arizona Game and Fish Department. While specific projects to implement these efforts on the forest would require site-specific project level analysis, the commenter's suggestion is supported by the following management approach (revised plan, chapter 2, Wildlife-Related Recreation): REC-WR-MA-05 "Consider recommendations of wildlife planning efforts such as the State Wildlife Action Plan, the North American Waterfowl Management Plan, and other range-wide management plans for big game, upland game, and aquatics species."

**Comment Number(s):**

2972-12

The Tonto National Forest recognizes and appreciates the collaborative partnerships and opportunities to work together on projects and priorities for a diversity of user groups. The Wildlife Related Recreation

section (revised plan, chapter 2) includes management approaches that develop and maintain partnerships and programs that promote local recreation through hunting, fishing, and watchable wildlife. In addition, the Forest recognizes the need to identify and enhance opportunities based on information from partnerships and data regarding demands and future trends.

**Comment Number(s):**

2806-6

Thank you for bringing this to our attention. This has been corrected in the revised plan (chapter 2, Wildlife-Related Recreation).

**Wildlife, Fish, and Plants (At-Risk Species)**

*Concern Statement 344. Commenter recommends collaborative approaches to restoring native plant communities.*

Response:

**Comment Number(s):**

2255-3

Thank you for your comment and support of the management approaches in the Tonto Forest plan. These are important areas, and we will continue to work with partners and others to develop tools for restoring native plant communities, and collaborate on education efforts.

*Concern Statement 345. Commenter is concerned with the Mexican gray wolf; that the forest plan does not provide plan direction to fulfill the agencies duty to conserve and recover the species and suggestions for additional analysis in the final environmental impact statement.*

Response:

**Comment Number(s):**

2970-500, 501

The Endangered Species Act of 1973, as amended (7 U.S.C. § 136, 16 U.S.C. § 1531 et seq.), requires provides that all Federal agencies utilize their authorities to carry out programs for the conservation of species formally listed by the U.S. Fish and Wildlife Service. It prohibits any Federal agency from carrying out any action that is likely to jeopardize the continued existence of any listed species. It further requires Federal agencies to consult with the Fish and Wildlife Service on actions that are authorized, funded, or carried out by such agencies that may affect listed species and/or their designated critical habitat. The Act mandates conferring with the Secretary of the Interior whenever an action is likely to jeopardize the continued existence of any species proposed for listing as threatened or endangered, or whenever an action might result in destruction or adverse modification of critical habitat proposed for listing. Pursuant to Section 7 (2)(a) of the Endangered Species Act, a biological assessment has been prepared to assess the effects of implementing the Tonto National Forest land and resource management plan and ensure that proposed actions in the selected alternative would not jeopardize the continued existence of listed species. Furthermore, any projects or activities implemented under the programmatic



direction of the forest plan that may affect a listed species or designated critical habitat are subject to consultation with Fish and Wildlife Service.

In addition, please see our Biological Assessment for the Tonto National Forest Land and Resource Management Plan for a more in-depth consideration of effects. In the case of the Mexican wolf and other federally listed species, the principal revised plan component directing management (chapter 2, Wildlife, Fish, and Plants), which states: Activities occurring within federally-listed species habitat should apply habitat management objectives and species protection measures from approved recovery plans. Implementation of recovery plans has been incorporated by reference so that the plan consistently refers to the most up-to-date, multi-agency strategy. The Forest is committed to implementing all applicable parts of the most recent Mexican wolf recovery plan. The revised forest plan provides a long-term framework for resource use and management, including species conservation. The details for single species management are not included specifically in this framework but are included as plan components that reference current recovery plans and allows for incorporating the best available science for the species.

We acknowledge that plan components cited in our draft environmental impact statement as supporting ecological conditions for Mexican wolves were not applicable or too generic to be considered valuable. In some cases, these plan components serve to support broad level habitat conditions that favor prey species. For example, plan direction that helps guide sustainable grazing practices may have an indirect benefit to wolves when it serves to provide forage for valued prey species. However, our grouping of conservation topics resulted in a crosswalk of plan components and species that contained some vague, insignificant, and irrelevant content. We have improved this crosswalk for the final environmental impact statement to be more informative and relevant.

**Concern Statement 346.** *Commenter is concerned with the Mexican spotted owl; the effects of mechanical thinning and high-severity fire on the species and the monitoring requirements as outlined in the recovery plan not being met.*

Response:

**Comment Number(s):**

2970-498

We have reviewed the literature cited regarding mechanical fuels treatment and potential effects to owls. While we agree that there is a need for additional, long-term demographic studies to help inform management of Mexican spotted owl and its habitats, we find that literature cited here does not fully reflect the overall conclusion purported in the comments submitted. For example, you cited Ganey et al. (2017) as stating, “Existing studies on the effects of fuels reduction treatments on spotted owls universally suggest negative effects from these treatments.” However, the following sentences state that such studies are few and they generally evaluate short-term responses, noting that, “There may be important tradeoffs between short-term impacts due to treatments and long-term benefits from those treatments due to reduction in the risk of high-severity fire (Lee and Irwin 2005, Ager et al. 2007, Tempel et al. 2015, Chiono et al. 2017).” This continues to be a central message of the publication as the concluding sentence states, “Until better information is available on such effects, we argue that it is premature to conclude that high-severity wildfire poses no threat to spotted owls, or to dismiss restoration treatments as a tool in reducing fire risk and habitat loss” (Ganey et al. 2017).

The commenter cites Wan et al. (2018) in saying that, “No empirical studies have evaluated these management activities [restoration thinning or logging] on the Mexican spotted owl.” However, while the review does note a need for more empirical work specific to forest thinning and restoration and the Mexican spotted owl subspecies, it does not suggest there is no relevant information on potential effects. The authors proceed to discuss and cite works related to forest thinning and potential effects; including improved foraging habitat for northern and California spotted owls, accelerated stand development for nesting northern spotted owls, reduced risk of spotted owl habitat loss to high-severity fire, reduced habitat quality and reproductive success of California spotted owls in response to medium intensity fuel treatments (Wan et al. 2018). The overall message of this publication is to discuss the need for long-term studies of owl demography in light of historical and emerging threats (e.g., commercial timber harvest, fuels reductions, climate change and changes in fire regime, and vegetation composition and succession). We generally concur with this assessment and note that the work was supported by the USDA Forest Service Rocky Mountain Research Station through a cooperative agreement with Northern Arizona University.

In reviewing the best available scientific information available and in consulting the Final Recovery Plan for the Mexican Spotted Owl, we find a sufficient preponderance of evidence to support reducing the risk of large-scale, high-intensity fires in Mexican spotted owl habitat through fuels management activities. We acknowledge the potential for adverse impacts to owls and habitat in such work; however, the revised forest plan incorporates management from the current recovery plan for Mexican spotted owl and its critical habitat. In this way, many of the potential adverse effects to Mexican spotted owl and its habitats are avoided and/or mitigated. Pursuant to Section 7 (2)(a) of the Endangered Species Act (7 U.S.C. § 136, 16 U.S.C. § 1531 et seq.), all future projects or activities that may have adverse effects to federally listed species or their critical habitat are subject to consultation with the U.S. Fish and Wildlife Service. Furthermore, the implementation of the National Environmental Policy Act does not require certainty of effects before proceeding with an action (40 CFR 1500). As such, we have relied on the best available scientific information to inform plan direction for the Mexican spotted owl and its habitat while acknowledging the uncertainty in predicting the effects of forest programs (such as fuels and fire reduction) on species.

In addition to project consultation and analyses, many desired conditions applicable to Mexican spotted owl and its critical habitats have been incorporated in plan components found throughout the revised forest plan and appendix G of the environmental impact statement. Plan direction includes standards and guidelines that protect old growth as well as large trees and snags. Additionally, please refer to our Biological Assessment for the Tonto National Forest Land and Resource Management Plan for further analysis and literature referenced on effects to the Mexican spotted owl.

**Comment Number(s):**

2970-499

Section 7 of the Endangered Species Act (7 U.S.C. § 136, 16 U.S.C. § 1531 et seq.) requires Federal agencies to ensure that actions they authorize, fund, or carry out are not likely to destroy or adversely modify designated critical habitat. Section 7 also requires that any Federal agency that carries out, permits, licenses, funds, or otherwise authorizes activities that may affect a listed species must consult with the U.S. Fish and Wildlife Service to ensure that its actions are not likely to jeopardize the continued existence of any listed species.

A biological assessment must be prepared for Federal actions (defined under the National Environmental Policy Act as a project significantly affecting the quality of the human environment) to evaluate the

potential effects of the proposal on listed or proposed species (50 CFR 402.12(b)). The contents of the biological assessment are at the discretion of the Federal agency and will depend on the nature of the Federal action (50 CFR 402.12(f)). The Forest Service also has direction in Forest Service Manual 2670 that guides habitat management for threatened, endangered, and proposed species. This document satisfies those requirements. As part of forest plan revision, the Tonto National Forest will provide the U.S. Fish and Wildlife Service with a biological assessment on the effects of the final forest plan. This assessment will not be included in the final environmental impact statement but will be referenced. Please see both reports for effects to threatened and endangered species. Any reasonable and prudent measures, or terms and conditions issued by the Fish and Wildlife Service through consultation on the revised plan will be clearly identified in the final record of decision. Additional consultation occurs as site-specific projects are implemented under the programmatic framework provided by the forest plan.

While recovery plans identify measurable and objective criteria against which progress toward recovery of a species can be tracked over time, they are primarily guidance and not regulatory documents. As such, the Forest Service is not required by the Endangered Species Act to implement actions in a recovery plan. Nevertheless, the Tonto National Forest is committed to implementing all applicable parts of the most recent Mexican Spotted Owl Recovery Plan. The revised forest plan provides a long-term framework for resource use and management, including species conservation. The details for single species management are not included specifically in this framework but are included as plan components that reference current recovery plans and allows for incorporating the best available science for the species.

While pre- and post-project monitoring is frequently a design element in projects involving federally-listed species, range-wide monitoring is outside the scope of the forest plan which pertains only to management in the planning area. The Southwestern Region of the Forest Service is participating in long-term occupancy monitoring programs as part of our commitment to recovering federally-listed species and their habitats.

**Concern Statement 347.** *Commenter is requesting additional information in the environmental impact statement relating to impacts from livestock grazing on endangered species.*

Response:

**Comment Number(s):**

2970-524

Our assessment of potential impacts from grazing can be found in the environmental impact statement (chapter 3, Wildlife, Fish, and Plants, Environmental Effects: Threats to Species (fine-filter), Grazing Impacts). This analysis is programmatic in nature in that the plan provides a framework for integrated resource management and for guiding project and activity decision making but does not implement projects or activities, commit the Forest Service to act, or regulate uses by the public (in other words, no site-specific decisions are made in a forest plan). Our analysis evaluates how the proposed alternatives affect programs that may have impacts on species.

**Concern Statement 348.** *Commenter suggests there are changes needed for the final forest plan and additional analysis in the final environmental impact statement based on the case studies presented for Mexican spotted owl, Mexican gray wolf, and Sonoran desert tortoise.*

Response:

**Comment Number(s):**

2970-812, 813

We have reviewed the three case studies provided by the commenter and responded in detail. Furthermore, we have used your suggestions to improve our analysis of at-risk species, in particular the crosswalk of plan components (appendix G of the environmental impact statement) that provide the ecological conditions for each of the species analyzed.

**Concern Statement 349.** *Commenter is suggesting wildlife habitat connectivity be addressed in an integrated manner sufficient to conserve ecological integrity.*

Response:

**Comment Number(s):**

2970-532, 536, 648,

We appreciate the great interest in habitat connectivity for the conservation of species on the Tonto National Forest. Furthermore, we fully acknowledge the importance of connected landscapes in maintaining biodiversity and recognize that there are many threats to the necessary movements of species at multiple scales and across many jurisdictions. The importance of this concept is highlighted by our directives which require consideration of planning for habitat connectivity on U.S. Forest Service lands (36 CFR 219.8(a) and 219.9(a)(1)).

However, after full consideration of various comments proposing the designation of habitat corridors as specific management areas on the forest, we have concluded that we do not have sufficient information necessary at this time to designate a specific area as proposed. Instead, we have opted to include plan components in the revised forest plan that address habitat connectivity throughout various program areas, and in this way provide an integrated approach that is applicable to habitats across the forest rather than a single designated area. We recognize that this integrated approach results in plan direction that may not be easily recognized as contributing to habitat connectivity because it is spread throughout various sections of the forest plan and not labeled. Due to the level of interest in this subject, we have included a crosswalk of plan components that contribute to the management of habitat connectivity in the final environmental impact statement. We feel that this approach appropriately meets the intent of the planning directives to promote ecological integrity (36 CFR 219.8(a) and 219.9(a)(1)) and in many ways may more effectively meet the needs of species, especially at-risk species.

Several factors contributed to the decision to integrate landscape connectivity planning rather than designate a specific area. Numerous comments proposed use of the recommended wilderness and eligible wild and scenic river process as a means of identifying, protecting, and connecting landscapes with high integrity habitats (i.e., currently designated wilderness areas). However, we find this method problematic

in that human impacts and developments tend to preclude impacted areas from meeting the established criteria for these management areas. While we recognize that recommended wilderness and eligible wild and scenic rivers often provide value for protecting habitats, the laws, regulations, and policies that provide for such designations to not consider their potential value for connecting landscapes (FSH 1909.12 Ch 70).

Additionally, while we are aware of instances where wildlife corridors have been designated and used successfully to conserve species (often with a focus on one or a small subset of species), we are not confident at this time that a generalized corridor would be the most effective method to conserve species on the Tonto National Forest. For example, most of our at-risk species are highly endemic and/or highly specialized, and the majority of these are plants and invertebrates known to have historically disjunct distributions (e.g., southwest land snails). Such species appear unlikely to benefit from a general corridor designation. In considering larger, more vagile species that depend on large landscapes (such as the big game species named in the comments), we are unable to find suggested areas that fit a common need. For example, elk habitat primarily occurs along the Mogollon Rim whereas bighorn sheep occur in the rocky, southern portion of the forest. Mule deer and mountain lion occur throughout region may use many corridors for movement.

Determining cases in which a corridor may be beneficial becomes more complex when considering climate change. While we recognize the body of evidence showing that species distributions are likely to change as warming impacts habitats, it seems unclear which species and what areas would most benefit from a designated climate change corridor. Without an understanding of which species needs are to be addressed it is difficult to identify or justify management policies that differ from forest-wide direction. For this and similar reasons, we have opted to include policy that focuses on maintaining and restoring habitat connectivity in all habitats where they occur.

While we have highlighted some of the reasons for not proposing a specific habitat connectivity corridor, we have strived to include plan direction that seeks to maintain and restore habitat integrity and direct management decisions that consider and lead to improved habitat connectivity. Some of these include specific desired conditions on the revised plan (chapter 2, Wildlife, Fish, and Plants) to maintain sufficiently interconnected habitats that are sufficiently resilient to withstand foreseeable levels of disturbance and redundant enough to maintain species diversity, enabling species to adapt to changing environmental conditions (e.g., climate change).

Plan guidelines in the Wildlife, Fish, and Plants section of the revised plan (chapter 2) direct the Forest to avoid landscape and vegetation alterations that significantly contribute to uncharacteristic habitat fragmentation. Other guidelines in this section of the revised plan instruct the Forest to design any new infrastructure or constructed features in ways that maintain or minimize negative impacts to the species movements, and when such impacts are found, the Forest should seek to modify or remove them to improve connectivity. Appendix G of the environmental impact statement provides a crosswalk of these and other plan components designed to consider and improve our management of habitat connectivity on the Tonto National Forest.

**Comment Number(s):**

2970-535

We appreciate the great interest in habitat connectivity for the conservation of species on the Tonto National Forest. Furthermore, we fully acknowledge the importance of connected landscapes in maintaining biodiversity and recognize that there are many threats to the necessary movements of species at multiples scales and across many jurisdictions. The importance of this concept is highlighted by our

directives which require consideration of planning for habitat connectivity on National Forest System lands (36 CFR 219.8(a) and 219.9(a)(1)).

To address this the Forest Service has incorporated plan components in the forest plan that address habitat connectivity throughout various program areas, and in this way provide an integrated approach that is applicable to habitats across the forest rather than a single designated area. We recognize that this integrated approach results in plan direction that may not be easily recognized as contributing to habitat connectivity because it is spread throughout various sections of the forest plan and not labeled. Due to the level of interest in this subject, we have included a crosswalk of plan components that contribute to the management of habitat connectivity in the final environmental impact statement, volume IV, Appendix H: Plan Components that Maintain or Restore Habitat Connectivity. The Forest Service feels that this approach appropriately meets the intent of the 2012 Planning Rule.

While we have highlighted some of the reasons for not proposing a specific habitat connectivity corridor, we have strived to include plan direction that seeks to maintain and restore habitat integrity and direct management decisions that consider and lead to improved habitat connectivity. Some of these include specific desired conditions to maintain sufficiently interconnected habitats (WFP-DC-5) that are sufficiently resilient to withstand foreseeable levels of disturbance and redundant enough to maintain species diversity, enabling species to adapt to changing environmental conditions (e.g., climate change) (WFP-DC-2). A full list of these components is in appendix H.

**Concern Statement 350.** *Commenters are concerned climate change is not being adequately addressed in the forest plan and environmental impact statement related to wildlife, fish, and plant species.*

Response:

**Comment Number(s):**

2948-19,25

While we acknowledge the importance of refugia as species adapt to a changing climate, we have not attempted to establish climate refugia areas as part of forest plan revision. Instead, the forest plan seeks to establish overarching goals for ecosystem function and address landscape level stressors as detailed in the chapter 1 of the revised plan. In this way we strive to mitigate and ameliorate the effects of climate change. Additionally, we do not have sufficient data at this time to effectively identify climate refugia and provide site-specific management; rather we have attempted to provide a framework for managing all potential habitats to the best of our abilities. However, many of our ongoing and future vegetation projects are designed with climate change consideration. Many of the actions in these projects are designed to allow the ecosystem to be more resilient in the face of changing conditions.

We appreciate the invitation to participate in the North American Bat Monitoring Program; we have various projects in place at this time. Additionally, we have included management approaches in the revised plan (chapter 2, Wildlife, Fish, and Plants) to help guide our wildlife programs to coordinate with other agencies and partners, especially the Arizona Game and Fish Department.

**Comment Number(s):**

2986-32

In many sections of the environmental impact statement (chapter 3), climate change is considered in a discussion of cumulative effects over time. Additionally, analyses that discuss vital habitats for species on

the Tonto National Forest (e.g., riparian areas, vegetative communities, and watersheds) work to consider information on a warming climate in their estimations of trends for such habitats. We have worked to incorporate such information; however, making predictions on the specific effects to and responses from species will be handled on a project level in compliance with forest plan direction.

**Comment Number(s):**

2986-83

To achieve ecological integrity, the 2012 Planning Rule (FSH 1909.12) emphasizes planning for resilience and managing to enhance the ability of ecosystems to adapt to change, stressors, and system drivers, including climate change. The plan has considered the potential impacts of climate change, to the degree that programmatic plan components and management approaches can or should incorporate concepts related to the issue. Most fundamentally, the plan sets forth desired conditions for vegetation that are designed to be resilient to future stressors, including climate change. The environmental impact statement incorporates climate change into the resource specific sections similarly to how it is incorporated into the final forest plan. It is difficult to sustain the existing biodiversity in the face of climate change because of the speed with which it's happening. New species and new species communities will replace floral and faunal communities that have been around for thousands of years, but we can't know what it will look like yet. The best available science tells us that resilience and sustainability are the best tools we have for managing the land in the face of a changing climate, and we talk about those extensively in the final forest plan and the environmental impact statement. To build on this information there is a management approach in forest plan, chapter 2, Ecological Response Units (ERU) and Wildlife, Fish, Plants (WFP) sections that read "work with partners and other experts in the field to proactively promote research and monitoring that will assist in the adaptive management related to climate change" and "consider impacts of climate change on at-risk species when designing projects and analyzing the effects of proposed projects."

**Concern Statement 351.** *Commenter is concerned with landing helicopters in designated wilderness areas.*

Response:

**Comment Number(s):**

2283-1

The authorization for Arizona Game and Fish Department to use helicopters in designated wilderness areas has already gone through a site-specific project level National Environmental Policy Act analysis and is in compliance with the current forest plan. As such, it is outside the scope of the draft forest plan and accompanying environmental impact statement. The revised forest plan does include content guiding the use of motorized activities in management of wildlife in recommended wilderness areas (revised plan, chapter 3, Recommended Wilderness). Management of game species, including research and monitoring, is conducted under the authority of the Arizona Game and Fish Department.

**Concern Statement 352.** *Commenter is concerned with landscape scale restoration efforts to benefit species habitats, wildlife connectivity, and migration corridors.*

Response:

**Comment Number(s):**

2972-13

The Tonto National Forest is governed by the Multiple Use and Sustainable Yield Act, which requires us to manage for many uses across the forest. The revised plan provides direction to assist future projects in restoring large landscapes and balancing multiple-use activities for the benefit of all, including valued wildlife resources. Hunting, fishing, and watching wildlife are deeply valued activities on the Tonto National Forest, and management of wild places to provide quality habitat and for these species is an essential service. The revised plan (chapter 2, Wildlife-Related Recreation) provides direction to maintain and improve habitats, provide for wildlife activities and access, and work in conjunction with the Arizona Game and Fish Department to achieve common goals in wildlife management.

Much of the plan direction concerning habitat connectivity is found throughout various sections of the revised forest plan because of the integrated nature of the issue. Due to interest in this topic, we have included a crosswalk of plan components that serve to provide for connected habitats across and range of activities and ecosystems in the appendix G of the environmental impact statement.

In addition to restoration in timbered areas, the revised plan also includes a number of objectives in woodland and desert systems (chapter 2, Vegetation and Ecological Response Units).

**Concern Statement 353.** *Commenter is concerned with the 50 percent grazing utilization levels in riparian areas and the impacts to at-risk species.*

Response:

**Comment Number(s):**

2970-810

The guideline for a 50 percent utilization (i.e., grazing) rate the commenter references was included erroneously in the draft plan and has been removed in the revised plan. The Forest has not included specific grazing/utilization rates as part of the revised forest plan but instead outlines the desired conditions that inform future, site-specific grazing authorizations. In this way, utilization levels can be adapted to account for site-specific conditions rather than applying a single standard across a varying landscape. Any specified utilization rates authorized must adhere to the standards and guidelines contained in the forest plan.

Pursuant to Section 7 (2)(a) of the Endangered Species Act, any projects or activities implemented under the programmatic direction of the forest plan that may affect a listed species or designated critical habitat are subject to consultation with Fish and Wildlife Service. Specific grazing authorizations are also subject to analyses under the National Environmental Policy Act. Effects to some at-risk species are also subject to project-level analyses under the National Environmental Policy Act. FSM 2670 requires that the Forest “review all Forest Service planned, funded, executed, or permitted programs and activities for possible effects on endangered, threatened, proposed, or sensitive species.” Thus, projects implemented under the



programmatic guidance of the forest plan will include project level analysis to evaluate effects to these species and determine appropriate conservation measures.

**Concern Statement 354.** *Commenters are concerned with the management and protection of at-risk species.*

Response:

**Comment Number(s):**

2970-515

We recognize the high value of riparian and aquatic systems in our arid landscape and their disproportional importance to the species that directly depend on them. We also recognize that grazing may impact these areas. As a programmatic document, the forest plan provides general guidance on grazing as well as the management of water resources and riparian areas; however, the specifics of grazing authorizations and the corresponding effects analyses are generally analyzed at the project level. Our analysis here cannot make such determinations because of the general nature and broad scope of forest planning.

The plan does contain program direction that seeks to guide future projects in ways that mitigate the effects of grazing on riparian and aquatic systems and preserve habitats for a variety of species, including at-risk species. Furthermore, the forest plan does not seek to replace native riparian and aquatic systems with artificial waters, which have the primary purpose of serving livestock. However, we do have plan content that recognizes that developed waters provide for wildlife use (e.g., Chiricahua leopard frogs often rely on these artificial habitats as refugia from invasive species and other degraded conditions; we work with the U.S. Fish and Wildlife Service and permittees to manage these areas according to the current recovery plan for the frog). Please reference the following sections in the revised plan (chapter 2) for additional direction for restoring natural watersheds, riparian areas, and aquatic habitats within a multiple-use framework: Riparian Areas, Seeps, Springs, Wetlands, and Riparian Management Zones, Watersheds and Water Resources, and Riparian Ecological Response Units.

**Comment Number(s):**

866-1

Inventoried roadless areas are highly valued for their contributions as biological strongholds for populations of at-risk and common species. They provide large, relatively undisturbed landscapes that are important to biological diversity and the long-term survival of many species. They also serve as barriers against the spread of nonnative invasive plant species and provide reference areas for study and research. The direction for managing these areas can be found in the Inventoried Roadless Areas section of the revised plan (chapter 3). The primary desired condition in this section states that: The roadless character of inventoried roadless areas is protected and conserved. The revised plan also contains the following direction to consider decommissioning of road and trails where they are inconsistent with desired conditions, have low-use, are unsustainable, are redundant, were designed to be temporary, etc.: REC-O-6, REC-DEV-G-2, REC-DIS-MO-G-3, RD-O-1, RD-S-4, RD-G-3, RD-MA-2, DWMA-MA-5.

Much of the plan direction concerning habitat connectivity is found throughout various sections of the revised plan because of the integrated nature of the issue. Due to interest in this topic, we will be including a crosswalk of plan components that serve to provide for connected habitats across and range of activities and ecosystems in the environmental impact statement.

Potential changes to the Tonto's transportation system will be evaluated in separate analysis through future project-level decision-making to comply with the 2007 Travel Management Rule (36 CFR212). Future site-specific travel management planning will use the framework set by the plan (such as desired conditions, standards, and guidelines). As the Travel Management Rule requires, potential resource impacts, access needs, and public input will be part of that process. These decisions will be consistent with the National Environmental Policy Act and Forest Service manual and handbook direction and would include analysis and opportunity for public involvement.

**Comment Number(s):**

157-2

The Forest Service complies with the Multiple-Use Sustained Yield Act of 1960 (70 Stat. 215; 16 U.S.C. 528-531). As such, our agency must balance the management of many resources, including wildlife habitat and timber production. The revised forest plan contains numerous plan components intended to provide the ecological conditions needed for wildlife, fish, and rare plants. Much of this conservation direction, however, focuses on habitat restoration. Plan direction describes the ultimate desired conditions for our diverse ecosystems with emphasis on addressing stressors to those systems. In addition, there are numerous plan components that require forest programs (e.g., recreation, minerals and mining, roads, etc.) to consider and mitigate impacts to species. Wildlife, fish, and rare plants face a host of challenges on the forest and few of these are completely resolved in the forest plan; however, the plan provides broad level guidance for projects and activities that consider the needs of species. Please see the final environmental impact statement for the land management plan, volume 3, Appendix G: Analysis of At-risk Species. Much of the plan direction concerning habitat connectivity is found throughout various sections of the revised forest plan because of the integrated nature of the issue. Due to interest in this topic, we have included a crosswalk of plan components that serve to provide for connected habitats across and range of activities and ecosystems in the final environmental impact statement.

**Comment Number(s):**

42-3

We appreciate your participation throughout the plan revision process. The Forest followed the 2012 Planning Rule to develop the forest plan and associated environmental impact statement which includes management and analysis of all forest resources. This includes wildlife, fish, and plants and the multiple vegetation communities that make up the Tonto National Forest.

**Concern Statement 355.** *Commenter is concerned with the potential risk of disease transmission to bighorn sheep from livestock grazing and suggested plan component changes and additions.*

Response:

**Comment Number(s):**

2986-26

In response to the comment, we have added an additional plan guideline (revised plan, chapter 2, Special Uses) which states: "Special use permits should not authorize the use of domestic sheep or goats where there is a risk of contact with bighorn sheep." This direction does not label all possible requests for special use permits that involve domestic sheep or goats (e.g., weed control, fuels management, pack animals, etc.); however, it clearly directs the Forest not to permit uses where there is a risk of disease

transmission to bighorn sheep. Future site-specific projects that are seeking to permit the use of domestic sheep or goats will need to comply with the applicable forest plan standards and guidelines, which will include an analysis of the project for its impacts on bighorn sheep in determining the level of significance in compliance with the National Environmental Policy Act.

**Concern Statement 356.** *Commenters are concerned with the Sonoran desert tortoise, some suggesting additional information should be considered in the determination of risks to the habitat and species including analysis about human-associated mortality and the impacts of current management actions on the species.*

Response:

**Comment Number(s):**

2970-647

To our knowledge, this information has not been compiled, nor is it required per law, regulation, policy, or as part of the candidate conservation agreement for the tortoise. Occasionally, tortoise mortality may be recorded, but generally these observations are opportunistic and not useful in attributing causes of mortality across a population. Nevertheless, we do have programmatic guidance in the recreation sections of the revised plan (chapter 2) that direct the Forest to consider and act upon potential impacts to wildlife, fish, and rare plants. Additional information can be found in appendix G of the environmental impact statement.

**Comment Number(s):**

2970-645

The revised forest plan is programmatic in nature and provides the framework for site-specific project implementation, as detailed in chapter 1 of the revised plan. In projects where tortoise habitat is present and is impacted by the specific actions, we comply with the Candidate Conservation Agreement or the Arizona Interagency Desert Tortoise Teams Recommended Standard Mitigation Measures, and the habitat and population levels of the Sonoran desert tortoise. Additionally, in the revised plan (revised plan, chapter 2, Wildlife, Fish, and Plants), there is guideline WFP-G-02: “Where the Forest Service has entered into a signed conservation agreement that provides guidance on activities or actions to be carried out by the Forest, those activities or actions should be undertaken consistent with the guidance found within the conservation agreement.” Additionally, in this same section of the revised plan, there is guideline WFP-G-08: “Projects and activities that may negatively impact Sonoran desert tortoises should apply mitigations from the Arizona Interagency Desert Tortoise Team’s Recommended Standard Mitigation Measures (or similar current guidance) when designing projects in desert tortoise habitat.”

We have conducted additional review on the best available scientific information for Sonoran desert tortoise, including the supporting information provided by the commenter. As a result, we have concluded that there is a substantial threat to the long-term persistence of this species on the forest and added tortoise to our list of species of conservation concern as requested. Chapter 3 of the environmental impact statement (Wildlife, Fish, and Plants) has an analysis of effects from the proposed action. Appendix G of the environmental impact statement provides a list of plan components that provide the ecological conditions for each species. We look forward to continued collaboration as we move forward with implementing the forest plan and work to conserve tortoises on the Tonto National Forest.

**Comment Number(s):**

2970-646

To our knowledge, this information has not been compiled, nor is it required per law, regulation, policy, or as part of the candidate conservation agreement for the tortoise. Occasionally, tortoise mortality may be recorded, but generally these observations are opportunistic and not useful in attributing causes of mortality across the range of the species. Nevertheless, we do have programmatic guidance in the recreation sections of the revised plan (chapter 2) that direct the Forest to consider and act upon potential impacts to wildlife, fish, and rare plants. Additional information can be found in appendix G of the environmental impact statement.

**Comment Number(s):**

2986-29

Threatened, endangered, and proposed species are determined by the U.S. Fish and Wildlife Service under the authority of the Endangered Species Act (7 U.S.C. § 136, 16 U.S.C. § 1531 et seq. PL 93-205, as amended). As such determinations on the listing of species under the act are outside the purview of the U.S. Forest Service and outside the scope of forest plan revision. However, as noted the Sonoran desert tortoise (*Gopherus morafkai*) is managed under a candidate conservation agreement (2015). In the revised plan, we have included guideline WFP-G-02 (chapter 2, Wildlife, Fish, and Plants) stating: “Where the Forest Service has entered into a signed Conservation Agreement that provides guidance on activities or actions to be carried out by the Forest, those activities or actions should be undertaken consistent with the guidance found within the Conservation Agreement.”

In addition, we have included guideline WFP-G-08 (revised plan, chapter 2, Wildlife, Fish, and Plants), which requires that: “Projects and activities that may negatively impact Sonoran desert tortoises should apply mitigations from the Arizona Interagency Desert Tortoise Team’s Recommended Standard Mitigation Measures (or similar current guidance) when designing projects in desert tortoise habitat.” This constitutes an additional species-specific approach to address conservation concerns for tortoises at the project level in accordance with our commitments in the conservation agreement and by the U.S. Forest Service under the authority of the National Forest Management Act (PL 94-588). However, Section 7(a)(1) of the Endangered Species Act of 1973 directs all Federal agencies to “utilize their authorities in furtherance of the purposes of this Act by carrying out programs for the conservation of endangered species and threatened species listed pursuant to section 4 of this Act.” Section 7(a)(2) of the Endangered Species Act requires Federal agencies to ensure that any actions authorized, funded, or carried out by the agency are not likely to jeopardize the continued existence of any threatened, endangered, or proposed species or adversely modify its critical habitat.

We have conducted additional review on the best available scientific information for Sonoran desert tortoise, including the supporting information provided by the commenter. As a result, we have concluded that there is a substantial threat to the long-term persistence of this species on the forest and added tortoise to our list of species of conservation concern as requested. Chapter 3 of the environmental impact statement (Wildlife, Fish, and Plants) provides the analysis of effects from the proposed action. Also, appendix G of the environmental impact statement provides a list of plan components that provide the ecological conditions for each species. We look forward to continued collaboration as we move forward with implementing the forest plan and work to conserve tortoise species on the Tonto National Forest.

**Comment Number(s):**

2986-28

We have conducted additional review on the best available scientific information for Sonoran desert tortoise, including the supporting information provided by the commenter. As a result, we have concluded that there is a substantial threat to the long-term persistence of this species on the forest and added tortoise to our list of species of conservation concern as requested. Chapter 3 of the environmental impact statement (Wildlife, Fish, and Plants) contains the analysis of effects from the proposed action. Also, appendix G of the environmental impact statement provides a list of plan components that provide the ecological conditions for each species. We look forward to continued collaboration as we move forward with implementing the forest plan and work to conserve tortoise species on the Tonto National Forest.

**Concern Statement 357.** *Commenters are requesting Mt. Ord be considered as a biological area, or similar recommended area, in the future.*

Response:

**Comment Number(s):**

2965-2

We are not aware of previous comments to establish Mt. Ord as a particular management area. A number of botanical and research natural areas have been proposed as part of the forest plan revision process (revised plan, chapter 3, Designated and Recommended Research Natural Areas and Botanical Areas). We recognize the popularity of the area as a go-to destination for birders and other naturalists. The entirety of the forest plan is designed to provide for the management of treasured ecosystems and wildlife habitats on multiple-use lands. Special designation is generally applied to a few areas where that direction needs modification or exception. At this time, we are not aware of such a need for Mt. Ord. We hope that it continues to be appreciated and enjoyed by forest users for many generations to come.

**Comment Number(s):**

2806-8

Watching wildlife is a highly valued recreation opportunity within the Tonto National Forest. The Forest is committed to providing the conditions that support this activity and the wildlife that are so enjoyed. For more information, please see our Wildlife-Related Recreation in the revised plan (chapter 2) and the accompanying section in the environmental impact statement (chapter 3).

**Comment Number(s):**

2965-1

We appreciate your participation throughout the plan revision process. The Forest followed the 2012 Planning Rule to develop the forest plan and associated environmental impact statement which includes management and analysis of all forest resources. This includes all landscapes on the forest and the vegetation communities that make up the Tonto National Forest, though the scale of this analysis may exclude mention of specific places on the landscape. Management for Mt. Ord would be considered under the multiple resources related to it (e.g., special uses, energy, ecological response units, scenery).

**Concern Statement 358.** *Commenters are seeking clarification or additional analysis in the final environmental impact statement.*

Response:

**Comment Number(s):**

2966-16

In addition to the required plan content, a forest plan may also include “optional plan ‘content’ (36 CFR 219.7(f)(2)), such as background information, explanatory narrative, general management principles, potential management approaches, management challenges, performance history, performance risks, contextual information, or referenced material. Optional content is not labeled or worded in a way that suggests it is a plan component and does not imply or constitute management direction, but it may help clarify plan direction and how it may be applied. A change to “other required plan content” or “optional content” does not require a plan amendment; instead, such changes may be made using an administrative correction process. An assessment of biodiversity can be found in the Final Assessment Report of Ecological Conditions, Trends, and Risks to Sustainability, volume I. The effects of fire to vegetation communities, including those containing rare plants, is analyzed in the associated sections of the final environmental impact statement in chapter 3.

**Comment Number(s):**

2969-3

A full assessment of the biodiversity on the Tonto National Forest can be found in our Final Assessment Report of Ecological Conditions, Trends, and Risks to Sustainability volume I. Site-specific surveys were not conducted as part of this large-scale, programmatic effort; however, Forest staff used the best available scientific information available to consider many vegetative communities and species. The Forest botany program strives to implement plan guidance to identify rare plants and conserve these species as directed.

**Concern Statement 359.** *Commenters suggest changes to resource plan components and descriptions to help provide clarity, aid in management, and add supporting information to the forest plan.*

Response:

**Comment Number(s):**

2806-17

Pursuant to 36 CFR § 219.9, the Tonto National Forest has adopted a complimentary approach to maintaining the diversity of plant and animal communities and the persistence of native species in the plan area, including species commonly enjoyed and used by the public (36 CFR § 219.10(a)(5)). Components in the revised forest plan direct the Forest to provide the ecological conditions needed to support species on the Tonto National Forest, including both common and uncommon native species (revised plan, chapter 2, Wildlife, Fish, and Plants and Wildlife-Related Recreation sections). Numerous plan components also direct the Forest to engage with and coordinate in species and habitat conservation with partners, including the Arizona Game and Fish Department (see PV-MA-02, REC-DIS-WB-MA-01, REC-DIS-WB-MA-01, WFP-MA-01, WFP-MA-05).

**Comment Number(s):**

2736-54

We acknowledge the importance of collaboration with the Arizona Game and Fish Department in conserving species of greatest conservation need and species of economic and recreational importance. In response to your comments, we have included the requested management approach (WFP-MA-08), which reads, “Work closely with the Arizona Game and Fish Department to address habitat and other conservation needs of State priority species (e.g., Species of Greatest Conservation Need, Species of Economic and Recreational Importance)” (revised plan, chapter 2, Wildlife-Related Recreation).

Additionally, we have included management approach REC-WR-MA-01, “Work in collaboration with Arizona Game and Fish Department to: A) maintain and/or enhance habitat for species of economic and recreational importance, B) reintroduce species of interest into historical home ranges, C) coordinate fish and wildlife management activities (e.g., reintroductions, introductions, or transplants; control or eradication of nonnative species; habitat enhancement; and the management of sport and native fishes), D) plan and prioritize projects that achieve desired conditions for hunting, fishing, and watchable wildlife species and habitats on the forest, E) establish short and long-term goals consistent with agency missions to foster healthy and productive populations of native and non-native sportfish and game species” (revised plan, chapter 2, Wildlife-Related Recreation).

Throughout the revised forest plan, there are several others management approaches that specifically name the Arizona Game and Fish Department for collaboration in the management of fish and wildlife (please see WFP-MA-01, WFP-MA-05, PV-MA-02).

**Comment Number(s):**

86-4

The revised forest plan contains numerous plan components intended to provide the ecological conditions needed by wildlife, fish, and rare plants. Much of this conservation direction, however, focuses on habitat restoration. Plan direction describes the ultimate desired conditions for our diverse ecosystems with emphasis on addressing stressors to those systems. In addition, there are numerous plan components that require Forest programs (e.g., recreation, minerals and mining, roads, etc.) to consider and mitigate impacts to species. Wildlife, fish, and rare plants face a host of challenges on the forest and few of these are completely resolved in the forest plan; however, the plan provides broad level guidance for projects and activities that consider the needs of species (environmental impact statement, appendix G).

Much of the plan direction concerning habitat connectivity is found throughout various sections of the revised plan because of the integrated nature of the issue. Due to interest in this topic, we have included a crosswalk of plan components that serve to provide for connected habitats across and range of activities and ecosystems in the environmental impact statement.

**Comment Number(s):**

2806-5

In the revised forest plan, most plan components apply to all projects unless specified otherwise. In the Wildlife, Fish, and Plants section of the revised plan (chapter 2), we have included a guideline (WFP-G-05) stating that: “New or reconstructed features (e.g., fences, steel posts, vent pipes, stock tanks, and drinkers) should be designed, constructed, and maintained to minimize wildlife mortality (e.g., capped fence posts and escape ramps).” The intent of this guideline is to direct the Forest to incorporate wildlife friendly designs in all appropriate site-specific projects while not constraining the methods to be used.

**Comment Number(s):**

2712-3

In many sections of the revised plan, climate change is considered in a discussion of cumulative effects over time. Additionally, analyses that discuss vital habitats for species on the Tonto National Forest (e.g., riparian areas, vegetative communities, and watersheds) work to consider information on a warming climate in their estimations of trends for such habitats. We have worked to incorporate such information; however, making predictions on the specific effects to and responses from species will be handled on a project level in compliance with forest plan direction.

While we acknowledge the importance of refugia as species adapt to a changing climate, we have not attempted to establish climate refugia areas as part of forest plan revision. In particular, using the wilderness recommendation process to connect habitats is problematic in that habitat connectivity is not a recognized part of wilderness criteria. Instead, the forest plan seeks to establish overarching goals for ecosystem function and address landscape level stressors. In this way we strive to mitigate and ameliorate the effects of climate change. Generally, we do not have sufficient information at this time to effectively identify climate refugia and provide site-specific management; rather we have attempted to provide a framework for managing all potential habitats to the best of our abilities. However, many of our ongoing and future vegetation projects are designed with climate change consideration. Many of the actions in these projects are designed to allow the ecosystem to be more resilient in the face of changing conditions.

Much of the plan direction concerning habitat connectivity is found throughout various sections of the revised forest plan because of the integrated nature of the issue. Due to interest in this topic, we have included a crosswalk of plan components that serve to provide for connected habitats across the range of activities and ecosystems in the final environmental impact statement. Additionally, the 1964 Wilderness Act directs the management of designated wilderness areas.

**Comment Number(s):**

2946-5

The revised plan contains guideline WAT-G-06 in the Watersheds and Water Resources section (revised plan, chapter 2) that states: “New or reconstructed roads and motorized routes, infrastructure, recreation sites, or similar constructed facilities should not be located within floodplains or within 300 feet of water resource features (e.g., perennial and intermittent streams, springs, wetlands, and riparian areas), except where necessary for stream crossings or to provide for resource protection to avoid the long-term adverse impacts associated with the occupancy and modification of floodplains and water resource features.” We agree with the importance of protecting water resources and their corresponding floodplains; however, at this time we are unaware of any rationale that would prompt a change from the 300 feet standard to 500 feet. The Roads section of the revised plan (chapter 2) contains guidelines for the issues brought up by the commenter. The current recommendations of 300 feet are derived from Belt et al. (1992).

**Comment Number(s):**

2946-3, 4

The Tonto National Forest recognizes the importance of coordinating with the Arizona Game and Fish Department in managing recreational fishing and native fish recovery on Federal land. As such, we have included a number of management approaches (revised plan, chapter 2, Recreation) that direct this type of collaboration and consideration of outside management plans (REC-WR-MA-05, REC-WR-MA-01, REC-WR-MA-06). Specifically, the first management approach in the Wildlife-related Recreation



section of the revised plan (chapter 2) states in part: “Coordinate fish and wildlife management activities (e.g., reintroductions, introductions, or transplants; control or eradication of nonnative species; habitat enhancement; and the management of sport and native fishes).” Additionally, we have edited Wildlife-related Recreation management approach REC-WR-MA-05 (revised plan, chapter 2) to include the Arizona Game and Fish Department’s Cold Water Fisheries Plan in the lists of planning documents to consider during site-specific plan implementation.

**Comment Number(s):**

2816-81

Pursuant to 36 CFR § 219.9, the revised forest plan adopts a complementary ecosystem and species-specific approach to maintaining the diversity of plant and animal communities and the persistence of native species in the plan area. However, in our assessment of the ecological conditions necessary for at-risk species, we found that a majority of threats to these species applied to groups rather than individual species (for example, loss or degradation of riparian and aquatic habitats, threats from uncharacteristic fire, rarity and endemism, recreation impacts, etc.). Thus, very few plan components in the forest plan are truly species-specific. Generally, we placed plan components in sections of the plan where they were most applicable (e.g., at-risk species considerations specific to the recreation program are found in the recreation section). Much of the plan direction benefiting at-risk species is found in the following sections of the revised plan (chapter 2): Vegetation and Ecological Response Units, Riparian Ecological Response Units, and Watersheds and Water Resources. Plan direction that applies more broadly to at-risk species can be found in the Wildlife, Fish, and Plants section of the revised plan (chapter 2). While we feel this integrated approach is beneficial to species and forest programs, we recognize that connecting plan components with species needs is difficult in this format. As such, we have included a crosswalk of at-risk species and the plan components that provide for their long-term persistence in the environmental impact statement (Appendix G: Analysis of At-risk Species).

**Comment Number(s):**

2950-5

Some newly proposed areas may impact the potential for some wildlife management activities. Forest Service-identified eligible and suitable rivers must be protected sufficiently to maintain free flow and outstandingly remarkable values unless a determination of ineligibility or non-suitability is made (revised plan chapter 3, Eligible Wild and Scenic Rivers). Free-flowing is defined as flowing in a natural condition without impoundment, diversion, straightening, riprapping, or other modification of the waterway. Thus, proposals for some types of fish barriers in eligible segments could be incompatible with this management direction.

There are no specific equipment restrictions for eligible wild and scenic rivers, rather proposed projects and activities are evaluated to determine if such actions would affect the segment’s eligibility. A responsible official may authorize site-specific projects and activities on National Forest System lands within Forest Service-identified eligible or suitable river corridors when the project and activities are consistent with the forest plan and interim protection measures outlined in the Forest Service Handbook 1909.12 Chapter 80 Section 84.3.

Projects and activities within recommended wilderness areas must protect and maintain the social and ecological characteristics that provide the basis for wilderness recommendation. The revised plan includes guideline RWMA-G-04 (chapter 3, Recommended Wilderness) that states: “Management activities, including transplanting (e.g., removal, reintroduction, or supplemental introduction), fish and wildlife

species, should be permitted to use motorized and mechanical means (e.g., helicopter landings) if necessary, to perpetuate or recover a threatened or endangered species, to restore the population of an indigenous species, or to manage fish and wildlife populations.” This management direction allows for management of species within recommended wilderness areas.

While the forest plan provides direction to support wildlife management in recommended wilderness, we are unable to analyze and authorize in this plan revision process all potential activities as it is possible that some projects may be inconsistent with the overarching plan direction and purpose for these areas. For example, standard RWMA-S-02 in the revised plan (chapter 3, Recommended Wilderness) states: “Management activities shall not permanently degrade the wilderness characteristics of the recommended wilderness area.” Thus, any authorized management should be consistent with this and other such standards in the forest plan. For site-specific projects that implement the forest plan, a detailed analysis will be conducted to determine if such projects are in compliance with all applicable laws, regulations, and policy, including forest plan components, NEPA, the Wilderness Act and the Wild and Scenic Rivers Act.

**Comment Number(s):**

58-24, 28

The examples in the referenced guideline (revised plan, chapter 2, Wildlife, Fish, and Plants) are provided to suggest ideas of the types of management that might be used to fulfil the general purpose of the guideline; however, these examples are not intended to constitute a mandatory or exhaustive list of the design features that might be used. The determination of what mitigations and design features may be required, and the feasibility of implementation (including funding) should occur at the project level. Whether design features to minimize wildlife mortality are part of permitted grazing would be identified in annual operating instructions. Generally, we expect that implementation of this plan component would serve to continue grazing management practices already practiced in the program. Specific measures may or may not be needed, but the guideline serves to guide management in a way that considers potential impacts of manmade structures to wildlife and provides a rational towards mitigating adverse effects. Additionally, we have edited this guideline to clarify that it applies to new or reconstructed features.

Uncapped fence posts are common hazards to birds and other wildlife, especially cavity-nesting species that are drawn to the features and are unable to climb out of artificial materials. Such mortality may have significant impacts on wild populations (Erickson 2005; Hathcock and Fair 2014; Malo et al. 2016).

**Comment Number(s):**

58-41

The referenced management approach (revised plan, chapter 2, Riparian Areas, Seeps, Springs, Wetlands, and Riparian Management Zones) suggests a potential approach to achieving desired conditions for riparian management zones. In this case, the approach suggests the Forest assess opportunities to reintroduce beavers and identify/prioritized potential areas. This work has yet to be done and as such we are unable to provide maps of designated areas at this time. As natural ecosystem engineers, beavers have been used with success to help restore riparian and other wetland areas. Should any such projects be proposed in the future, specifics would follow as part of planning and implementation.

**Comment Number(s):**

58-29, 32

Upon further review of the referenced guideline (revised plan, chapter 2, Wildlife, Fish, and Plants), which states, “Earthen stock tanks identified as important for at risk species should be managed to maintain water and habitat needed for species survival and reproduction, consistent with existing water rights,” we find that this plan component is redundant with the guidelines already contained within the Chiricahua Leopard Frog (*Rana chiricahuensis*) Recovery Plan (2007). Additionally, the guidance to maintain water is potentially unclear and may not result in the best management for stock ponds/tanks as habitat for at-risk species. Thus, this plan component will be edited or removed in order to be more consistent the Chiricahua Leopard Frog (*Rana chiricahuensis*) Recovery Plan.

**Comment Number(s):**

2948-16

The revised plan contains a guideline in the Caves and Karsts section (chapter 2) to incorporate bat friendly closures when necessary and to manage cave and karst features to provide habitat for cave specialists (particularly hibernacula and maternity roosts for bats). In determining the specific design features at the project level, the revised plan also contains a management approach (chapter 3, Significant Caves) to work collaboratively with Bat Conservation International to develop protections for the resources, which will most likely include the use of the most current direction from Bat Conservation International. We look forward to continuing our collaborative work to conserve vital bat habitat on the forest.

**Comment Number(s):**

2948-2

The Tonto National Forest is committed to providing for a diversity of plant and animal communities. To this end we have included plan content that directs the Forest to provide the ecological conditions that contribute to the recovery of federally listed threatened and endangered species, conserve proposed and candidate species, maintain viable populations of species of conservation concern, and sustain both common and uncommon native species. For more information, see the revised plan (chapter 2, Wildlife, Fish, and Plants, and the environmental impact statement (chapter 3, Wildlife, Fish, and Plants and Appendix G: Analysis of At-Risk Species).

**Comment Number(s):**

2948-17:18

The Tonto National Forest recognizes the disproportionate importance of water resources and vegetative communities as habitat for many species, including bats. As such, we have provided extensive plan direction to maintain and restore riparian habitats and watersheds across the forest, including in the following sections of the revised plan (chapter 2): Riparian Ecological Response Units, Riparian Areas, Seeps, Springs, Wetlands, and Riparian Management Zones, and Watersheds and Water Resources. We also acknowledge that man-made water resources often serve a role for bats and other species that use them. We have also included objectives and guidelines in the revised plan (chapter 2, Rangelands, Forage, and Grazing) to provide wildlife escape ramps where applicable to such structures. Additionally, we have incorporated management approach RMZ-MA-04 in the revised plan (chapter 2, Riparian Areas, Seeps, Springs, Wetlands, and Riparian Management Zones) to assess opportunities to reintroduce beavers to riparian ecosystems as a means of achieving riparian health and providing habitat for at-risk species and other listed species.

Some emergency response activities, such as wildfire suppression, may result in degradation to water; however, our agency does its best to minimize these impacts through action taken by the Burned Area Emergency Response teams and post fire rehabilitation projects. Not all water sources are managed or under the authority of the Forest Service.

**Comment Number(s):**

2948-14

The Tonto National Forest recognizes the importance old trees, dead trees (snags), downed wood (coarse woody debris) and structural diversity as important habitat components for many species, including roosting sites for bats. As such, we have incorporated plan components for these features throughout applicable sections of the revised plan (chapter 2) including: ERU-DC-03, ERU-DC-16g., ERU-G-09, ERU-G-12, ERU-MA-04, ERU-PJO-DC-03, ERU-PJJUG-DC-03, ERU-MEWMPO -DC-03, ERU-MEWMPO -DC-11, ERU-PJC-DC-04, ERU-PPE-PG-DC-05, ERU-PPE-PG-DC-13, ERU-PPE-SS-DC-02, ERU-PPE-SS-DC-08, ERU-PPE-SS-G-01, ERU-PPE-SS-G-02, ERU-PPF-DC-02, ERU-PPF-DC-08, ERU-PPF-G-01, ERU-MCD-DC-01, ERU-MCD-DC-09, ERU-MCD-DC-12, ERU-MCD-G-13, ERU-MCW-DC-03, ERU-MCW-DC-04, ERU-MCW-DC-05, ERU-MCW-G-01.

**Comment Number(s):**

2825-6

We have conducted additional review on the best available scientific information for *C. townsendii*, *Idionycteris phyllotis*, *Myotis thysanodes*, and *Myotis velifer*, including the supporting information provided by the commenter. As a result, we have concluded that there is a substantial threat to the long-term persistence of two of these species on the forest. Therefore, we have added *M. townsendii* and *Myotis thysanodes* to our list of species of conservation concern as requested. Please see the associated analysis in the environmental impact statement (chapter 3, Wildlife, Fish, and Plants) for an analysis of effects from the proposed action. Also, see appendix G of the environmental impact statement for a list of plan components that provide the ecological conditions for each species.

While we have identified conservation issues and potential threats to *Idionycteris phyllotis* and *Myotis velifer*, we are unable to characterize these as substantial concerns about the species' ability to persist over the long term in the plan area based on the guidance of FSH 1909.12, chapter 10, section 12.52c. As more information becomes available on these species, and how particular concerns may affect them on forest, we will re-evaluate their status as needed.

Generally, the revised forest plan contains programmatic guidance to provide for a diversity of plant and animal communities. Additionally, there is programmatic direction specific to bats and bat roosts that directs the Forest to protect these vital habitats. Finally, the revised plan directs the Forest to work with partners to conserve and protect wildlife and wildlife habitat. We look forward to continued collaboration as we move forward with implementing the forest plan and work to conserve bat species on the Tonto National Forest.

**Comment Number(s):**

2948-13

We have worked to incorporate management direction that supports the habitats and ecological conditions important to many species, including bats. We look forward to future collaborative work at the project level to conserve bats in the future.

**Comment Number(s):**

2948-15

We recognize the substantial value of cave, karsts, and other rocky features that provide vital roosting for various bat species. As such we have include plan components in the revised plan (chapter 2) that direct forest to work with our partners to identify and protect these features: CVK-DC-03, CVK-G-01, SCMA-DC-01, SCMA-MA-01). Projects and activities that might affect these features should be addressed in site-specific analyses and be consistent with this direction in the forest plan.

**Comment Number(s):**

2806-26

Direction for the selection and monitoring of focal species (found in FSH 1909.12 chapter 30, section 32.13c) specifies that every plan monitoring program must identify one or more focal species and one or more monitoring questions and associated indicators addressing the status of the focal species. The purpose for monitoring the status of focal species over time is to provide insight into the following: 1) Integrity of ecological systems on which focal species depend, 2) Effects of management on those ecological conditions, 3) Effectiveness of the plan components to provide for ecological integrity and maintain or restore ecological conditions, and 4) Progress towards achieving desired conditions and objectives for the plan area. It is not expected that a focal species be selected for every element of ecological conditions. In this way, focal species are intended to provide information related to the specific monitoring questions and ecological conditions we manage rather than to serve as direct indicators of diversity.

We have selected the Mexican spotted owl (*Strix occidentalis lucida*) as a focal species for reasons outlined in the revised plan (chapter 4, Monitoring, Focal Species). Numerous plan components were developed specifically to provide the ecological conditions needed to support the recovery of Mexican spotted owl and its critical habitat; thus, monitoring Mexican spotted owl is informative in how well we are achieving desired conditions in owl habitat. After reconsidering red brome (*Bromus rubens*) as a focal species, we plan to remove this invasive grass as a focal species. While we feel that monitoring the invasion of non-native grasses has important ecological value, especially in low deserts, there is likely more value in incorporating such monitoring as part of our invasive species program rather than focusing on a single species related to this issue.

**Comment Number(s):**

2806-19

In the revised forest plan, plan components generally apply to all projects unless specified otherwise. The direction to design manmade structures to minimize wildlife mortality applies to both mining and developed recreation projects. The commenter's suggestion would be considered in site-specific project planning, when applicable.

**Comment Number(s):**

2806-18

Our objective to complete at least 20 products or activities that educate the public about wildlife, fish, and rare plants every 2 years (revised plan, chapter 2, Wildlife, Fish, and Plants) is one aspect of a multi-faceted approach to conserving biodiversity on the forest. This objective will not serve to constrain the Forest from participating in additional or different types of programs, projects, or partnerships. While we

are committed to working with various partners in restoring and maintaining species habitat, direction in the forest plan does not apply to individuals or organizations outside of the U.S. Forest Service; thus, we cannot direction compel partnerships. However, we have numerous plan components that guide the Forest to work with our public and partners (revised plan, chapter 2, Partnerships and Volunteers).

**Comment Number(s):**

2972-8

The Tonto National Forest greatly appreciates and relies on the expertise and guidance of the Arizona Game and Fish Department. As such, we have included numerous management approaches in the revised plan (chapter 2) to foster collaborative work with the department in wildlife and recreation management: PV-MA-02, REC-DIS-WB-MA-01, REC-WR-MA-01, SU-MA-02, WFP-MA-01, LRMA-MA-01.

**Comment Number(s):**

3013-3

While the revised plan does not call out wildlife overpasses specifically, proposed plan direction for habitat connectivity broadly guides the Forest to support such projects. Guideline REC-WR-G-03 in the revised plan (chapter 2, Wildlife-Related Recreation) directs the Forest to maintain/and or enhance wildlife connectivity for both economically important and other species. Additionally, guideline WFP-G-05 (revised plan, chapter 2, Wildlife, Fish, and Plants) states that new infrastructure or constructed features (e.g., fences, roads, recreation sites, facilities, drinkers, and culverts) should be designed and maintained to minimize negative impacts to the movement and dispersal of wildlife, fish, and rare plants. Infrastructure and constructed features already present that do negatively impact movement and dispersal should be modified or removed when no longer in use in order to improve connectivity. Barriers may be used to protect native species or prevent movement of nonnative species. Similar guidelines (revised plan, chapter 2, Roads) are also applied to roads with regards to aquatic species passage. Much of the plan direction concerning habitat connectivity is found throughout various sections of the revised forest plan because of the integrated nature of the issue. Due to interest in this topic, we have included a crosswalk of plan components that serve to provide for connected habitats across and range of activities and ecosystems in the final environmental impact statement.

**Comment Number(s):**

2925-00

Plan components in the revised forest plan refer specifically to management authorities within the purview of the U.S. Forest Service. As required by § 219.8(a), the plan must include plan components, including standards or guidelines, to maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area, including plan components to maintain or restore their structure, function, composition, and connectivity. The language in this plan component reflects our commitment to provide for connectivity as required by the planning regulations. We feel that inclusion of the language “where practicable and feasible” is not specific enough to clarify when the plan component should be applied, ultimately obscuring the primary goal of the guideline. This direction has been purposefully included as a guideline rather than a standard because we expect some projects may need flexibility in defining compliance. Please see the section Plan Components and Other Plan Content in Chapter 1. Introduction of the revised forest plan for more on implementing guidelines.

**Comment Number(s):**

2925-00

Plan components in the revised forest plan refer specifically to management authorities within the purview of the U.S. Forest Service. In accordance with 36 CFR § 219.9 (b)(1) the Forest is required to “...provide the ecological conditions necessary to: contribute to the recovery of federally listed threatened and endangered species, conserve proposed and candidate species, and maintain a viable population of each species of conservation concern within the plan area.” While it is correct that only species “...known to occur in the plan area... “may be considered as species of conservation concern (36 CFR 219.9c), authorities to manage for at-risk species is not limited to known occurrences. While not all projects and activities may fall under Forest Service authorities, the revised forest plan directs management actions authorized by the agency.

**Comment Number(s):**

2925-00

The plan component for human-wildlife interactions is a desired condition as defined in 36 CFR § 219.7 (e)(1i) in that it describes a “specific social, economic, and/or ecological characteristics of the plan area, or a portion of the plan area, toward which management of the land and resources should be directed.” This desired condition does not identify specific measures or site-specific requirements, but instead provides an overarching goal within a multiple-use framework.

**Comment Number(s):**

2925-00

The referenced guideline calls for an action to consider a range of conservation actions that may be important to species within the jurisdiction of the Tonto National Forest. Any future proposals will also consider relevant law, regulation, policy, and authorities. While mitigations may not be appropriate in all scenarios, they are not required by this guideline nor are they the only action available.

**Comment Number(s):**

2925-00

We recognized the Tonto National Forest’s commitments to the Candidate Conservation Agreement for the Sonoran Desert Tortoise (2015). While we have not listed plan components specific to all such conservation agreements, we have incorporated these agreements by reference in guideline WFP-G-02 which states, “Where the Forest Service has entered into a signed conservation agreement that provides guidance on activities or actions to be carried out by the Forest, those activities or actions should be undertaken consistent with the guidance found within the conservation agreement.” Under the National Forest Management Act (NFMA, 16 U.S.C. §§ 1600-1614) and USDA Forest Service policy the Forest Service is directed to “manage habitats for all existing native and desired nonnative plants, fish, and wildlife species in order to maintain at least viable populations of such species” and to “avoid actions which may cause a species to become threatened or endangered” (Forest Service Manual [FSM] 2670.12, 2670.22). The regional forester may designate species as sensitive as described in the FSM 2670. The objectives of management for such species are to ensure their continued viability throughout their range on National Forest System lands, and to ensure that they do not become threatened or endangered because of Forest Service actions. The Sonoran desert tortoise is designated sensitive on the regional forester's sensitive list in the southwest region. On the Tonto National Forest, the tortoise is considered a species of conservation concern. While conservation agreements are useful in collaborative work among partners, they do not restrict the Forest from making additional commitments to species conservation. Incorporating suggested measures from the Arizona Interagency Desert Tortoise Team, as stated in guideline WFP-G-10, is already widely practiced on the forest. We also note that part of implementing the

guidance is a consideration of whether measures are needed; thus, not all projects are expected to need all possible recommended conservation measures.

**Comment Number(s):**

37-7, 21

Examples stated within parentheses are meant to add context or help illustrate direction but does not necessarily restrict the types of motorized or mechanical means stated in the guideline. Existing regulation, policy, or law will guide which types of motorized activities will be authorized during wildlife management activities. Also, please note that this direction applies only to recommended wilderness areas on the Tonto National Forest.

**Concern Statement 360.** *Commenter is suggesting additional analysis or language be included in the final environmental impact statement related to post-fledging family areas (PFAs).*

Response:

**Comment Number(s):**

2932-41

We agree with the commenter's statement and have added the following language to the environmental impact statement (chapter 3, Forestry and Forest Products, alternative B and alternative C respectively): Alternative B does not include plan components specifically for northern goshawks that direct the Forest to survey for and establish post-fledging family areas and nest areas. This can free up valuable resources that can be reallocated to meet the increased treatment objectives; and alternative C does not include plan components specifically for northern goshawks that direct the Forest to survey for and establish post-fledging family areas and nest areas. Although this can free up valuable resources that can be reallocated to meet the increased forest objectives, it would do little to increase the availability and quantity of forest products due to the focus on fire use over mechanical treatment.

**Comment Number(s):**

2932-39

Alternatives B and C (described in chapter 2 of the environmental impact statement) do not include a guideline to place management constraints on restoration activities (e.g., prescribed fire and mechanical treatments) during the northern goshawk breeding season. The specific direction for post-fledging family areas and nest areas for northern goshawks applies only to alternatives A and D. (For more information on these and other differences by alternative, see chapter 2 of the environmental impact statement).

Comparison of plan components changing by alternative for issue 2: natural resource management in the environmental impact statement. In our assessment of at-risk species on the Tonto National Forest, northern goshawks were not identified as a species of conservation concern; thus, we did not include specific plan components for their management. However, there was some public interest in retaining prior plan direction concerning goshawk breeding. As such, this direction was considered in the no-action alternative (A) and alternative D.

**Comment Number(s):**

2932-40,42



Within the Wildlife, Fish, and Plants section of the revised plan (chapter 2), the first guideline states “Activities occurring within federally-listed species habitat should apply habitat management objectives and species protection measures from approved recovery plans.” Direction for the recovery of federally-listed species is incorporated in the forest plan by reference in an effort to be consistent across agencies and jurisdictions. As past plan amendments (currently part of alternative A) to conduct inventories for Mexican spotted owls were derived from the first Mexican spotted owl recovery plan, we expect such inventories to be conducted as presently implemented in all alternatives using the current survey protocol from the most recent Mexican spotted owl recovery plan. The Tonto National Forest is committed to implementing all applicable parts of the most recent Mexican spotted owl recovery plan.

**Concern Statement 361.** *Commenter is suggesting additional plan components to protect at-risk species in riparian areas.*

Response:

**Comment Number(s):**

2970-472

The forest plan provides broad, program-level direction for management of National Forest System lands and resources, but does not authorize projects or activities, commit the Forest Service to act, or regulate uses by the public (revised plan, chapter 1). Thus, most riparian and aquatic habitat restoration is expected to occur as part of project implementation. Such work may include but is not limited to implementation of watershed restoration action plans in priority sixth-code watersheds, implementation of treatments recommended in total load assessments, and application of best management practices to projects and activities proposed by other forest management programs, compliance/enforcement of utilization standards for livestock grazing, acquiring instream flow water rights for streams vulnerable to dewatering, or removing non-native invasive species in aquatic and terrestrial systems.

We recognize the importance of restoring riparian and aquatic habitats on the Tonto National Forest and we acknowledge the disproportional importance of such areas to the biodiversity of otherwise arid systems. In revising the forest plan, we have sought to provide broad direction for how to go about restoring these vital systems within a multiple use framework; however, the plan does not outline the specifics projects we expect will be required to move riparian and aquatic habitats towards desired conditions. We also expect that achieving the conditions described will depend on external forces that influence water on the forest.

For a list of plan components that contribute to the ecological conditions that support species of conservation concern and contribute to the recovery of threatened and endangered species see appendix G of the environmental impact statement.

**Comment Number(s):**

2970-469

The Endangered Species Act of 1973, as amended (7 U.S.C. § 136, 16 U.S.C. § 1531 et seq.), requires that all Federal agencies utilize their authorities to carry out programs for the conservation of species formally listed by the U.S. Fish and Wildlife Service. It prohibits any Federal agency from carrying out any action that is likely to jeopardize the continued existence of any listed species. It further requires Federal agencies to consult with the Fish and Wildlife Service on actions that are authorized, funded, or carried out by such agencies that may affect listed species and/or their designated critical habitat. The Act

mandates conference with the Secretary of the Interior whenever an action is likely to jeopardize the continued existence of any species proposed for listing as threatened or endangered, or whenever an action might result in destruction or adverse modification of critical habitat proposed for listing. Pursuant to Section 7 (2)(a) of the Endangered Species Act, a biological assessment has been prepared to assess the effects of implementing the Tonto National Forest land and resource management plan and ensure that proposed actions in the selected alternative would not jeopardize the continued existence of listed species.

The regional forester's sensitive species program is the Forest Service's dedicated initiative to conserve and recover plant and animal species according to Forest Service policy (FSM 2670). It is important to note that species of conservation concern will replace regional forester sensitive species as part of the plan revision. Both categories were established so species remain viable on National Forest System lands, and therefore it is unnecessary to apply the processes for sensitive species to administrative units once forest plan revision under the 2012 Planning Rule is completed. Applying both systems on the same administrative unit would be redundant.

The 2012 Planning Rule (36 CFR 219.9(b)) requires that plan components provide ecological conditions necessary to maintain "a viable population" of each species of conservation concern and defines a viable population as, "a population of a species that continues to persist over the long term with sufficient distribution to be resilient and adaptable to stressors and likely future environments" (36 CFR 219.19). In practice, we identified substantial threats to persistence for species of conservation concern in order to then develop plan components that address such risks. In cases where all known threats were reasonably addressed, it was presumed that necessary conditions for persistence were ultimately maintained.

We recognize the importance of restoring riparian and aquatic habitats on the Tonto National Forest and we acknowledge the disproportional importance of such areas to the biodiversity of otherwise arid systems. In revising the forest plan, we have sought to provide broad direction for how to go about restoring these vital systems within a multiple use framework; however, the plan does not outline the specifics projects we expect will be required to move riparian and aquatic habitats towards desired conditions. We also expect that achieving the conditions described will depend on external forces that influence water on the forest.

**Concern Statement 362.** *Commenter is suggesting clarification to plan components and future right-of-way management.*

Response:

**Comment Number(s):**

2938-21

We acknowledge that the construction and maintenance of infrastructure (including energy rights-of-way) may result in some habitat fragmentation. Plan direction from other sections of the revised plan provide specific direction on maintaining rights-of-way while considering vegetation and land uses (chapter 2, Energy Production and Delivery). Other revised plan components (chapter 2) address the management of energy corridors and vegetation, accessibility standards, and minimizing adverse impacts to species (EG-DC-03, EG-S-02, FC-DC-03, FC-DC-05, FC-S-01, FC-G-02, FC-G-03). Plan direction in Wildlife, Fish, and Plants guideline WFP-G-06 (revised plan, chapter 2) serves in considering habitat connectivity and implementing mitigations where possible; however, we do not expect this guideline to prevent required management of infrastructure and facilities.

**Concern Statement 363.** *Commenter is suggesting the coarse-filter/fine-filter framework lack specificity and elements needed to contribute to restoring threatened and endangered species and species of conservation concern.*

Response:

**Comment Number(s):**

2970-808

Pursuant to 36 CFR § 219.9, the revised forest plan adopts a complementary ecosystem and species-specific approach to maintaining the diversity of plant and animal communities and the persistence of native species in the plan area. In our assessment of the ecological conditions necessary for at-risk species, we found that a majority of threats to these species applied to groups rather than individual species (for example, loss or degradation of riparian and aquatic habitats, threats from uncharacteristic fire, rarity and endemism, recreation impacts, etc.). Thus, very few plan components in the forest plan are truly species-specific; however, we consider many plan components to be fine-filter components in that they are not directly related to habitat conditions. Generally, we placed plan components in sections of the plan where they were most applicable (e.g., at-risk species considerations specific to the recreation program are found in the recreation section). A review of fine-filter threats and associated plan components can be found in the environmental impact statement (chapter 3, Wildlife, Fish, and Plants, At-Risk Species, Environmental Effects: Threats to Species (Fine-filter)).

While we acknowledge that some habitats are departed for a number of reasons (please see our Biological Assessment for the Tonto National Forest Land and Resource Management Plan), the revised forest plan provides direction to maintain and restore ecological integrity of habitats, including the ecological conditions needed by many at-risk species. Much of the plan direction benefiting at-risk species is found in the Vegetation and Ecological Response Units, Riparian Ecological Response Units, and Watersheds and Water Resources sections of the revised plan (chapter 2). Plan direction that applies more broadly to at-risk species can be found in the Wildlife, Fish, and Plants section of the revised plan (chapter 2). While we feel this integrated approach is beneficial to species management and forest programs, we recognize that connecting plan components with species needs is difficult in this format. As such, we have included a crosswalk of at-risk species and the plan components that provide for their long-term persistence in appendix G of the environmental impact statement.

As discussed elsewhere in our response to your comments, we acknowledge that some plan components cited in our draft environmental impact statement as supporting ecological conditions for at-risk species were not applicable or too generic to be considered valuable for some species. Our grouping of conservation topics resulted in a crosswalk of plan components and species that contained some vague, insignificant, and irrelevant content. In response to your comments, we have improved this crosswalk for the final environmental impact statement (appendix G) to be more informative and relevant.

Finally, we note that the forest plan is intended to provide broad, program-level direction for management of National Forest System lands and resources, but it does not authorize projects or activities, commit the Forest Service to take action, or regulate uses by the public as detailed in chapter 1 in the revised plan. Thus, the work of reversing trends in departed habitats is ultimately dependent upon projects and activities implemented under the guidance of the forest plan.

**Comment Number(s):**

2970-811

Pursuant to 36 CFR § 219.9, the revised forest plan adopts a complementary ecosystem and species-specific approach to maintaining the diversity of plant and animal communities and the persistence of native species in the plan area. In our assessment of the ecological conditions necessary for at-risk species, we found that a majority of threats to these species applied to groups rather than individual species (for example, loss or degradation of riparian and aquatic habitats, threats from uncharacteristic fire, rarity and endemism, recreation impacts, etc.). Thus, very few plan components in the forest plan are truly species-specific; however, we consider many plan components to be fine-filter components in that they are not directly related to habitat conditions. Generally, we placed plan components in sections of the plan where they were most applicable (e.g., at-risk species considerations specific to the recreation program are found in the recreation section). A review of fine-filter threats and associated plan components can be found in the final environmental impact statement for the draft land management plan, volume 2: chapter 3 (continued), Wildlife, Fish, and Plants, At-Risk Species, Environmental Effects: Threats to Species (fine-filter).

While we acknowledge that some habitats are departed for a number of reasons (please see our Biological Assessment for the Tonto National Forest Land and Resource Management Plan), the revised forest plan provides direction to maintain and restore ecological integrity of habitats, including the ecological conditions needed by many at-risk species. Much of the plan direction benefiting at-risk species is found in the Vegetation and Ecological Response Units, Riparian Ecological Response Units, and Watersheds and Water Resources sections of the revised plan. Plan direction that applies more broadly to at-risk species can be found in the Wildlife, Fish, and Plants section (revised plan, chapter 2). While we feel this integrated approach is beneficial to species management and forest programs, we recognize that connecting plan components with species needs is difficult in this format. As such, we have included a crosswalk of at-risk species and the plan components that provide for their long-term persistence (appendix G of the environmental impact statement).

As discussed elsewhere in our response to your comments, we acknowledge that some plan components cited in the environmental impact statement as supporting ecological conditions for at-risk species were not applicable or too generic to be considered valuable for some species. Our grouping of conservation topics resulted in a crosswalk of plan components (appendix G of the environmental impact statement) and species that contained some vague, insignificant, and irrelevant content. In response to your comments, we have improved this crosswalk to be more informative and relevant.

Finally, we note that the forest plan is intended to provide broad, program-level direction for management of National Forest System lands and resources, but it does not authorize projects or activities, commit the Forest Service to act, or regulate uses by the public as detailed in chapter 1 of the environmental impact statement. Thus, the work of reversing trends in departed habitats is ultimately dependent upon projects and activities implemented under the guidance of the forest plan.

**Comment Number(s):**

2970-485

To make the determination required by 36 CFR 219.9(b)(1), the responsible official should evaluate if emerging plan components that would provide for ecosystem integrity and ecosystem diversity (coarse-filter approach) would also provide the ecological conditions necessary to meet the Rule's requirements for all the at-risk species in the plan area. If the evaluation indicates such plan components would not

provide sufficient conditions required by the Rule for one or more at-risk species, the responsible official shall develop additional, species-specific plan components, including standards or guidelines, for each of those species (fine-filter approach).

In our assessment of the ecological conditions necessary for at-risk species, we found that a majority of threats to these species applied to groups rather than individual species (for example, loss or degradation of riparian and aquatic habitats, threats from uncharacteristic fire, rarity and endemism, recreation impacts, etc.). Thus, very few plan components in the forest plan are truly species-specific; however, we consider many plan components to be fine-filter components in that they are not directly related to habitat conditions. Generally, we placed plan components in sections of the plan where they were most applicable (e.g., at-risk species considerations specific to the recreation program are found in the recreation section). A review of fine-filter threats and associated plan components can be found in the final environmental impact statement for the land management plan, volume 2: chapter 3 (continued), Wildlife, Fish, and Plants, At-Risk Species, Environmental Effects: Threats to Species (Fine-filter).

While we acknowledge that some habitats are departed for a number of reasons, the revised forest plan provides direction to maintain and restore ecological integrity of habitats, including the ecological conditions needed by many at-risk species. Much of the plan direction benefiting at-risk species is found in other sections including the Vegetation and Ecological Response Units (ERU), Riparian Ecological Response Units (RERU), and Watersheds and Water Resources (WAT) sections for the forest plan. Plan direction that applies more broadly to at-risk species can be found in the Wildlife, Fish, and Plants (WFP) portion of the plan. While we feel this integrated approach is beneficial to species management and forest programs, we recognize that connecting plan components with species needs is difficult in this format. As such, we have included a crosswalk of at-risk species and the plan components that provide for their long-term persistence in the final environmental impact statement for the land management plan, volume 4, Appendix G: Analysis of At-Risk Species. Furthermore, for listed species under the Endangered Species Act, we have plan direction to consider habitat management objectives and species protection measures from approved recovery plans (See forest plan, chapter 2, Wildlife, Fish, and Plants).

## Rock Climbing and Fixed Anchors

### Forest Plan, Chapter 2, Recreation

In response to numerous comments related to rock climbing and rappelling on the Tonto National Forest, and specifically the use of permanent fixed anchors and bolts, the following response provides explanations and modifications to or new plan components where indicated.

#### **Original plan guideline REC-DIS-NMO-G-05 has been updated from:**

(original) “Where rock climbing is an appropriate recreational activity, permanent fixed anchors or bolts for rock climbing and rappelling should be allowed only by prior written authorization, if demonstrated impacts to at-risk species, scenic integrity, cultural resources, or user-conflict concerns have been communicated to the public, and there are no other safe means of descent available and the area is impassable by the use of removable anchors.”

#### **To updated plan guideline REC-DIS-NMO-G-04:**

(updated) “Permanent fixed anchors or bolts for rock climbing and rappelling should be allowed where resource conflicts do not exist (e.g., at-risk species, scenic integrity, cultural resources) and removable protection<sup>10</sup> is not practicable for safe ascent or descent for approved routes.”

The new language identifies ascent along with descent as a type of rock climbing and rappelling activity, removes confusing language about identifying where rock climbing is an appropriate activity, and removes the requirement for permanent fixed anchors and bolts for rock climbing and rappelling to have a prior written authorization. The actual guideline number may have changed from the original draft, but the plan component remains under the forest plan, chapter 2, Recreation, Dispersed Recreation, Non-Motorized section as a guideline.

#### **Plan desired condition REC-DIS-NMO-DC-04 remains the same:**

“Unauthorized permanent fixed anchors for rock climbing and rappelling are not present on the landscape or natural features.”

This desired condition expresses the need to prevent illegal infrastructure, i.e., fixed anchors, in order to protect other natural resources such as at-risk species, scenic integrity, and cultural resources. This plan component is general, and its purpose is not to identify a need for authorization to install permanent fixed anchors, but to identify a resource desired condition where illegal infrastructure is not present. We recognize that illegal installation of permanent fixed anchors without consideration of values such as sensitive species habitat, scenic byways, and cultural resources is a management issue, and thus there is a need for action brought forth by additional plan components (standards, guidelines, and management approaches). The actual desired condition number may have changed from the original draft, but the plan component remains under the forest plan, chapter 2, Recreation, Dispersed Recreation, Non-Motorized section as a desired condition.

#### **Plan management approach REC-DIS-NMO-MA -04 has been split**

This plan component was split into two separate plan components to increase clarity and address two different topics related to management plans and fixed anchors.

REC-DIS-NMO-MA-04: “Collaborate with established local and national climbing, caving, and canyoneering organizations to monitor popular and desirable climbing areas and develop best

---

<sup>10</sup> Removable protection is defined as removable anchors and other temporary equipment.

practices and management plans for these areas (e.g., cave management plans, climbing management plans, vertical trails, individual route applications, and canyoneering routes)”

REC-DIS-NMO-MA-05: “Coordinate with local partners and climbing groups to either remove or implement maintenance and replacement of existing fixed anchors and bolts and to consider new areas when necessary to meet demands for rock climbing and rappelling while meeting public safety and natural resource desired conditions and where compatible with other National Forest uses”

These management approaches address the maintenance of existing fixed anchors and the recommended approach for the Forest to consider new routes and areas for this recreational activity. The Forest and Districts should work with local organizations to address user needs and Forest resource concerns when developing management plans for this recreational activity.

To our knowledge, there are currently numerous undocumented permanent fixed anchors and bolts installed throughout the Tonto National Forest. These infrastructures are not permitted and did not undergo National Environmental Policy Act analysis for approval before installation. Because we do not have a complete list of where these infrastructures are and have not performed the National Environmental Policy Act analysis to evaluate resource impacts, the Forest Plan cannot identify a plan component that "grandfathers" existing permanent fixed anchors and bolts.

#### **New plan management approach REC-DIS-NMO-MA-06**

The final plan includes the addition of a new management approach as a direct response to comments.

REC-DIS-NMO-MA-06: “Work with partner organizations and user groups to expand public education on safe recreational climbing practices and the use of permanent fixed anchors and bolts. Coordinate enforcement efforts with partner agencies, user groups, clubs, and local organizations to increase public education and build “self-regulation” within the recreational climbing community.”

## List of Commenters

Table 1 lists each commenter, their unique letter number, and any listed affiliation. This table will help commenters find their specific comments and determine how it was coded by searching the letter number field once it is known. Many comment letters include multiple concern statements, which are responded to under applicable categories and concern statements in this appendix.

**Table 1. List of individuals, organizations and government affiliates, and letter numbers**

Last Name	First Name	Letter #	Organization Name
A.	L.	644	
A.	Lauren	857	
Aber	Thomas	904	
Accardo	Jan	475	
Accary	Hania	3663	
Accary	Hania	4230	
Adams	Jeanna	2697	
Adams	Bett	2777	
Adams	Chris	2873	
Adams	Jill	4148	
Adcock	Michelle	519	
Ademi	Elizabeth	4297	
Aden	Sandi	4098	
Aderhold	Sebastian	1965	
Adkins	Patti	3804	
Agneessens	Rosemary	3907	
Agnew	Erika	2850	
Agriopoulos	Danielle	4009	
Ahlstrand	Heidi Lynn	1052	
Ahlstrand	Heidi Lynn	2217	
Ahmad	Taimur	1980	
Aiken	Edwin	199	
Aker	Kathi	1284	
Akiba	Lorraine	1523	
Akin	Kyle	1709	
Alabiso	Marie	3980	
alayza mujica	bernardo	787	
Albert	Susan	1508	
Albert	Susan	3452	
albin	merritt	2579	
Albrecht	Mark	3975	
Albrecht	Yvonne	4169	
Alderete	David	56	
Alderete	Olivia	56	
Alexander	Kathleen	1483	
Alexander	Peggy	3841	
Alexis	B J	417	

Last Name	First Name	Letter #	Organization Name
Algasso	JoAnn	242	
Alioto #1452	Janine	2673	
Allen	Mary	249	
Allen	Ann	314	
Allen	Ann	1438	
Allen	Aaron	1757	
Allen	Karen	2855	
Allen	Donna	3643	
Allen	Sylvia	3772	
Allison	Connie	1295	
ALM	LUKE	67	
Almanza	Devin	2779	
Almasy	Lucy	4162	
Alquist	David	80	
Altman	Andrew	1941	
Alvarado	Margaret	4274	
Always	Patricia	931	
Alyxander	Thomasin	392	Ubeadquitous
Amato	Ashley	2743	
Ambler	Susan Kelly	2396	
ames	nannette	342	
Ames	Carol	3964	
Amicis	Lorenzo	2517	
AmRhein	Fred	1792	
Amundrud	Thomas	3290	
Anacker	Celeste	367	
Anacker	Celeste	1392	
Anaya	Lucas	1914	
anchors	carla	1075	
Anderholm	Jon	772	
andersen	glenn	2362	
Anderson	Matthew	328	
Anderson	Karen	414	
anderson	jeffery	419	
Anderson	Rosanne	716	
Anderson	Karen	1122	
Anderson	Fred	1196	



Last Name	First Name	Letter #	Organization Name
Anderson	Glen	1331	
Anderson	Dorothy	1385	
Anderson	Christina	1456	
Anderson	Betty	1462	
Anderson	Sean	1931	
Anderson	Nicholas	2093	
Anderson	Tor	2101	
Anderson	Amy	2400	
Anderson	Cynthia	2836	
Anderson	Bobby	2863	
Anderson	Mary	3129	
Anderson	Gena	3294	
Anderson	Laurel	3386	
Anderson	Richard	3608	
Anderson	Fred	3619	
Andregg	S.	1409	
Andrews	Warren	1885	
Andrews	Nancy	3245	
Andrews	Daniel	3533	
Angell	JL	119	
Angora	Andria	518	
Angus	Billy	725	
Angus	Billy	1527	
Anifer	Penni	4242	
Anifer	Penni	4243	
Annecone	Lisa	789	
Anon	Carol	96	
Anon	Anon	102	
Anon	Andrea	202	
Anon	Sabine	335	
Anon	Sandi	361	
Anon	Anon	455	
Anon	Anon	622	
Anon	Yvette	845	
Anon	Pat	863	
Anon	Anon	927	
Anon	Anon	1128	
Anon	J	1237	
Anon	Anon	1241	
Anon	Nina Degracia	1252	
Anon	Anon	1289	
Anon	Anon	1299	
Anon	Anon	1417	
Anon	Anon	1555	
Anon	Anon	1608	

Last Name	First Name	Letter #	Organization Name
Anon	Anon	2403	
Anon	Anon	2464	
Anon	clarence	2552	
Anon	Robert	2568	
Anon	Anon	2831	
Anonymous	Anonymous	5	
anonymous	anonymous	445	
anonymous	anonymous	993	
anonymous	anonymous	2198	
Anstey	Cynthia	3195	
Antaya	Christine	2726	
antle	kathy	4284	
Apodaca	Daniel	1898	
Appenzeller	Cary	745	
Aranita	Rose	2707	
Archer	Tracey	1459	
Arent	Raymond	1172	
Arguello	Sylvana	171	
Arguello	Sylvana	2380	
ARIAS	LAURA	1320	
Armbruster	Charlotte	56	
Armbruster	Dieter	56	
Armentrout	Harley	3987	
Armstrong	Valerie	2043	
Armstrong	Zach	2758	
arnette	celestine	3712	
Arnold	Ben	482	
Arnold	Pat	2421	
Arnold	Aimee	3088	
Arnold	Susan	3961	
Arnone	Ruth	2605	
Aroneo	Regina	2936	
Aroneo	Regina	4056	
Arsenault	Kyle	2549	
Ashton	James	1953	
Ashworth	Dianne	2852	
Aston	Robert	1942	
atkins	kathryn	2322	
Atkinson	James	663	
Atkinson	Ellen	2342	
Atwood	April	3906	
Aukeman	Darcie	4295	
Aurin	Trina	327	
Austin	Guy	2951	
Austring	Dee	3172	

Last Name	First Name	Letter #	Organization Name
Averill	Zach	1917	
Averre	Jen	1187	
Avila	Dayana	440	
Aydelott	Steve	879	
Ayers	Robert	4276	
Ayin	Samantha	847	
Ayyar	Adarsh	2249	
Ayyar	Adarsh	3485	
Aziz	Mark	177	
B	L	3361	
B.	Christine	826	
Babb	Gary	1382	
Babbitt	Susan	637	
Babula	Richard	2372	
Bach	Julie	1000	
Backhouse	Maxi	4194	
Baclija	Martin	504	
Baclija	Martin	2298	
Bade	Kathy	4089	
Baden	Eileen	4278	
Bader	Larry	2902	
Badila	John	1720	
Baechle	Jake	1731	
Baer	Martha	4267	
Bahr	Sandy	2970	Sierra Club - Grand Canyon Chapter
Bailey	Stephen	191	
Bailey	Chrissy	571	
BAILEY	DORI	1094	
Bailey	Helen	1228	
Bailey	Marie	4081	
Bains	Jeffrey	1290	
Bakal	Martin	3481	
Baker	Diana	1470	
Baker	Darlene	2371	
Baker	Tiffany	2412	
Baker	Kristina	2584	
Baker	Peggy	3644	
Balaban	Susan	903	
Balan	David	2156	
Bales	Clarice	3011	
Balicka	Maria	1207	University of Washington
Ballard	Terry	3256	
Ballou	Jeffrey	210	

Last Name	First Name	Letter #	Organization Name
Ballou	Cary	3978	
Balls	Ligma	10	american citizens
Balog	Ranko	705	
Baltin	Brian	2238	
Bambauer	Jennifer	4153	
Baralis	Indira	3158	
Barbara	Jennifer	1668	
Barbeau	Rich	1723	
Barker	Richard	3408	
Barkley	Daniel	3710	
Barlett	Randy	2009	
Barlow	Marla	3777	
Barnett	Curtis	91	
Barral	France	2439	
Barredo	Aileen	3604	
Barreto	Stanley	990	
Barrett	Lisa	493	
Barrett	Lisa	1364	
Barrett	Eric	1797	
Barri	Val	1468	
Barrie	Lori	2426	
Barry	Sharon	1495	
Barthelson	Roger	3008	
Bartlett	David	216	
Bastek	Christopher	2513	
Bastian	Mark	3191	
Batcheller	Paul	2086	
Bates	Gina	247	
Batway	Jewell	3476	
Baumgardner	Rex	4170	
Baxter	Jo	1198	
Beach	Mark	2479	
Beach	Mark	2494	
Beal	Tricia	3984	
Beam	Ryan	3629	
Bean	F	591	
Bean	F	1647	
Bean	Heidi	2160	
Beard	Pamela	1035	
Beaton	Suzanne	252	
Beavers	Nancy	237	
Bechko	Corinna	4155	
Bechmann	Elisabeth	3192	
Bechtel	Paul	720	

Last Name	First Name	Letter #	Organization Name
Bechtold	Scott	3439	
Becker	Jaime	2565	
Bedford	Linda	3896	
Behl-Whiting	Kathy Marie	967	
Behl-Whiting	Kathy Marie	2181	
Beighe	Denise	3773	
Belanger	Scott	2472	
Belew	Lynette	3947	
Belflower	Reuben	2006	
Bell	Moe	56	
Bell	Stephanie	1142	
Bell	Mackenzie	1939	
Bell	Kellie	2828	
Bell	Kellie	3035	
Bell	Steve	3062	
Bell	Pat	3858	
Bello	D	936	
Bellville	Bonny	3632	
Beloin	Theodore	3781	
Bemis	MCarolyn	2234	
Bender	Donna	436	
Bender	Donna	1610	
Benefield	Julianna	1220	
Benet	Mercedes	948	
Benevento	Gina	822	
Benjamin	Jonathan	2529	
Bennetts	Sam	2514	
Bennetts	Sam	2527	
Benschoter	John	3910	
Bensinger	Judy	429	
Benson	Elsa	3620	
Benson	Joyce	4205	
Benton	Susan	3096	
berario	myra	947	
Bercaw	John	1844	
Berg	David and Judith	3098	
Berger	Karen	842	
Berger	Karen	1103	
Berger	Leah	3552	
Bergeron	Adrian	629	
Bergeron	Sheilagh	1350	
Berginc	Jasmine	1901	
bergman	scott	68	
Bergreen	Marc	1963	

Last Name	First Name	Letter #	Organization Name
Berkeley	Pauline	2263	
Berkmen	Victoria	4014	
Berko	Ilan	1907	
Berman	Anon	747	
berman	siegrid	781	
Bernath	Tina	1225	
Berry	Nina	1269	
Berryman	Sabrina	3588	
Bersell	Barbara	1538	
Bersson	Jessie	46	
Bertelsen	Luke	1848	
Bertoi	Jonathan	1843	
Bertram	Harrison P	662	
Bess	Jim	1213	
Best	Rhonda	3169	
Bethany Rakes	Julie	3170	
Bevan	Erik	17	
Beves	Peter	970	
Beyer	Janice	423	
Beyer	Kevin	3182	
Bhatnagar	Deepika	1990	
Bhence	Blaze	376	
Bhend	John	1395	
Bian	Amanda	3971	
Bibler	Todd	2017	
Bickel	Bettina	3374	
Biehn	Lisa	2832	
Bierman	Kenneth	3681	
Bieszk	John	2402	
Bigglestone	Branwyn	4115	
Bilger	Robert	2595	
Billings	Brian	4111	
Bindseil	TJ	1856	
Bingaman	Vince	40	
Binnie	Robert	3076	
Bird	Zoe	2455	
Bird	Bryan	2868	
Bishop	Brooke	201	
Biss	Jeffery	585	
Bisschop	Peter	1568	
Bisschop	Peter	3016	
Bittner	Michael	1087	
Bittner	Michael	4154	
Black	Sherry	1301	
Black	Carol	2646	

Last Name	First Name	Letter #	Organization Name
BlackmerBlomquist	Stacy	4180	
Blackwell	Stephen	1995	
Blackwell-Marchant	Patricia	410	
Blackwell-Marchant	Patricia	1358	
Blain	Richard	1285	
Blair	Debbie	1432	
Blakestad	Nancy	3111	
Blanco	Heather	1846	
Bland	Nancy	1354	
Blandford	Mark	634	
Blandford	Rick	2840	
Blasco	Natalie	880	
Blevins	Anita	3381	
Blidar	Ronald	856	
Bloch	Aleta	3387	
Bloodworth	Ben	1711	
Blubaugh	Christine	4195	
Blue	Donna	1296	
Blumberg	John	3186	
Blume	Sharon	3868	
bocchetti	ralph	2162	
bocchetti	ralph	2440	
Bockelman	Kathy	3711	
Boehler	Karen	2349	
Bogen	Nancy	522	
Bogen	Nancy	1092	
Bogios	Constantine	766	
Bogle	Lauren	2131	
Bohman	Richard	2825	Central Arizona Grotto
Bohn	Diana	1073	
Bohr	Ron	3469	
Bokun	Radojka	3731	
Boland	Tara	2782	
Bold	Richard	293	ATT plus DirecTV
Bolembach	Kevin	223	
Boles	Crystal J	3541	
Bolesta	Murray	3296	
Bolton	Loretta	2373	
Bolyard	Sam	2536	
Bond	George	308	
Bond	David	3708	
Bondoc	Michael	1139	

Last Name	First Name	Letter #	Organization Name
Bondy	Sandrs	3517	
Bonner	Tracey	998	
Bonner	Sarah	2700	
Bonner	Dana	3314	
Boone	Emily	1023	
booth	Frank	3433	
Bordelon	Tika	853	
Bordelon	Tika	2159	
Borg	Carolyn	2471	
Borgerding	Danielle	33	
Borgeson	Dean	481	
Borowski	Aaron	1162	
Bostick	Eileen	278	
Botkin	John	3778	
Botto	Sherri	3897	
Botz	Andrew	3136	
Boucher	Jason	1938	
Bourdon	Nicholas	1804	
Bousquet	Bob	1327	
Bowers	Gail	3899	
Bowley	Kat	2424	
Bowman	Ruby	1152	
Bowman	Emily	2053	
Bowman	Trevor	2092	
Bowman	Renae	4092	
Bowyer	Ian	1947	
Box	Ken	1061	
Boydston	Jean	4109	
Boyer	Tod	906	
Boyle	Madeleine	4053	
Bradley	Kathy	1415	
Bradley	Marya	2650	
Bradley	Heath	2773	
Bradshaw	Debi	56	
Bradshaw	Mike	56	
Brady	Nathan	2511	
Brainard	Verna	756	
Braithwaite	Georgia	1391	
Braithwaite	Georgia	3150	
Branam	Linsey	38	
Brandes	Germano	932	
Brandes	Susan	3347	
Branin	Fred	2866	
Brannon	Elizabeth	3422	
Braun	Clait	3041	

Last Name	First Name	Letter #	Organization Name
Brayman	Alex	1706	
Breakfield	Sandra	1342	
Brearley	Owen	11	
Breda	Bo	2275	
Brenn	Dorothy	3377	
Brenner	Natasha	447	
Brenner	Jared	1498	
Brenner	Lise	1552	
Brenner	Jane	4245	
Bressler	Ryan	1824	
Brewer	Georgia	100	
Brewer	Anna	1267	
Brewer	Amanda	1435	
Brewer	Anna	3189	
Brewer	Roger	4213	
Brinker	Debra	3337	
Brinker	Debra	4182	
Brite	Sonya	3419	
Britton	Terrie	2974	Arizona Mining Association
Broadbent	Dawn	972	
Brockhaus	Matthew	1904	
Brockway	Charles	2752	
Brodd	Jon-Paul	1835	
broll	carol	232	
Brooke	Michael	4068	
Brooker	Jim	3203	
Brooks	Mary	281	
Brooks	Jen	291	
Brosky	Michelle	788	
Bross	CT	592	
Brothers	Nancy N	750	
Broughton	Beatrice	759	
Brown	Kevin	229	
Brown	Dannis	306	
Brown	Janice	488	
Brown	Maryetta	821	
Brown	James	974	
Brown	Kevin	1197	
Brown	Doug	1557	
Brown	Chad	1779	
Brown	Nicholas	1962	
Brown	Nancy	2140	
Brown	James	2180	
Brown	Jenny	2982	

Last Name	First Name	Letter #	Organization Name
Brown	Wynne	3090	
Brown	J.	3159	
Brown	Jeffrey	3636	
Brown	Duncan	3865	
Brown	Lindie	4032	
Browne-Schlack	Stephanie	1976	
Brownfield	Harry and Jill	2218	
Browning	Marjorie	3282	
Brtis	Tim	2745	
Bruce	Felicia	1158	
Bruce	Jonathan	1993	
Bruce	Joy	2317	
Bruce	Peter	2804	
Bruhis	Noa	2985	
Bruhneke	Andrea	1805	
Bruno	Christina	1902	
Brusin	Eugene	257	
Bryan	Pat	757	
Bryan	Pat	1398	
Bryant	Elizabeth	425	
Bryant	Lori	3067	
Bubb	Anthony	1869	
Buck	Barbara	3253	
Buell	Richard	1950	
Bugliarelli	Diane	542	
Bugliarelli	Diane	2228	
Bulla	Terry	135	
bullock	tammy	1491	
Bumanis	Christy	3602	
Bundschu	Anton	1737	
Buness	Cynthia	3860	
Burak	Pauline	2582	
Burback	Larry	578	
Burback	Sandi	3656	
Burbank	Molly	1911	
Burch	Robert	1355	
Burg	Rev. Max	2143	
Burgard	Brittany	2528	
Burgess	Jeff	23	
Burgess	Jeffrey	2463	
Burgess	Jeff	2808	
Burgess	Eleanor	3109	
Burgess	K. H.	3119	
Burgess	Christa	3418	

Last Name	First Name	Letter #	Organization Name
Burgunder	Henry	4152	
Burke	A Janine	1192	
Burke	Kelly	2970	Wild Arizona
Burke	Kathleen	3345	
Burke	Laramie	4026	
Burkhart	Alice	3320	
Burns	Shane	1988	
Burns	Lyn	4134	
Burr	Paula	3047	
Burr	Brandon	4136	
Burton	Bruce	1860	
Burton	Patricia	3493	
Burton	Lura	4237	
Burval	Peter	1639	
Bus	Danielle	3103	
Buscemi	Donna	344	
Buscemi	Donna	2671	
Buskirk	Dale	4252	
Bustamante	Maria	1597	
Butkus	Joann	480	
Butler	Kimberly	20	Maricopa County Air Quality Department
Butler	Nancy	1461	
Butler	Jeff	1903	
Butler	Sam	2308	
Butler	Elizabeth	2907	
Butler	Ava	3557	
Butler	Lane	4075	
Buttermore	Patrick	49	
Butters	Arlene	181	
Buttery	Rickey	1093	
Buyan	Brett	1517	
Cabico	Cailin	1888	
Cacioppo	Judy	214	
Caiazzo	Joan	1367	
Cais	Sandra	275	
Calambro	Leslie	2261	
Caldwell	Mary	3814	
Cale	Nancy	2648	
Calhoun	Jackie	1582	
Calhoun	Kitty	1800	
Calhoun	Jerry	3241	
Callahan	Ellen	2345	
Callaway	Sunday	4216	

Last Name	First Name	Letter #	Organization Name
Callin	Julian	1875	
Calvo	Jeannette	355	
Camerlin	Amber	2761	
Campbell	Norma	531	
Campbell	Donna	916	
Campbell	Allan	956	
Campbell	Varday	3857	
Campbell	Brenda	3963	
Campbell	June	4095	
Cangilla	Hannah	1707	
Canivez	Nicolas	1866	
Canright	Mark	180	
Canright	Rebecca	193	
Canter	Mindy	1389	Location Properties
Cantor	Alison Cantor	3901	
Canty	Ken	2200	
Cappas	Marina	1334	
Cappello	Robert	4091	
Caprioli	Paul	1276	
Caputo	Michael	801	
Caputo	Michael	2138	
Caracci	Gina	743	
Carbia	Vanessa	3892	
Carcache	Jonathan	3977	
careccia	maryfrances	1522	
Carley	Jim	2230	
Carlson	Rita	824	
Carlson	James	1718	
Carlton	Hawken	3464	
Carmean Floyd	Roxann	263	
Carmean Floyd	Roxann	4159	
Carmichael	Brenda	2387	
Carney	Cheryl	646	
Caron	Bruce	3898	
Carpenter	Barbara	3786	
Carrell	Jimmy	1360	
Carrington	Martha	427	
Carroll	Linda	939	
Carroll	John	1410	
Carroll	James	1868	
Carroll	Karen	2394	
Carstarphen	Kristin	437	
Carter	Rob	319	
Carter	Alan	991	

Last Name	First Name	Letter #	Organization Name
Carter	Gary	1310	
Carter	Rob	2571	
Carter	Ben	2749	
Cartwright	Philip B	3306	
Carver	Georgia	1687	
Casner	George	3559	
Casper	Chris	273	
Castelli-Hill	Susan	711	
Castillo	Rita	901	
Castine	Timothy	1036	
Castle	Allison	510	
Casucci	Tallie	2542	
Caulfield	Rebecca	3867	
Caviglia	G	805	
Caviglia	G	1507	
Cederholm	Mark	3618	
Celaya	Kristene	3351	
Celler	Theodore	2507	
Celli	Eli	2854	
cervini	kristine	4080	
Chacon	S J	4225	
Chadwick	Lisa	2631	
Chadwick	Gail	2924	
Chaffin	Barbara	2668	
Chain	Leslie	334	
Chandra	Anshuman	4028	
Chapman	Rich	3338	
Chappell	Carol	1280	
Char	Elizabeth	3842	
Charbonneau	Sandra	2690	
Charles	Stanley	1407	
charney	danielle	3297	
Chase	Felicia	1486	
Chase	Peggy	2800	
Chase	Ronald	2801	
Chase	Carol	2959	
Chavez	Phyllis	438	
Chavez	Josh	2775	
Chavez	Salissa	3974	
Chemistruck	Vicki	2742	
Cherry	Patrick	2518	
chesner	donna	3147	
Chevallier	Jeremy	2975	
Chinn	Karen	784	
Chipman	Pamela	349	

Last Name	First Name	Letter #	Organization Name
Chirchirillo	Joe	1780	
Chodosh	Janie	2617	
Choppers-Wife	Sue	3102	
chopra	neetu	2437	
Chorlton	Roberta	3112	
Christensen	Donna	3091	
Christensen	Margaret	4038	
Christiansen	Chris	14	
Christiansen	Karen	1485	
Christiansen	Kevin	1851	
Christie	Bill	3687	
Christoff	Stephanie	1702	
Chua	Matthew	1810	
Church	Katie	2119	
Chynoweth	Iris	3734	
Ciafone	Siobhan	1969	
Cicchitto	Derek	1959	
cielukowski	john	1116	
Ciesielski	J.B.	240	
Cimino	Eve	3349	
Cisna	Todd	678	
Cisna	Todd	1329	
Cizek	Robert Karen	3023	
Clancy	Mike	3503	
Clark	Connie	559	
Clark	Stephanie	758	
Clark	Rebecca	923	
Clark	Diane	1038	
Clark	Stephanie	1669	
Clark	Jan	2845	
Clark	Carol	2908	
Clark	Virginia	3534	
Clarke	Veronica	41	
Clarke	Eithne	1060	
Clarke	Zackary	1785	
clausen	karen	1257	
clavin	tom	4030	
Cleary	Karen and Will	323	
Cleaver	Melissa	132	
Clemens	Regina	3336	
Clement	Monica	3941	
Clements	Jordy	1836	
Clendenin	Ann	3568	

Last Name	First Name	Letter #	Organization Name
Cleveland	Randall	239	PEACE-Protecting Earth and Animals with Compassion and Education
Clewlow	John	4235	
Clifton	Matthew	1773	
Cline	Robert	2933	
Cline	Woody	2991	Gila County Board of Supervisors
Clinger	Patricia	3072	
Clinger	Patricia	3073	
Close	Austin	1949	
Cloud	James	3912	
Coalgate	Jerry	708	
Cobb	Sandra	582	SEIU
cobb	robert	2278	
Cobb	Abraham	2892	
Cody	T. Stephen	3554	
Coen	Laura	2118	
Coffman	Kathy	3633	
Coghlan	Ronald	3956	
Cohen	Judy	2361	
Cohen	Judy	2433	
Cohill	Michael	1536	
Cohn	Janet	3383	
Colangelo	Annapoorne	1136	
Colangelo	Kim	3435	
Cole	Susan	1022	
Cole	Cal	1356	
Cole	Emma	2897	
Cole	Mary Lou	3264	
Colebank	Darryl	4002	
Coleman	David	1259	
Coleman	Lynne	4211	
coleman taylor	peggy	907	
Collins	Carol	340	
Collins	Patricia	817	
Collins	Carol	1125	
Collins	Aaron	2095	
Collins	Tyler	2477	
Collis	Robert	2879	
collodel	deborah	309	
Colours	Rebekah	2436	
Colpas	Marcie	3967	

Last Name	First Name	Letter #	Organization Name
Colson	Rosemary	657	
Colton	Cammy	608	
Colton	Jeff	892	
Comerford	Martin	2466	
Condry	Jacque	3407	
Conger	Carol	3900	
Conklin	Lu	3318	
Conn	Patrick	267	
Conner	Charles	3149	
Connery	Matt	1820	
Connolley	Meggen	4198	
Connolly	April	1104	
Conroy	Beverly Ann	909	
Conroy	Thomas	2297	
Conway	Bill	77	
Conway	Maurene	154	
Conway	Maurene	2184	
Conway	Courtney	2976	
Conway	Robert	3229	
Cook	Gary	1049	
Cook	Ruth	1481	
Cook	Vicki	3013	
Cooper	Gerald	3611	
Cooper	Jan	3862	
Copello	Janell	546	
Copenhaver	Patricia	765	
Coppotelli	Heide	227	
Coppotelli	Fred	553	
Corby	Jackie	534	
Cordes	Kristina	1719	
Cordes	Kelly	2661	
Cording	Paul	1749	
Corey	Marilee	937	
Corkett	Ann-Marie	1072	
Corkett	Ann-Marie	2226	
Cornelia	Jared	554	
Cornelia	Jared	1222	
Cornell	John	2972	Theodore Roosevelt Conservation Partnership
Correa	Jose	1998	
Corry	Ronit	605	
Cosand	Diana	4027	
Costa	Lynn	651	
Costa	Mike	3852	



Last Name	First Name	Letter #	Organization Name
Costamagna	Marilyn	2273	
Costantino	David	3022	
Cota	Rouchelle	3914	
Cottam	Daniel	2876	
Cotter	Justina	2996	
Couch	Sandra	2790	
Couch	Sandra	2904	
Coultas	Gary	2763	
Courts	Ian	3920	
Covello	Sue	408	
Covey	Tim	357	
Coviello	Deborah	1079	
Covington	Mike	2981	
Cowee	Elizabeth	1889	
Cowell	Kristina	2125	
Cox	Nate	1978	
Cox	Marie	3328	
coz	ann	1650	
Crabill	Phillip J	478	
Cradic	Sharon	3526	
Cragin-Bruns	Moiselle	2720	
Craig	Ann	1380	
Craig	Elizabeth	3275	
Crane	Marcella	4132	
Crawford	Wanda	3972	
Crawley	Johnathon	2130	
Cremin	Gayla	187	
Crenshaw	Robert	3312	
Crist	Dawn	1575	
Criswell	Peggy	3659	
Croasdale	Kathlene	636	
Crook	Alia	2019	
Crooms	Sandy	459	
Crosby	Christina	2438	
Cross	Darryl	22	
Cross	Dave	506	
Crossett	Cheyenne	4262	
Crouse	Linda	1451	
Crouser	Paul	286	
Crowe	Peter	3310	
Crowley	Joyce	124	
Crowley	Luke	4000	
Crumbo	Kim	2970	The Rewilding Institute
Cruz	Benjamin	3053	

Last Name	First Name	Letter #	Organization Name
Cunico	Juliette	2414	
Cuny	Chris	2978	
Curia	Peter	4062	
Curiak	Mike	2744	
Curl	Teresa	4072	
Curleu	June	1688	
Curran	John	589	
Curtis	Janell	882	
Curtis	Tasha	2224	
Cushing	Michael	1322	
cutler	debbie	3162	
Cuttler	Elaine	3431	
Cutts	Matt	1602	
Czaplicki	Christopher	47	
D	LII	2407	
Dacus	Chris	1658	
Dahl	Elizabeth	2280	
Dahlgren, PhD	Mr. Shelley	404	
Daigle	Jennifer	4006	
Dailey	Eileen	3424	
dalal	namita	1506	
Dale	Donna	2290	
Dale	Donna	3646	
Dalton	Marsha	375	
Damato	Susan	2220	
Dameron	Susan	2341	
Damiani	Mary Beth	3300	
dander	katherine	1247	
Dandrea	Mary	3213	
Daniel	Kian	2567	
Daniele	Renate	3876	
Danielson	Sarah A	3874	
Dankwort	Rudolf	3097	
DAnna	Marie	737	
danowski	k	2332	
Darden	Ruth	517	
Darling	Carrie	3488	
Davenport	Patricia B.	2236	
Davenport	Susan	2350	
Davidson	Sally	3871	
Davies	Len	3413	
Davis	Charles	3	
Davis	Ryan	122	
Davis	Ellen	366	
Davis	Ryan	1130	

Last Name	First Name	Letter #	Organization Name
Davis	Shonna	1406	
Davis	Thomas	1834	
Davis	Glenn	2269	
Davis	Suzanna	3184	
Davitt	Margaret	2257	
Dawson	James	108	
de Castro	Brian	977	
De Cecco	Jorge	2177	
De Fiore	M	4266	
Deal	Tiff	986	
Deapen	Kristopher	3463	
DeBraal	karen	3686	
deBurlo	Robert	1992	
Declerck	Michael	1818	
DeCristofaro	Jeffrey	3548	
Deddy	John	1029	
Dee	Diana	924	
Dee	Laurice	3206	
DeGennaro	Matthew	1874	
Deierling	Rachel	4096	
Deiure	Francesco	3725	
Delaney	Janet	930	
Delange	Dan	2051	
Dellospidale	Mary	567	
Dellospidale	Mary	1127	
demars	sylvia	3913	
Demetre	Victoria	3730	
Dempsey	Sheila	573	
Denis	Laurie	1009	
Denis	Laurie	1105	
Denissen	Paula	770	
Dennings	Jo Ann	3716	
der Marwitz	Anna	2533	
Deroche Jr	Russel	2358	
Desens	Krista	3421	
DeShazo	Bridget	2104	
Deshotel	Shelley	3240	
Desmond	Jeanette	620	
Desmond	Sheila	2338	
Desousa	Sarah	715	
DeStefano	Jerry	2535	
Deter	Nicole	460	
Deter	Nicole	1227	
Deters	Ron	2636	
Dethman	Rick	2510	

Last Name	First Name	Letter #	Organization Name
Detmers	Peggy	1223	
Devers	Deborah	2327	
DeVine	J	3199	
Devlin	Summer	1243	
Devlin	Katie	3986	
DeWitt	Steven	1882	
Dexel	Levi	2861	
Dezutti	Joyce	2614	
Di Maria	Karuna	3623	
Di Russo	Donald	764	
Diamante	Nina	1182	
Diamond	Wendy	2315	
Diaz	Denise	2645	
DiBlanca	Joseph and Lynn	466	
Dickson	Mary	512	
Diehl	Patrick	511	
Diernbach	Diane	3727	
Dietzmann	Cynthia	2442	
DiFante	Diane	594	
Dillon	Brent	2011	
DiMiceli	Crystal	1085	
Disilvestro	Kyle	56	
Disilvestro	Stephanie	56	
Ditchman	Michele	2328	
Ditsworth	Thomas	3542	
Dixon	Billy	1862	
Dixon	Joyce	2627	
Doane	Jesica	1981	
Dobson	Patricia	2366	
Dockstader	Wendie	4222	
Dodd	Belinda	914	
Dodgen	Sharon	3834	
Dolinajec	Noah	4238	
Dollard	Nancy	253	
Doman	Heidi	3699	
Dominguez	Suzanne	4097	
Donahoe	Kevin	2501	
Donahue	Madeleine	3875	
Donahue	Katharine	3957	
Donnelly	Stephen	121	
Donnici	Anthony	2395	
Donovan	Elaine	346	
Donovan	Stephan	3450	
Doochin	Dianne	796	

Last Name	First Name	Letter #	Organization Name
Doochin	Dianne	2144	
Doolen	Tina	2309	
Doolittle	Aaron	2016	
Dorchin	Susan	1177	
Doty	Connor	3787	
Doucet	Lisha	2659	
Doucette	John	2369	
Dougherty	Amy	3539	
Douglas	Dianne	3905	
Douglass	Amy	3566	
Douma	Barbara	2251	
Dowling	Holly	149	
Dowling	Holly	1525	
Dowling	Holly	4012	
Downey	Deirdre	717	
Dragon	David	697	
Drakos	Paul	1767	
Draus	Sandy	2005	
Draus	Sandy	2094	
Dravida	Srikiran	412	
Dreier	Tamara	1562	
Drever	Kevin	871	
Driscoll	Marie	719	
Dryer	Ellen	106	
Dublinski	Jim	2969	
Duckert	Ken	2434	
Duemler	Scott	2122	
Dufficy	Judy	467	
Duffy	Therese	4272	
Dugaw	Anne	250	
Dumaplin	Kathleen	3161	
Dunay	Terry and Susan	26	
Dunay	Sue	2703	
Duncan	Sylvia	317	
Duncan	Kimberly	1055	
Dunn	Timothy	120	
Dunn	Kellen	300	
Dunn	Kathy	448	
Dunn	John	472	
Dunn	Gary	1165	
Dunn	Kellen	1487	
Dunn	Timothy	1497	
Dunn	Tammi	2620	
Dunn	Elmo	2699	

Last Name	First Name	Letter #	Organization Name
Dunn	Patrick	4147	
Duon	Nicolas	303	
Duon	Nicolas	1488	
Durand	Stephen	2937	Saguaro Lake Ranch
Durante	Lorraine M	3594	
Duray	Phyllis	3851	
Durbin	Jay	2543	
Durbin	Kira	2953	
Durfee	Alex	2739	
Durrer	Mary	1067	
Durrer	Mary	1444	
Durum	Kathy	1026	
Durum	Kathy	1594	
Dusek	Russell	2239	
Dutschke	Stephen	1235	
Duvert	Elizabeth	397	
Dyke	Ruth	566	
Dykstra	Tom	3800	
Dylan	Phoebe	3810	
Dzikoski	Angela	3790	
Eames	Cheryl	4176	
Earl	Nelson	3946	
Earney	Michael	621	
Earney	Michael	1229	
Eastham	Robert	3793	
Eastman	Susan	763	
Eaton	Kathleen	1340	
Eaton	Linda	3480	
Eaves	Mitch	2072	
Eby	Amber	456	
Eccles	Rita	3958	
Eck	Jj	3688	
Eckberg	Brenda	1057	
Eddy	Lukas	1870	
Edelman	Mark	2809	
Edelstein	Susan	151	
Eden	Jonathan	1030	
Edens	Luke	2192	Friends of Agua Fria National Monument
Edmison	Sean	953	
Edmondson	Nancy	1181	
Edwards	Eric	115	
Edwards	Julie	330	

Last Name	First Name	Letter #	Organization Name
Edwards	Julie	1109	
Edwards	Angela	2532	
Edwards	Monique	3811	
Egge	Mark	2662	
Eigensatz Meuli	Pascale	3844	
Eigler	Kelly	1323	
Eikermann	Vicki	56	
Eilers	Pam	2955	
Eisler	Sherry	3384	
Elia	Marguerite	607	
Ellett	William and Kathleen	3071	
Ellis	Andrew	1754	
Ellis	Carlisle	3672	
Elving	Christine	3261	
Ely	Alexis	2480	
Embry	Judith	1692	
Emerson	Jan	292	
Emery	Kira	3547	
Emlet, PAc	Mark	876	
Emminger	Julie	2115	
Emrick	Carol	150	
Emrys	Merlin	398	
Emrys	Merlin	1200	
Encinas	Helena	4291	
Eng	Richard	2137	
Engbring	Matthew	2116	
Engelman	Lavonne	1674	
Engelman	Lavonne	3785	
Enger	Erin	145	
Englander	Carl	3087	
Enstrom	Elsa	3911	
epperson	Leslie	3916	
Erbs	Lori	816	
erhart	marla	1457	
erhart	marla	4046	
Erickson	Charles	2922	
Erickson	Kathleen	3388	
Erlewine	Emily	4251	
Ernst	Cathie	1682	
Esden-Tempski	Danika	799	
Espino	Linda	4221	
Esposito	Susan	113	
Esposito	Susan	1108	
Esquisabel	Ane	2080	

Last Name	First Name	Letter #	Organization Name
Estarrona	Mikael	3985	
Esteve	Gregory	515	
Estok	Karen	507	
Evan	V	1324	
Evans	Samuel	48	
Evans	J.L.	613	
Evans	Bronwen	896	
Evans	David	2364	
Evans	Bronwen	2457	
Evans	Bronwen	2458	
Evans	Jude	2724	
Evans	Bronwen	2957	
Evans	Bronwen	2958	
Evans	Brianne	3808	
evans	nick	4124	
Everett	David	61	
Everett	Theresa	1605	
Evinczik	Eric's	3146	
Ewing	James	596	
Fabbo	Lucia	2626	
Fachet	Patrick	3738	
Fadden	c	3968	
fadem	linda	3360	
Fahey	Kathy	3082	
Faich	Ron	217	
Faich	Ron	2175	
Falcon	Jennifer	2818	
Falconer	Russ	59	
Falk	Diane	742	
Falk	Diane	2157	
Falk	Rebecca	2610	
Faller	Alison	3510	
Falsetto	Rita	666	
Falsken	James	452	
Fanucchi	Joanne	3081	
Farkas	Elizabeth	4107	
Farley	Mike	4178	
Farmer	Bonnie	1193	
Farmer	Christopher	1772	
Farrell	Mike	1721	
Farrell	Valerie	2154	
Farrell	Courtney	3758	
Fass	Arline	1656	
Fass	Arline	4074	
Faust	John	3074	

Last Name	First Name	Letter #	Organization Name
Favero	Vanessa	962	
Featherstone	Roger	2970	Arizona Mining Reform Council
Fehlberg	Olivia	50	
Fehr	Richard	1676	
fehrenkamp	catherine	3989	
feig	andrea	2452	
Feit	Lisa	2792	
Feldman	Tracy	110	
Feletar	Linda	1102	
Feliciano	Renee	1107	
Felix	Robert	1400	
Felletter	Conor	1776	
Fennell	April	358	
Fennell	April	3678	
Ferguson	Cheryl	4071	
Ferguson	Jocelyn	3454	
Fernande	Fournier	3649	
Ferrell	George	813	
Fetbrod	Matthew	1896	
Feuerbacher	Nancy	3581	
Fiedor	Jillian	1516	
Field	Brian	550	
Field	Fran	1578	
Field	Brian	1661	
Fielder	L.	898	
Figueroa	Silvia	3440	
Filan	Joy	2687	
Filsinger	Erik	18	
Fine	Cindy	85	
Fine	Cindy	1318	
Fine	Morgan	2054	
Fine	Donna	3339	
Fine	Ashley	4172	
Fine	Jovita	4183	
Fingerman	Robert	179	
Finkelstein	Sheldon	3444	
Finn	Peggy	2029	
Finnell	Kelly	3515	
Finstrom	David	1791	
Fischer	Mark	4204	
Fishman	Judy	3130	
Fister	Lee	612	
Fister	Lee	1282	
Fitch	Karen	2798	

Last Name	First Name	Letter #	Organization Name
Fitzgerald	Mike	2881	
Fitzpatrick	John	780	
Flatland	Mike	751	
Fleck	Paula	3445	
Fleener	Henry	3308	
Fleming	Nancy	1335	
Fleming	Jim	2554	
Fletcher	Barbara	1017	
Fletcher	Barbara	1119	
Fletcher	Carol	1652	
Fletcher	Mark	2007	
Flinkstrom	Janet	2415	
Flocco-McMaster	Kathy	987	
Flood	Patricia	1460	
Flood	Tim	2965	
Flood	Timothy J.	2970	Arizona Riparian Council, Conservation Committee
Flowers	Bobbie	558	
Flowers	Bobbie	1244	
Floyd	Tina	658	
Fluet	Christine	2277	
Flynn	Melissa	1762	
Flynn	Kevin	1826	
Flyntz	Margaret	3927	
Fogarty	Dan	1313	
Fogleman	Maxwell	3259	
foley	susan	556	
Fonseca	Vincent	168	
Foote	Anne	922	
Ford	Jesse	698	
Ford	Peggy	3084	
Ford	Holly	3741	
Foreman	Samuel	1819	
Foreman	Alex	2486	
Foreman	William	2499	
Foreman	Diane	2515	
Formoso	Jennifer	3115	
Forsberg	Sofie	3997	
Forster	Michael	388	
Forsyth	Mark	1006	
Fortier	Karen	1402	
Fortunato	D'Anna	1635	
Foschi	Patricia	1644	

Last Name	First Name	Letter #	Organization Name
Foskett	MaryAnna	1618	
Foster	Marlene	137	
Foster	Jessica	980	
Foster	Will	1386	
Foster	Stephanie	3477	
Fountain	Anne	3693	
Fox	Stephanie C.	184	
Fox	Monica	244	Creation Care Ministry St. Clement Church
Fox	Barbara	2430	
Fox	John	2451	
Fradkin	Allison	82	
Frana	Bruce	1437	
France	Ray	3220	
Frank	Dave	128	
Frank	Robert	4128	
Frank	Elizabeth	4157	
Franseen	Laura	3578	
Franz	Derek	1863	
Fraser	Susan	203	
Fraser	David	1770	
Frasieur	Forest	963	City of Santa Rosa
Fratello	Melissa	3830	
Fray	Linley	3828	
Frazier	Jordan	3395	
Fredrickson	Thane	4257	
Freeman	Amy	98	
Freeman	Amy	1117	
Freeman	Joseph	3101	
freeman	woody	3743	
Freeman	Judy Freeman	4118	
Freimuth Jr	Erich	617	
Freund	Julia	348	
Freund	Julia	1505	
Freund	H.	3399	
Friedmann	Michael	198	
Friis	Rolf	3263	
Frith	Emily	3291	
Fritzler	Deb	2677	Sweet Briar College
Fujita	Sandra	1677	
Fukushima	Melissa	1823	
Fularczyk	Margaret	3938	
Fulmer	Merryl	3335	

Last Name	First Name	Letter #	Organization Name
Fuqua	Chad	4181	
Fura	DJ	555	
furlong	john	2188	
Furnish	Shearle	537	
Furniss	Stephanie	2967	
Furutate	Midori	855	
G	G	2597	
Gaede	Marnie	913	
Gaff	Mal	1648	
Gaffney	Lorri	4005	
Gage	Jennifer	2619	
Gajewski	Lucas	1821	
Galbraith	David	2064	
Gallagher	Lynn	2600	
Gallagher	Vic	2827	
Gallagher	Margaret	3198	
Gallion	Terri	3315	
Gallo	Nicole	270	
Galyean	Andrea	2794	Arizona Mountaineering Club
Galyean	Andrea	2989	Arizona Mountaineering Club
Gamble	Albert	400	
Gandolfo	Deborah	370	
ganMoryn	Croitiene	834	
Gann	Sara	2205	
Gant	Ella	2847	
Garcia	Yolanda	1514	
Garcia	Reyna	1567	
Garcia	Joseph	1743	
Garcia	Armando	2012	
Garcia	Armando A.	2206	
Garcia	Dulce	3410	
Garcia	Leticia	3775	
Garcia	Maria	4076	
Garde	Carol	2183	
Gardner	Rebecca	776	
Garfinkel	Nina	1311	
Garland	Steve	945	
Garlit	Donald	735	
Garoutte	Claudia	1587	
Garoutte	Debra	3873	
Garoutte	Claudia	3934	
Garratt	Elizabeth	1421	

Last Name	First Name	Letter #	Organization Name
Garratt	D.	1422	
Garrison	Anita	208	
Garrison	Robert G.	1118	
Gartland	Chris	4288	
Garvey	Lydia	2392	
Garza	Tina	2418	
gaspar	suzanne	1037	
gaspar	suzanne	1143	
Gates	Joanne	2210	
Gaudet	Fred	2653	Arizona Trail Association
Gazzola	Linda	1598	
Gebler	Joseph	3558	
Gelhard	Kate	2615	
Gelling	Cristy	3512	
Gelsomino	Rene	2287	
Gemmell	Doug	420	
Genaze	Matthew	803	
Gendron	Bob	172	
Gendron	Bob	1251	
Geno	Debbie	4061	
Genovese	Michael	2520	
Gensel	Rothery	835	
Geoghegan	William	1513	
george	sharon	439	
George	Richard	1427	
Georges	Gaye	2654	
Georgevits	Tom	2056	
Gerdes	Jason	2057	US EPA Region 9
Gergel	Inna	1372	
Germain	Gisele	3148	
Gerry	Andrew	2785	
Gervasio	Joe	56	
Gevaert	Karen	3718	
GGentes	Mija	921	
Ghosh	Sudeshna	4156	
Ghostley	Stephen	2334	
Gibbons	Brian	696	
Gibbs	Deborah	3258	
Gibbs	Denise	3949	
Gibson	Elizabeth	3628	
Gifford	Elizabeth	4192	
Gilbard	Alexis	1905	
Gilbert	Camille	587	
Gilbert	Camille	1550	

Last Name	First Name	Letter #	Organization Name
Gilbert	Meaghan	2898	
Gilchrist	Bill	3647	
Giles	Jilian	3460	
Gillaspie	Richard	675	
Gillaspie	Richard	1397	
Gillette	Donna	4114	
Gilligan	Ainslie	2256	
Gillis	Patricia	4130	
gilman	meg	322	
gilman	meg	1134	
Gilman	Monica	2383	
Gilmour	Ken	4065	
Gilson	Mark	56	
Gilson	Mary	56	
Gindele	Abigail	688	
Gindele	Abigail	2306	
Gioannini	Pat	2004	
Giovanetto	Laine	3706	
Girshick	Lori	1442	
Girshick	Lori	4173	
Gist	Del	2999	
Given	Martha D.	3372	
Gladkin	Michael	2755	
Glass	Leslie	3279	
Glass	Jordan	3304	
Glasscock	Rita	564	
Glasser	Mark	2728	
Glaunsinger	Lorna	56	
Glaunsinger	William	56	
Gleaton	Melinda	2307	
Glider	Richard	3768	
Gliva	Stephen	1066	
Glocke	Julia	2833	
Gluck	Jake	2757	
Goden	Gay	771	
Godwin	Nadine	2165	
Goerke	Carol	3990	
Goff	Frances	1377	
Gogas	John	1751	
Goggins	M Kay	1270	
Golab	Mitch	3626	
Goldberg	Daniel	665	
Goldberg	Laura	1579	
Goldsmith	Ken	2292	
Golser	Wolfgang	2995	

Last Name	First Name	Letter #	Organization Name
Golubski	Nancy	3544	
Gomez	Edward	2110	
Goncalves	Anita	693	
Gonstalla	Esther	4116	
Gonzalez	Olga	1900	
Gonzalez	Sofia	3331	
Gonzalez	Ana	3679	
Gooch	Watson	1362	
Goodberg	Robert	4160	
Gooden	Anne	4263	
Goodman	Pamela	704	
Goodnight	Donna	2846	
Goodrich	Lisa	1321	
Goodwin	Shaun	3982	
Goodyear	Maxine	332	
Goor	Jared	1922	
Goppert	Donald	944	
Gordon	Amanda	638	
Gordon	Lonnie	673	
Gordon	Diane	3403	
Gore	Robert	1351	
Gorman	Laurie	586	
Gorman	Catherine	3917	
Gorski	Elizabeth	3368	
Gosselin	Kathy	2330	
Gotch	Sandra	3713	
Gothard	Brian	2003	
Goudreault	Christine	2713	
Gould	Steve and Nancy	353	
Goupil	Kyle	1937	
Gourlay	Chantal	2587	
Gowan	Mark	1002	
Goyette	Roland	547	
Gradoni	Peter	104	Alfred United Methodist Church
Graham	Gina	56	
Graham	Tom	56	
Graham	Amanda	713	
Graham	Michelle	3373	
Graham	Tyler	3639	
Grahmann	Julie	56	
Grainger	Elizabeth	1473	
Graniello	Luciano	3755	
Granlund	Fred	428	

Last Name	First Name	Letter #	Organization Name
Grant	Andrew	2786	
Grasso	Jennifer	2686	
Grause	J	639	
Gravance	Rochelle	791	
Graver	Chuck	891	
Graver	Chris	1837	
Graves	Caryn	166	
Graves	Caryn	1202	
graves	Michelle	2250	
Gray	Bob	1899	
Gray	Andrew	2176	
Gray	Tom	3357	
Gray	Monica	3762	
Greco	Claudia	1347	
Green	Sara	331	
Green	Jamie	686	
Green	Jamie	1689	
Green	Rick	2076	
Green	Arden	2370	
Green	Jamie	2550	
Green	Tyler	3124	
Green	Maryann	3208	
Green	Martha	3622	
Greenberg	Stephen	337	
Greendorfer	Susan	3448	
Greene	Jeanine	3698	
Greenwald	Daniel	1756	
Greer	Russel	1774	
Greer	Helen	2839	
greger	sabine	1520	
greger	sabine	3833	
Greiner	Ben	2748	
Greishaw	Neil	4289	
Greives	Thomas	3221	
Grenard	Mark	262	
Grenard	Mark Hayduke	3805	
Greuel	Bridget	3366	
Griepsma	Debi	394	
Grieves	Kathy	3929	
Griffin	Steven	1190	
Griffin	Jessica	1807	
Griffith	Jennifer	1240	
Grimes	Cindy	606	
Grimwood	Jaime	3288	
Grolitzer	Rita	2420	



Last Name	First Name	Letter #	Organization Name
Groom	Joan	3185	
Gross	Steve	299	
Grotzke	Mark	576	
Grove	Terry	3815	
Grover	Justin	1530	
Groves	C	654	
Groves	C	670	
Gruman	Greg	3822	
Gruver	Chere	3624	
Guaraldi	Thomas A	495	
Gudzevich	Deborah	3595	
Gunn	David	1915	
Gura	Joanne	3818	
Gurdin	J. Barry	775	
Gustafson	Alice	1895	
Gustafson	Duane	2468	
Gustafson	Sarah	2534	
Guzman	Genevieve	3657	
H	A	2558	
Habben	Nicholas	3962	
Habecker	Martin	3999	
hadley	marlyne	1623	
Hagen	Valerie	3668	
Hager	Jon	1218	
Hagstrom	Lorijo	3453	
Haldeman	Pat	2065	
Halfin	Clara	2274	
Hall	Diana	473	
Hall	Sue	934	
Hall	Andrea	1100	
Hall	Sue	1670	
Hall	Joseph	1894	
Hall	Jessica	2059	
Hall	Matthew	3064	
Hall	Stacy	3152	
Halladay	Jason	2082	
Hallberg	Russell	3307	
Halligan	Michele	2352	
Hallinan	Brianna	858	
Hallstedt	Macey	2530	
Hallstrom	Erin	1825	
Halverson	Andrew	2768	
Ham	Michele	851	
Hamann	Karl	421	
Hamilton	Carly	2042	

Last Name	First Name	Letter #	Organization Name
Hamilton	Marianne	2929	
HAMILTON	HAZEL	3466	
Hamilton	Arden	4200	
Hamm	Michael and JoAnn	2219	
Hammond	Stephanie	3128	
Hammond	Sally	3231	
Handforth	Michael	3486	
Hanifen	Mandy	2215	
Hanks	Laura	1317	
Hanmer	Noah	449	
Hannay	Kathryn	4142	
Hansell	Connor	1735	
Hansell	Warwick	1752	
Hansen	Amy	206	
Hansen	Joan	598	
Hansen	Linda	1638	
Hansen	Sheryl	2607	
Hansen	Julie	4265	
Hanson	Art	966	
Hanson	Chad	2664	
Hanson	Cathleen	2826	
Hanson	Alice	3528	
Harabadji	Andrei	2813	
Hardee	David	1206	
Harden	Ronald	593	
Harder	Kate	565	
Hardester	Jason	1815	
Harding	Elizabeth	664	
Harding	Mary	3754	
Hardwick	Gloria	2776	
Hardziej	Mary	454	
Hargraves	Mark	2406	
Harlan	Melissa	4240	
Harold	Geoffrey	4215	
Harper	Barbara	951	
Harper	Jacqueline	3145	
Harralson	David	364	
Harrie	Susan	988	
Harriman	Frances	251	
Harrington	W B	3044	
Harris	David	911	
Harris	Nancy	1332	
Harris	jules	3966	
Harrison	Randy	264	APWU

Last Name	First Name	Letter #	Organization Name
Harrison	Paige	682	
Harrison	Jeane	888	
Harrison	Michael	1032	
Harrison	Norma J F	1336	Peace and Freedom Party, on the ballot in California, for socialism
Harrison	Zachary	2109	
Hart	Donna	1384	
Hart	Susanna Sophia	3484	
Hart	Lyn	3926	
Harte	Mary	2267	
Hartgraves	Paula	3324	
Hartman	Jonathan	1449	
Hartman	George	2299	
Hartman	George	2391	
Hartman	DeAnn	4101	
Harts	Dwight	2074	
Hartung	Bridgette	2643	
Harz	Erik	1775	
Hasbach	Corinna	1016	
Haslag	Robert	1471	
Haslem	Mark F.	389	
Hastings	Beth	3886	
Hathaway	Melissa	209	
Hauck	Molly	2148	
Hauer	Nancy	1146	
Hausam	Tom	3592	
Hauser	Deborah	2641	
Haustowich	Donna	3893	
Haverfield	Heather	1338	
haverkamp	kathy	1479	
Hawk	Maggie	4077	
Hawkins	Savannah	461	
Hawkins	Savannah	2679	
Hawryluk	Gina	2108	
Hawse	Angela	1956	
Hawthorn	Pat	660	
Hay	Karen and Jeff	718	
Hayes	Debbie	2618	
Hayes	Linda	3709	
Haynes	Rebecca	3915	
Headd	Rex	1858	
Headrick	Jacklyn	1659	

Last Name	First Name	Letter #	Organization Name
Heairet	Kevin	3396	
Healingline	Helgaleena	379	White Rabbit Grove RDNA
Healingline	Helgaleena	1490	RDNA
Heard	E J	3034	
Heath	Jason	1865	
Heavyrunner	Mia	170	
Heavyrunner	Mia	1184	
Heck	Kerry	1018	
Heck	Kerry	2723	
Hedblom	LuAnne	2930	
Heffernan	Dan	2242	
Heffron	Josh	2623	
Heffron	Josh	2624	
Hegedus	Barbara	1077	
Hegemeyer	Michael	3732	
Hegland	Patricia	457	
Heid	Tim	2746	
Heidelmeier	Bob	1680	
Heilhecker	Juliann	1219	
heilman	dannielle	3770	
Heimsath	Arjun	2121	
Heinle	Janet	320	
Heinle	Janet	1294	
Heinly	Bridgett	1489	
Heintz	Nancy	3564	
Held	Johanna	2207	
Helfert	Michael	3045	
Heltebrake	Jane	3425	
Helzer	Jack	56	
Helzer	Suzanne	56	
Helzer	Grace	3046	
Hemphill	Miriam	2903	
Hendrell	Lynda	3093	
Hendrickson	Alana	3703	
Hendzel	Charles	3202	
Hennessy	Eileen	2838	
Henriksen	James	4001	
Henriques	Claudio	2559	
Henriques	Heloisa	2561	
Henriques	Claudio	2819	
Henriques	Heloisa	2820	
Henry	Amy	295	
Hensgen	Eric	836	
Hensgen	Eric	1667	

Last Name	First Name	Letter #	Organization Name
Henzi	Bernadette	3931	
Herbruck	Janet	1169	
Herbst	Tori	433	
Herbst	Tori	1443	
Herdan	Deborah	3555	
Herlihy	Peggy	2221	
Herlihy	Kaitlin	2984	
Herman	Steve	1884	
Herman	Steve	2073	
Hermanson	Dave	793	
Hernandez	Rosaura	4084	
Herndobler	Beth	1307	
Herndon	Laura	221	
Herndon	Laura	1195	
heron	Joan	1339	
Herrmann	Cheryl	4015	
Hervert	Carla	2423	
Herwig	Gary	1124	
Herzog	Cheryl	4244	
Hesh	Suzanne	3000	
Hess	Shelly	3826	
Hesse	Sharon	3482	
Hesse and Doug Dyer	Susanne	809	
Hessler	Charles	1133	
Heuett	Mary Lou	3993	
Hewitt	Sarah	1359	
Heximer	Jason	2483	
Heydorn	Rachel	4064	
Heyneman	Amy	549	
Hibben	T	1685	
Hickman	Elizabeth	196	
Hickman	Elizabeth	1577	
Hicks	Robert	302	
Hicks	Cynthia	4189	
Hiestand	Carol	3806	
Higashi	Kylie	2858	
Higginbotham	Jennifer	1063	
Hilbert	Michael	3398	
Hilding	Nancy	1277	
Hile	Amy	3265	
Hill	Sebastian	1997	
Hill	Jennifer	2495	
Hill	Anita	3371	
hill	sam	3965	

Last Name	First Name	Letter #	Organization Name
Hilliker	Claire	3846	
Hillis	Jonathan	2124	
Hiney	Thomas	1906	
Hinshaw	Ann	1091	
Hinson	Katherine	3173	
Hipworth	Danielle	502	
Hirsch	Lysbeth	3359	
Hitzel	Michael	1822	
Hixon	Kim	3695	
Hlayard	Jim	3134	
Hlodnicki	Bruce	378	
Hoagland	Dona	451	
Hoch	Albert	1521	
Hodges	Sherri	139	
Hodges	Sherri	1563	
Hodges	Sherri	3188	
Hoevel	Laura	2337	
Hoevel	Laura	2649	
Hoffman	Char	3655	
Hoffman	Tara	3661	
Hoffman	Tara	3801	
Holcomb	Gus	1733	
Holcomb	Rikki	3538	
Holcombe	Cassie	3774	
Holden	William	3167	
Holderer	James	3018	
Holland	Dianna	1353	
Hollender	Thomas	2970	White Mountain Conservation League
Holliday	Craig	2002	
holliday	craig	2389	
Holloway	R Sue	3455	
Holmberg	Daniel	3211	
Holmgren	Jeanette	3675	
Holt	Alan	487	
Holt	Eric	2487	
Holt	Britney	2544	
Holy	Dominique	2844	
Homsey	Ellen	524	
Homsey	Ellen	1537	
Hong	Celeste	545	
Honold	Wendy	1428	
Honore	Stephanie	2603	
Hoop	Anne	116	

Last Name	First Name	Letter #	Organization Name
Hoort	Nancy	1278	
Hopkins	Paul	655	
Hopkins	Jean	694	
Hopkins	Jimi	3546	
Horn	William and Carol	4121	
Horne	Charlotte	2669	
Horne	Charlotte	2670	
Horowitz	Laura	528	
Horowitz	Laura	2573	
horstman	stephani	228	
Horton	Ryan	1778	
horton	Deanna	3404	
horton	Dan	4106	
Horvath	Elyse	2867	
Hosking	Dan	56	
Hossinger	Susan	3210	
Hotham	SHARON	3562	
Houck	Kathy	3385	
Hough	Eric	3783	
Hougham	Tom	1167	
Houghton	N	3040	
Houston	Robert	4021	
Houtsma	James	3918	
Howard	Nancy	325	
Howard	Laurie	2589	
Howard	Genna	3311	
Howard	Bobbie	3319	
Howe	Jared	83	
Howe	Jared	1083	
Howe	Rebecca	2994	
Howell	Shelly	1333	
Howie	Becky	1771	
Hubert	Ronald	3143	
Hudson	Donald	1847	
Huffman	Melodie	701	
Hufnagel	Glenn	1147	
Hughes	Kevin	889	
Hughes	Robert	905	Shawnee Natural area guardians
Hughes	Barbara	961	
Hughes	Lisa	1203	
Hughes	Peggy	3769	
Hulbert	Patricia	3489	
Hulka	Kathryn	3238	

Last Name	First Name	Letter #	Organization Name
Hull	Todd	1736	
Hull	Cynthia	2377	
Hull-Carlson	Juanita	3095	
Hulsey	Tamara	648	
Humbert	Jennifer	3449	
Hummer	Chad	2721	
Humphrey	Tim R.	2991	Gila County Board of Supervisors
Humphries	Colleen	2233	
Hunt	Debra	2622	
Hunt	Donald	4226	
Hunter	Daniel	3680	
Hupperts	Connie	4283	
Hurlbut	Kelly	3721	
Hurst	Rose	3043	
Husbands	Robert	1454	
Huston	Lyn	3430	
Hutchins	Kathleen	1160	
Hutchins	Michael	3346	
Hutchins	Katherine	3586	
Hutchinson	Deborah	1330	
Hutchinson	Christina	2474	
Hutchinson	Ann	2927	Black Canyon Heritage Park
Hutchinson	Richard	4099	
Hutchison	Stanley	1500	
Huttner	Joseph	2285	
Huynh	Dorothy	2473	
Iacob	Noa	653	
Ichida	Billy	56	
Ichida	Ginny	56	
Infield	Maryan	2142	
Ingebretson	Erik	2551	
Ingram	Chris	2865	
Ingram	Michael	3230	
Inskeep	Kathryn	1076	
Internicola	Eric	1925	
Iovino	Teresa	1230	
Irons	Bridget	1484	
Isaacs	Kelly	4149	
Ivanovic	Vladimir	2008	
Ivey	Dana	1631	
Ivie	Cecyl	90	
J.	Sandy	818	
Jacobs	Shannon	1496	

Last Name	First Name	Letter #	Organization Name
Jacobsen	Barbara	1138	
Jacquemart	Cindi	56	
Jacques	Sally	1263	
Jaffer	Ahmed	2524	
Jakab	Elisabeth	2331	
Jakeman	Molly	3994	
Jakusz	Darlene	523	
Jakusz	Darlene	1255	
James	Daniel	1910	
Janke	Susan	3903	
Janke	Eilene	4223	
Janson	Sharon	828	
Jarboe	JoLynn	351	
Jarboe	JoLynn	1546	
Jarrell	Joseph	2899	
Jastromb	Virginia	753	
Jayson	Patricia	3176	
Jefferies	Ben	2106	
jelinek	jennifer	374	
Jenkins	Shirley	569	
Jenkins	Jacqueline	935	
Jenkins	Barbara	3525	
Jenkins	Angela	3944	
Jenkins and Holmes	Eugenie and Brian	1549	
Jennings	Jerri	56	
Jensen	Camilla	2883	
Jensen	Heidi	3820	
Jeremy	Emerson	3817	
Jergens	Jovy	823	
Jerome	Maryanne	1480	
Jerome	Eric	2771	
Jess	F	471	
Jewett	Theresa	2856	
Jimenez	Chris	1946	
Jimenez	Daniel	4003	
Jimenez	Daniel	4141	
Jimenez National Congressional Scholar	Reverend Nathan	521	Citizens Aware of Government Activities SUPER PAC
Jirotko	Marina	3251	
Joel	Stewart	3069	
Johnson	Dennis	1	
Johnson	Dennis	2	
Johnson	Joyce	219	

Last Name	First Name	Letter #	Organization Name
Johnson	Jennifer	255	
Johnson	Cheryl	641	
Johnson	Martha	827	
Johnson	G. G.	943	
johnson	shawn	1214	
Johnson	Rhonda	1477	
Johnson	Aimee	1499	
johnson	Joyce	1543	
Johnson	Adrian	2023	
Johnson	Patrick	2075	
Johnson	G. G.	2171	
Johnson	Matt	2500	
Johnson	Bonnie	2576	
Johnson	Jenifer	3268	
Johnson	Ella	3499	
Johnson	Hattie	3722	
Johnson	Beatris	3889	
Johnson	Roy	4286	
Johnston	Sue	435	
Johnston	Jeremy	2546	
Johnstone, DC	Grace	732	
Joiner	Kimberly	2710	
Joncus	Andrew	3237	
Jones	Elliot	95	
Jones	Jan	498	
Jones	Henry	969	
Jones	Lee	1111	
Jones	Eric	1279	legacy Forest Trust
Jones	Mike	2481	
Jones	Dave	2488	
Jones	Brian	2993	
Jones	Mary Ann	3748	
Jones	Linda	3798	
Jones	Tristan	3863	
Jones	Stephanie	4190	
Jordan	Cody	1972	
Jordan	Lois	3343	
Joy	Kristi	3821	
Julkes	Bettie	4029	
Jungerheld	Mari Ann	3677	
Juracka	Kathleen	1544	
Jurczak	Luanne	2616	
Jurgensen	Catherine	312	
K	C	1684	

Last Name	First Name	Letter #	Organization Name
K	Serena	2271	
K.	Jo	640	
K.	Jo	1426	
Kadrich	Peter	3674	
Kady	Pat	3736	
Kaintz	John	3836	
Kaiser	Ariel	1714	
kalan	susan	112	
Kalavity	Karen	1238	
Kalemkerian	Lori	4082	
Kalesnik	Tracy	354	
Kalik	Antal	117	Lone Wolf Ind Inc
Kalina	Matt	35	
Kalukin	Andrew	2336	
Kane	Riley	1996	
Kane	Linda	4073	
Kane	Cynthia	4210	
Kaney	Travis	2055	
Karlin	Brady	2052	
karlson	fred	1217	
karlson	fred	4144	
Karnovich	Rennie	2027	
Karolczak	Elizabeth	3224	
Karp	Chuck	4059	
Katayama	Julie	2348	
Kateley	Allison	4035	
Kathrens	Ginger	148	
Kathrens	Ginger	2934	The Cloud Foundation
Katsarou	Litsa	2355	
Katsouros	Tracey	258	
Katsouros	Tracey	259	
Katz rose	Elana	347	
katz rose	elana	1221	
katzen	joanne	501	
Kaufman	Michelle	1376	
Kaufman	Andrea	1394	
Kavanaugh	Michael	1964	
Kawszan	Karen	800	
Kay	Greg	1799	
Kazak	Ilene	848	
Kazak	Ilene	849	
Kazanjan	Rosanna	3459	
Kea	Ruth	4105	
Kearney	Mary	3717	

Last Name	First Name	Letter #	Organization Name
Keast	Heather	2191	
Keedy	John	51	
Keedy	John	52	
Keedy	John	53	
Keedy	John	54	
Keefe	Christopher	981	
Keefe	Kristen	3719	
Keefe	Alex	4290	
Kehlenbeck	Jenny	4299	
Keifner	Shannon	2411	
Kellam	Marcia	1064	
Keller	Pat	2756	
Kellermann	Thomasin	529	
Kelley	Ryan	2492	
Kellman	Steven G.	539	
Kelly	Wayne	505	
Kelly	Conor	1729	
Kelly	Linda	3180	
Kelly and Family	Lisa Ann	1458	
Kelly and Family	Lisa Ann	350	
kelson	elizabeth	2853	
Kelts	Sharon	2164	
Kemmerer	Carol	767	
Kemmerer	Carol	3651	
Kemper	Jo	2759	
Kenawell	Kara	3094	
Kenawell	Kara	3869	
Kendall	William T.	3498	
Kendrick	Missy	2462	
Kendrick	Joanne	3662	
Kenna	Aaron	4171	
Kennedy	Robert	289	
Kennedy	Michelle	2127	
Kennedy	Erin	3684	
Kennedy Ice	Mary	3461	
Kenney	Ed	272	
Kenney	Ellen	3106	
Kenny	Bonnie	356	
Kenoyer	Melanie	111	
Kent	Diane	2259	
Kent	Kevin	2476	
Kent	Diane	4188	
Kentfield	Maren	3697	
Kenworthy	Valarie	3042	

Last Name	First Name	Letter #	Organization Name
Keplinger	Edgar	3969	
Kern	Edward	942	
Kerns	Kelly	235	
Kerns	Michael-David	2675	
Kessler	Robert	915	
Kester	Lenore	4016	
Kestrel	Cindi	2139	
Kettner	Gerda	3364	
Kibbe	Carolyn	3217	
Kibler	JK	1663	JK's Multi-Tasking
Kidd	Lori Beth	1469	
Kieckhaefer	Cindy	3720	
Kieffer	Ramsay	577	
Kiernan	Barbara	2393	
Kiipper	Barb	2630	Jicarilla Mustang heritage alliance
Kilgore	Deb	1515	
Kilgore	Deb	1519	
Kilgore	Anne	2566	
Kilgore	Catherine	3617	
Kilpatrick	Wilma	2557	
Kincaid	Shelby	2523	
kindel	karen	2409	
Kindig	Norman	1268	
King	Jean	109	
King	Linda	1287	
King	Peter	1352	
King	Maggie	2678	
King	Karen	3726	
Kinkead	Timothy	383	
Kinney	Loretta	3571	
Kinsey	Jeff	3609	
Kinslow	Paul	3406	
Kipling	Caroline	500	
Kipling	Caroline	1298	
Kiriathy	Susanne	256	
Kirk	Leslie	4047	
Kirschling	Karen	1573	
Kish	Elizabeth	1375	
Kisor	Dave	1565	
Kistler	Andrew	84	
Kite	Richard	197	
Kite	Richard	1141	

Last Name	First Name	Letter #	Organization Name
Kjono	Pamela	2601	
Klafke	Cameron	1753	
Klauk	Elizabeth	560	
Klauk	Elizabeth	1383	
kleber	keith	4199	
Klein	James	373	
Klein	James	1475	
KLEIN	DOUGLAS	2450	
Klele	Gehan	418	
Kline	Rick and Laurie	3872	
Klipfel II	George F	1286	
Klisch	Norma	4285	
Klockenbrink	Walter	551	
Klosner	Marc and Jill	859	
Klossner	Kathy	2577	
Klosterman	Pete	386	
Klugiewicz	Mark	1020	
Klugiewicz	Mark	2211	
Klumb	Carole	2640	
Kluthe	Christopher	1813	
Knapp	Jeff	56	
Knapp	Joe	56	
Knapp	Kristi	56	
Knapp	Knapp	1657	
Knasas	Marie	3584	
Knight	Bobbie	1683	
Knightly	David	2281	
Knipp	Donna	2151	
Knoll	Carolyn	677	
Knowles	Cybele	2935	Center For Biological Diversity
Knowles	Cybele	3257	
Knudsen	Sarah	628	
Knuth	Lilly	624	
Koch	Clint	2062	
Kocoras	Peggy	2598	
Koehler	Albert	125	
Koehler	Francine	785	
Koepfel	Ari	2895	
Koessel	Karl	241	
Koff	Marilyn	1078	
Koff	Marilyn	1090	
Koff	Marilyn	3939	
Kofler	Michelle	1611	

Last Name	First Name	Letter #	Organization Name
Kohleriter	Bonnie	2628	
Kokal	Kristin	1374	
Kolida	Jamesmichael	3902	
Kondo	Takanori	2893	
Kondreck	Janine	1297	
Konstanty	Kristin	1603	
Koritz	Mark	599	
Korn	Meryle A.	1328	
Korres	Amy	4207	
Koshofer	Bonnie	1005	
Koshofer	Bonnie	2225	
Koskinen	Michele	1348	
Kosowicz	Aleks	647	
Koster	Keith	4197	
Kostro	Ed	3935	
Kotowski	Betsy	584	
Kovshun	Rita	1199	
Kowall	Lindsay	3394	
Kowalski	Mike	630	
Kowalski	Nancy	3350	
Kozicki	Jennifer	1909	
Kraft	Diane	1309	
krager	kathie	3356	
Krasnow	Mark	1958	
krause	doug	233	
Krause	Ramona	2169	
Kravcov Malcolm	Karen	4033	
Kravetz	Darla	465	
Krchnavi	Kimala	4264	
Krejer	Juliana	3724	
Krell	Elinore	143	
Krell	Elinore	3228	
Kremer	Ursula	1034	
Kreuser	Tom	27	
Kreutz	Gregor	1883	
Kriegel	Kevin	4067	
Kring	Juli	878	
Kring	Juli	2136	
Krinks	Jerralynn	3100	
Krueger	Michelle	960	
Krumpeck	Ryan	815	
Kruse	Audrey	2384	
Kuchman	Scott	28	
Kuciej	Walter	2374	

Last Name	First Name	Letter #	Organization Name
Kuhn	James	1585	
Kuhnert	Bob	75	
Kujawski	Steven	2100	
Kullby	Kendra	2880	
Kung	Tiffanie	2032	
Kunkel	Hunter	2860	
Kunz	Kestrel	2970	American Whitewater
kunz	kestrel	3301	
Kunze	Jonathan	2769	
Kurtz	Ken	3795	
Kurz	Daniel	458	
Kurz	Daniel	1188	
Kust	Melina	2022	
Kust	Melina	2048	
Kuticka	Sheri	2404	
Kuttler	Keith	4	
L	V	2608	
L.	Ken	3757	
LaBarbera	Joseph	2717	
Labiner	David and Janis	3567	
LaBouy	Anne	1408	
LaCroix	Edward	1748	
Laddin	Linda	2432	
Laden	Marie-Eve	1853	
Ladwig	Terry	431	
Laevey	Susan	3316	
LaFlamme	Jeff	3771	
LaFleur- Campbell	Teresia	345	
Lafond	David j.	152	
Lai	Tina	1943	
Lambeau	Catherine	161	
Lambert	Howard	1304	
Lambert	Angela	1654	
Lambros	Kathryn	2629	
Lame	Nadia	2878	
Lamons	Kristina	2425	
Lampson	John	3909	
Landauer	Tania	2208	
Landsberg	Yamuna	1189	
Lane	Matthew	15	
Lane	Beth	3050	
Lane	Laura	3428	
Lane	Beth	3521	



Last Name	First Name	Letter #	Organization Name
Lang	Liana	1436	
Lang	Marilyn	2047	
Lang	Diane	3278	
Lang	Katarina	3472	
Langan	Eileen	3948	
Lange	Marlena	173	
Langlois	Donna	3411	
Lanka	Mike	3729	
Lanskey	Marcus	1570	
Lapen	Steve	1918	
Laperle	Alexander	1831	
Laplante	Charlene	2971	San Carlos Apache Tribe, Department of Justice
Lapointe	Kenneth	2231	
LaPointe	Drena	3641	
Larivey	Dan	2353	
LaRoche	Dominic	2660	
Larrouy	Georgette	4010	
Larsen	Kara	2034	
Larson	Gary	60	
Larson	Brian	2147	
Larson	Mark W.	2970	Maricopa Audubon Society
Larson	Richard	3401	
Larson	John	3414	
Larson	Steve	3509	
Larson	Jean	4247	
Larson-Whittaker	Cole	3036	
LaSchiava	Dona	3936	
Lashaway	Lisa	2580	
Lasley	Nancy	2311	
LaSorte	David	1726	
Latinette	Ian	3298	
Laub	Jacob	2001	
Lau-Enright	Lily	2212	
Laughren	Cynthia	3273	
Laughren	Cynthia	3782	
Laukevicz	Gerolynn	1089	
Laurson	Edward	130	
Lavallee	Jocelyn	2079	
lawford	Rhonda	2583	
Lawrence	William	56	
Lawrence	Robert	729	

Last Name	First Name	Letter #	Organization Name
Lawrence	Rhett	877	
Lawrence	Pat	1593	
Lawrence	William	2493	
Lawrence	Michael	2637	
Lawrence	Cheryl	2680	
Lawson	Joseph	738	
Lazarus	Marianne	1504	
Leahy	Susan	2365	
Leale	Sam	1897	
Learmont	Liz	4150	
Leary	John	3333	
Leather	Rose	268	
LeBeau	Barry	1691	
Lechner	Leonard	2295	
Ledden	Dennis	999	
Lee	Michael	687	
Lee	Michael	1281	
Lee	Virginia	1697	
Lee	Karen	1814	
Lee	Monica	2061	
Lee	Peter	2168	
Lee	Jerick	2788	
Lee	Matt	2896	
Lee	Savannah	2977	
Lee	Mia	3471	
Lee	Virginia	3667	
Lee	Kenneth	3802	
Leech	Lisa	1541	
Lees	Aubrey	530	
Lefcourt	Philip	843	
Lehnhoff	Erik	2033	
Leigh	Joni	3292	
Leimgruber	Stephen	2117	
Leinbaugh	Tracy	165	
Leinen	Kyle	1765	
Leitch	Mary Ann	1653	
Leland	L.	541	
Lemke	Hannah	714	
Lemkuil	Rita	1179	
Lemos	Mitchell	1806	
Lenchner	Nicholas	1936	
Lenchner	Nicholas	1960	
Lenchner	Nicholas	1975	
Lenier	Doug and Karen	2172	

Last Name	First Name	Letter #	Organization Name
Lenski	Kim	2695	
Lenski	Kim	2696	
Lentini	Michael	4126	
Leonard	Valerie	107	
Leonard	Cami	4093	
Leonhard	Joseph	1878	
Leonhardt	Theresa	659	
Lepine	Heather	2041	
Leslie	M. Virginia	941	
LeTourneau	Alice	3809	
Leveton	Lajeanne	626	
Levick	Lainie	3001	
Levin	Jon	739	
levin	cathyeizabath	1086	
Levin	Julie	1121	
Levitt	Vera	2132	
Levy	Claire	1465	
Levy	Leslie	3382	
Lewis	Erma	142	
Lewis	Ryan	1893	
Lewis	Shirley	3168	
Lewis	Emily	3309	
Lewis	Michele	4057	
Ley	Janis	3634	
Lieber	Leo	812	
Liedlich	Nancy	3923	
Liesegang	Craig	3177	
Lightbody	Kathryn	2692	
Likos	Dinakos	1532	
Lillard	Renee	2555	
Lilling	Glenda	723	
Lilling	Glenda	1660	
Lillywhite	Lesley	1420	
Lillywhite	Lesley	3654	
Limyao	Amy	3750	
Lin	Chingyi	769	
Lin	Diana	1787	
Lind	Paul	2321	
Linde	Brittany	2044	
Lindegren	Ri	2968	
Lindgren	Connie	1361	
Lindsay	Cathy	1150	
Lindsay	Jim	2429	
Lindsey	Judi	2194	
Linstrom	Kristopher	1994	

Last Name	First Name	Letter #	Organization Name
Lipsey	Joseph	4282	
Lipsky	Carol	1149	
Little	Margaret	602	
littleman	Tina	3432	
Litzsinger	Raymond	321	
Litzsinger	Raymond	1308	
Livgren	Martin	230	
Livingston	Deborah	178	
Livingston	Deborah	1137	
Lizer	Henry	1453	
LoCicero-Walsh	Jessica	1841	
Loftin	Debra	2024	
Logan	Mallory	1796	
Lohli	Arlene	2216	
Lojowsky	Karel	774	
Lojowsky	Karel	779	
Long	Laura	2258	
Long	Larisa	3631	
Longever	Jordan	2725	
Longly	Keith	6	
Loosli	Ed	1153	
Loosli	Maureen	3376	
Lopez	Audrey	2335	
lopez	josie	2448	
Lorenson	Kyle	2778	
Lorenz	Laird	1664	
Lott	Ethan	2014	
Loucks	Cynthia	4186	
Lovas	Matthew	1977	
love	nancy	3998	
Lovejoy	John	4034	
Lowe	Paige	535	
Lowe	Margot	1399	
Lowe	Martha	3505	
Lowen	Steve	301	
Lozano	Luis	157	
Luce	Gale	810	
Luck	Diane	401	
Ludeman	Jacob	1829	
Luke	Keth	744	
Lukensmeyer	Pat	3764	
Lundeen	William	1929	
Lupenko	Andy	513	
Luria	Mayra	1216	
Lurie	Benjamin	1727	

Last Name	First Name	Letter #	Organization Name
Lutton-Coronado	Brenda	4166	
Lye	Andre	2973	Resolution Copper Company
Lyman	Teresa	4129	
Lynch	Lori	56	
Lynch	Mike	56	
Lynch	Renee	56	
Lynch	Catherine	910	Corona Ranch Shared Well Assn. #2
lynch	cindy	2382	
Lynes	Erica	1934	
Lynn	Laura	1887	
Lyon	Torsten	2077	
Lyons	Mary	3114	
Lystra	Renice	56	
Lystra	Terry	56	
Mabe	Angela	1890	
Macan	Edward	2265	
Macdonald	Nina	1556	
Macdonald	Kathie	2596	
Mace	Pat	88	
Mace	Pat	1113	
Macelhiney	Michael	1759	
Maciel	Marie	343	
Mackey	Claudia	837	
Mackey	Claudia	2325	
MacLamroc	Alan	543	
Maclure	Carole	703	
MacMillan	Andrew	3607	
MacNaughton	Joshua	2770	
MacNeil	d'Anne	3612	
Madden	Annie	984	
Mader	Thomas	248	
Madigan	Jill	1561	
Maestro	Betsy	3776	
Magana	Susan	380	John C. Kimball High
Magana	Susan	1300	John C. Kimball High
Maillet	David	3325	
major	elizabeth	844	
major	elizabeth	2639	
Maki	Edward	2625	
Malara-Aiello	Grace	266	

Last Name	First Name	Letter #	Organization Name
Malhotra	Sangeeta	4112	
Malinowski	Jody	3530	
Malka	Laura	1110	
Malone	Ed	97	
Malone	Annie	2926	
Malven	Tania	207	
Maly	Jessica	1782	
Maly	Timothy	1795	
man	cave	798	
Manchester	Margaret	3565	
Mancini	Alfred	778	
Mandel	Tatiana	2304	
Mangan	Deborah	163	
Mangrum	Deborah	2417	
Mangrum	Deborah	2716	
Mann	Lindsay	2843	
Mann	Doreen	3887	
Manners	Helen	752	
Mantle	Stacy	3012	
Manzer	Marlene	3855	
Marancik	David	1859	
Marascio	Katie	2096	
Marcel	Lorretta	867	
March	Robert	160	
Marcus	Martin	929	
Marcus	Martin	2170	
Margerum	John	520	
Margolis	Laurence	1474	
Margulis	Elise	1681	
Marina	Aida	432	
Marinakis	Marie	1341	
Marineau	Janet	1080	
Mark	Robert	3835	
Markham	Vera	3685	
Marks	Diane	2811	
Marler	Bob	4256	
Marne	Marielle	3536	
Maron-Friend	Judith	1655	
Marotta	Tracy	1580	
Marotta	Tracy	1583	
Marovich	Billy	56	
Marquis	Moir	3597	
Marquis	David	4039	
Marr	Betty	1357	
Marra	Albert	2652	

Last Name	First Name	Letter #	Organization Name
Marrs	Cynthia	635	
Marrs	Cynthia	1084	
Marshall	Linda	329	
Marshall	Linda	1547	
Marshall	Allysun	1974	
Marshall	Liz	3107	
Marti	Miranda	4301	
Martin	Robin	87	
Martin	Patrick	841	
Martin	Angie	2730	
Martin	Tommie C.	2991	Gila County Board of Supervisors
Martin	Chase	3138	
Martinez	Priscilla	574	
martinez	c.	783	
Martinez	Irene	1145	
Martinez	Priscilla	1559	
Martinez	Laura	3645	
Maslin	Cheryl	3765	
Mason	Charlotte	2339	
Massengale	Bob	4231	
Massie	Sherry	3249	
Mast	Mirtella	1256	
Masters	Kerry	874	Animal Advocates of the Inland NW
Mastri	Francis	1007	
Mastri	Francis	1448	
Materi	Sandra	1041	
Materi	Sandra	1539	
Mates	Susan	2255	
Mathers	Jay	1916	
Mathes	Barbara	3591	
Mathews	Susan	1551	
Mathews	Janet	3527	
Matijega	Kathryn	3520	
Mattesen	Betina	2817	
Matthews	Nancy	3004	
Mattingly	Michele	2161	
Mattison	Tim	56	
Mattos	Claudio	2562	
Mattos	Heloisa	2563	
Mattos	Claudio	2821	
Mattos	Heloisa	2822	
Mattson	Sally	2375	

Last Name	First Name	Letter #	Organization Name
Matyjasik	Michal	2036	
Mauet	Sarah	3475	
Mautner	Kathleen	3891	
Mawhorter	Jerry	1101	
Mazza	Valentina	2693	
Mazzola	Lisa	619	
Mazzola	Lisa	1226	
McAdoo	Jill	1738	
McAllister	Cheryl	21	
McAllister	Cheryl	3848	
McCaleb	Mac	19	Granite Mountain Guides
McCann	Ellen	494	
McCann	Ellen	1412	
McCann	Annie	1463	
McCarthy	Diane	2574	
McClintock	Steve	25	
McCLure	Andrew	1861	
McClurg	Daviann	1166	
McCord	Blake	2842	Northern Arizona Climbers Coalition
McCormick	Kelly	1955	
Mccoy	Joan Ellen	2209	
McCreery	Nita	3799	
McCreery	SueAnne	3823	
McCue	Chad	2754	
McCue	Marika	3733	
McCuen	Annie	288	
McCuen	Annie	1419	
McCulloch	Norma	1250	
McCullough	Kimberly	2910	
McCurdy	Michael	2060	
McDaniel	Scott	2882	
McDermott	Cory	55	
Mcdermott	Marley	983	
McDermott	Ruthann	1662	
Mcdermott	Cory	1886	
Mcdonald	Pamela	1548	
Mcdonald	Thomas	3113	
McDonald	Kathleen	3598	
McDonald	A.	3666	
McDonough	Rebecca	2270	
Mcelaney	Rosemarie m	1183	
McFarland	Kathryn	3255	

Last Name	First Name	Letter #	Organization Name
McGann	Tim	2992	
McGarvie	James	2279	
McGaughey	Mary	1010	
McGill	Ann C	852	
McGill	Bonnie	2685	
McGovern	David	1892	
Mcgrath	Teresa	4102	
McGuire	Ellie	557	
McGuire	Ellie	1564	
McHenry	Ian	2039	
McHugh	Heather	2381	
McKay	Megan	1845	
McKean	Joe	3569	
McKee	Matt	1833	
McKee	Lary	2178	
mckee	shelley	2705	
McKee	Nelda	3019	
McKee	Donna	3092	
McKee	Brian	3468	
McKenna	Jacci	140	
McLain	Karen	2722	
McLaughlin	Eric	101	
McLennan	James	2070	
McLeod	Connor	1908	
McMullen	Colleen	645	
McMullin	William	885	
McMullin	Peter	3908	
McMurtrey	James	2386	
McNamara	Catherine	430	
McNamara	Karla	533	
McNamara	Scott	1811	
McNamara	Anita	3550	
Mcnitzky	Nina	1232	
McPeak	Candice	3791	
McRae	Betty	56	
McWilliams	Nancy	3585	
Mead	Stephen	279	
Mead	Stephen	1215	
Meade	Mark	1879	
Meaney	Sarah	2586	
Means	Andrew	3543	
Medina	Kathleen	1050	
Medrano	Daniel	1616	

Last Name	First Name	Letter #	Organization Name
Medtlie	Amy	1777	
Meehan	Anthony	2762	
Meere	Carol	4202	
Meharam	Saleh	2516	
Meiberg	Linda	1044	
Meidinger	Dawn	2925 <sup>11</sup>	Pinto Valley Mining Corp. and Carlota Copper Company
Meigs	Jeremy	1768	
Meindl	Pamela	3397	
Meis	Doug	2766	
Melde	Christa	2741	
Mello	Phil	3689	
Melton	Alyssa	190	
Meltzer	Rachel	2460	
Mendoza	Berney	3882	
Menendez	Gabrielle	668	
Menke	Elaine	3070	
Menke	Peggy	3742	
Menor	Catherine	4275	
Meriwether	Don B.	854	
Merk	Joel	377	
Merk	Joel	2447	
Merrick	Judy	1476	
Merrill	Beth	497	
Messer	Gretchen	2572	
Messina	Jen	2289	
Messing	Mark	443	
Metcalf	Mary	625	
Metz	Emily	2727	Metz Gardens and Landscapes
Metzger	Chelsea	2738	
Meyer	Marilee	946	
Meyer	Donna	3089	
Meyer	Caitlin	4004	
Meyers	Sarah	1004	
Meyers	Jeffrey	3078	
Meyers	Gregory	4087	
Michael	Veronica	464	
Michaels	Gary	3006	
Michaud	Lizann	3085	
Michel	Debora	562	

<sup>11</sup> For this particular letter, our content analysis software was unable to process much of the contents due to formatting. Therefore, the concerns

from this letter are all labeled 2925-00. in the following response to comments because they were not captured by the program.

Last Name	First Name	Letter #	Organization Name
Michel	Sarah	3845	
Mick	Marilyn	2666	
Mick	Rick	3365	
Mickey	Judy	2454	
Midboe	Tim	491	
Middlesworth	Jane B	2461	
Middleton	Andrew	1535	
Midgley	Jon	3326	
Mielke	Chris	56	
Mihelic	Tanner	1973	
Milauskas	Christina	3763	
Miles	Elson	3026	
milgrim	charlene	3441	
Miller	Larry	169	
Miller	Robert	352	
Miller	Michael	462	
Miller	Lester	707	
Miller	Jane	920	
Miller	Barbara	997	
Miller	Michael	1157	
Miller	Judith	1236	
Miller	Tamara	1366	
Miller	Leah	2105	
Miller	Pamela	2553	
Miller	P	2593	
Miller	Valerie	2606	
Miller	D. Rex	2655	
Miller	Kaylan	2870	
Miller	Joe	2941	Gila Trout Chapter 530 Trout Unlimited
millier	barbara	3015	
Miller	Linda	3030	
Miller	Vicky	3121	
Miller	Nicole	3490	
millier	mike	3519	
Miller	Kelly	3535	
Miller	Brad	4031	
Miller	John E	4164	
Miller	Elaine	4219	
Milligan	Jason	1979	
Milliken	Gerry	4069	
Milliman	Aileen	3277	
Mills	Dave	92	
Mills	Jackie	159	

Last Name	First Name	Letter #	Organization Name
Milton	Alice	3059	
Milton	Carol	3144	
Minadeo	Melody	4135	
Minamide	Jenice	3271	
Minar	Barb	2193	
Minic	Marija	1717	
Minka	Rue	1283	
Mintah	Lois	4013	
Mish	Stan	2740	
Mish	Stan	2750	
Mishodek	Sandy	3402	
Missey	Craig	4232	
Mitchel	John	3702	
Mitchell	Cheryl	1246	
Mitchell	Jonathan	1769	
Mitchell	Carl	2760	
Mitchell	Brett	3749	
Mitchelson	Steven	3327	
Mitra	Ursula	4122	
Mittan	Ron	2324	
Mo	T	1542	
Mo	T	2445	
Moewes	David	3992	
Moler	Matt	29	
Molgora	Bianca	1672	
Mondragon	Michelle	1509	
Monfredini	Janet	721	
Monnat	j	4254	
Monnich	Robert	2812	
Monroy	Amanda	3417	
Montalvo	Kara	2932	Salt River Project
Montgomery	Harris	2874	
Montgomery	Stephen	3005	
Moody	Peggy	1027	
Moore	Mary	1051	
Mooney	Linda	861	
Mooney	Linda	3930	
Mooney	Sandra	4008	
Moonshadow	Ms	3295	
Moore	Felicia	56	
Moore	Michael	56	
Moore	Brad	2120	
Moraiti	Vicky	2354	
Moran	James	1649	

Last Name	First Name	Letter #	Organization Name
Moran	Judy	4085	
Mord	Ben	2087	
Moree	Jeremiah	39	
Morello	Phyl	2240	
Morello	Phyl	2244	PETA
Moreno	Mayelly	490	
Morgan	Anita	2197	
Morganfield	Max	1742	
Morin	Carla	3457	
Morozumi	Katie	1940	
Morrell	Greg	4261	
Morris	Elli	2764	
Morris	Peter	3877	
Morrison	Jeanne	2689	
Morrison	Colleen	2851	
Mortensen	Harold and Georgi	1262	
Mortimer	Ashlee	2947	Arizona Cattle Growers
Moscatello	Brian	736	
Mosely	Chris	1957	
Moser	Paul	2190	
Moses	Sally	3233	
Mosher	Kathryn	2465	
Mosher	Kathleen	3652	
Moss	Paul	1694	
Mostov	Elizabeth	1388	
Moszyk	John	702	
Motes	Paul	3942	
Motta	Michael	615	
Motta	Denise	2694	
Motta	John	2830	Twisted Tails Inc
Moulds	Don	2031	
Mount	Pat	3065	
Mouras	Theodore	3075	
Mouras	Melanie	3194	
Mouzourakis	Katherine	712	
Moy	T	2823	
Mozulay	Andreanna	3945	
Mudge	Kathie	3156	
Mueller	Adrienne	2085	
Mueller	Mark	2498	
Mugglestone	Lindsay	2300	
Muir	Robs	1732	
Mulholland	William	4236	

Last Name	First Name	Letter #	Organization Name
Muller	Regine	3500	
Mulligan-Tyler	Marion	1046	
Mullins	Pamela	2453	
Mulvihill	Alex	1923	
Mundy	Ken	548	
Munoz	Julie	3577	
Munz	Carl	3151	
Murakami	Maki	381	
Muraski	Bennett	3513	
Murdock	Tyler	3020	
Murphy	Dacia	296	
Murphy	Brigid	749	
Murphy	Linda	1528	
Murphy	Dacia	3960	
Murphy-Young	Paige	3068	
Murray	Susan	979	
Murray	Brian	2505	
Murray	Sandra	2706	
Muszynski	Allyssa	3393	
Mydosh	Jennifer	4209	
Myers	Robert	470	
Myers	Mary	3861	
Myers	Jane	3870	
Mykitiak	Debra	2711	
N	M	3740	
N.	Kris	1178	
Naccarato	Frank	3181	
Naegele	Alice	2203	
Nagel	Pamela	1305	
Nagel	Dennis	4280	
Nagy	Ken	56	
Nagy	Patricia	56	
Nanfito	Chad	2063	
Naples	Jean	957	
Nash	Katie	2037	
Nasif	Maria	3266	
Navan	Gloria	2859	
Navarro	Eleanor	3670	
Nazor	Craig	3491	
Neary	Sally	185	
Necas	Al	3988	
Nedialkov	Tzenko	31	
Neel	Anthony	1830	
Neill	Victoria	1913	
Neils	A.	3369	

Last Name	First Name	Letter #	Organization Name
Neilson	Gabriel	326	
Neilson	Gabriel	1592	
neiman	e	1569	
Nellson	L	700	
Nelms	Brandi	4208	
Nelsen	Randy	2293	
Nelson	Thomas	794	
Nelson	David	832	
Nelson	Jennifer	1373	
Nelson	L	1619	
Nelson	Erik	1764	
Nelson	Justin	2950	Arizona Chapter of Backcountry Hunters and Anglers
Nelson	Brett	3904	
Nelson	David	3921	
Nelson	Michele	3924	
Nelson	Michael	4138	
Nelson-Wong	Erika	1715	
Nessel	Laurie	3058	
Netherlands	Simone	2983	Salt River Wild Horse Management Group
Neuhauser	Alice	2296	
Neulen	Regine	4146	
Nevans	Ann	1403	
Newman	Kathy	141	
Newman	Charles	1763	
Newman	Sharon	2906	
Newman-Osmon	Jacomina	3849	
Newsome	Carole	2134	
Nguyen	An	2531	
Nicholas	Jill	601	
Nichols	Robert	274	
Nichols	Joe	1589	
Nichols	Beverly	2467	
Nichols	Beverly	3540	
Nickels	Ernie	3037	
Nicolai	Nicola	2367	
Nicole	Alexandra	1595	
Nidess MD	Rael	746	
Nidess, M.D.	Rael	1211	
Nielsen	Keeley	1734	
Nielsen	Nancy	3099	

Last Name	First Name	Letter #	Organization Name
Niernberger	Jana W	1144	
Niesen	Andreas	2379	
Nightingale	Jill	238	
Nilsson	Jared	1783	
Nimmons	Rebecca	164	
Nixon	Leslie	3056	
Noble	Arthur	1132	
Noble	AJ	4123	
Noble	Mrs. Liz and Mr. Ken	4234	
Nodsle	Jessica	2489	
Noeding	Lauren	2490	
Nogles	Tammy	1637	
Noguerol	Ramiro	1069	
Noguerol	Ramiro	2470	
Nolan	Kathryn	4227	
Nordstrom	Jim	3933	
Norling	Eric	1983	
Norton	David	1855	
Notestine	James	3789	
Nottingham	Holly	1627	
nottingham	nottingham	3812	
Novkov	Russell	2153	
Novkov	Russell	2266	
Nowak	Diane	276	
Nowak	Diane	3367	
Noyes	Donna	1703	
Nuesch	Raymond	1249	
Nuffer	Fritz	1961	
Nunez	P	1413	
Nunley	Colton	1725	
Nutley	Andrea	1210	
Obr	Brooks	940	
OBrien	William	3390	
O'Brien	Lee	204	
O'Brien	Robert	391	
O'Brien	Daniel	1423	
O'Brien	Andy	1802	
O'Connor	Deborah	600	
Oddonetto	Peter	2939	
Oddonetto	Peter	2942	
Oddonetto	Peter	2943	
Oddonetto	Peter	2945	
oddonetto	michael	2952	
Odell	Kisti	897	



Last Name	First Name	Letter #	Organization Name
O'Dell	Sean	2469	
Odom	Richard	2805	
ODonnell	Robin	2688	
O'Donnell	Kevin	978	
Ogasian	Bethany	1881	
Ogasian	Jason	2102	
Oggiono	Nanette	996	
Oggiono	Alyssa	1633	
O'Hara	Karen	4070	
OHiggins	Judy	4127	
Ohlendorf	Richard	1502	
Ohlendorf	Carol	1503	
Ohmann	Karen	4103	
Olander	Alan	215	Country Cat Clinic
Oldham	Doris	2329	
Oldham	Doris	2333	
Oliver	Katherine	3283	
Ollove	Steve	1628	
Olsen-Mikitowicz	Victoria	2961	
O'Meara	Colleen and Joe - WEG	773	
O'Meara	Kathy	2841	
O'Neill	Mariah	3723	
Opp	Nathan	2097	
Orban	Kiah	3160	
Orban	Billy	4161	
Ord	Katherine	4054	
Orloff	Michael	311	
O'Rourke	Melissa	3187	
Oroz	Michelle	819	
Orr	Noel	2187	
Orr	Lou	2201	
Osada	Susan	2351	
Osgood	Pamela	790	
Osgood	Karen and Edward	2241	
Osment	Alison	3462	
Osterberg	Nils	2303	
Oswald	Judi	1074	
Oswald	Judi	1135	
Oswald	Fred	3132	
Otani	Sue	4041	
Otter	Craig	3970	

Last Name	First Name	Letter #	Organization Name
Otto	Ana	2857	Arizona Farm Bureau Federation
Ouellette	Tracy	363	
Ouellette	Tracy	2560	
Oulman	Lynne	1596	
Owens	Carolyn	3104	
Oxley	Rhonda	2252	
Oxley	Jeremy	4246	
Ozkan	Dogan	2326	
p	m	3551	
P.	E.	532	
Pace	Jared	8	
Pace	Gayle	1401	
Packer	Patti	2413	
Packman	Zola	1387	
Padgett	Linda	200	
Padilla	Pat	479	
Page	Michele	1292	
Paisner	Miriam	1478	
Pal	M	3859	
Paladin	John	825	
Palla	Paul	463	
Palla	Paul	1511	
Pallister	Erik	2129	
Palmer	Timothy	12	
Palmer	Robert	469	
Palmer	Kirk	2126	
Paltin	Sharon	2310	
pan	pinkyjain	4108	
Papandrea	John	453	Local Union #3 IBEW
Pappano	Ruth	2729	
Pappas	Robin	1114	
Papscun	Alan	540	
Paradise	Brian	156	
Parcell	Jennifer	3779	
Parcell	Teresa	3881	
Pardi	Marco	2222	
Parham	Felix	2491	
Park	Jeannie	1545	
Parker	David	860	
Parker	Janice	1008	
Parker	David	1666	
Parker	Brenda	3010	
Parker	Richard	3017	

Last Name	First Name	Letter #	Organization Name
Parker	Judy	3507	
Parker	Lea	3888	
Parkins	Janet	1665	
Parks	Durrie	3794	
Parmer	Alison	3254	
Parobek	Lubos	1803	
Parr	Carmel	681	
Parr	Carmel	3829	
Parra	Alfonso	1781	
Parra	Alfonso	1828	
Parzick	Anne	754	
Pasholk	Kelly	118	
Paskowitz	Nancy	2376	
Passoa	Valerie	1173	
Pastula	Adam	1747	
Patenaude	Richard	2928	
Patrick	Scott	1809	
Patterson	Krista	36	
Patterson	Pam	1418	
Patton	James	133	
Paturzo	Susan	1590	
Patzan	Cristoffer	1951	
Paul	Amy	2506	
Pauls	Virgil	1191	
Paulson	Julie	4253	
Pavlova	Karina	516	
Pavlova	Karina	2564	
Pawloski	Linda	3262	
Paxton	G.	514	
Paxton	G.	1123	
Payment	Deborah	4007	
Peacey	Victoria	2921	Resolution Copper Mining LLC
Peacey	Victoria	2973	Resolution Copper
Peacock	Barb	3286	
Pearce-Lipari	Carolyn	3728	
Pearcy	Elizabeth	4040	
Pearl	Angela	2665	
Pearson	Juliet	192	
Pechmann	Cindy	3831	
Peddy	Jan	4177	
Pedersen	Ellen	2319	
Pedone	Chris	1533	
Peel	Roberta	4241	

Last Name	First Name	Letter #	Organization Name
Peirce	Susan	699	
Peirce	Susan	1129	
Pekurar	Laurean	3222	
Pekurar	Laurean	3363	
Pell	Tigran	2067	
Pelletier	Dr Kenneth R	395	
Pelletier	Judith	3354	
Pellizzari	Flavia	926	
Peltier	Drew	2545	
Penn	Ruthanne	3483	
Peplow	Bonnie	3127	
Pepper	Jayne	4145	
Percival	Wilhelm	2038	
Perdios	Dan	2656	
Peretz	Philip	3707	
Perinchief	Jana	411	
Perizzolo	Vicki	1455	
Perkins	Guy	246	
Perkins	Patrick	1919	
Perkins	Guy	1926	
Perkins	Chris	1970	
Perkins	Christopher	2069	
Perkins	Karen	3340	
Perkins	Karen	4143	
Perlman	Tiina	57	
perlman	janet	575	
Perlmutter	Martha D.	254	
perrault	monte	4133	
Perry	John	3164	
Peters	Kathleen	1025	
Peters	Rob	2401	
Peters	Robert	2970	Defenders Of Wildlife
Peters	Melody	3673	
Peterson	Susan	730	
Peterson	Ken	1921	
Peterson	Carl	2025	
Peterson	David	2040	
Peterson	Tracey	3391	
Petrillo	Diane	912	
Petro	Mike	1204	
Pettit	Robert	1987	
Pettit	Robert	2875	
Pettus	Beverly	2602	
Petty	Kevin	174	

Last Name	First Name	Letter #	Organization Name
Petty	Gina	2316	
Pew	Don	396	
Pew	Don	1180	
Pfost	Leslie	1629	
Phelps	Cody	3575	
Phillips	Teresa	631	
Phillips	Margaret	1224	
Phillips	Paul	1651	
Phillips	Randy	1744	
Phillips	Clark	2045	
Phillips	Elaine	2344	
Phillips	Erin	2674	
Phillips	Mary	3660	
Piatigorski	Roxie	806	
Piatigorski	Roxie	2141	
Picchetti	Gloria	403	
Piche	Jennifer	2428	
Pickett	Carla	4255	
Pierce	Nuri	839	
Pike	Donald	64	
Pinkham-Salt	Debbie	1634	
Pinkus	Walter	3117	
Pirazzi	Tina	415	
Pirazzi	Tina	2179	
Piselli	Tony	690	
Pitsker	Peter	3884	
Planchon	Nicole	3269	
Pliner	Elliot	588	
Plotkin	Rabbi Adele	3494	
Pogue	Maggie	4260	
poland	barbara	194	
Polhman	Keith	56	
Polish	Bret	2288	
Poltzer	Drew	1622	
Polk	Nora	89	
Pollack	Anne	3553	
Pollard	Pat	3174	
Pollock	Brice	1842	
Polya	Lance	220	
Pomeroy	Tracey	2521	
Ponce	Raphaël	4139	
Poole	Bronwyn	287	
Popielarczyk	Ed	695	
Popoff	Kathy	685	
Porcelli	Maureen	925	

Last Name	First Name	Letter #	Organization Name
Porcelli	Maureen	1581	
porcino	nancy	1242	
Porter	Sharon	1501	
Porter	Rin	3048	
Porter	Tim	3502	
Porter	Candace	3640	
Posch	Robert	138	
Posner	Ari	1630	
Post	Sheryl	1099	
Potter	David	1065	
Potter	Avery	2747	
Potts	Kimberly	2260	
Potts	Richard	4049	
Potzka	Tedric	3825	
Powell	Jessica	1798	
Powers	Todd	973	
Prather	Erica	3380	
Prefontaine	Joan	3890	
Prehn	Tyler	3737	
Pribanic	Carl	2378	
Price	Allen	492	
Price	Mary	727	
Price	Yuko	3545	
Price	Rona	3973	
Priestley	Gail	4203	
Prijatel	Jean	2803	
Pritchard	Adrienne	4022	
Proemm	Klaus	4119	
Prostko	Linda	807	
Provenzano	Pierina	1314	
provost	jorda	1482	
Prybylski	John	1554	
Public	Jean	42	
Publiee	Jean	65	
Pugh	Bree	2431	
Pugh	Janis	2949	
puliselic	christine	538	
Pultz	Kimberly	1690	
Punneo	Sheryll	846	
Purigraski	Kayla	2478	
Putman	Holly	183	
Putman	Holly	1254	
Putrich	Steve	2318	

Last Name	First Name	Letter #	Organization Name
Quackenbush	Cory	2368	Northern Arizona Climbers Coalition
Quackenbush	Cory	2512	Northern Arizona Climbers Coalition
Quackenbush	Cory	2548	
Quan	Jim	1945	
Quarles	Jerry	928	
Querner	Kathleen	2385	
Quigley	Mike	2970	The Wilderness Society
Quigley	Sean	3171	
Quillin	Mara	56	
Quillin	Terry	56	
Quinlan	Michael	3247	
Quinn	Harley	1028	
Quinn	Michael	1534	
Quinn	Zoe	1586	
Quinn	Patrick	2408	
Quittner	Claudia	992	
Qureshi	Darian	4217	
R	Joe	2419	
Raasch	Carolyn	2449	
Rabin	Pat	3937	
Racine	Robert	3850	
Radarian	Forrest	3704	
Rafferty	Janet	1425	
Rafferty	Bernard	2435	
RAIMAN	KRIS	3950	
Ralph	Matthew	13	
Ralph	Sarah	955	
Ralston	Hannah	2787	
Rambler	Terry	2954	San Carlos Apache Tribe
Rambler	Terrie	2971	San Carlos Apache Tribe
Ramirez	Mary	402	
Ramirez	Hank	1131	
Ramirez	Mary	1625	
Ramirez	Grace	2227	
Ramos	Joann	2702	
Ramsey	Megan	369	
Ramsey	Elizabeth	740	
Ramsey	Elizabeth	741	

Last Name	First Name	Letter #	Organization Name
Ramsey	Megan	1604	
Ramsthaler	Rosa	2684	
rancourt	shannon	3260	
Rand	Kevin	3212	
Randall	Dee	3120	
Randolph	charlotte	3154	
Raney	Gary	4218	
Rangel	Louise	1600	
Rangel	Manuel	2538	
Raper	Connie	2343	
Rappaport	Alexandra	2683	
Raseman	William	1728	
Rasmussen	Susan	2590	
Rasmussen	Patsy	3676	
Ratcliffe	Laurie	2793	
Rathbone	Marjorie	294	
Ratkovsky	Greg	1390	
Ratzat	Jennifer	4120	
Rawles	Tom	2911	
Rawles	Linda	2920	
Ray	Bobby	579	
Raymond	Wendy	1231	
Raymond	Michael	2363	
Read	Gina	3267	
Reagan	Johnny	1876	
Rebong	Matthew	1999	
Recca	Frances	661	
Rector	Crystal	78	
Redish	Maryellen	829	
Redish	Maryellen	1872	
Redish	Maryellen	2173	
Redosh	Douglas	1816	
Redwine	Harriet	3055	
reed	jennifer	1239	
Reed	Jane	1325	
Reed	Roger	4271	
Reeder	Katharine	3379	
Reeder	John	3714	
Rees	Michael	422	
Rees	Nathan	2946	Trout Unlimited
Rees	Judy	3270	
Reese	Michele	1312	
Reese	Michele	3274	
Reeve	Amanda	2816	Freeport-McMoRan

Last Name	First Name	Letter #	Organization Name
Reeve	Amanda	2890	Snell and amp; Wilmer L.L.P.
Regan	Barry	3108	
Rehkopf	Ethan	1930	
Reichel	Rhonda	297	
Reichert	Robyn	1518	
Reichert	Charlotte	4024	
Reichman	Edward	93	
Reichow	Debbie	3739	
Reinert	Jennifer	1275	
Reinhart	Julie	3141	
Reisch	Sherry	2810	
Remak	Jeannette	733	
Remilien	Sandra	2638	
Rendigs	Richard and Kim	2575	
Renkes	Saelon	3002	
Revak	Carol	3981	
Revesz	Bruce	1450	
Revill	Ann	2963	
Reynolds	Michele	155	
Reynolds	Jim	508	
Reynolds	Bryon	3496	
Reynolds	Stephanie	3570	
Rhein	Sandy	900	
Rhodes	Janet	2268	
Rhodes	Karen	4179	
Rhone	Destini	2815	
Rice	Brittney	3803	
Rich	Corey	2090	
Rich	Corey	2123	
Richards	Jacob	3470	
Richardson	Caroline	633	
Richardson	Leslie	2323	
Richardson	Gail and John	2456	
Richkarday	Ana	4258	
Richmond	Lonna	563	
Richter	Bryan	3153	
Rickard	Kathleen	66	
Ricker	Robertta	3879	
Ricketts	Debra	16	
Rickman	Martin	3955	
Ricks	Linda	683	
Riddle	Carolyn	627	
Ridella	Gerard	777	

Last Name	First Name	Letter #	Organization Name
Rider	Dara	4036	
Riedemann	Hannah	4050	
Riesberg	Jody	2223	
Riffel	Nicolette	4248	
Rigano	Kim	2609	
Rinas	Juanita	833	
Rincon	Anna	2186	
Ringgold	Bryan	2107	
Rings	Sally	3447	
Rink	Glenn	2780	
Rios	Jean	4025	
Rios	Elisa	4079	
Ripley-Busek	Xyn	3355	
Rippetoe	Robert	131	
Risser	Renee	189	
Risser	Renee	2446	
Rissien	Adam	2970	Wildearth Guardians
Rister	Patty	2848	
Ritter	Ginger	2736	Arizona Game and Fish Department
Ritter	Ginger	2795	Arizona Game and Fish Department
Ritter	Philip	3317	
Roa	Tania	2276	
Roach	Bob	706	
Robbins	Justine	74	
Robbins	Sarah	1679	
Roberson	SaraBeth	3196	
Robert	Virginia	4131	
Roberts	Gail	234	
Roberts	Gail	1151	
Roberts	Amy	2312	
Roberts	Elizabeth	2443	
Roberts	Karen	3060	
Roberts	Karen	3061	
Robertson	Christina	1013	
Robertson	Myles	1053	
Robertson	Scott	3523	
Robeson	Anita	3753	
Robinett	Ron	56	
Robinson	Joyce	444	
Robinson	Lee	509	
Robinson	John	1854	
Robinson	Dvora	3590	

Last Name	First Name	Letter #	Organization Name
Robinson	Ruth	3854	
Robison	Anne	3653	
Roche	John	1265	
Roche	Maureen	3281	
Rochkind	Iris	917	
Rochkind	Iris	1170	
Rock	Sharon	3605	
Rodar	Jodi	1424	
Rodgers	Paul	3123	
Rodnova	Natalia	1967	
Rodrigues	Pam	3193	
Rodriguez	Susan	1274	
Rodriguez	L.	1678	
Rodriguez	Rebeca	2889	
Rodriguez	Susan	3007	
Rodriguez	Tom	3049	
Rodriguez	Anthony	3658	
Roesch	Al	536	
Rogan	Mary	838	
Rogers	Pamela	182	
Rogers	Dennis	426	
Rogers	Sarah	3420	
Rogowski	Drew	1790	
Roh	Marian	3133	
Rolf-Jansen	Bellinda	3648	
Romans	Jennifer	1467	
Romberger	Cynthia	3207	
Romero	deb	1472	
Romesburg	Denise	305	
Romesburg	Denise	3760	
Roos	Irene	2294	
Roper	Jay	3518	
Roquemore	Angela	1601	
Rose	Tonya	850	
Rose	Andrea	2663	
Rose-Fortmueller	Laura	3243	
Rosenberg	Gj	2182	
Rosenblood	Jamie	2284	
Rosenfeld	Wendy	1208	
Rosenfield Podolsky	Lisa	3940	
Rosenkotter	Barbara	2286	
Ross	Robert	2783	
Ross	Kimra	3200	
Ross	Margaret	3234	

Last Name	First Name	Letter #	Organization Name
Ross	Pat	3284	
Rossachacj	Robert	450	
Rossachacj	Robert	1574	
Rossi	Dave	2475	
Rossi	Patricia	3885	
Rosso	Brit	3083	
Roth	Erik	572	
Roth	Erik	1140	
Rothrock	Leilani	3021	
Rowell	Diana	3832	
Rowland	Marcia	4051	
Royall	Naomi	1746	
Royce	Lynn	3792	
Ruanova	Lisa	4117	
Rubenstein	Nicole	1839	
Rubeo	Scott	1724	
Rubin	Rita	2998	
Rubin	Levi	4298	
Rubino	Karen	989	
Rudd	Laura	2189	
Rudin	David	126	
Rudisill	Amanda Sue	724	
Rule	Juliann	2849	
Rumiantseva	Elena	883	
Rumiantseva	Elena	2718	Law Office of Cleodis Floyd
running	Shelly	3563	
Ruopp	Kathy	618	Southtown Health Foods
Rupp	Janet	1156	
rupp	cathy	1201	
Rupp	Robin	1393	
Rush	John	3767	
Russell	Douglas	3052	
Russell	Candace	3630	
Rutherford	Sue	2000	
Rutkowski	Robert	476	
Rutledge	Will	211	
Ryan	Emmet	316	
Ryan	Robert	1944	
Ryan	Diiane	3329	
Ryan	Paul	3596	
Rynes	Michael	689	
Rysavy	Robin	908	
S	C	544	
S	C.	958	

Last Name	First Name	Letter #	Organization Name
S	C.	1088	
S	H	1452	
S	Steve	3954	
S.	Adrienne	1171	
S.	Sam	3323	
Sabinson	Mara	360	
Sabinson	Mara	1599	
Sabri	Sandi	4220	
Sachau	Barbara	44	
Sackmann	Jody	3197	
Saderman	Lydia	134	
sadow	jeffrey	3125	
Sadowski	Diane	881	
Sage	Marianne	3819	
Salamone	Marianne	1062	
Salas	Jan	1369	
Salisbury	Allyn	2642	
Salone	Margo	1636	
Samp	Cecelia	1675	
Sampery	M	525	
Sampery	M	1524	
Sample	Stephen	4175	
Sampson	David	2028	
Sampson	Sonie	3669	
Samuel	Cynthia	73	
Samuels	Maurice	2635	
Sanchez	Rodolfo	632	
Sanchez	Corina	2509	
Sanchez	Virginia	4042	
Sancho	Mimi	2837	
Sandberg	Harlan	2940	
Sanders	Jeffrey	902	
Sanders	Renee	3437	
Sanders	Brenda	3443	
Sandoval	Brenda	3511	
Sandrolini	Jim	2541	
Sanford	Ken	2719	
sang	sara	4201	
Santangelo	Roseann	1529	
Santangelo	Roseann	4168	
santopietro	dawne	123	
Sapone	Diane	2591	
Sapp	Robert	4214	
Saraydarian	Gita	3392	
Sardo	Steven	3583	

Last Name	First Name	Letter #	Organization Name
Sargent	Deborah	371	
Sauser	Tom	3118	
Savige	David	2158	
Savoy	Richard	277	
Sawford	Kate	2046	
Saxon	Diana	959	
Sayer	Stanley	2232	
Sayler	Becky	4043	
Sayre	Daniel	4167	
Scagnelli	Alyssa	2872	
Scaltrito	Marietta	814	
Scaltrito	Marietta	1512	
Scantlebury	E	4185	
Scarborough-Weiss	Eli	1716	
Schaefer	Lorna	3429	
Schaefer	Nathan	3603	
Schaeffer	Steve	2877	
Schafer	Robert	1058	
Schantz	Robert	2592	
Schauer	Elizabeth	994	
Schaut	Matthew	728	
Schechter	Naomi	2824	
Scheib	Lauren	3573	
Scheifele	Edna	1378	
Scheld	Steve	147	
Schellie	Kristina	3232	
Scherfee	Beth	3638	
Schick Young	Sylvia	4066	
Schiele	Lori	2254	
Schildwachter	Steve	609	
Schippert	Elizabeth	260	
Schlebecker	Isabel	3303	
Schlichting	Lena	1838	
Schlick	Jeremy	2485	
Schloessinger	Fred	485	
Schloss-Birkholz	Gisela	167	
Schmauss	Marti	2657	
Schmidt	Terry	58	
Schmidt	Terry	72	
Schmidt	Justin	3248	
Schmitt	Tim	1040	
Schmittauer	John	1433	
Schmittauer	John	1494	
schmoller	ron	3079	

Last Name	First Name	Letter #	Organization Name
Schmonsees	Laura	2081	
Schneeberger	Ann	2682	
Schneider	Abigail	1713	
Schneider	Jerry Schneider	2246	
Schneider	Max	3561	
Schofield	Anna	949	
Scholten	Sheri	4300	
Schongar	Elizabeth	3952	
schrauger	stewart	3983	
schreurs	tami	1047	
Schroeter	Rogil	3560	
Schuck	Vicki	3405	
Schueth	Steve	86	
Schuhrke	Nancy	1588	
Schuhrke	Nancy	3226	
Schult	Diana	2964	
Schultz	Nancy	2214	
Schulz	Linda	971	
Schumacher	Amy	2305	
Schuman	Laura	1493	
Schümmer	Sue	3155	
Schuster	Philip	2864	
Schwaab	Devon	2676	
Schwartz	Don	1019	
Schwartz	Marge	1126	
Schwartz	Elizabeth	1640	
Schwartz	Brieanah	2909	American Wild Horse Campaign
Scott	Pippa	205	
Scott	J. David	1446	
Scott	Dane	2091	
Scott	John	2502	
Scott	Pam	2634	
Scott	Dee	2901	
Seals	Donny	442	
Seaton	Leslie	3135	
Sebanc	susan	1176	
Sebastian	Joseph	884	
Sebastian	Joseph	2247	
Sedon	Douglas	486	
Seeley	Megan	1857	
Seeley	Thomas	1891	
Seff	Joshua	786	
Sefscik	Sue	975	

Last Name	First Name	Letter #	Organization Name
Segal	Bob	1641	
Seidel	Crystal	1620	
Seiler	Marilyn	3378	
Selbin	Susan	212	
Sellers	Ryon	2871	
Sellon	Kim	1621	
Seltzer	Elizabeth	976	
Seltzer	Rob	1293	
Seltzer	Elizabeth	1404	
Seltzer	Elizabeth Seltzer	2731	
Seltzer	Elizabeth Seltzer	2732	
Seltzer	Cherie	3280	
Selvig	Jeffery	1871	
Semon	Nora	56	
Senesac	Pixie	3353	
sensharma	christy	3163	
Serazio	Charlotte	691	
Serazio	Sandra	692	
Serrano	Nathan	2547	
Serrao	Ilona	2834	
Serxner	Shoshana	919	
Settlemyre	Robert	1808	
Severns	Dayle	895	
Sevilla	Toni	2539	
Sévilla	Caroline	3473	
Sewald	Michelle	499	
Sewright	Kathleen	1643	
Sexton	Elizabeth	3051	
sexton	sara	4060	
Shaffer	Terri	245	
Shaffer	Estelle	1098	
Shaffer	Nicole	2390	
Shaffer	Nicole	2691	
Shafransky	Paula	526	
Shaia	Gerald	1096	
Shannon	Curt	2071	
Shannon	Curt	2647	
Shannon	Curt	2931	
Shannon	Joe	3105	
Shapiro	Michael	1161	
Shapiro	Aggie	3683	
Shardy	Rebecca	1271	
Shardy	Rebecca	1272	
Sharfman	William	2291	



Last Name	First Name	Letter #	Organization Name
Shaw	Melinda	1319	
Shaw	Stephen	3705	
Sheldon-DiVito	Mary Jo	3126	
Shelton	James	1760	
Shelton	Patricia	3285	
Shen	Chenchen	43	
Shen	Gloria	893	
Sherman-Jones	Cynthia	338	
Sherwood	Kate	2282	
Sheshebor	Niloofer	656	
Sheshebor	Lily	2357	
Shimkonis	Ericka	595	
Shin	Janet	3227	
Shirey	Linda	225	
Shirey	Linda	1540	
Shirley	Hazel	2540	
Shock	Allison	3574	
Shoemaker	Sloan	94	
Shonkwiler	Randy	709	
Short	Jacquelyn	1933	
Short	Kyle	2781	
Short	Kimberly	3751	
Shostak-Kinker	Titiana	1740	
Shotts	Tami	3665	
Shouse	Antonia	1043	
Shroyer	Donna	616	
Shultz	Doris	899	
Sidd	Susan	1033	
Sidder	Aaron	2948	Bat Conservation International
Siemion	Letitia	3342	
Sikand	Vikram	81	
Sikand	Vikram	1558	
Siler	Julie	1416	
Siltala	Shirley	3352	
Silver	Margaret	1154	
Silver	Ronald	1159	
Silverman	Susan	4293	
Simmonds	Paula	3209	
Simmons	G.	1429	
Simmons	J	3637	
Simons	Anita	782	
Simpson	Edith	918	
Simpson	Janet	2633	
Sims	Catherine	368	

Last Name	First Name	Letter #	Organization Name
Sims	Catherine	2405	
Sims	Becky	3838	
Sinclair	L.	477	
Sindoni	Jenne	1396	
Siner	Ann	610	
Singer	Sherry	2887	
Sisk	Sidney	1642	
Sivesind	Torunn	1615	
Sivulich	Lenore	1370	
Skelton	Joanne	3344	
Skidmore	Chris	3219	
Skinner	Richard	3442	
Sklar	Dans	734	
Sklar	Dana	2243	
slaten	Constance	3313	
Slay	Mark	1794	
Slichenmyer	Jeanette	3788	
S-M	Manu	1115	McMaster University
Smiley	Christine	3465	
Smiley	Jaimi	3627	
Smith	Robert P.	24	
Smith	Corbett	71	
Smith	Judith	315	
Smith	Robert	324	
Smith	David	568	
Smith	Deborah	748	
Smith	Julie	873	
Smith	Thomas	1015	
Smith	Kristi	1082	
Smith	Sheila	1258	
Smith	Richard	1571	
Smith	Ron	1607	
Smith	Cam	1968	
Smith	Joseph	1991	
Smith	Hanson	2026	
Smith	Steve	2030	
Smith	Douglas	2111	
Smith	Julie	2146	
Smith	Leslie	2301	
Smith	Arthur	2484	
Smith	Joann	2621	
Smith	Kristin	2672	
Smith	Pricilla	3014	
Smith	Stacey	3183	

Last Name	First Name	Letter #	Organization Name
Smith	Linda	3322	
Smith	Tracy	3692	
Smith	Horace	4017	
Smith	Anna Nellis	4233	
Smith	Deanna	4277	
Smithers	John	995	
Smithson	Sarah	4063	
Smudin	Carole	1306	
Snedeker	Stephanie	3487	
Sneed	Randy	9	
Snow	Cason	1212	
Snyder	Valerie	1081	
Snyder	Brad	1168	
Snyder	Zachary	1708	
Snyder	Dave	1985	
Snyder	Nancy	4137	
Soares	David	1447	Ridge church
Solano	Daniel	4113	
Soll	Hugo	3348	
Sollitto	Alissa	136	
Solomon	Alan	938	
Solomon	Alan	2149	
Solow	Andrew	1989	
Soltis	Rachel	3289	
Somers	Susan	4229	
Sommers	Travis	2503	
Sonin	John S.	1566	
Sonoquie	Monique	1315	The Indigenous Youth Foundation
Sons	Lisa	1245	
Sopeland	Becky	62	
Souza	Peter	804	
Souza	Peter	1696	
Sparks	Rodney	70	
Sparling	Sheryl	830	
Sparrow	Deb	3031	
Spatti	Joan	2712	
Spaulding	Marie	333	
Speak	Steve	2733	Tonto Recreation Alliance
Spencer	Mark	37	Recreation Aviation Foundation
Speranza	Ilya	1054	

Last Name	First Name	Letter #	Organization Name
Speranza	Ilya	1606	
Spiegelman	Robin	820	
Spoden	Lynn	3370	
Spotts	Richard	1056	
Spotts	Richard	3038	
Spotts	Richard	3039	
Spragett	Cedra	3744	
Spratley	Richard	868	
Sprecher	Cindy	3766	
Springer	Dixie	795	
Spurt	Karen	3537	
Sreiber	Andrea	3943	
Sreiber	Andrea	4083	
St Clare	Simone	933	
Stadler	Loretta	3616	
Stafford	Janet	1164	
Stafford	Evan	2737	
Staley	Brian	56	
Staley	Tina	56	
Staley	Sam	4037	
Stalsworth	Wayne	474	
Stambaugh	Mark	3003	
Stancell	Cecilia	623	
Standley	Patrick	3139	
Stanley	Kate	2088	
Stanley	Toby	4110	
Stanton	Jeff	3321	
Staquet	Josh	3190	
Stark	Liane	3122	
Starseed	Lozz	188	
Stawinoga	Greg	762	
Stclair	Ron	3953	
Stebbins	Kerri	3236	
Steele	Mary	441	
Steele	Donna	3864	
Steffen	Maria	261	
Steffy	Stephen	3458	
Stegman	Cathy	1445	
Stehle	Alice	496	
Steiger	Lisa	99	
Steiger	Norman	105	
Steiger	Lisa	1365	
Steiger	Norman	1368	
Stein	Colby	3478	
Steiner	Neal	1253	

Last Name	First Name	Letter #	Organization Name
Steiner	A.L.	2283	
Steinert-Bresilge	Heidi	2313	
Steinhart	Carol	405	UW, VA Hospital, WI-DATCP
Steinhart	Carol	1266	UW, VA Hospital, WI-DATCP
Steinhilber	Silvia	3272	
Steininger	Bob	282	
Steinke	Kris	3434	
Steitz	Mimi	3613	
Stephen	Louisa	3824	
Stephens	Steve-Anna	4151	
Stepnicka	Sara	3362	
Sterling	Marjorie	2174	
Stern	Richard	649	
Stern-Eilers	Estelle	3427	
Sternlieb	Faith	4019	
Sterr	Josephine	1948	
Stetler	David	127	
Stetler	David	2163	
Steuer	Sharon	1303	
Steuter	Don	3250	
Stevens	David	652	
Stevens	Shannon	1852	
Stevenson	Nan	114	
Stevenson	Nan	1264	
Stevenson	Julia	1591	
Stewart	Sarah	669	
Stewart	Mary	671	
Stewart	Chris	672	
Stewart	Sarah	1698	
Stewart	Mary	1699	
Stewart	Diana	1700	
Stewart	Chris	1701	
Stewart	Nancy	3166	
Stigliano	MJ	1291	
Stimmer	Elisabeth	3416	
Stoakes	Mike	2229	
Stock	Sandra	643	
Stock	Sandra	3409	
Stoecker	Evan	1793	
Stonas	Walter	2020	
Stone	Nicole	2885	
Stone	Nicole	2888	

Last Name	First Name	Letter #	Organization Name
Stone	David	3305	
Storace	Michelle	3341	
storer	timothy	3201	
Storer	Ruth	4045	
Stork	Maryann	985	
Storm	Laurie	1174	
Stout	Cindy	56	
Stout	Ken	56	
Stover	W. Andrew	887	
Stover	Charry	3522	
StPeter	Susan	1343	
Strailey	Faith	2320	
Strait	Terry	1786	
Strate	Gretchen	4048	
Strayer	Jill	1761	
Strelke	Robert	2237	
Strickland	Lee	3054	
strong	Iars	384	
Strong	Beth	2611	
Strong	Grace	4165	
Stroup	Marylyn	2235	
Stuart	Todd	1971	
Stuhaan	Sandy	3492	
Stutzman	Kerry	3615	
Suarez	Joseph	393	
Suarez	Joseph	1466	
Subramanian	Rahul	2894	
Sugarman	Kathy	307	
Suggs	Joyce	3671	
Sumler	James	3501	
Summers	Carolyn	406	
Summerville	Chris	3423	
Sunblade	Barbara	2644	
Sunde	John	676	
Supplee	Tice	2806	Audubon Arizona
Surovell	Jeffrey	1194	Pratt institute
Susik	Michael	2612	
Sutherland	Susan sutherland	2714	Mustang Ambassador Program
Sutton	Russ	3780	
Swagart	Patricia	2114	
Swallow	Kevin	872	
Swan	Curtis	864	
Swartwout	Guy	4268	

Last Name	First Name	Letter #	Organization Name
Swartz	Deborah	3216	
Swartz	Wendy	4196	
Sweeney	Ellen	3110	
Sweetman	Tyrrell	3715	
Swenson	Virginia	2570	
Swope	Robin	2459	
Syme	William	1039	
Sypkens	Thomas	2753	
Szumal	Ray	213	
Szurley	Linda	243	
T	Gary	3415	
Tachna	Heather	2802	
Tagala	Peter	2767	
Tagliarini	Angelica	4239	
Tallman	Eve	1812	
Talwar	Vin	2202	
Tamargo	Jorge J	468	
Tamblyn	Marsha	3579	
Tang	Sean	1850	
Tang-Smith	Spenser	1912	
Tann	emary	2734	
Tanner	Nancy	3735	
Tanner	Jeffrey	4273	
Tanz Kubota	Ria	385	
Tarallo	Mary	1011	
Tarassenko	Nicholas	2112	
Taylor	Elizabeth	313	
Taylor	Elaine	372	
Taylor	Elaine	1414	
Taylor	Ron	1755	
Taylor	JJ	2496	
Taylor	Gigi	3027	
Taylor	Gigi	3358	
Taylor	Matthew	3813	
Tayro	Deana	3287	
Tedesco	Terry	3582	
Teeuwisse	Bart	1935	
Teevan	John	284	
Teger	Mike	1827	
Telese	Nancy	581	
Temple	Michele	1614	
Tennessee	Richard	603	
Terrock	Jennifer	1441	
Terry	Felicia	2519	
Terry	Robin	3807	

Last Name	First Name	Letter #	Organization Name
Teunissen	Christina	3593	
Thatcher	Tobey	3412	
Thing	Susan	3175	
Thoman	James	2569	
Thomas	Debbie	1431	
Thomas	Peter	1712	
Thomas	Britton	1788	
Thomas	Shauna	2128	
Thomas	Karen	2388	
Thomas	Donna	2912	
Thomas	Stephen	3880	
Thomas	Toni	4224	
Thomas	Georgia	4250	
Thomas	Harold	4302	
Thomas-Kruse	Barbara	4287	
Thomasson	Tabitha	964	
Thompson	Brian	869	
Thompson	TJ	1326	
Thompson	Kyle	1801	
Thompson	Brett	1832	
Thomsen	Greg	1730	
Thornton	Mary	1185	
Thornton	Lori	4281	
Thurman	Thomas	1609	District 2 Yavapai County
Thurman	Thomas	2807	
Thurston	Jean	1260	
Tiberi	judy	2681	
Tibsherany	K.	3696	
Tidwell	Stephanie	3142	
Tiemann	Beverly	3951	
Tieu	Kathy	1864	
Tighe	Michael	2765	
Timmins	M	4058	
Timmons	Clyde	1014	
tippens	rebecca	129	
Tischler	Jeffrey	865	
Toberer	Eric	1766	
Tobey	Adam	1924	
Tobias	Christopher	650	
Tobias	Kate	2829	Twisted Tails Inc
Tobin	Ralph	2213	
Todd	James	1632	
Tokarczyk	Janine	1363	

Last Name	First Name	Letter #	Organization Name
Tokarz	Joan	886	
Tollefson/Conard	Margot	1148	
Tomasi	Pernell	2537	
Tomlin	Curtis	954	
Tompkins	Adam	3650	
Topalian	Maggie	2956	
topher	chrys	831	
Torres	Kay	2980	
Torrey Palermo	Lorna	3235	
Tourneau	Ryan	1741	
Towne	Patrick	3299	
Towne	Bonnie	4088	
Townsend	Sarah	1234	
Townsley	Aaron	2751	
Tozzi	Sharon	2397	
Trainor	Mark	4055	
Tran	Sheila	761	
Tran	Sheila	1434	
Tran	Peter	1840	
Treadway	Vanessa	4184	
Treharne	Andy	2923	Federal Lands Hunting, Fishing and Shooting Sports Roundtable
Treuhaft	Linda	285	
Tripp	Martin	1059	
Tripp	Peter	1849	
Tris	Joseph	2050	
Troiano	Joseph	310	
Troy	Laura	4269	
Trudeau	Joseph	2796	Center For Biological Diversity
Trudeau	Joseph	2797	Center For Biological Diversity
Trudeau	Joseph	2799	Center For Biological Diversity
Trudeau	Joe	2884	
Trudeau	Joseph	2913	Center For Biological Diversity
Trudeau	Joseph	2914	Center For Biological Diversity

Last Name	First Name	Letter #	Organization Name
Trudeau	Joseph	2915	Center For Biological Diversity
Trudeau	Joseph	2916	Center For Biological Diversity
Trudeau	Joseph	2917	Center For Biological Diversity
Trudeau	Joseph	2918	Center For Biological Diversity
Trudeau	Joseph	2919	Center For Biological Diversity
Trudeau	Joseph	2962	Center For Biological Diversity
Trudeau	Joe	2970	Center For Biological Diversity
Trudeau	Joe	2987	
Trudeau	Joe	2990	Center For Biological Diversity
True	Shelly	162	True Busy For You
Trufan	Hal	680	
Trufan	Hal	2588	
Trussell	Steve	2974	Arizona Mining Association
Trutt	Kenneth	3446	
Tsai	Katherine	1966	
Tuck	Judith	3028	
Tucker	James	2145	
Tucker	James	2410	
Tucker	Lana	2581	
Tucker	Collee	2667	
Tuell	Cyndi	2986	Western Watersheds Project
Tumolo	Christopher	1012	
Tumpson	Daniel	760	
Tunstall	Jean	870	
Turick	P	1612	
Turken	Donald	894	
Turner	Phyllis	390	
Turner	Vickye	811	
Turner	Phyllis	2199	
Turner	Justin	2482	
Turner	Phyllis	3922	

Last Name	First Name	Letter #	Organization Name
Turner	Kate	4228	
Turobiner	Martha	3682	
Tyler	Anna	3847	
Tyrell	Kevin E	34	
Uhl	Leslie	1464	
Uhlir	Christina	2340	
Umphries	Andrew	4212	
Unema	Joel	2886	
Unmacht	Jim	2966	Arizona Sportsmen for Wildlife Conservation
Urquhart	Steven	304	
Uyenishi	Steve	290	
Val	Kris	3140	
Valaji	Medi	2253	
Valencia	E	3438	
valente	thomas	3165	
valentine	jennifer	2556	
Valero	Maudie	2698	
Valle	Nayda	3532	
Van Alstyne	Anne	218	
Van Cleave	Berinda	2578	
van de Looij	Yvonne	3467	
van de Looij	Yvonne	3621	
van de Waarsenburg	Marc	3925	
Van Kolken	Robert	362	
Van Leuven	Phyllis	2427	
van Oers	Tricia	792	
Van Slyke	Lynne	3664	
Vana	Cheryl	4023	
Vanantwerp	Mari	3928	
Vance	Renee	1379	
Vandaveer	Vonda	3077	
VanDerAa	Kathleen	4259	
VanderHoeven	Nakisha	3293	
Vanderstar	Bev	3700	
VanWinkle	Jean Marie	283	
Varga	Dolores	2152	
Varga	Dolores	3436	
Varvel	Sandra	862	
Vasilakis	Adam	2049	
Vasquez	John	56	
Vayda	Karen	679	
Vayda	Karen	2204	

Last Name	First Name	Letter #	Organization Name
Vayu	Satya	2814	
Vazquez	Sara	3691	
Velarde	Mario	144	
Velazquez	Anita	424	
Venci	Brittany	2113	
Venezio	Glen	3745	
Ventittelli	Aubrey	3024	
Vera	Nina	2272	
Veraldi	Anne	409	
VerDuin	Melissa	226	
Verhougstraete	Marc	1750	
Verna	Diane	1163	
Verplank	Lana	3086	
Vers	Frank	30	
Vezian	Marc	175	
Viandier	Jamila	2196	
Viezens	Harry	56	
Viezens	Marcia	56	
Villnow	Ivy	1705	
Vincent	Karen	1349	
Viney	James	3556	
Viola	Blake	3816	
Visperas	Carlene	2444	
Vivian	John	3843	
Vlasopolos	Anca	3524	
Vogel	Bob	3302	
Vogel	Fran	4140	
Vogt	Susan	1205	
Vogt	Jennifer	2021	
vogt	warren	2715	
Vogt	Suzanne	4100	
von Eberstein	Camille	365	
von Foerster	Madeline	3599	
Voysey	Helen	1867	
VrMeer	Janice	4052	
Waddel	Pat	667	
Wager	Joan	3839	
Waggoner	Cassie	2944	
Waggoner	Lee	3580	
Waggoner	Deborah	3894	
Wagner	Priscilla	1671	
Wagner	Elissa	2399	
Wagner, PhD	G Blu	2264	
Wagnon	Wes	2058	
Wainwright	Joel	2066	

Last Name	First Name	Letter #	Organization Name
Wakefield	Marie	1613	
Wald	Aloysius	614	
Waldron	Nicole	1031	
Waldron	Virgina	2347	
Waldron	Carla C.	3242	
Walker	Frank	63	
Walker	Christie	416	
Walker	Joan	1584	
Walker	Joan	2262	
Walker	Lori	2960	
Walker	Lori	2979	
Walker	Leslie	3276	
Walker	Ronald	3508	
Walker	Heather	3614	
Walker	David	3837	
Wallace	E. Clare	2658	
Wallach	Deborah	1877	
Walls	Mary	2166	
Walls	JoAnne	4279	
Walsh	Marce	642	
Walsh	Gerald	1070	
Walsh	Kelly	1302	
Walsh	Marce	1439	
Walsh	Ditra	2441	
Walsh	Liane	3157	
Walsh	Denise	3601	
Waltasti	Marilyn	1288	
Waltasti	Marilyn	3797	
Walters	Steven	2015	
Walters	Sandra	2599	
Walters	Carole	3610	
Waltman	Karen	413	
Waltman	Karen	1704	
Walton	Kathe	3474	
Wang	Angel	3032	
Ward	Terrence	590	
Ward	Toni	1739	
Ward	Sarah	1817	
Ward	Rosemary	2346	
Ward	M Elizabeth	2594	
WardDonahue	Elizabeth	731	
Warfield	Melissa	2314	
Warfield	Melissa	2651	
Warfield	Melissa	3025	
Warner	Dee	56	

Last Name	First Name	Letter #	Organization Name
Warner	Doyle	56	
Warner	Jen	3856	
Warren	Greg	79	
Warren	Mark	1003	
Warren	Mark	2185	
Warriner	Jeremiah	3330	
Wasgatt	Ann	808	
Wasserman	Zachary	1784	
Wasserman	Joseph	2245	
Wasuta	Cody	2862	
Waters	Susan	597	
waters	michael	3506	
Waters	Michelle	3895	
Waterston	Beth	3529	
Watkins	Jeff	45	
Watkins	Katie	2497	
Watkins	Chris	2938	Arizona Public Service
Watkins	Chris	2988	
Watson	Virginia	336	
Watson	Alexa	1758	
Watson	John	2133	
Watson	Virginia	2150	
Watson	Laurel	3178	
Watson	Kathy	4187	
watters	Whitney	1531	
watters	cheryl	1560	
Watts	Susan	1106	
Watts	Elizabeth	1405	
Wattson Lamb	Elsie	186	
Waugh	Kym	1048	
Wayne	L	4296	
Wayterra	Anamaria	3752	
Weant-Leavitt	Margaret	3761	
Weathersbee	Christine	2416	
Weathersbee	Christine	3479	
Weaver	Chad	2013	
Weaver	Michael	2735	
Weaver	Carolyn	4020	
Webb	Dean	1261	
Webb	Maureen	1371	
Webb	Zachary	2526	
Webber	R	4163	
Weber	Lore	407	
Weber	Cricket	2791	

Last Name	First Name	Letter #	Organization Name
Weber	Carole	4078	
Webster	Catherine	3116	
Webster	Phyllis	3244	
Wedlake	Michelle	4174	
Weekley	Terri	3976	
Weigel	Stephanie	1112	
Weihe	Orion	1880	
Weinberger	Mark	1095	
Weinstein-Klass	Naomi	768	
Weis	Marie	1526	
Weisel	Janet	1510	
Weiss	Nancy	3606	
Weisser-Lee	Melinda	3066	
Weissmueller	Bonnie	3759	
Weisz	Russell	875	
Welborn	Michael And Valerie	3504	
Welch	Laurie	2891	
Weldon-Faulkner	Cassandra	952	
Welker	Dan	2504	
Welles	Diane	3853	
Wellington	Mary	3497	
Wells	Lasha	2585	
Welsh	Cailyn	4206	
Wendell	Claudia	2704	
Wendler	Susan	3878	
Weng MD	Michael	3451	
Wentworth	Katherine	583	
Wenzel	Joseph	3495	
Wenzer	Minivere	434	
Werner	Katherine	484	
Werner	Elizabeth	1411	
Wernette	Tim	3866	
Wertheim	Ellen	1120	
Wertz	Brad	3587	
Wesley	Susan	3218	
Wess	Roger	269	
Wessman	Eric	1001	
West	Isaac	1722	
West	Benjamin	2772	
Westby	Sharon D	3531	
Westby	David	3642	
Westfall	Emily	2522	
Wetherall	Jakki	2708	

Last Name	First Name	Letter #	Organization Name
Wetherall	Richard	2709	
Wetteland	Signe	231	
Wetzel	Glen	3840	
Wheaton	Merrijo	3063	
Wheaton	Leslie George	3131	
Wheaton	Merrijo	3576	
Wheaton	Leslie George	4193	
Wheeler	Dorothy	3179	
Wheeler	Clare	4292	
Whilden	Andrew	2525	
Whisenant	Jake	1932	
Whitacre	Lisa	3625	
Whitaker	Howard	1097	
Whitcomb	Sherry	2835	
Whitcomb	D.E.	3214	
White	Sabrina	32	
White	Charlene	69	
White	Mark	236	
White	Robbie	265	
White	Rob	1155	
White	Scott	2360	
Whitehouse	Judy	4090	
Whiterabbit	Herman	950	
Whiterabbit	Herman	2167	
Whitnah	Carol	4191	
Wicker	R David	1316	
Wicker	Cynthia	3215	
Wickham	Ken	3375	
Wiegman	Sherri	3029	
Wieland	Lorenn	4018	
Wiener	Wendy	3959	
Wight	Suzanne	3033	
Wightman	Kevin	840	
Wilber	Fr. Stewart	1440	
Wilcox	Nicholas	2084	
Wilde	Deena	3919	
Wildflower	Ivory	3057	
Wilfing	Charles	1645	
Wilfing	Janice	1646	
Wilhelm	Dave	4104	
Wilk	Peter	1710	
Wilkes	Phil	1982	
Wilkinson	Connie	1068	
Wilkinson	Diana	3995	
Williams	Roger	56	



Last Name	First Name	Letter #	Organization Name
Williams	David	153	
Williams	Melissa	489	
Williams	Weldon	965	
Williams	David	1209	
Williams	Yvonne	1572	
Williams	Katie	1789	
Williams	Catherine	2398	
Williams	Sheila	2701	
Williams	Katie	2789	
Williams	Stephania	3225	
Williams	Janet	3389	
Williams	Catherine	3600	
Williams	Cheryl	4011	
Williamson	Patricia	387	
Williamson	Debbie	1576	
Williamson	Gay	2359	
Willis	G.	982	
Wills	Debra	890	
Wills	Michael	3400	
Wilson	Eric	7	
Wilson	Tina	224	
Wilson	Donald	280	
Wilson	Michelle	552	
Wilson	Steve	570	
Wilson	Debra	580	
Wilson	Debra	604	
Wilson	Debra	710	
Wilson	Debra	1626	
Wilson	Winn	1695	
Wilson	William	1873	
Wilson	Amelia	2018	
Wilson	Debra	2422	
Wilson	Douglas E Wilson	4270	
Wing	Marjorie	298	
Wingert	Paulette	2905	
Winholtz	Betty	866	
Winslow	Lee	399	
Winslow	Lee	3009	
Wirrig	Susan	722	
Wirth	Mark	1430	
Wiseman	Krystyna	3239	
Wissler	Frank	146	
Witte	Roslynn	3932	
Witzeman	Janet	3589	

Last Name	First Name	Letter #	Organization Name
Wleklinski	Don	1273	
Wohlleb	Michael	1024	
Wolcott	James	103	
Wolcott	James	1381	
wolf	r.	3516	
Wolfe	Iris	2997	
Wolfe	Amy	4094	
Wolff	Pat	271	
Wolff	Jenny	4086	
Wolfgang	Luke	3205	
Wolfsohn	Sharon	2155	
Wollman	Nan	1071	
Wollman	Nan	3456	
Wolny	Rose	3426	
Wolph	Pat	2632	
Wolverton	Nichol	2035	
Wolverton	Andrew	3332	
Wolverton	Emily	4249	
Wong	Courtney	2068	
Wontor	Debra	158	
Wontor	Debra	1492	
Wood	Lorna	222	
Wood	Peter	339	
Wood	Dale	1617	
Wood	Dale	1624	
Wood	Nancy	3080	
Wood	Hollis	3572	
Wood	Peter	3784	
Wood	Christine	3827	
Wood	Linda	3883	
Wood	Barbara	3979	
Woodman	Renee	797	
Woodruff	Janet	1344	
Woods	roth	611	
Woods	Roth	1693	
Woodward	Kathy	2613	
Woody	Austin	2784	
Wornum	Claudia	1248	
Worth	Monty	2089	
Worth	Braxton	3690	
Wray	Anthea	483	
Wright	Priscilla	1021	
Wright	Ann	1042	
Wright	Tom	2900	
Wright	Debra	3137	

Last Name	First Name	Letter #	Organization Name
Wright	Jenae	3334	
Wright	Joan	3756	
Wright	Sally	4125	
Wright III	Trigg	802	
Wrinn	Chris	341	
Wulbern	Kristina	3701	
Wyatt	Rose	176	
Wyckoff	Sam	2098	
Wyse	Margo	1045	
Yamamoto	Marc	2774	
Yamauchi	Saeko	4158	
Yanke	Brian	1673	
Yarnell	Adam	2083	
Yasaitis	Thomas	726	
Yates	Larry	2195	
Yborra	Gail	1337	
Yee	Dennis	3246	
Yellis	Stefanie	3991	
Yensen	Roger	2078	
yerman	leslie j	3223	
Yerry	Gordon	3747	
Yonker	Ashley	527	
York	Peggy	674	logisticare
Young	Teresa	684	
Young	Mary	1233	
Young	Doug	1686	
Young	Marjorie	3204	
Young	Kirstina	3514	
Young	Carolyn	3549	
Young	Miranda Allison	3996	
Yu	Sau-Ling	3746	
Yule	Kelsey	76	
Yule	Kelsey	3694	
Z	A	2135	

Last Name	First Name	Letter #	Organization Name
Zabilski	Julie	3252	
Zachary	Nick	2099	
Zadeh	Edward	195	
Zagula	Lorraine	3635	
Zak	Casey	1954	
Zalewska	Dobi	755	
Zaman-Zade	Rena	2356	
Zamora	Julie	1986	
Zampieri	Janet	4044	
Zanders	Marya	382	
Zanetakos	Nicole	2604	
Zaporowski	Steve	1952	
Zarrello	Dana	359	
Zdobinski	Deborah	1346	
Zeigler	Matt	2010	
Zeilman	Lorena	2869	
Zelasko	Sandy	446	
Zeldin	Jeffrey	2508	
Zenker	Rev. Elizabeth	1553	
Zerzan	Paula	561	
Zerzan	Paula	3796	
zey	john	968	
Ziegler	Matthew	4294	
Ziegner	Isak	2103	
Zilles	Karen	1984	
Zinn	Andrea	1175	
Zirasri	Ran	2248	
Zoner	Kurt	1745	
Zucker	Marguery lee	2302	
Zupancic	Jodie	1186	
Zwarun	Judith	503	
Zwarun	Judith	1345	
Zyla	Alison	318	