

Group Title	Updated Comment:	Summary Comment:	Response:	Original Comment:	New Sub-Category	Sub-Category	PC Statement
Need for change should be based on existing conditions	Issue: The DEIS fails to establish a need for change based on existing conditions. Remedy: The Purpose and Need chapter should be revised to represent the purpose of this DEIS in accordance to NEPA. Existing conditions should be fully provided without prejudicial wording, and clear statements of the need for change should be provided based on existing conditions.	The DEIS fails to establish a need for change based on existing conditions and is not clear regarding "revision topics". Recommend the purpose and need chapter be revised in accordance with NEPA.	XXXX	Issue: The DEIS fails to establish a need for change based on existing conditions. Remedy: The Purpose and Need chapter should be revised to represent the purpose of this DEIS in accordance to NEPA. Existing conditions should be fully provided without prejudicial wording, and clear statements of the need for change should be provided based on existing conditions.		need based on existing conditions	PC 101-1 The Forest Service should revise the Purpose and Need chapter to represent the purpose of this DEIS in accordance to NEPA to provide clear statement of the need for change based on existing conditions.
General effects - climate change to forest	The TIME is NOW to make the changes we need in the amount of greenhouse gases we emit.	The Forest Service must address and disclose threats to the forests from climate change.					
	Stop subsidizing the plunderer. Many reports clearly show that "fees" for forest that we all own do not cover the life-cycle cost of opening with roads, drainage, clean water and wildlife. These items do not account for the loss of a place to go to reconstitute our body and soul from our life in many parts of poorly planned	Our national forests need to be protected. The Forest should be managed to emphasize ecological sustainability. The Forest Service should emphasize protection of biodiversity, endangered species and other animals, habitat, and old growth.					

	and built America. Save these gems as long as forever or to when we categorically can proof we can not survive without their resources.					
The plan and other planning efforts	One of the concerns that we have with the documents as written as they make reference to other planning documents that are currently being developed by the Forest Service. As an example, the Forest Plan discusses the addition of both wildlife quite areas and wilderness, but it is difficult to evaluate these in the absence of a completed Travel Management Plan. There is no doubt that Travel Management Rule will bring restrictions on legitimate forest users, something that we believe is needed, but how can one evaluate or support the need for quite areas or additional wilderness without knowing how much restriction will be applied by TMR? This seems to be a piecemeal approach to planning that is difficult for affected users to evaluate in their entirety.	Explain how the Forest Service Handbook and the travel management plan relate to the plan and projects.	<b>**Check out Kaibab p. 5, 4th comment</b>	One of the concerns that we have with the documents as written as they make reference to other planning documents that are currently being developed by the Forest Service. As an example, the Forest Plan discusses the addition of both wildlife quite areas and wilderness, but it is difficult to evaluate these in the absence of a completed Travel Management Plan. There is no doubt that Travel Management Rule will bring restrictions on legitimate forest users, something that we believe is needed, but how can one evaluate or support the need for quite areas or additional wilderness without knowing how much restriction will be applied by TMR? This seems to be a piecemeal approach to planning that is difficult for affected users to evaluate in their entirety.	Travel Management Plan	PC 1120-2 The Forest Service should not make reference to other planning documents that are currently being developed by the Forest Service (TMP) because how can one evaluate or support the need for quite areas or additional wilderness without knowing how much restriction will be applied by TMR?

The plan and other planning efforts	The ASNF must provide the public a detailed explanation to: Why the documents are not integrated into the proposed Forest Plan, and given they are separate How will these 3 separate documents ( Travel Management, FSH, new plan) be integrated specific to projects, and Which of the 3 documents is to be the primary document?	Explain how the Forest Service Handbook and the travel management plan relate to the plan and projects.	<b>**Check out Kaibab p. 5, 4th comment</b>	The ASNF must provide the public a detailed explanation to: Why the documents are not integrated into the proposed Forest Plan, and given they are separate How will these 3 separate documents ( Travel Management, FSH, new plan) be integrated specific to projects, and Which of the 3 documents is to be the primary document?	Integrating Documents into Plan	PC 175-20 The Forest Service must provide the public a detailed explanation to why Travel Management, FSH, and the new plan are not integrated into the proposed Forest Plan, and given they are separate how will these 3 separate documents be integrated specific to projects. The Forest Service should explain which of the 3 documents is to be the primary document
Need to consult with USFWS	The plan revision will affect threatened and endangered plants and animals. Therefore, the Forest Service is obligated to consult with the FWS to ensure that plan revision “is not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of [critical] habitat of such species.”	The Forest Service is obligated to consult with USFWS to ensure the plan revision “is not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of [critical] habitat of such species.”	<b>**Check out Prescott p. 14, last comment</b>	The plan revision will affect threatened and endangered plants and animals. Therefore, the Forest Service is obligated to consult with the FWS to ensure that plan revision “is not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of [critical] habitat of such species.”	Consultation with FWS on Endangered Plants and Animals	
Roads jurisdiction	With regards to motorized travel: We believe that any roads in the state of Arizona should fall under the jurisdiction of the county and sheriff with which they are located, and if a road needs to be closed the sheriff .can make that decision.	Any roads in the state of Arizona should fall under the jurisdiction of the county and sheriff where they are located.	XXXX	With regards to motorized travel: We believe that any roads in the state of Arizona should fall under the jurisdiction of the county and sheriff with which they are located, and if a road needs to be closed the sheriff .can make that decision.	Travel Management	PC 107-1 The Forest Service has very limited jurisdiction in Arizona because the lands belong to the citizens of Arizona, not the federal government.

Jurisdiction - greenlee co	<p>This is in reference to Programmatic Draft Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan. The United States Forest Service, Department of Agriculture has very limited jurisdiction in Greenlee County as proved by the following affidavit, supporting court cases and references that are included: [ (1) Jurisdiction Affidavit Pertaining to Federal Jurisdiction over Areas Acquired by the United States in the county of Greenlee, state of Arizona, (2) 16 U.S.C 480 Civil and criminal jurisdiction, (3) U.S. Supreme Court, United States v. County of Fresno, 429 U.S. 452 (1977) ].</p>	<p>The Forest Service has limited jurisdiction in Greenlee County as proved by affidavit, supporting court cases and references including: (1) Jurisdiction Affidavit Pertaining to Federal Jurisdiction over Areas Acquired by the United States in the county of Greenlee, state of Arizona, (2) 16 U.S.C 480 Civil and criminal jurisdiction, (3) U.S. Supreme Court, United States v. County of Fresno, 429 U.S. 452 (1977), (4) The Doctrine of Retroactivity and Prospectivity is being violated by the DOJ in attempting to enforce the Organic Act of 1897, Taylor Grazing and FLPMA upon the pre existing right of property., (5) Union Pacific R. Co. v. Laramie Stock Yards Co., 231 U.S. 190 (1913), (6) 16 USC 472 - Laws affecting forest lands, (7) U.S. Supreme Court Wilcox v. Jackson, 38 U.S. 13 Pet. 498498 (1839) ], (8) U.S. Constitution - Amendment 10, (9) 16 USC 534 - Termination and cancellation of easements; notice; hearing, (10) 40 USC 1314 - Easements</p>	XXXX			
Jurisdiction - greenlee co	<p>This is in reference to Programmatic Draft Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan. The United States Forest Service, Department of Agriculture has very limited jurisdiction in</p>	<p>The Forest Service has limited jurisdiction in Greenlee County as proved by affidavit, supporting court cases and references including: (1) Jurisdiction Affidavit Pertaining to Federal Jurisdiction over Areas Acquired by the United States in the county of</p>	XXXX			

	<p>Greenlee County as proved by the following affidavit, supporting court cases and references that are included: The pre-existing rights acquired prior to 1976 are protected and are subject to State law. State law is the rules of decision as per Erie Railroad Company vs. Thompson. The United States Forest Service has no authority, police powers or jurisdiction to disturb these pre-existing rights. [ (1) The Doctrine of Retroactivity and Prespectivity is being violated by the DOJ in attenmpting to enforce the Organic Act of 1897, Taylor Grazing and FLPMA upon the pre existing right of property., (2) Union Pacific R. Co. v. Laramie Stock Yards Co., 231 U.S. 190 (1913), (3) 16 USC 472 - Laws affecting forest lands, (4) U.S. Supreme Court Wilcox v. Jackson, 38 U.S. 13 Pet. 498498 (1839) ].</p>	<p>Greenlee, state of Arizona, (2) 16 U.S.C 480 Civil and criminal jurisdiction, (3) U.S. Supreme Court, United States v. County of Fresno, 429 U.S. 452 (1977), (4) The Doctrine of Retroactivity and Prospectivity is being violated by the DOJ in attempting to enforce the Organic Act of 1897, Taylor Grazing and FLPMA upon the pre existing right of property., (5) Union Pacific R. Co. v. Laramie Stock Yards Co., 231 U.S. 190 (1913), (6) 16 USC 472 - Laws affecting forest lands, (7) U.S. Supreme Court Wilcox v. Jackson, 38 U.S. 13 Pet. 498498 (1839) ], (8) U.S. Constitution - Amendment 10, (9) 16 USC 534 - Termination and cancellation of easements; notice; hearing, (10) 40 USC 1314 - Easements</p>				
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	<p>Agriculture or any Federal Agency has no delegation of authority, jurisdiction or police powers in relation to Rights of Way or RS2477 roads in Greenlee County, Arizona [(1) 16 USC 534 - Termination and cancellation of easements; notice; hearing, (2) Union Pacific R. Co v. Laramie Stock Yards Co., 231 U.S. 190 (1913), (3) 40 USC 1314 - Easements, (4) U.S. Supreme Court Wilcox v. Jackson, 38 U.S. 13 Pet. 498498 (1839) ].</p> <p>As per Federal law and State law the rules of decision are Arizona State Law pertaining to right of ways and RS 2477 roads in Greenlee County, Arizona.</p> <p>[ (1) 16 USC 534 - Termination and cancellation of easements; notice; hearing, (2) Union Pacific R. Co. v. Laramie Stock Yards Co., 231 U.S. 190 (1913), (3) 40 USC 1314 Easements, (4) U.S. Supreme Court Wilcox v. Jackson 38 U.S. 13 Pet. 498498 (1839)</p>	<p>Retroactivity and Prospectivity is being violated by the DOJ in attempting to enforce the Organic Act of 1897, Taylor Grazing and FLPMA upon the pre existing right of property., (5) Union Pacific R. Co. v. Laramie Stock Yards Co., 231 U.S. 190 (1913), (6) 16 USC 472 - Laws affecting forest lands, (7) U.S. Supreme Court Wilcox v. Jackson, 38 U.S. 13 Pet. 498498 (1839) ], (8) U.S. Constitution - Amendment 10, (9) 16 USC 534 - Termination and cancellation of easements; notice; hearing, (10) 40 USC 1314 - Easements</p>				
Jurisdiction - greenlee co	<p>This is in reference to Programmatic Draft Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan. The United States Forest Service, Department of Agriculture has very limited jurisdiction in Greenlee County as proved by the following affidavit, supporting court cases and</p>	<p>The Forest Service has limited jurisdiction in Greenlee County as proved by affidavit, supporting court cases and references including: (1) Jurisdiction Affidavit Pertaining to Federal Jurisdiction over Areas Acquired by the United States in the county of Greenlee, state of Arizona, (2) 16 U.S.C 480 Civil and criminal jurisdiction, (3) U.S. Supreme</p>	XXXX			

	<p>references that are included: Police Powers My comment is the as per the 10th amendment of the Constitution of the United States of America. All police powers are reserved to the state or to the people. Please provide me the cites and authorities if you disagree with me. [ (1) U.S. Constitution - Amendment 10 ]</p>	<p>Court, United States v. County of Fresno, 429 U.S. 452 (1977), (4) The Doctrine of Retroactivity and Prospectivity is being violated by the DOJ in attempting to enforce the Organic Act of 1897, Taylor Grazing and FLPMA upon the pre existing right of property., (5) Union Pacific R. Co. v. Laramie Stock Yards Co., 231 U.S. 190 (1913), (6) 16 USC 472 - Laws affecting forest lands, (7) U.S. Supreme Court Wilcox v. Jackson, 38 U.S. 13 Pet. 498498 (1839) ], (8) U.S. Constitution - Amendment 10, (9) 16 USC 534 - Termination and cancellation of easements; notice; hearing, (10) 40 USC 1314 - Easements</p>				
NFS should be State	<p>Actually, these national forest lands should be STATE Forest Lands</p>	<p>National forest lands should be State forest lands.</p>	XXXX	<p>Actually, these national forest lands should be STATE Forest Lands</p>	Land Designations	
Management emphasis is - Protect	<p>We cannot allow the erosion of protections for those places [national forests and public lands] if future generations are to enjoy them as we do.</p>	<p>Our national forests need to be protected. The Forest should be managed to emphasize ecological sustainability. The Forest Service should emphasize protection of biodiversity, endangered species and other animals, habitat, and old growth.</p>	XXXX	<p>I have had my breath taken quite literally away so many times in my life by the natural beauty of our national forests and public lands. No picture, no video, no second hand account and no great numbers of them could prepare one for the grandeur and the sheer immenseness of the beauty and majesty of those places. Those moments and that</p>	Protection of Land	<p>PC 175-1 The Plan should focus on ecological sustainability, preservation, restoration, and protection of forest soil and land still in any state with wild characteristics, this includes roadless and wilderness designated areas. The Forest Service should include the need for the use of mechanical thinning and prescribed fire and wildfire to achieve long-</p>

				pristine majesty are priceless! We cannot allow the erosion of protections for those places if future generations are to enjoy them as we do.		term restoration objectives. The Plan should emphasize executing well less than perfect projects now, over developing scientifically perfect projects that are never implemented.
Management emphasis - Protect	Our national forests need more protection, not less.	Our national forests need to be protected. The Forest should be managed to emphasize ecological sustainability. The Forest Service should emphasize protection of biodiversity, endangered species and other animals, habitat, and old growth.	XXXX	Our national forests need more protection, not less.		Protection
Management emphasis - Protect	Ecological sustainability must be the "guiding star" for the Forest Service to set its management course. I am very concerned with the direction the A-S plan is headed.	Our national forests need to be protected. The Forest should be managed to emphasize ecological sustainability. The Forest Service should emphasize protection of biodiversity, endangered species and other animals, habitat, and old growth.	XXXX	Ecological sustainability must be the "guiding star" for the Forest Service to set its management course. I am very concerned with the direction the A-S plan is headed.		Concern with Plan Direction
						PC 175-1 The Plan should focus on ecological sustainability, preservation, restoration, and protection of forest soil and land still in any state with wild characteristics, this includes roadless and wilderness designated areas. The Forest Service should include the need for the use of mechanical thinning and prescribed fire and wildfire to achieve long-term restoration objectives. The Plan should emphasize executing well less than perfect projects now, over developing scientifically perfect projects that are never implemented.

Management emphasis - Protect	The Forest Service, so long as it exists, should do whatever is within its power to protect the lands and natural environments within its purview. . . . The Forest Service should strive to not be one of these by working with maximum effort toward sustaining environments, forests, habitats, places, etc. for which it is responsible.	Our national forests need to be protected. The Forest should be managed to emphasize ecological sustainability. The Forest Service should emphasize protection of biodiversity, endangered species and other animals, habitat, and old growth.	XXXX	The Forest Service, so long as it exists, should do whatever is within its power to protect the lands and natural environments within its purview. Aspects of the government are expiring, as are certain governmental actors/agents/offices because of poor performance, dishonesty, misuse of office, etc. The Forest Service should strive to not be one of these by working with maximum effort toward sustaining environments, forests, habitats, places, etc. for which it is responsible.	Protection	PC 105-2 The Forest Service should manage the national forests with permanent strong protections from logging of timber, mining, hunting, petroleum drilling, and non-passive recreation for wildlife, flora and fauna, endangered species, insects, wildflowers, and old growth habitat.
Management emphasis - Protect	The US Forest Service needs to be about protecting the important ecological value of these lands and preserving their remote nature.	Our national forests need to be protected. The Forest should be managed to emphasize ecological sustainability. The Forest Service should emphasize protection of biodiversity, endangered species and other animals, habitat, and old growth.	XXXX	The US Forest Service needs to be about protecting the important ecological value of these lands and preserving their remote nature.	Protection	
Management emphasis - Protect	I urge you to select a plan that will protect the greatest amount of biodiversity	Our national forests need to be protected. The Forest should be managed to emphasize ecological sustainability. The Forest Service should emphasize protection of biodiversity, endangered species and other animals, habitat, and old growth.	XXXX	I urge you to select a plan that will protect the greatest amount of biodiversity	Emphasize Conservation of Biological Diversity	PC 975-1The Forest Service plan should be strongly protective of natural ecosystems, habitats and biological diversity now existing on the forest.

Management emphasis - Protect	Robust protection for endangered species and the old-growth forest and associated habitat upon which they depend is needed. Please revise the plan to provide strong protection for endangered species such as Mexican gray wolves, Mexican spotted owls, Apache trout and other rare species, including insects and wildflowers which do not appear to be sufficiently inventoried for the area covered by the plan.	Our national forests need to be protected. The Forest should be managed to emphasize ecological sustainability. The Forest Service should emphasize protection of biodiversity, endangered species and other animals, habitat, and old growth.	XXXX	Robust protection for endangered species and the old-growth forest and associated habitat upon which they depend is needed. Please revise the plan to provide strong protection for endangered species such as Mexican gray wolves, Mexican spotted owls, Apache trout and other rare species, including insects and wildflowers which do not appear to be sufficiently inventoried for the area covered by the plan.	Protection	PC 105-2 The Forest Service should manage the national forests with permanent strong protections from logging of timber, mining, hunting, petroleum drilling, and non-passive recreation for wildlife, flora and fauna, endangered species, insects, wildflowers, and old growth habitat.
Management emphasis - Protect	Strong enforcement of endangered species and intact old-growth forest should be the top priority above commercial logging interests and any non-pastoral recreational interests.	Our national forests need to be protected. The Forest should be managed to emphasize ecological sustainability. The Forest Service should emphasize protection of biodiversity, endangered species and other animals, habitat, and old growth.	XXXX	Strong enforcement of endangered species and intact old-growth forest should be the top priority above commercial logging interests and any non-pastoral recreational interests.	Protection	PC 105-2 The Forest Service should manage the national forests with permanent strong protections from logging of timber, mining, hunting, petroleum drilling, and non-passive recreation for wildlife, flora and fauna, endangered species, insects, wildflowers, and old growth habitat.
Management emphasis - Protect	I urge you to plan for the highest level of protection for the biodiversity and habitats now existing in the forest.	Our national forests need to be protected. The Forest should be managed to emphasize ecological sustainability. The Forest Service should emphasize protection of biodiversity, endangered species and other animals, habitat, and old growth.	XXXX	I urge you to plan for the highest level of protection for the biodiversity and habitats now existing in the forest.	Emphasis Conservation of Biological Diversity	PC 975-1 The Forest Service plan should be strongly protective of natural ecosystems, habitats and biological diversity now existing on the forest.

Management emphasis - Protect	Animals are also important, too, and yet they are also under threat from poaching, pollution, cars, and deforestation. They need all the protection they can get and the best way of giving it to them is to support all laws and funds that can help protect our wildlife for generations to come.	Our national forests need to be protected. The Forest should be managed to emphasize ecological sustainability. The Forest Service should emphasize protection of biodiversity, endangered species and other animals, habitat, and old growth.	XXXX	Animals are also important, too, and yet they are also under threat from poaching, pollution, cars, and deforestation. They need all the protection they can get and the best way of giving it to them is to support all laws and funds that can help protect our wildlife for generations to come. Animals are a part of our national heritage and we need to respect that.	Protect Wildlife Habitat	PC 974-1 The Forest Service should protect the wildlife and habitat from threats from poaching, pollution, cars, and deforestation and implement a recovery plan in order to ensure the ecological value and integrity, restoration, and recovery of the forest for future generations. The Forest Service should keep the contiguous tracts of land that are critical for the wildlife and allow the visitor to enjoy this wonderful landscape in solitude and quiet recreation.
Management emphasis - Protect	revisions in the management plan for Apache-Sitgreaves National Forest should be aimed primarily at accomplishing and safeguarding the greatest possible safe habitat for the restoration of Mexican wolves and for other native species of wildlife.	Our national forests need to be protected. The Forest should be managed to emphasize ecological sustainability. The Forest Service should emphasize protection of biodiversity, endangered species and other animals, habitat, and old growth.	XXXX	revisions in the management plan for Apache-Sitgreaves National Forest should be aimed primarily at accomplishing and safeguarding the greatest possible safe habitat for the restoration of Mexican wolves and for other native species of wildlife.	Emphasize Conservation of Biological Diversity	
Management emphasis - Protect	The wildlife -plant and animal - of the region rely on your stewardship and protection for now and posterity.	Our national forests need to be protected. The Forest should be managed to emphasize ecological sustainability. The Forest Service should emphasize protection of biodiversity, endangered species and other animals, habitat, and old growth.	XXXX	I want to add my voice to this concern with a strong reminder that you are called to a higher responsibility above corporate interests. The wildlife -plant and animal - of the region rely on your stewardship and protection for now and posterity.	Protection	

Management emphasis - protect pollution	With air pollution on the rise, we need our forests more than ever to combat our dying O-Zone. However, there's not enough done to protect our forests from deforestation and pollution.	There is a need to protect our forests from deforestation and pollution.	XXXX	With air pollution on the rise, we need our forests more than ever to combat our dying O-Zone. However, there's not enough done to protect our forests from deforestation and pollution.		Increase Protection	
Management emphasis - restoration	This body of thought and writing and its growing influence in our day is a remarkable legacy for the Apache, and one that I would hope would inspire special effort regarding the restoration of watersheds and ecosystem health through the plan and its implementation on this forest.	The Forest Service should make special effort regarding the restoration of watersheds and ecosystem health.	XXXX	This body of thought and writing and its growing influence in our day is a remarkable legacy for the Apache, and one that I would hope would inspire special effort regarding the restoration of watersheds and ecosystem health through the plan and its implementation on this forest.		Ecosystem Health	PC 175-1 The Plan should focus on ecological sustainability, preservation, restoration, and protection of forest soil and land still in any state with wild characteristics, this includes roadless and wilderness designated areas. The Forest Service should include the need for the use of mechanical thinning and prescribed fire and wildfire to achieve long-term restoration objectives. The Plan should emphasize executing well less than perfect projects now, over developing scientifically perfect projects that are never implemented.
Management emphasis - forbid logging, mining, drilling	I strongly urge you to choose a management plan that will set aside and protect permanently wildlife flora and fauna from any kind of hunting and will forbid any logging of timber, forbid any mining and forbid any petroleum drilling	The Forest Service should protect the forests and wildlife by forbidding uses including (1) logging, (2) mining, (3) drilling, and (4) road construction.	XXXX	I strongly urge you to choose a management plan that will set aside and protect permanently wildlife flora and fauna from any kind of hunting and will forbid any logging of timber, forbid any mining and forbid any petroleum drilling		Protection	PC 105-2 The Forest Service should manage the national forests with permanent strong protections from logging of timber, mining, hunting, petroleum drilling, and non-passive recreation for wildlife, flora and fauna, endangered species, insects, wildflowers, and old growth habitat.

Management emphasis is - forbid logging, mining, drilling	The National Forests are a treasure that MUST be protected. No construction or logging should be permitted. PERIOD!! Individuals who have permits to remove dead and down timber are fine since that helps the forest, but NO commercial trucks, road construction or other noise and pollution should be tolerated.	The Forest Service should protect the forests and wildlife by forbidding uses including (1) logging, (2) mining, (3) drilling, and (4) road construction.	XXXX	The National Forests are a treasure that MUST be protected. No construction or logging should be permitted. PERIOD!! Individuals who have permits to remove dead and down timber are fine since that helps the forest, but NO commercial trucks, road construction or other noise and pollution should be tolerated.		Protection of Land	PC 175-1 The Plan should focus on ecological sustainability, preservation, restoration, and protection of forest soil and land still in any state with wild characteristics, this includes roadless and wilderness designated areas. The Forest Service should include the need for the use of mechanical thinning and prescribed fire and wildfire to achieve long-term restoration objectives. The Plan should emphasize executing well less than perfect projects now, over developing scientifically perfect projects that are never implemented.
Management emphasis is - forbid logging, mining, drilling	Why cannot the Forest Service understand its mission is NOT to manage forest ecosystem destructively by clear cutting, road building, and commercial logging?	The Forest Service should protect the forests and wildlife by forbidding uses including (1) logging, (2) mining, (3) drilling, and (4) road construction.	XXXX	Why cannot the Forest Service understand its mission is NOT to manage forest ecosystem destructively by clear cutting, road building, and commercial logging?		No additional Development	
Management emphasis is - uses degrade water	Forest uses that reduce water quality and quantity degrade aquatic ecosystems and should not be allowed under the new plan.	Forest uses that reduce water quality and quantity or degrade aquatic ecosystems not be allowed.	XXXX	Forest uses that reduce water quality and quantity degrade aquatic ecosystems and should not be allowed under the new plan.		Adding Guidelines for Protection of Water Quality	PC 508-1 The Forest Service should not allow any Forest uses that reduce water quality and quantity degrade aquatic ecosystems under the new plan.

Management emphasis - no national monuments	no more National Monuments, No more National Parks. Enough is Enough!	There should be no more national monuments or national parks.	XXXX	no more National Monuments, No more National Parks. Enough is Enough!		Land Designations	
Management emphasis - benefit humans	I would like to see us return to the days of multiple use for all of the people, not just the ones who take you to court or threaten with legal action.	The forest should be managed for the benefit of humans including (1) current and future generations, (2) provision of goods and services, (3) balance ecological sustainability with economic uses and social sustainability, (4) multiple use.	XXXX	I would like to see us return to the days of multiple use for all of the people, not just the ones who take you to court or threaten with legal action.		Return to Multiple Use in Forest Management	PC 106-1The Forest Service should manage land under the multiple use and other land management regulations and consider the valuable use of logging and grazing.
Management emphasis - benefit humans	I am not a proponent for over logging or over grazing, but they both have a valuable use on our National Forest System Lands. That is what they were designated for. Let's get back to proper and reasonable Forest Management.	The forest should be managed for the benefit of humans including (1) current and future generations, (2) provision of goods and services, (3) balance ecological sustainability with economic uses and social sustainability, (4) multiple use.	XXXX	I am not a proponent for over logging or over grazing, but they both have a valuable use on our National Forest System Lands. That is what they were designated for. Let's get back to proper and reasonable Forest Management.		Return to Multiple Use in Forest Management	PC 106-1The Forest Service should manage land under the multiple use and other land management regulations and consider the valuable use of logging and grazing.
Management emphasis - benefit humans	Analyze management and develop Alternatives based on values and resources that are important to current and future generations, and that benefit the human as well as the ecological environment.	The forest should be managed for the benefit of humans including (1) current and future generations, (2) provision of goods and services, (3) balance ecological sustainability with economic uses and social sustainability, (4) multiple use.	XXXX	Analyze management and develop Alternatives based on values and resources that are important to current and future generations, and that benefit the human as well as the ecological environment.		Ecological and Public Benefits	

<p>Management emphasis - benefit humans</p>	<p>A much more beneficial and reasonable approach would be to manage the forest to provide goods and services needed by the people.</p>	<p>The forest should be managed for the benefit of humans including (1) current and future generations, (2) provision of goods and services, (3) balance ecological sustainability with economic uses and social sustainability, (4) multiple use.</p>	<p>XXXX</p>	<p>A much more beneficial and reasonable approach would be to manage the forest to provide goods and services needed by the people.</p>	<p>Manage for Forest Products and Services</p>	<p>PC 2610-10 The Forest Service should address managing the forest to provide goods and services needed by the people, adding an identifiable plan of action related to the impacts on forest users for each desired condition, and a more balanced approach because the Proposed LMP overwhelmingly emphasizes ecological sustainability over economic uses and social sustainability and, private, statutory and pre-existing rights will be minimized</p>
<p>Management emphasis - benefit humans</p>	<p>Very early on, the Proposed LMP declares that the "(plan integrates forest restoration, watershed protection, climate resilience, wildlife conservation, and contributions to social and economic values, goods and services" all the while "honor[ing] the continuing validity of private, statutory and pre-existing rights." See Proposed LMP, Page 1. However, with further review of the body of the Proposed LMP, it becomes immediately apparent that the Proposed LMP overwhelmingly emphasizes ecological sustainability over economic uses and social sustainability. Indeed, private, statutory and pre-existing rights are minimized in the Proposed LMP, often only being mentioned in passing. As such,</p>	<p>The forest should be managed for the benefit of humans including (1) current and future generations, (2) provision of goods and services, (3) balance ecological sustainability with economic uses and social sustainability, (4) multiple use.</p>	<p>XXXX</p>	<p>Very early on, the Proposed LMP declares that the "(plan integrates forest restoration, watershed protection, climate resilience, wildlife conservation, and contributions to social and economic values, goods and services" all the while "honor[ing] the continuing validity of private, statutory and pre-existing rights." See Proposed LMP, Page 1. However, with further review of the body of the Proposed LMP, it becomes immediately apparent that the Proposed LMP overwhelmingly emphasizes ecological sustainability over economic uses and social sustainability. Indeed, private, statutory and pre-existing rights are minimized in the Proposed LMP, often only being mentioned in passing. As such,</p>	<p>Revise Plan</p>	<p>PC 2610-10 The Forest Service should address managing the forest to provide goods and services needed by the people, adding an identifiable plan of action related to the impacts on forest users for each desired condition, and a more balanced approach because the Proposed LMP overwhelmingly emphasizes ecological sustainability over economic uses and social sustainability and, private, statutory and pre-existing rights will be minimized</p>

	the Proposed LMP, DEIS, and Related Plan Documents should be redrafted to instill a more balanced approach to forest management.			the Proposed LMP, DEIS, and Related Plan Documents should be redrafted to instill a more balanced approach to forest management.			
Authority to close areas	Why does the F.S. always close areas for administrative use only during hunting seasons, horn hunting seasons yet we see four wheeler tracks and pickup tracks and find they are F.S. employees behind the locked gates at those times??	Why does the Forest Service closes areas for administrative use during hunting and horn hunting season but Forest Service employees are allowed behind the locked gates at those times?	XXXX	Why does the F.S. always close areas for administrative use only during hunting seasons, horn hunting seasons yet we see four wheeler tracks and pickup tracks and find they are F.S. employees behind the locked gates at those times??		Administrative Use of Closed Areas	
Management emphasis - Let them be	We don't know enough about how forests work and what all they do for us to be damaging them in the ways we are. Let them be.	We don't know enough about how forests work and what all they do for us to be damaging them in the ways we are. Let them be.	XXXX	We don't know enough about how forests work and what all they do for us to be damaging them in the ways we are. Let them be.		Damage to Forest	
Range of alternatives	Issue: The DEIS has failed to develop and present alternatives that are significantly different from each other.	The DEIS considers an inadequate range of alternatives because (1) the alternatives are too similar, (2) there are not enough alternatives, or (3) the alternatives do not address the purpose and need or issues.	XXXX	Issue: The DEIS has failed to develop and present alternatives that are significantly different from each other.		Range of Alternatives	PC 207-28 The Forest Service should develop and present alternatives that are significantly different from each other because it currently provides a narrow range of differences and does not address the values, purpose and need, and the issues of current and future impacts or differences in resource management.

<p>Range of alternatives</p>	<p>The proposed alternatives have very similar objectives; there is insufficient specific information included to indicate how they may differ in practice. The Agency presents elements common to all Alternatives (page 17) in a clear and easy to understand format, while obscuring differences between Alternatives that might exist by burying any such differences in text, rather than an equally clear and understandable format. The Alternatives are not developed and presented in a way to facilitate comparison, but even so, the only Alternative that stands out as significantly different is Alternative D due to major increase in wilderness. All of the proposed alternatives except Alternative A (the present plan) are based on an underlying assumption that "restoration" of historic conditions or something similar is the objective and all management will aim at this objective no matter which alternative is chosen (we presume that present management will not be the chosen alternative, although the reasons for this are not adequately explained).</p>	<p>The DEIS considers an inadequate range of alternatives because (1) the alternatives are too similar, (2) there are not enough alternatives, or (3) the alternatives do not address the purpose and need or issues.</p>	<p>XXXX</p>	<p>The proposed alternatives have very similar objectives; there is insufficient specific information included to indicate how they may differ in practice. The Agency presents elements common to all Alternatives (page 17) in a clear and easy to understand format, while obscuring differences between Alternatives that might exist by burying any such differences in text, rather than an equally clear and understandable format. The Alternatives are not developed and presented in a way to facilitate comparison, but even so, the only Alternative that stands out as significantly different is Alternative D due to major increase in wilderness. All of the proposed alternatives except Alternative A (the present plan) are based on an underlying assumption that "restoration" of historic conditions or something similar is the objective and all management will aim at this objective no matter which alternative is chosen (we presume that present management will not be the chosen alternative, although the reasons for this are not adequately explained).</p>	<p>Range of Alternatives</p>	<p>PC 207-28 The Forest Service should develop and present alternatives that are significantly different from each other because it currently provides a narrow range of differences and does not address the values, purpose and need, and the issues of current and future impacts or differences in resource management.</p>
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Range of alternatives	The DEIS does not bring forward the issues of current and future impacts on the human environment of any of the Alternatives, much less Alternative D, which necessarily would have significant impact on the socio-economics of the communities dependent on the A-S NF. The narrow range of difference between the alternatives found in the DEIS means that the effects and outcomes of implementing any of the alternative not much different other than Alternative D, and the true effects and outcomes of implementing Alternative D are not rigorously explored and analyzed.	The DEIS considers an inadequate range of alternatives because (1) the alternatives are too similar, (2) there are not enough alternatives, or (3) the alternatives do not address the purpose and need or issues.	XXXX	The DEIS does not bring forward the issues of current and future impacts on the human environment of any of the Alternatives, much less Alternative D, which necessarily would have significant impact on the socio-economics of the communities dependent on the A-S NF. The narrow range of difference between the alternatives found in the DEIS means that the effects and outcomes of implementing any of the alternative not much different other than Alternative D, and the true effects and outcomes of implementing Alternative D are not rigorously explored and analyzed.	Range of Alternatives	PC 207-28 The Forest Service should develop and present alternatives that are significantly different from each other because it currently provides a narrow range of differences and does not address the values, purpose and need, and the issues of current and future impacts or differences in resource management.
Range of alternatives	Third, by including one alternative that the agency cannot lawfully implement, the Forest Service has deprived the public of the required range of reasonable alternatives. The A-S Plan Draft EIS considers only two legal action alternatives. Given the range of values and the range of options available for management of this forest, which encompasses more than two million acres, the Forest Service has deprived the public of an EIS that evaluates a full range of reasonable alternatives, in violation of NEPA	The DEIS considers an inadequate range of alternatives because (1) the alternatives are too similar, (2) there are not enough alternatives, or (3) the alternatives do not address the purpose and need or issues.	XXXX	Third, by including one alternative that the agency cannot lawfully implement, the Forest Service has deprived the public of the required range of reasonable alternatives. The A-S Plan Draft EIS considers only two legal action alternatives. Given the range of values and the range of options available for management of this forest, which encompasses more than two million acres, the Forest Service has deprived the public of an EIS that evaluates a full range of reasonable alternatives, in violation of NEPA	Range of Alternatives	PC 104-4 The Forest Service is violating NEPA by failing to acknowledge the provision of the Roadless Rule barring reconsideration of the rule in forest plan revisions, by not including information critical to understanding the FS duties concerning management of inventoried roadless areas. NEPA and NFMA require the Forest Service to ensure the public receives the accurate and high quality information needed to analyze a full range of legal alternatives.

Range of alternatives	The range of alternatives does not address the Purpose and Need or the Issues, and is inadequate. Both the NEPA and the NFMA require you to look at a broad range of alternatives. In this case, the Forest Service really only has two alternatives as the three action alternatives set the exact same management strategies, guidelines, standards, objectives and goals for each alternative. We can't tell how things would be different under the action alternatives, to be honest, since all the management instructions are the same. This failing is fatal, and comprehensive.	The DEIS considers an inadequate range of alternatives because (1) the alternatives are too similar, (2) there are not enough alternatives, or (3) the alternatives do not address the purpose and need or issues.	XXXX	The range of alternatives does not address the Purpose and Need or the Issues, and is inadequate. Both the NEPA and the NFMA require you to look at a broad range of alternatives. In this case, the Forest Service really only has two alternatives as the three action alternatives set the exact same management strategies, guidelines, standards, objectives and goals for each alternative. We can't tell how things would be different under the action alternatives, to be honest, since all the management instructions are the same. This failing is fatal, and comprehensive.	Range of Alternatives	PC 207-28 The Forest Service should develop and present alternatives that are significantly different from each other because it currently provides a narrow range of differences and does not address the values, purpose and need, and the issues of current and future impacts or differences in resource management.
Scope of analysis	The area for analysis as presented to the public is the Apache-Sitgreaves National Forest, yet recommendations are made in Alternatives for not only NF lands outside the A-S, but for lands managed by other public agencies as well as tribal and private lands. While it is understood that ecosystems may span across management borders, any such inclusion is outside the scope of the DEIS. Furthermore, the lands included are not consistently addressed throughout the DEIS. Remedy: Remove reference to or inclusion of lands outside the A-S from the scope, analysis, justification and	Remove the reference to or inclusion of lands outside the Apache-Sitgreaves NFs from the scope, analysis, justification, and recommendations or change the name of the DEIS to demonstrate the inclusion of lands outside the Apache-Sitgreaves NFs.	XXXX	The area for analysis as presented to the public is the Apache-Sitgreaves National Forest, yet recommendations are made in Alternatives for not only NF lands outside the A-S, but for lands managed by other public agencies as well as tribal and private lands. While it is understood that ecosystems may span across management borders, any such inclusion is outside the scope of the DEIS. Furthermore, the lands included are not consistently addressed throughout the DEIS. Remedy: Remove reference to or inclusion of lands outside the A-S from the scope, analysis, justification and	Area for Analysis	

	recommendations. Or, alternatively, change the DEIS name to demonstrate the inclusion of lands above and beyond the Apache-Sitgreaves NF, including all maps (e.g. Figure 1, page 2) that indicate that only the lands of the A-S NF are at issue.			recommendations. Or, alternatively, change the DEIS name to demonstrate the inclusion of lands above and beyond the Apache-Sitgreaves NF, including all maps (e.g. Figure 1, page 2) that indicate that only the lands of the A-S NF are at issue.			
Decisionmaker authority	Why does according to your DEIS leave the ultimate decision up to one supervisor who chances are isn't schooled in our area let alone the fact that they probably won't read a half dozen public comments to base those decisions on.	Explain why the decision on the land management plan is left up to one supervisor.	XXXX	Why does according to your DEIS leave the ultimate decision up to one supervisor who chances are isn't schooled in our area let alone the fact that they probably won't read a half dozen public comments to base those decisions on.		Deciding Official	PC 175-22 The Forest Service should explain why the ultimate decision is left up to one supervisor.
Decisionmaker authority3	What give the F.S. the right to think they can implement "rules" that cause such economic disasters on our communities? We depend on the tourism, cattle, sheep, hunting, fishing etc. and you without care or conscience implement those rules!!	Explain how the Forest Service can implement rules.	XXXX	What give the F.S. the right to think they can implement "rules" that cause such economic disasters on our communities? We depend on the tourism, cattle, sheep, hunting, fishing etc. and you without care or conscience implement those rules!!		Economic Impacts to Communities	7) define: "rare"; "unique"; "habitat" and" protection" (from what?) Page 61: Rare and unique habitats should be protected:
Implement appendix A - climate change	Appendix A, with its comprehensive analysis of climate change trends, possible effects, and management strategies to avoid or mitigate these effects, is an excellent supplement to the DEIS and one of the finest treatments of climate change that my office has seen in a NEPA document. We recommend that the Final EIS and Record of Decision include a commitment to implement these mitigation strategies.	Include a commitment to implement the mitigation strategies identified in the plan's Appendix A (Climate Change Trends and Apache-Sitgreaves NFs Land Management Planning) into the final EIS and record of decision (ROD).	XXXX	Appendix A, with its comprehensive analysis of climate change trends, possible effects, and management strategies to avoid or mitigate these effects, is an excellent supplement to the DEIS and one of the finest treatments of climate change that my office has seen in a NEPA document. We recommend that the Final EIS and Record of Decision include a commitment to implement these mitigation strategies.		Thorough and Comprehensive Analysis	

Consistency with law, policy, reg	The reason I have taken such pains to describe the requirements of the statute and the regulations, and to discuss the 1987 Plan, is that the Apache-Sitgreaves National Forest, despite taking fifteen extra years to prepare its plan, has almost entirely failed to follow the requirements of the statute and regulations, and has proposed a plan that is demonstrably worse than the old one. [See letter for details]	The proposed plan should be revised because it is not consistent with law, policy, or regulation because the Forest Service did not (1) discuss costs or net public benefits, (2) prepare a variety of alternative management strategies that address alternative objectives and discuss associated benefits or costs, (3) establish standards and guidelines to meet minimum management requirements, and (4) consider an alternative and disclose how "decisions based on it will or will not achieve the requirements of ... environmental laws and policies.	** Check out Kaibab p. 83	The reason I have taken such pains to describe the requirements of the statute and the regulations, and to discuss the 1987 Plan, is that the Apache-Sitgreaves National Forest, despite taking fifteen extra years to prepare its plan, has almost entirely failed to follow the requirements of the statute and regulations, and has proposed a plan that is demonstrably worse than the old one.	Revise Plan	PC 2610-6 The Forest Service should address that as a Regulatory agency, it must follow the appropriate Acts, Laws, Regulations and Policies and does not need to use them, or parts of them, as desired conditions, standards, and/ or guidelines because the site-specific analysis will clearly identify, comply, and apply the appropriate laws to the decision and that there are authorities higher than this plan that cover proposed wilderness, proposed wild and scenic, proposed primitive and especially proposed research Natural Areas (RNA's).
Consistency with law, policy, reg	You have not obtained the needed information, have not described or discussed the net public benefits, have not revealed costs, have not prepared a variety of alternative management strategies that address alternative objectives, have not discussed the benefits or costs of those strategies, and worst of all have not established standards and guidelines that will assure that you meet minimum management requirements and protect the Apache-Sitgreaves forest resources in perpetuity. For those reasons, the proposed plan is inadequate and needs to be dramatically revised.	The proposed plan should be revised because it is not consistent with law, policy, or regulation because the Forest Service did not (1) discuss costs or net public benefits, (2) prepare a variety of alternative management strategies that address alternative objectives and discuss associated benefits or costs, (3) establish standards and guidelines to meet minimum management requirements, and (4) consider an alternative and disclose how "decisions based on it will or will not achieve the requirements of ... environmental laws and policies.	** Check out Kaibab p. 83	You have not obtained the needed information, have not described or discussed the net public benefits, have not revealed costs, have not prepared a variety of alternative management strategies that address alternative objectives, have not discussed the benefits or costs of those strategies, and worst of all have not established standards and guidelines that will assure that you meet minimum management requirements and protect the Apache-Sitgreaves forest resources in perpetuity. For those reasons, the proposed plan is inadequate and needs to be dramatically revised.	Disclosure of Information	

Consistency with law, policy, reg	Also, it is illegal under provisions of the National Environmental Policy Act to consider an alternative without disclosing how "decisions based on it will or will not achieve the requirements of ... environmental laws and policies" (40 C.F.R. 1502.2(d)).	The proposed plan should be revised because it is not consistent with law, policy, or regulation because the Forest Service did not (1) discuss costs or net public benefits, (2) prepare a variety of alternative management strategies that address alternative objectives and discuss associated benefits or costs, (3) establish standards and guidelines to meet minimum management requirements, and (4) consider an alternative and disclose how "decisions based on it will or will not achieve the requirements of ... environmental laws and policies.	** Check out Kaibab p. 83	Also, it is illegal under provisions of the National Environmental Policy Act to consider an alternative without disclosing how "decisions based on it will or will not achieve the requirements of ... environmental laws and policies" (40 C.F.R. 1502.2(d)).	Range of Alternatives	PC 104-6 The Forest Service needs to disclose scientific controversy and uncertainty because it is illegal under provisions of the National Environmental Policy Act to consider an alternative without disclosing how "decisions based on it will or will not achieve the requirements of ... environmental laws and policies" (40 C.F.R. 1502.2(d))...
Consistency with law, policy, reg2	Forest Plans should be specific to their Forest areas and the desired conditions should be aligned with current Forest Service Manual direction and guidance.	The plan should be aligned with Forest Service Manual guidance and direction, the Forest Service mission, and congressional expectations.	XXXX	Forest Plans should be specific to their Forest areas and the desired conditions should be aligned with current Forest Service Manual direction and guidance.	Desired Conditions	
Consistency with law, policy, reg2	Another underlying concern would be how the deciding official could ever relate this plan to the Forest Service mission and congressional expectations. I see little direction in this plan that will assist the site-specific managers on developing and planning meaningful projects that could meet such a nebulous goal.	The plan should be aligned with Forest Service Manual guidance and direction, the Forest Service mission, and congressional expectations.	XXXX	Another underlying concern would be how the deciding official could ever relate this plan to the Forest Service mission and congressional expectations. I see little direction in this plan that will assist the site-specific managers on developing and planning meaningful projects that could meet such a nebulous goal. Another critical question would be if PNVT as a	Deciding Official	

				goal meets the Forest Service mission or mandates.		
Consistency with law, policy, reg2	Develop your desired condition and subsequent standard and guidelines so that the public can understand a clear relationship to the Forest Service mission, motto, vision and guiding principles.	The plan should be aligned with Forest Service Manual guidance and direction, the Forest Service mission, and congressional expectations.	XXXX	Develop your desired condition and subsequent standard and guidelines so that the public can understand a clear relationship to the Forest Service mission, motto, vision and guiding principles.		Desired Conditions
Consistency with law, policy, reg3	Regulatory agency must follow the appropriate Acts, Laws, Regulations and Policies so do not use them, or parts of them, as desired conditions, standards, and/ or guidelines. The site-specific analysis will clearly identify, comply, and apply the appropriate laws to the decision. The deciding official usually is responsible for this.	The plan should not repeat the appropriate acts, laws, regulations, or policies as desired conditions, standards, and/or guidelines.	XXXX	Regulatory agency must follow the appropriate Acts, Laws, Regulations and Policies so do not use them, or parts of them, as desired conditions, standards, and/ or guidelines. The site-specific analysis will clearly identify, comply, and apply the appropriate laws to the decision. The deciding official usually is responsible for this.		Site specific Level
Consistency with law, policy, reg4	Do not presuppose land classifications or apply standards that do not apply. There are policies and existing direction to classify. Do not attempt a NEPA analysis as part of this programmatic plan. There are authorities higher than this plan that cover proposed wilderness., proposed wild and scenic, proposed primitive and	The Forest Service should not conduct site-specific NEPA analysis to classify areas (e.g., wilderness, wild and scenic rivers) as part of the plan.	XXXX	Do not presuppose land classifications or apply standards that do not apply. There are policies and existing direction to classify. Do not attempt a NEPA analysis as part of this programmatic plan. There are authorities higher than this plan that cover proposed wilderness., proposed wild and scenic, proposed primitive and		Wilderness Management Areas

	especially proposed research Natural Areas (RNA's). There is a reason they must under go site-specific analysis.			especially proposed research Natural Areas (RNA's). There is a reason they must under go site-specific analysis.			
Integrate	Another very disturbing issue with this proposed DEIS and Plan is the movement by Forest Service per se away from the original intent and direction of the National Forest Management Act of 1976. The first / current Forest Plan was/is an integrated document addressing the all the various functions that make up a "Forest" and its "operation, which includes; Range, Timber, Water, Minerals, Wildlife and Recreation. This First Plan was the first time the public was encouraged to participate in a process with the Agency to have the various functions of the FS work together in an integrated method putting the needs of the lands long-term sustainability the primary goal and objective.	The plan should meet the intent of NFMA to be an integrated document addressing all the various functions that make up a forest and its operation, which includes range, timber, water, minerals, wildlife and recreation.	**Check out Kaibab, p. 6, 1st				
Is plan implementable (funding)	A second major shortfall in the documents presented is a factual discussion to the funding necessary to function any of the alternatives presented. This was a major flaw in the first plan and now 25 years later funding is even more important given the	There is a need for a discussion of the funding necessary to implement the alternatives (desired conditions will not happen without adequate funding).	XXXX	A second major shortfall in the documents presented is a factual discussion to the funding necessary to function any of the alternatives presented. This was a major flaw in the first plan and now 25 years later funding is even more important given the		Funding	

	current status of the National Treasury. All grand and great sounding DFC's / DC's will not happen without adequate funding			current status of the National Treasury. All grand and great sounding DFC's / DC's will not happen without adequate funding		
Wilderness process (underrepresented ecosystems)	Wilderness to meet Regional needs. (p.13, Specialists Report). Indicates that there are seven ecosystems that are underrepresented in wilderness in the Southwest Region. I am unaware of any policy or direction that provides a basis to establish MA's for this purpose. The seven ecosystems exist or do not exist and they should be managed in accordance with their character, not to meet some Regional need. They have existed since at least 1979 RARE II and probably long before, but those with authority to establish them as wilderness.....have not taken action. If wilderness protection is really necessary then why have the areas not been affected since 1979. Responsible resource management can still be practiced and approval of managerial actions can be controlled.	Underrepresented ecosystems should not be used as a criterion in the wilderness evaluation process.	XXXX	Wilderness to meet Regional needs. (p.13, Specialists Report). Indicates that there are seven ecosystems that are underrepresented in wilderness in the Southwest Region. I am unaware of any policy or direction that provides a basis to establish MA's for this purpose. The seven ecosystems exist or do not exist and they should be managed in accordance with their character, not to meet some Regional need. They have existed since at least 1979 RARE II and probably long before, but those with authority to establish them as wilderness.....have not taken action. If wilderness protection is really necessary then why have the areas not been affected since 1979. Responsible resource management can still be practiced and approval of managerial actions can be controlled.	Wilderness Management Areas	

Wilderness process (underrepresented ecosystems)	Eagar requests that the Forest Service not analyze and consider areas for "wilderness" designation based upon the desire to make sure all ecosystems are represented in an area designated as "wilderness".	Underrepresented ecosystems should not be used as a criterion in the wilderness evaluation process.	XXXX	Eagar requests that the Forest Service not analyze and consider areas for "wilderness" designation based upon the desire to make sure all ecosystems are represented in an area designated as "wilderness".		Wilderness Designation Process	
Wilderness process (underrepresented ecosystems)	Issue: The DEIS erroneously assumes that all ecosystems must be represented in wilderness. DEIS page 363, paragraph one: Remedy: Remove any wilderness area recommendations solely based on underrepresentation.	Underrepresented ecosystems should not be used as a criterion in the wilderness evaluation process.	XXXX	Issue: The DEIS erroneously assumes that all ecosystems must be represented in wilderness. DEIS page 363, paragraph one: Remedy: Remove any wilderness area recommendations solely based on underrepresentation.		Recommendation for Wilderness Based on representing all Ecosystems	PC 1264-3 The Forest Service should address the seven ecosystems that are underrepresented in wilderness in the Southwest Region and not establish MA's for this purpose because there is no policy or direction to include them as wilderness because they are underrepresented and should remove any wilderness area recommendations solely based on underrepresentation.
Wilderness process (general)	FSH 1909.12, Chapter 70 which the ASN (and Region 3) used to develop criteria for evaluating is no longer valid for the purpose of guiding the wilderness evaluation process and that the former Chapter 7 should be used for this purpose.	The Forest Service should use the former chapter 7, instead of FSH1909.12 chapter 70 to guide the wilderness evaluation process including considering areas that contain closed system roads.	XXXX	FSH 1909.12, Chapter 70 which the ASN (and Region 3) used to develop criteria for evaluating is no longer valid for the purpose of guiding the wilderness evaluation process and that the former Chapter 7 should be used for this purpose.		Developing Criteria for Wilderness Evaluation Process	
Wilderness process (general)	We therefore contend that FSH 1909.12, Chapter 70 which the ASN (and Region 3) used to develop criteria for evaluating is no longer valid for the purpose of guiding the wilderness evaluation process and that the former Chapter 7 should be used for this purpose.	The Forest Service should use the former chapter 7, instead of FSH1909.12 chapter 70 to guide the wilderness evaluation process including considering areas that contain closed system roads.	XXXX	We therefore contend that FSH 1909.12, Chapter 70 which the ASN (and Region 3) used to develop criteria for evaluating is no longer valid for the purpose of guiding the wilderness evaluation process and that the former Chapter 7 should be used for this purpose.		Developing Criteria for Wilderness Evaluation Process	

Wilderness process (general)	We request that the ASNF reconsider the potential wilderness lands on the Forest this time allowing areas to be evaluated that contain closed system roads that do not dominate the landscape. We also request that the ASNF not eliminate citizen proposals or portions of them that contain closed system roads that do not dominate the landscape.	The Forest Service should use the former chapter 7, instead of FSH1909.12 chapter 70 to guide the wilderness evaluation process including considering areas that contain closed system roads.	XXXX	We request that the ASNF reconsider the potential wilderness lands on the Forest this time allowing areas to be evaluated that contain closed system roads that do not dominate the landscape. We also request that the ASNF not eliminate citizen proposals or portions of them that contain closed system roads that do not dominate the landscape.	Developing Criteria for Wilderness Evaluation Process	
Wilderness process (general) 2	We ask that the ASNF consider the “need” for preserving this last-of-its-kind intact system of wildland rather than only analyze their value as stand-alone potential wilderness units. Based on the unfortunate lack of intact wildland systems in the Southwest we believe the “need” for recommending a system of potential wilderness on the ASNF is high.	Consider the need for preserving this last-of-its-kind intact system of wildland rather than only analyze their value as stand-alone potential wilderness units. There is concern that the ecological “need” for preserving the wilderness characteristic of quiet, resilient and unfragmented habitat is high for all potential wilderness units.	XXXX	We ask that the ASNF consider the “need” for preserving this last-of-its-kind intact system of wildland rather than only analyze their value as stand-alone potential wilderness units. Based on the unfortunate lack of intact wildland systems in the Southwest we believe the “need” for recommending a system of potential wilderness on the ASNF is high.	Potential Wilderness	
Wilderness process (general) 2	There is a preponderance of scientific evidence of the ecological benefits of preserving landscapes in a roadless condition. We provide a literature review, entitled “Habitat Fragmentation and the Effect of Roads on Wildlife and Habitats” (attached) compiled by Mark L. Watson, Habitat Specialist of the New Mexico Game and Fish Department for the purpose of providing scientific input to planning projects in R3. We confidently believe that the ASNF has the best opportunity	Consider the need for preserving this last-of-its-kind intact system of wildland rather than only analyze their value as stand-alone potential wilderness units. There is concern that the ecological “need” for preserving the wilderness characteristic of quiet, resilient and unfragmented habitat is high for all potential wilderness units.	XXXX	There is a preponderance of scientific evidence of the ecological benefits of preserving landscapes in a roadless condition. We provide a literature review, entitled “Habitat Fragmentation and the Effect of Roads on Wildlife and Habitats” (attached) compiled by Mark L. Watson, Habitat Specialist of the New Mexico Game and Fish Department for the purpose of providing scientific input to planning projects in R3. We confidently believe that the ASNF has the best opportunity	Potential Wilderness	

	of any Forest in Arizona and R3 to preserve large tracts of quality habitat for the multitude of sensitive species. We therefore believe that the ecological “need” for preserving the wilderness characteristic of quiet, resilient and unfragmented habitat is high for all potential wilderness units on the ASNF.			of any Forest in Arizona and R3 to preserve large tracts of quality habitat for the multitude of sensitive species. We therefore believe that the ecological “need” for preserving the wilderness characteristic of quiet, resilient and unfragmented habitat is high for all potential wilderness units on the ASNF.			
Wilderness process (general) 2	Include ample wilderness recommendations to protect large contiguous habitats and protect opportunities for quiet recreation.	Consider the need for preserving this last-of-its-kind intact system of wildland rather than only analyze their value as stand-alone potential wilderness units. There is concern that the ecological “need” for preserving the wilderness characteristic of quiet, resilient and unfragmented habitat is high for all potential wilderness units.	** Check out Prescott p. 59 for comments re: recommended wilderness	Include ample wilderness recommendations to protect large contiguous habitats and protect opportunities for quiet recreation.		Maintain, Expand and Protect Wilderness	PC 1265-7 The Forest Service should add stronger protections for wilderness-quality lands to protect large contiguous habitats, ecological value, their remote nature, spectacular scenery, and protect opportunities for quiet recreation. The Forest Service should protect as wilderness the roadless lands surrounding the Blue Range Primitive Area (specifically Pipestem, Lower San Francisco, Mitchell Peak and Sunset Roadless Areas) and the Leonard Canyon and Chevelon Canyon Roadless units on the Sitgreaves side of the Forest.
Wilderness process (general) 2	[revisions in the management plan for Apache-Sitgreaves National Forest should be aimed primarily at accomplishing and safeguarding the greatest possible safe habitat for the restoration of Mexican wolves and for other native species of wildlife.] and a federal push to establish and designate at least 50 percent of the forest as	Consider the need for preserving this last-of-its-kind intact system of wildland rather than only analyze their value as stand-alone potential wilderness units. There is concern that the ecological “need” for preserving the wilderness characteristic of quiet, resilient and unfragmented habitat is high for all potential wilderness	** Check out Prescott p. 59 for comments re: recommended	and a federal push to establish and designate at least 50 percent of the forest as wilderness		Plan and Management Direction	

	wilderness	units.	wilderness				
Wilderness process (general) 2	Include ample wilderness recommendations to protect large contiguous habitats and protect opportunities for quiet recreation	Consider the need for preserving this last-of-its-kind intact system of wildland rather than only analyze their value as stand-alone potential wilderness units. There is concern that the ecological “need” for preserving the wilderness characteristic of quiet, resilient and unfragmented habitat is high for all potential wilderness units.	** Check out Prescott p. 59 for comments re: recommended wilderness	Include ample wilderness recommendations to protect large contiguous habitats and protect opportunities for quiet recreation		Maintain, Expand and Protect Wilderness	PC 1265-7 The Forest Service should add stronger protections for wilderness-quality lands to protect large contiguous habitats, ecological value, their remote nature, spectacular scenery, and protect opportunities for quiet recreation. The Forest Service should protect as wilderness the roadless lands surrounding the Blue Range Primitive Area (specifically Pipestem, Lower San Francisco, Mitchell Peak and Sunset Roadless Areas) and the Leonard Canyon and Chevelon Canyon Roadless units on the Sitgreaves side of the Forest.
Wilderness process (general) 2	The more wilderness areas we can create and/or protect, the better. Once an area loses wilderness status and people start and continue to chip away at the quiet, the plants, the waterways, the animals, the paths, etc., there is no turning back. That area cannot be wilderness again.	Consider the need for preserving this last-of-its-kind intact system of wildland rather than only analyze their value as stand-alone potential wilderness units. There is concern that the ecological “need” for preserving the wilderness characteristic of quiet, resilient and unfragmented habitat is high for all potential wilderness units.	** Check out Prescott p. 59 for comments re: recommended wilderness	The more wilderness areas we can create and/or protect, the better. Once an area loses wilderness status and people start and continue to chip away at the quiet, the plants, the waterways, the animals, the paths, etc., there is no turning back. That area cannot be wilderness again.		Maintain, Expand and Protect Wilderness	PC 1265-12 The Forest Service should make maintaining or expanding roadless and wilderness areas and restoration of degraded areas a high priority and manage more of the forest as wilderness or primitive areas where natural fire can take its course because funds are limited for restoration treatments and prescribed burning. The Forest Service should increase the proposed wilderness addition

							in Alternative B to wrap around the south side of Terry Flat along the Alpine Wildland Urban Interface (WUI) boundary to Crackerjack Lake, and recommend wilderness on Escudilla Mountain along the lines of the White Mountain Conservation League's 2009 proposal because of its accessibility to urban populations within a half day's drive.
Wilderness process (general) 2	Make sure to protect as recommended wilderness the roadless lands contiguous to the Blue Range Primitive Area (specifically protect Pipestem, Lower San Francisco, Mitchel Peak and Sunset Roadless Areas as potential wilderness). This would essentially protect the largest and most ecologically productive wildland unit on National Forest Lands in Arizona.	Consider the need for preserving this last-of-its-kind intact system of wildland rather than only analyze their value as stand-alone potential wilderness units. There is concern that the ecological "need" for preserving the wilderness characteristic of quiet, resilient and unfragmented habitat is high for all potential wilderness units.	XXXX	Make sure to protect as recommended wilderness the roadless lands contiguous to the Blue Range Primitive Area (specifically protect Pipestem, Lower San Francisco, Mitchel Peak and Sunset Roadless Areas as potential wilderness). This would essentially protect the largest and most ecologically productive wildland unit on National Forest Lands in Arizona.		Protect as Recommended Wilderness	
Wilderness process (general) 2	Protect as wilderness the roadless lands surrounding the Blue Range Primitive Area (specifically Pipestem, Lower San Francisco, Mitchel Peak and Sunset Roadless Areas). Additionally, protect as wilderness the Leonard Canyon and Chevelon Canyon Roadless units on the Sitgreaves side of the Forest.	Consider the need for preserving this last-of-its-kind intact system of wildland rather than only analyze their value as stand-alone potential wilderness units. There is concern that the ecological "need" for preserving the wilderness characteristic of quiet, resilient and unfragmented habitat is high for all potential wilderness units.	XXXX	Protect as wilderness the roadless lands surrounding the Blue Range Primitive Area (specifically Pipestem, Lower San Francisco, Mitchel Peak and Sunset Roadless Areas). Additionally, protect as wilderness the Leonard Canyon and Chevelon Canyon Roadless units on the Sitgreaves side of the Forest.		Protect as Recommended Wilderness	

Wilderness process (general) 2	Protect as recommended wilderness the roadless lands contiguous to the Blue Range Primitive Area (specifically protect Pipestem, Lower San Francisco, Mitchel Peak and Sunset Inventoried Roadless Areas as potential wilderness). This would essentially protect the largest and most ecologically productive wildland unit on National Forest Lands in Arizona.	Consider the need for preserving this last-of-its-kind intact system of wildland rather than only analyze their value as stand-alone potential wilderness units. There is concern that the ecological "need" for preserving the wilderness characteristic of quiet, resilient and unfragmented habitat is high for all potential wilderness units.	XXXX	Protect as recommended wilderness the roadless lands contiguous to the Blue Range Primitive Area (specifically protect Pipestem, Lower San Francisco, Mitchel Peak and Sunset Inventoried Roadless Areas as potential wilderness). This would essentially protect the largest and most ecologically productive wildland unit on National Forest Lands in Arizona.		Protect as Recommended Wilderness	
Wilderness process (general) 3	These areas [with mixed individual Capability ratings] should also be managed in a way to preserve their wilderness value. As mentioned above it is up to Congress to determine which lands will be included in the Wilderness system. Since the ASNF Evaluation has identified at least one Capability area with a High rating we feel that the Forest Service should leave to Congress the discretion of how to balance a set of mixed Capability scores.	For areas that received a medium, medium/high, or high capability rating in the wilderness evaluation, the Forest Service should manage them in a way to preserve their wilderness values.	XXXX	These areas should also be managed in a way to preserve their wilderness value. As mentioned above it is up to Congress to determine which lands will be included in the Wilderness system. Since the ASNF Evaluation has identified at least one Capability area with a High rating we feel that the Forest Service should leave to Congress the discretion of how to balance a set of mixed Capability scores.		Congressional Role in Wilderness	
	All areas that received High rankings on Capability should be managed in a way to preserve their wilderness values. While the need for additional Wilderness areas is high throughout the ASNF, we do not think that low rankings on either Need or Availability should preclude an area from being managed in a way that preserves its potential inclusion in the Wilderness	For areas that received a medium, medium/high, or high capability rating in the wilderness evaluation, the Forest Service should manage them in a way to preserve their wilderness values.	** Check out Prescott p. 61 1st comment				

	System.					
Wilderness process (population, need)	Factor one” and “Factor three” as described in the Potential Wilderness Draft Evaluation Reports use arbitrary radius distance from illogical community centers (i.e. Silver City being the community used for the eastern side of the ASNF) that lead to the conclusion that the need for additional wilderness is low. We are concerned with the arbitrary criteria that are currently being used to evaluate the “need” for more wilderness on the ASNF. In fact, there is nowhere in the state of Arizona where potential wilderness lands are not within a 100 mile radius of an existing wilderness. Therefore this arbitrary criteria ensures that all of the potential wilderness units will receive a low rating. Additionally the existing Inventoried Roadless Areas were applied to the 100 mile radius to indicate that there is a low need for addition wilderness on the ASNF. Yet the ASNF is evaluating (under Alternative C) the removal of the National Roadless Area	Explain the criteria used in "factor one" and "factor three" of the wilderness need evaluation. There is concern that arbitrary distances from illogical community centers lead to the conclusion that the need for additional wilderness is low	XXXX	Factor one” and “Factor three” as described in the Potential Wilderness Draft Evaluation Reports use arbitrary radius distance from illogical community centers (i.e. Silver City being the community used for the eastern side of the ASNF) that lead to the conclusion that the need for additional wilderness is low. We are concerned with the arbitrary criteria that are currently being used to evaluate the “need” for more wilderness on the ASNF. In fact, there is nowhere in the state of Arizona where potential wilderness lands are not within a 100 mile radius of an existing wilderness. Therefore this arbitrary criteria ensures that all of the potential wilderness units will receive a low rating. Additionally the existing Inventoried Roadless Areas were applied to the 100 mile radius to indicate that there is a low need for addition wilderness on the ASNF. Yet the ASNF is evaluating (under Alternative C) the removal of the National Roadless Area	Wilderness Draft Evaluation Report Process	

	Conservation Rule protections from the IRAs on the ASNF. It is deceptive and perhaps capricious to on one hand to claim there is no need for permanent wilderness protections because of the proximity to IRAs, while on the other hand to consider removing the protections from those IRAs.			Conservation Rule protections from the IRAs on the ASNF. It is deceptive and perhaps capricious to on one hand to claim there is no need for permanent wilderness protections because of the proximity to IRAs, while on the other hand to consider removing the protections from those IRAs.		
Wilderness process (need factor2)	We question the validity of that analysis particularly in light of the fact that the ASNF, by a significant margin, has the least amount of wilderness lands of any Forest in the Southwest and also considering a Regional review of wilderness indicated that the northeast quadrant of Arizona was the most underrepresented quadrant of an underrepresented state within an underrepresented Region.	Reconsider the underrepresentation of wilderness in the northeast quadrant of Arizona in the evaluation of Need Assessment Factor 2.	XXXX	We question the validity of that analysis particularly in light of the fact that the ASNF, by a significant margin, has the least amount of wilderness lands of any Forest in the Southwest and also considering a Regional review of wilderness indicated that the northeast quadrant of Arizona was the most underrepresented quadrant of an underrepresented state within an underrepresented Region.		Validity of Analysis
Wilderness process (need factor2)	It is noteworthy that the ASNF contains the majority of public lands that is capable of providing wilderness values in proximity to the northeast quadrant of Arizona – ‘the most under-represented’ quadrant of Arizona. Based on the regional analysis the “need” rating for all of the potential wilderness units should be significantly increased.	Reconsider the underrepresentation of wilderness in the northeast quadrant of Arizona in the evaluation of Need Assessment Factor 2.	XXXX	It is noteworthy that the ASNF contains the majority of public lands that is capable of providing wilderness values in proximity to the northeast quadrant of Arizona – ‘the most under-represented’ quadrant of Arizona. Based on the regional analysis the “need” rating for all of the potential wilderness units should be significantly increased.		Validity of Analysis

Wilderness process (recommendation criteria)	Issue: Report erroneously presumes there is a need for additional wilderness for recreational activities near populated areas. Wilderness Specialist Report, page 13, first paragraph, page 13: Remedy: Review analysis and remove any recommendation for designation of wilderness solely based upon the desire to provide recreation opportunities for a select segment of the population that enjoys hiking in "designated wilderness". Review analysis and remove recommendations for designation of wilderness solely based on representing all landforms and ecosystems within a given area.	Remove any recommendation for designation of wilderness solely based on a desire to provide recreation opportunities.	XXXX	Issue: Report erroneously presumes there is a need for additional wilderness for recreational activities near populated areas. Wilderness Specialist Report, page 13, first paragraph, page 13: Remedy: Review analysis and remove any recommendation for designation of wilderness solely based upon the desire to provide recreation opportunities for a select segment of the population that enjoys hiking in "designated wilderness". Review analysis and remove recommendations for designation of wilderness solely based on representing all landforms and ecosystems within a given area.	Recommendation for Wilderness Based on representing all Ecosystems	PC 1264-2 The Forest Service should review analysis and remove any recommendation for designation of wilderness solely based upon the desire to provide recreation opportunities for a select segment of the population that enjoys hiking in "designated wilderness".
Wilderness process (species need)	It is clear that "factor four" for evaluating the need for additional wilderness does not reflect the intent of the Wilderness Act. The ASNF has identified 11 Threatened and Endangered Species, 105 Species of Concern, and 208 Species of Interest that occur or are found on the forests. The agency then points out that "none of these species require a primitive wilderness environment to survive," concluding that the need for additional wilderness is low. This is yet another example of criteria developed from FSH 1909.12, Chapter 70 that are no longer valid in light of the June 30, 2009 ruling of the U.S.	Reconsider "factor four" of the wilderness need evaluation.	XXXX	It is clear that "factor four" for evaluating the need for additional wilderness does not reflect the intent of the Wilderness Act. The ASNF has identified 11 Threatened and Endangered Species, 105 Species of Concern, and 208 Species of Interest that occur or are found on the forests. The agency then points out that "none of these species require a primitive wilderness environment to survive," concluding that the need for additional wilderness is low. This is yet another example of criteria developed from FSH 1909.12, Chapter 70 that are no longer valid in light of the June 30, 2009 ruling of the U.S.	Wilderness Draft Evaluation Report Process	

	District Court for the Northern District of California.			District Court for the Northern District of California.		
Wilderness process (species need)	Most of the 224 species mentioned above evolved in natural, primitive environments and ultimately their collective persistence in viable, ecologically effective populations depend on protection and restoration of those conditions forest-wide, especially within wilderness. Most, not just "some" (as is stated in the Potential Wilderness Draft Evaluation Reports), of those species, including the Mexican gray wolf, black bear, goshawk, Mexican spotted owl and other raptors, elk, mountain lion, pronghorn, Gunnison's prairie dog, deer and other species "would benefit from reduced disturbance and human encounters".	Reconsider "factor four" of the wilderness need evaluation.	XXXX	Most of the 224 species mentioned above evolved in natural, primitive environments and ultimately their collective persistence in viable, ecologically effective populations depend on protection and restoration of those conditions forest-wide, especially within wilderness. Most, not just "some" (as is stated in the Potential Wilderness Draft Evaluation Reports), of those species, including the Mexican gray wolf, black bear, goshawk, Mexican spotted owl and other raptors, elk, mountain lion, pronghorn, Gunnison's prairie dog, deer and other species "would benefit from reduced disturbance and human encounters".	Wilderness Draft Evaluation Report Process	
Wilderness process (Wallow)	Eagar requests that the Forest Service reconsider evaluating areas within the Wallow fire that were burned with moderate and high intensity as potential "wilderness".	The Forest Service should reconsider evaluating areas within the Wallow fire that were burned with moderate to high intensity as potential "wilderness".	XXXX	Eagar requests that the Forest Service reconsider evaluating areas within the Wallow fire that were burned with moderate and high intensity as potential "wilderness".	Fire	

WSR Evaluation	<p>Freeport strongly disagrees with ASNF designating Sardine Creek as a "Wild" river. As suggested previously, the general area in which Sardine Creek is situated, is dominated by the Morenci copper mining operations, a very large mining and industrial complex. Furthermore, a major portion of Sardine Creek, over one river mile, is bisected by a 142+/- acre private land in-holding, the Walker homestead. At the time of patent, the homestead consisted of dwelling and livestock structures, and a sizable orchard, much of which we understand remains to the present day. Finally, we note that Freeport maintains a number of unpatented mining claims and sites in the general vicinity of Sardine Creek. The designation of Sardine Creek as "Wild" is not consistent with its location near the Morenci copper mining complex, the historical homestead use, or with potential future uses associated with mining operations as afforded by the statutory rights of unpatented mining claimants.</p>	<p>The designation of Sardine Creek as "wild" is not consistent with its location near the Morenci copper mining complex, the historical homestead use, or with potential future uses associated with mining operations as afforded by the statutory rights of unpatented mining claimants.</p>	XXXX	<p>Freeport strongly disagrees with ASNF designating Sardine Creek as a "Wild" river. As suggested previously, the general area in which Sardine Creek is situated, is dominated by the Morenci copper mining operations, a very large mining and industrial complex. Furthermore, a major portion of Sardine Creek, over one river mile, is bisected by a 142+/- acre private land in-holding, the Walker homestead. At the time of patent, the homestead consisted of dwelling and livestock structures, and a sizable orchard, much of which we understand remains to the present day. Finally, we note that Freeport maintains a number of unpatented mining claims and sites in the general vicinity of Sardine Creek. The designation of Sardine Creek as "Wild" is not consistent with its location near the Morenci copper mining complex, the historical homestead use, or with potential future uses associated with mining operations as afforded by the statutory rights of unpatented mining claimants.</p>	Designation of Sardine Creek as Wild River	<p>PC 1157-1 The Forest Service should not designate Sardine Creek as a "Wild" river. The designation of Sardine Creek as "Wild" is not consistent with its location near the Morenci copper mining complex, the historical homestead use, or with potential future uses associated with mining operations as afforded by the statutory rights of unpatented mining claimants.</p>
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WSR evaluation (fish barrier)	<p>Fish Barrier Maintenance: The Department is concerned, however, about how certain rivers were analyzed and classified in the 2009 Eligibility Report for the National Wild and Scenic River System, Apache-Sitgreaves National Forests, which excluded portions of several rivers around man-made fish barriers. Those portions were classified as not eligible because they were described as no longer flowing in a natural condition due to the existence of structures which had modified the waterway. This approach was requested and supported by A-S and Department fish biologists at the time, with these barriers being identified as necessary for native fish recovery efforts undertaken on A-S</p>	<p>There are concerns regarding river classification around man-made fish barriers as identified in the 2009 Eligibility Report for the National Wild and Scenic River System Apache-Sitgreaves National Forests. The eligibility of these segments and the associated management that is required to maintain and possibly modify barriers may be in conflict. For the 2009 analysis, two segments of two streams, Fish Creek and East Fork Lower Colorado River (LCR) were requested to be excluded and classified as not eligible for WSR designation given the same conditions involving existing man-made fish barriers, but were not. The East Fork LCR, included an excluded segment for two gabion fish barriers, but did not include an exclusion for another fish barrier upstream at Colter Dam.</p>	XXXX	<p>Fish Barrier Maintenance: The Department is concerned, however, about how certain rivers were analyzed and classified in the 2009 Eligibility Report for the National Wild and Scenic River System, Apache-Sitgreaves National Forests, which excluded portions of several rivers around man-made fish barriers. Those portions were classified as not eligible because they were described as no longer flowing in a natural condition due to the existence of structures which had modified the waterway. This approach was requested and supported by A-S and Department fish biologists at the time, with these barriers being identified as necessary for native fish recovery efforts undertaken on A-S</p>	Fish Barriers	
WSR evaluation (fish barrier)	<p>For the 2009 analysis, two segments of two streams, Fish Creek and East Fork Lower Colorado River (LCR) were requested to be excluded and classified as not eligible for WSR designation given the same conditions involving existing man-made fish barriers, but were not. The Department is concerned that the eligibility and suitability of these segments and the associated management that is</p>	<p>There are concerns regarding river classification around man-made fish barriers as identified in the 2009 Eligibility Report for the National Wild and Scenic River System Apache-Sitgreaves National Forests. The eligibility of these segments and the associated management that is required to maintain and possibly modify barriers may be in conflict. For the 2009 analysis, two segments of two streams,</p>	XXXX	<p>For the 2009 analysis, two segments of two streams, Fish Creek and East Fork Lower Colorado River (LCR) were requested to be excluded and classified as not eligible for WSR designation given the same conditions involving existing man-made fish barriers, but were not. The Department is concerned that the eligibility and suitability of these segments and the associated management that is</p>	Fish Barriers	

	<p>required to maintain and possibly modify barriers will conflict with and hinder the ability to secure the major investment and accompanying biological objectives represented in these man-made structures as watershed conditions change.</p>	<p>Fish Creek and East Fork Lower Colorado River (LCR) were requested to be excluded and classified as not eligible for WSR designation given the same conditions involving existing man-made fish barriers, but were not. The East Fork LCR, included an excluded segment for two gabion fish barriers, but did not include an exclusion for another fish barrier upstream at Colter Dam.</p>		<p>required to maintain and possibly modify barriers will conflict with and hinder the ability to secure the major investment and accompanying biological objectives represented in these man-made structures as watershed conditions change.</p>		
WSR evaluation (fish barrier)	<p>For Fish Creek, there was no excluded section for the fish barrier. Instead, the segments changed because of the fish barrier, but did not exclude it, thus the location of that barrier falls within the recreational segment. The 2009 analysis stated that there is a low, naturalized fish barrier, which is inaccurate.</p>	<p>There are concerns regarding river classification around man-made fish barriers as identified in the 2009 Eligibility Report for the National Wild and Scenic River System Apache-Sitgreaves National Forests. The eligibility of these segments and the associated management that is required to maintain and possibly modify barriers may be in conflict. For the 2009 analysis, two segments of two streams, Fish Creek and East Fork Lower Colorado River (LCR) were requested to be excluded and classified as not eligible for WSR designation given the same conditions involving existing man-made fish barriers, but were not. The East Fork LCR, included an excluded segment for two gabion fish barriers, but did not include an exclusion for another fish barrier upstream at Colter Dam.</p>	XXXX	<p>For Fish Creek, there was no excluded section for the fish barrier. Instead, the segments changed because of the fish barrier, but did not exclude it, thus the location of that barrier falls within the recreational segment. The 2009 analysis stated that there is a low, naturalized fish barrier, which is inaccurate.</p>	Fish Barriers	

WSR evaluation (fish barrier)	The East Fork LCR, included an excluded segment for two gabion fish barriers, but did not include an exclusion for another fish barrier upstream at Colter Dam. The Department contends that Colter Dam is an impoundment, and that the 2009 analysis overlooked this feature	There are concerns regarding river classification around man-made fish barriers as identified in the 2009 Eligibility Report for the National Wild and Scenic River System Apache-Sitgreaves National Forests. The eligibility of these segments and the associated management that is required to maintain and possibly modify barriers may be in conflict. For the 2009 analysis, two segments of two streams, Fish Creek and East Fork Lower Colorado River (LCR) were requested to be excluded and classified as not eligible for WSR designation given the same conditions involving existing man-made fish barriers, but were not. The East Fork LCR, included an excluded segment for two gabion fish barriers, but did not include an exclusion for another fish barrier upstream at Colter Dam.	XXXX	The East Fork LCR, included an excluded segment for two gabion fish barriers, but did not. The Department contends that Colter Dam is an impoundment, and that the 2009 analysis overlooked this feature	Fish Barriers	
Preferred alternative	If the public comments mattered in the DEIS, then the Forest Service personnel, Whomever they are, would not have already formulated a "preferred alternative: in "Alternative B", unless it is based solely on their own desires.	The Forest Service should not have formulated a preferred alternative.	XXXX	If the public comments mattered in the DEIS, then the Forest Service personnel, Whomever they are, would not have already formulated a "preferred alternative: in "Alternative B", unless it is based solely on their own desires.	Preferred alternative	

Public meeting (alt b)	Another incorrect procedure followed is that the USFS preferred alternative (Alternative B), was the only one mentioned at the public meetings. "Alternative B" pamphlets were handed out at these meetings and were posted on bulletin boards. There was one at the Post Office. These flyers mentioned only Alternative B. This gave many people the false impression that Alternative B was already a done deal. This is in clear violation of CEQ regulations at Sec. 1502.2€.	There are concerns that only Alternative B was mentioned in handouts, flyers, and during February 2013 public meetings - violating CEQ regulations at Sec. 1502.2€.	XXXX	Another incorrect procedure followed is that the USFS preferred alternative (Alternative B), was the only one mentioned at the public meetings. "Alternative B" pamphlets were handed out at these meetings and were posted on bulletin boards. There was one at the Post Office. These flyers mentioned only Alternative B. This gave many people the false impression that Alternative B was already a done deal. This is in clear violation of CEQ regulations at Sec. 1502.2€.	Public Meetings - only mentioning Alternative B	
Public meeting (alt b)	1. Open houses in Springerville February 27, 2013 and in Duncan February 28, 2013 highlighted alternative B only. Your regulations require you to present all alternatives to the public at the same time if there is public money used for an open house setting.	There are concerns that only Alternative B was mentioned in handouts, flyers, and during February 2013 public meetings - violating CEQ regulations at Sec. 1502.2€.	XXXX	1. Open houses in Springerville February 27, 2013 and in Duncan February 28, 2013 highlighted alternative B only. Your regulations require you to present all alternatives to the public at the same time if there is public money used for an open house setting.	Presenting Only Alternative B at Public Meetings	1) more specific, clear language and strategy, 2) by reformatting to streamline presentation of information in a more logical flow, omitting duplication and conflicting information, and correcting format, grammar and punctuation for purposes of clarity., 3) provide links to downloadable reference materials available on the internet (and if documents are not yet on the internet, put them there).,4) add an alphabetic index of acronyms., 5) Add a comprehensive summary / discussions to just how well the first Forest Plan worked, both the good and the not-so good, 6) add a reference on the importance of litter, 7) define: "rare"; "unique"; "habitat" and" protection" (from what?) Page 61: Rare

							and unique habitats should be protected
Public meeting (wildlife group)	In 2007 I signed up for and starting in August "participated" in the public discussion group called "Habitat and Species" now referred to in Appendix F of the DEIS as the "Wildlife" Public Discussion Group. I attempted several times to present published, peer reviewed, scientific papers directly relevant to major habitat and species concerns in the ASNF. Below find some of the science I was forbidden to present by a forceful element within the group which dominated the process entirely. A majority of the group where professional representatives of agenda groups (Nature Conservancy, Center for Biological Diversity, Natural Resources Defense Council, Grand Canyon Wildlands Council, etc.) These representatives of specific agendas cannot be referred to as conservationists as their preconceived purpose/agendas can only corrupt the science upon which valid conservation measures must be based. Having recognized this strong	Explain how Forest Service personnel could legally provide input during the wildlife public discussion group held in 2007.	XXXX	In 2007 I signed up for and starting in August "participated" in the public discussion group called "Habitat and Species" now referred to in Appendix F of the DEIS as the "Wildlife" Public Discussion Group. I attempted several times to present published, peer reviewed, scientific papers directly relevant to major habitat and species concerns in the ASNF. Below find some of the science I was forbidden to present by a forceful element within the group which dominated the process entirely. A majority of the group where professional representatives of agenda groups (Nature Conservancy, Center for Biological Diversity, Natural Resources Defense Council, Grand Canyon Wildlands Council, etc.) These representatives of specific agendas cannot be referred to as conservationists as their preconceived purpose/agendas can only corrupt the science upon which valid conservation measures must be based. Having recognized this strong		Public Input Process	

and divisive attitude was usurping the important habitat and species (wildlife) portion of the plan, I called Michelle Davalos and asked her why the Forest Service did not organize the public input so various stakeholder interests could relate in a collaborative manner as it seemed that the current public input framework of isolated interests was setting up a situation of conflict.

Ms. Davalos replied that forest service personnel were forbidden, by the planning rule, to provide input into the Plan.

I remembered that this particular point had been stressed at the public meetings where we signed up for various public discussion groups (I signed up two discussion groups). We were told forest service personnel would be present at the discussion groups only to answer questions and give advice on the process, and would not input opinion or information. Then I remembered another thing. At the last Species and Habitat meeting the FS employee present had done just what Michelle had said was against the rule. He had brought in 60 pages of listed "Species for Consideration Found Within The Forest Potential Natural Vegetation

and divisive attitude was usurping the important habitat and species (wildlife) portion of the plan, I called Michelle Davalos and asked her why the Forest Service did not organize the public input so various stakeholder interests could relate in a collaborative manner as it seemed that the current public input framework of isolated interests was setting up a situation of conflict.

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	<p>Type on the ASNFs" with approximately 25-30 species per page and dated August, 21, 2007! Someone had been very busy!</p> <p>We then proceeded to go round-robin around the meeting table adding species to the list based on such scientific evidence as "I saw fewer skunks this year", or "On my summer hikes I saw fewer of this and that bird".</p> <p>This person also lined a meeting room wall with large maps of the forests divided into various designations, and gave us all a copy of a self produced 49 page self-written presentation dated November 1, 2007 which, for all intents and purposes, forms the outline of the current Proposed Land Management Plan.</p> <p>This makes me wonder, all things considered - including Ms. Davalos' comment to me about FS personnel not being able to legally provide input, was this legal or not?</p>			<p>Type on the ASNFs" with approximately 25-30 species per page and dated August, 21, 2007! Someone had been very busy!</p> <p>We then proceeded to go round-robin around the meeting table adding species to the list based on such scientific evidence as "I saw fewer skunks this year", or "On my summer hikes I saw fewer of this and that bird".</p> <p>This person also lined a meeting room wall with large maps of the forests divided into various designations, and gave us all a copy of a self produced 49 page self-written presentation dated November 1, 2007 which, for all intents and purposes, forms the outline of the current Proposed Land Management Plan.</p> <p>This makes me wonder, all things considered - including Ms. Davalos' comment to me about FS personnel not being able to legally provide input, was this legal or not?</p>		
<p>Objecti on/app eal 2</p>	<p>An effective conflict resolution and conflict reduction process aimed NOT AT MANAGING potential discrepancies but at RESOLVING potential discrepancies between the Apache-Sitgreaves National Forests Land Management Plan and the Navajo County objectives, plans and policies, their compatibility and their interrelated impacts, and</p>	<p>The Forest Service should conduct an effective conflict resolution and conflict reduction process aimed not at managing potential discrepancies but at resolving potential discrepancies between the plan and county objectives, plans, and policies.</p>	<p>XXXX</p>	<p>An effective conflict resolution and conflict reduction process aimed NOT AT MANAGING potential discrepancies but at RESOLVING potential discrepancies between the Apache-Sitgreaves National Forests Land Management Plan and the Navajo County objectives, plans and policies, their compatibility and their interrelated impacts, and</p>	<p>Counties and Local Communi ties</p>	

	emphasizing their joint objectives.			emphasizing their joint objectives.		
Need to clarify plan	(THROUGHOUT THIS DOCUMENT MOST OF THE WRITTEN TABLE REFERENCES AND ACTUAL TABLE IDENTIFICATIONS DO NOT MATCH) Example, page 53 First complete paragraph reference is made to "Table 6" when table is identified as "Table 2".	Update the plan and EIS to make them easier to read and understand by (1) clarifying terminology and using clear and plain language, (2) adding an index of acronyms, (3) reducing the length, (4) correcting inconsistencies, grammar, and punctuation, (5) providing hyperlinks to downloadable information, and (6) reformatting to streamline presentation.	XXXX	(THROUGHOUT THIS DOCUMENT MOST OF THE WRITTEN TABLE REFERENCES AND ACTUAL TABLE IDENTIFICATIONS DO NOT MATCH) Example, page 53 First complete paragraph reference is made to "Table 6" when table is identified as "Table 2".	Table References	
Need to clarify plan	Appendix F. is supposed to be Collaboration and Public Involvement. When the link is selected it goes to Appendix F. Maps. Where is the correct information for this appendix?	Update the plan and EIS to make them easier to read and understand by (1) clarifying terminology and using clear and plain language, (2) adding an index of acronyms, (3) reducing the length, (4) correcting inconsistencies, grammar, and punctuation, (5) providing hyperlinks to downloadable information, and (6) reformatting to streamline presentation.	XXXX	Appendix F. is supposed to be Collaboration and Public Involvement. When the link is selected it goes to Appendix F. Maps. Where is the correct information for this appendix?	Missing Information and Corrections to Information	

Need to clarify plan	The statement “The Apache-Sitgreaves NFs would be funded in future years at levels similar to the past 5 years.” is way too optimistic. The Forest Service budget has been decreasing steadily over the last 5 years, There is no reason to believe it will level off or return to previous funding levels anytime soon. A more honest statement would be “The funding for the Apache-Sitgreaves NFs in future years would be funded at levels similar to or less than the past five years.”	Update the plan and EIS to make them easier to read and understand by (1) clarifying terminology and using clear and plain language, (2) adding an index of acronyms, (3) reducing the length, (4) correcting inconsistencies, grammar, and punctuation, (5) providing hyperlinks to downloadable information, and (6) reformatting to streamline presentation.	XXXX	The statement “The Apache-Sitgreaves NFs would be funded in future years at levels similar to the past 5 years.” is way too optimistic. The Forest Service budget has been decreasing steadily over the last 5 years, There is no reason to believe it will level off or return to previous funding levels anytime soon. A more honest statement would be “The funding for the Apache-Sitgreaves NFs in future years would be funded at levels similar to or less than the past five years.”	Missing Information and Corrections to Information	
Need to clarify plan	Page 1, last par.- "The plan integrates...climate resilience..." Does this mean resilience to climate change or that the climate is resilient? If the first, it needs to be reworded; if the second, it makes no sense.	Update the plan and EIS to make them easier to read and understand by (1) clarifying terminology and using clear and plain language, (2) adding an index of acronyms, (3) reducing the length, (4) correcting inconsistencies, grammar, and punctuation, (5) providing hyperlinks to downloadable information, and (6) reformatting to streamline presentation.	XXXX	Page 1, last par.- "The plan integrates...climate resilience..." Does this mean resilience to climate change or that the climate is resilient? If the first, it needs to be reworded; if the second, it makes no sense.	Climate Resilience	
Need to clarify plan	Chapter 1 describes the purpose and need for the proposed plan revision and outlines the general policies, goals and objectives for the plan. Several concepts and implied assumptions are introduced that form the basis for the statements in all of the rest of the plan. Some of these concepts are poorly defined, inconsistent, and lacking in	Update the plan and EIS to make them easier to read and understand by (1) clarifying terminology and using clear and plain language, (2) adding an index of acronyms, (3) reducing the length, (4) correcting inconsistencies, grammar, and punctuation, (5) providing hyperlinks to downloadable information, and (6) reformatting to	XXXX	Chapter 1 describes the purpose and need for the proposed plan revision and outlines the general policies, goals and objectives for the plan. Several concepts and implied assumptions are introduced that form the basis for the statements in all of the rest of the plan. Some of these concepts are poorly defined, inconsistent, and lacking in	Purpose and Need Concepts	

	scientific credibility. Since the entire plan rests on these concepts and assumptions, they are critiqued before addressing specific sections of the plan. Several statements are quoted or paraphrased below to illustrate these concepts. Important terms are highlighted.	streamline presentation.		scientific credibility. Since the entire plan rests on these concepts and assumptions, they are critiqued before addressing specific sections of the plan. Several statements are quoted or paraphrased below to illustrate these concepts. Important terms are highlighted.			
Need to clarify plan	The DEIS and the Proposed Plan are extremely lengthy and difficult to read and understand. One thing that would help is an alphabetic index of all the acronyms. The need for reducing the length of EIS documents, the preparing of analytic rather than encyclopedic impact statements, the writing environmental statements in clear and plain language is covered in the CEQ regulations Sees. 1500.4, 1502.2, and 1502.8.	Update the plan and EIS to make them easier to read and understand by (1) clarifying terminology and using clear and plain language, (2) adding an index of acronyms, (3) reducing the length, (4) correcting inconsistencies, grammar, and punctuation, (5) providing hyperlinks to downloadable information, and (6) reformatting to streamline presentation.	XXXX	The DEIS and the Proposed Plan are extremely lengthy and difficult to read and understand. One thing that would help is an alphabetic index of all the acronyms. The need for reducing the length of EIS documents, the preparing of analytic rather than encyclopedic impact statements, the writing environmental statements in clear and plain language is covered in the CEQ regulations Sees. 1500.4, 1502.2, and 1502.8.		Writing in Neutral, Clear Language	PC 175-2 The Forest Service should revise the plan to include:
Need to clarify plan	Reformat the Proposed Plan and DEIS to streamline presentation of information in a more logical flow, omitting duplication and conflicting information, and correcting format, grammar and punctuation for purposes of clarity. Provide links to downloadable reference materials available on the internet (and if documents are not yet on the internet, put them there).	Update the plan and EIS to make them easier to read and understand by (1) clarifying terminology and using clear and plain language, (2) adding an index of acronyms, (3) reducing the length, (4) correcting inconsistencies, grammar, and punctuation, (5) providing hyperlinks to downloadable information, and (6) reformatting to streamline presentation.	XXXX	Reformat the Proposed Plan and DEIS to streamline presentation of information in a more logical flow, omitting duplication and conflicting information, and correcting format, grammar and punctuation for purposes of clarity. Provide links to downloadable reference materials available on the internet (and if documents are not yet on the internet, put them there).		Format	

Need to clarify plan	Issue: The DEIS and Plan glossaries do not contain the same definitions or fail to define terms used throughout the documents. Correct glossaries so that identical terms are defined the same between all documents, including Specialist Reports.	Update the plan and EIS to make them easier to read and understand by (1) clarifying terminology and using clear and plain language, (2) adding an index of acronyms, (3) reducing the length, (4) correcting inconsistencies, grammar, and punctuation, (5) providing hyperlinks to downloadable information, and (6) reformatting to streamline presentation.	XXXX	Issue: The DEIS and Plan glossaries do not contain the same definitions or fail to define terms used throughout the documents.		Errors and Omissions in Definitions and Terminology	
Need to clarify plan	Issue: The DEIS fails to present the Alternatives in a format that allows them to be adequately compared. Remedy: The Alternatives should be included in the DEIS Table of Contents so they can be easily located. A table should be in Chapter 2 that allows for ready comparison of all components of the Alternatives.	Update the plan and EIS to make them easier to read and understand by (1) clarifying terminology and using clear and plain language, (2) adding an index of acronyms, (3) reducing the length, (4) correcting inconsistencies, grammar, and punctuation, (5) providing hyperlinks to downloadable information, and (6) reformatting to streamline presentation.	XXXX	Issue: The DEIS fails to present the Alternatives in a format that allows them to be adequately compared. Remedy: The Alternatives should be included in the DEIS Table of Contents so they can be easily located. A table should be in Chapter 2 that allows for ready comparison of all components of the Alternatives.		Comparison Tables	PC 207- 29 The Forest Service should include the alternatives in the DEIS Table of Contents so they can be easily located and a table should be in Chapter 2 that allows for ready comparison of all components of the Alternatives. The Forest Service should revise Tables 1 and 2 to show the same data categories
Need to clarify plan	Issue: The tables that are provided for comparison of Management Areas do not provide the same descriptions of management areas Remedy: Revise Tables 1 and 2 to show the same data categories.	Update the plan and EIS to make them easier to read and understand by (1) clarifying terminology and using clear and plain language, (2) adding an index of acronyms, (3) reducing the length, (4) correcting inconsistencies, grammar, and punctuation, (5) providing hyperlinks to downloadable information, and (6) reformatting to streamline presentation.	XXXX	Issue: The tables that are provided for comparison of Management Areas do not provide the same descriptions of management areas Remedy: Revise Tables 1 and 2 to show the same data categories.		Comparison Tables	PC 207- 29 The Forest Service should include the alternatives in the DEIS Table of Contents so they can be easily located and a table should be in Chapter 2 that allows for ready comparison of all components of the Alternatives. The Forest Service should revise Tables 1 and 2 to show the same data categories

Need to clarify plan	Replace confusing language and concept with language that can be easily understood by the non-expert reader regarding the role fires play in providing a healthy forest.	Update the plan and EIS to make them easier to read and understand by (1) clarifying terminology and using clear and plain language, (2) adding an index of acronyms, (3) reducing the length, (4) correcting inconsistencies, grammar, and punctuation, (5) providing hyperlinks to downloadable information, and (6) reformatting to streamline presentation.	XXXX	Replace confusing language and concept with language that can be easily understood by the non-expert reader regarding the role fires play in providing a healthy forest.	Clear Writing	PC 905-1 The Forest Service should replace confusing language and concept with language that can be easily understood by the non-expert reader regarding the role fires play in providing a healthy forest because the discussion on consequences is confusing.
Need to clarify plan	Issues: The Plan contains many errors and omissions. "Geographic Area Desired Conditions" (p 59-74) Reason for these desired conditions not making any reference to grazing, hunting or logging should be supplied.	Update the plan and EIS to make them easier to read and understand by (1) clarifying terminology and using clear and plain language, (2) adding an index of acronyms, (3) reducing the length, (4) correcting inconsistencies, grammar, and punctuation, (5) providing hyperlinks to downloadable information, and (6) reformatting to streamline presentation.	XXXX	Issues: The Plan contains many errors and omissions. "Geographic Area Desired Conditions" (p 59-74) Reason for these desired conditions not making any reference to grazing, hunting or logging should be supplied.	Desired conditons	
Need to clarify plan	Issue: Glossary terms are incorrect, misleading or incomplete. Unique - The term "unique" is used repeatedly in this document, for example: "unique riparian vegetation types" {p. 5} "unique species", referring to plant and animal species claimed to be found only on the A-S NF. (p.5) "unique waters", referring to designation by ASDWR to certain streams. "Communities, populations, and individual plant and animal species are uniquely adapted to and	Update the plan and EIS to make them easier to read and understand by (1) clarifying terminology and using clear and plain language, (2) adding an index of acronyms, (3) reducing the length, (4) correcting inconsistencies, grammar, and punctuation, (5) providing hyperlinks to downloadable information, and (6) reformatting to streamline presentation.	XXXX	Issue: Glossary terms are incorrect, misleading or incomplete. Unique - The term "unique" is used repeatedly in this document, for example: "unique riparian vegetation types" {p. 5} "unique species", referring to plant and animal species claimed to be found only on the A-S NF. (p.5) "unique waters", referring to designation by ASDWR to certain streams. "Communities, populations, and individual plant and animal species are uniquely adapted to and	Errors and Omissions in Definitions and Terminology	PC 3600-1 The Forest Service should revise and clarify the incorrect, misleading, or incomplete glossary terms as follows: 1. Unique – the term is used repeatedly in this document with different meanings example: "unique riparian vegetation types" {p. 5} "unique species", referring to plant and animal species claimed to be found only on the A-S NF. (p.5) "unique waters", referring to designation by ASDWR to certain streams. "Communities,

dependent on ecosystem diversity.", implying a high degree of evolutionary organization (p11) The first three examples cited of the use of "unique" employ the latter, disputed meaning of the word, i.e. rare or unusual, since there is no reason to think that the more commonly accepted definition is appropriate. However, most readers would assume that the use of the term implies that these vegetation types, species or "waters" are like completely unlike those found anywhere else - which is not true. It would be better to use a term that indicated these attributes are of limited extent rather than "unique" as most people interpret the word. The fourth example implies a view of the degree of organization and balance in nature that is not supported by modern science.

dependent on ecosystem diversity.", implying a high degree of evolutionary organization (p11) The first three examples cited of the use of "unique" employ the latter, disputed meaning of the word, i.e. rare or unusual, since there is no reason to think that the more commonly accepted definition is appropriate. However, most readers would assume that the use of the term implies that these vegetation types, species or "waters" are like completely unlike those found anywhere else - which is not true. It would be better to use a term that indicated these attributes are of limited extent rather than "unique" as most people interpret the word. The fourth example implies a view of the degree of organization and balance in nature that is not supported by modern science.

populations, and individual plant and animal species are uniquely adapted to and dependent on ecosystem diversity.", implying a high degree of evolutionary organization (p11). 2. Ecotone - Ecotone was a term used by Clements and other ecologists who espoused the concept that plant communities were comparable to organisms or quasi organisms with emergent properties. The transitions from one community to another were called ecotones. If one adopts the "continuum" or "individualistic" concept (e.g Gleason) plant species abundance is seen to vary in response to environmental gradients, thus "ecotones" are only zones of rapid change as opposed to more gradual change where environmental conditions are relatively constant. Thus, the definition used in this plan (a community sharing species of adjacent communities) would apply to any plant community, and thus has no meaning. 3. Herbivory - is defined as "loss of vegetation due to consumption by another organism." It actually means the act of consumption of vegetation by an herbivore, or an animal that eats plants. 4. Livestock Grazing - is defined as "foraging by permitted livestock" which implies that

						<p>foraging that is not "permitted" is not grazing. 5. Resiliency - the concept of resiliency is somewhat controversial, but generally means a system that has the capacity to change in response to some stress and to recover from that stress. Resilience is different from stability - which is resistance to change. These concepts seem to be somewhat confused in this document. 6. Scenic integrity - This definition is confusing. In one place it says high scenic integrity is the "state of naturalness" or "without disturbance created by humans." In another, it says the highest scenic integrity ratings are given to those landscapes that have little or no deviation from the landscape character valued by constituents for its aesthetic quality, which could mean that scenic integrity is in the eye of the beholder. There is no reason to believe that the "historic condition" is the only landscape character that can be appropriately valued by "constituents".</p>
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Need to clarify plan	Replace biased language with neutral language and concentrate efforts on providing the public with simple and clear descriptions of the desired condition of the Forest in the future.	Update the plan and EIS to make them easier to read and understand by (1) clarifying terminology and using clear and plain language, (2) adding an index of acronyms, (3) reducing the length, (4) correcting inconsistencies, grammar, and punctuation, (5) providing hyperlinks to downloadable information, and (6) reformatting to streamline presentation.	XXXX	Replace biased language with neutral language and concentrate efforts on providing the public with simple and clear descriptions of the desired condition of the Forest in the future.		Writing in Neutral, Clear Language PC 175-2 The Forest Service should revise the plan to include:
Need to clarify plan	Biased wording within the DEIS should be changed to present an unprejudiced selection of Alternatives.	Update the plan and EIS to make them easier to read and understand by (1) clarifying terminology and using clear and plain language, (2) adding an index of acronyms, (3) reducing the length, (4) correcting inconsistencies, grammar, and punctuation, (5) providing hyperlinks to downloadable information, and (6) reformatting to streamline presentation.	XXXX			
Need to clarify plan	Structurally, we found the plan difficult review as it is very disjointed and difficult to follow. In general, there was not a logical flow to the document. The final Plan and EIS should be restructured to a more readable, user/reviewer friendly approach.	Update the plan and EIS to make them easier to read and understand by (1) clarifying terminology and using clear and plain language, (2) adding an index of acronyms, (3) reducing the length, (4) correcting inconsistencies, grammar, and punctuation, (5) providing hyperlinks to downloadable information, and (6) reformatting to streamline presentation.	XXXX	Structurally, we found the plan difficult review as it is very disjointed and difficult to follow. In general, there was not a logical flow to the document. The final Plan and EIS should be restructured to a more readable, user/reviewer friendly approach.	Writing in Neutral, Clear Language	PC 175-2 The Forest Service should revise the plan to include:

Need to clarify plan	It is impossible to be as specific as possible when both the proposed land management plan for the a/s and the programmatic draft environmental impact statement for the A-S is so difficult to understand. They are both very nonspecific.	Update the plan and EIS to make them easier to read and understand by (1) clarifying terminology and using clear and plain language, (2) adding an index of acronyms, (3) reducing the length, (4) correcting inconsistencies, grammar, and punctuation, (5) providing hyperlinks to downloadable information, and (6) reformatting to streamline presentation.	XXXX	It is impossible to be as specific as possible when both the proposed land management plan for the a/s and the programmatic draft environmental impact statement for the A-S is so difficult to understand. They are both very nonspecific.		Provide Science and Fact Based Measurable Specifics	PC 175-2 The Forest Service should revise the plan to include:
Need to clarify plan	The Forest Service is a regulatory agency and should communicate in an affirmative form of expression. The use of ambiguous or vague language should be avoided. Examples would be resilient, minimally, relative, and similar.	Update the plan and EIS to make them easier to read and understand by (1) clarifying terminology and using clear and plain language, (2) adding an index of acronyms, (3) reducing the length, (4) correcting inconsistencies, grammar, and punctuation, (5) providing hyperlinks to downloadable information, and (6) reformatting to streamline presentation.	XXXX	The Forest Service is a regulatory agency and should communicate in an affirmative form of expression. The use of ambiguous or vague language should be avoided. Examples would be resilient, minimally, relative, and similar.		Removing Ambiguous Wording	
Need to clarify plan	"Variation in achieving objectives may occur during the next 15 years because of changes in environmental conditions, available budgets and other factors. Objectives are strongly influenced by recent trends, past experiences, and anticipate staffing levels, and short-term budgets" I know this is accurate but perhaps can be deleted?	Update the plan and EIS to make them easier to read and understand by (1) clarifying terminology and using clear and plain language, (2) adding an index of acronyms, (3) reducing the length, (4) correcting inconsistencies, grammar, and punctuation, (5) providing hyperlinks to downloadable information, and (6) reformatting to streamline presentation.	XXXX	"Variation in achieving objectives may occur during the next 15 years because of changes in environmental conditions, available budgets and other factors. Objectives are strongly influenced by recent trends, past experiences, and anticipate staffing levels, and short-term budgets" I know this is accurate but perhaps can be deleted?		Removing Ambiguous Wording	

Need to clarify plan	CEQ 40CFR writing. This applies for an EIS however certainly should also apply to this plan... written in plain language... appropriate graphics so that the decision maker and the public can readily understand them	Update the plan and EIS to make them easier to read and understand by (1) clarifying terminology and using clear and plain language, (2) adding an index of acronyms, (3) reducing the length, (4) correcting inconsistencies, grammar, and punctuation, (5) providing hyperlinks to downloadable information, and (6) reformatting to streamline presentation.	XXXX	CEQ 40CFR writing. This applies for an EIS however certainly should also apply to this plan... written in plain language... appropriate graphics so that the decision maker and the public can readily understand them	CEQ 40CFR - Plain Language Writing	
Need to clarify plan	Not all versions of the Plan are identical. Not all physical copies of the Plan match the PDF versions of the Plan, which makes discussion of the issues of the Plan difficult. It is not known where the differences might be in each version, nor whether the differences are sufficiently substantive as to render the whole public review process meaningless. Note that this means that some of the page references in these comments may not agree with page numbers of the versions used by the Revision Team. Remedy: Identify and publicize all differences to the various versions of the Plan.	Identify the differences between the printed and electronic (.pdf) version of the proposed plan.	XXXX	Not all versions of the Plan are identical. Not all physical copies of the Plan match the PDF versions of the Plan, which makes discussion of the issues of the Plan difficult. It is not known where the differences might be in each version, nor whether the differences are sufficiently substantive as to render the whole public review process meaningless. Note that this means that some of the page references in these comments may not agree with page numbers of the versions used by the Revision Team. Remedy: Identify and publicize all differences to the various versions of the Plan.	Versions of Plan	PC 175-5 The Forest Service should Identify and publicize all differences to the various versions of the DEIS to include different page numbers on the .pdf version of the DEIS and the one mailed to the public.
Discuss how S&Gs meet DCs	For parties not familiar with these types of Land Management Plans, we recommend a discussion of standards or guidelines addressed under forest or range management practices that are used to provide consistency in meeting desired	Within the plan, describe how the standards and guidelines addressed under forest or range management practices are used in meeting desired conditions or objectives (e.g., how livestock grazing standards meet a vegetation type's desired conditions).	XXXX	For parties not familiar with these types of Land Management Plans, we recommend a discussion of standards or guidelines addressed under forest or range management practices that are used to provide consistency in meeting desired	Range Management	PC 150-4 The Forest Service should carry forward, strengthen and clarify the existing standards and guidelines to the new Forest Plan with binding standards and guidelines that provide consistency in meeting desired conditions. The Forest Service

	conditions or objectives. For example, the Plan could describe livestock grazing standards that move toward meeting a vegetation type's desired conditions			conditions or objectives. For example, the Plan could describe livestock grazing standards that move toward meeting a vegetation type's desired conditions		should keep the current standard and guidelines because it will protect the environment, ensure viability of federally listed and regionally sensitive wildlife populations, as well as old growth forests, protect the agency against inappropriate lobbying efforts, public pressure, and provide public accountability.
Concern with plan components	Carry forward existing management standards and guidelines Existing standards and guidelines should be carried forward and strengthened in the new Forest Plan	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).	** Check out Kaibab , p. 7, 1st comment & p.8, 2nd comment & p. 44 comment 1	Carry forward existing management standards and guidelines Existing standards and guidelines should be carried forward and strengthened in the new Forest Plan	Strengthening and Keeping Existing Standards , Objectives, and Guidelines	
Concern with plan components	This is the home of these organisms and as such nothing but a clearly laid out and planned implementation of binding standards and the metrics for confirming these goals is needed.	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).	** Check out Kaibab , p. 7, 1st comment & p.8, 2nd comment & p. 44 comment 1	This is the home of these organisms and as such nothing but a clearly laid out and planned implementation of binding standards and the metrics for confirming these goals is needed.	Binding Standards	PC 959-2 The Forest Service should strengthen and add clear direction binding standards and metrics in order to implement and monitor the standards for protecting species and habitat. Weakening or repealing environmental standards in a forest plan results in lesser or no environmental standards at the site-specific level.

<p>Concern with plan components</p>	<p>Finally, I am dismayed that the new plan would rollback existing standards that currently constrain forest management for protection of the environment; there are only unclear statements like "desired conditions". Who's desired conditions? and "objectives" again who is deciding on these "objectives?" This will only allow too much agency discretion which historically has been guided (misguided) by political rather than scientific needs. This would also minimize public accountability in the decisions made. Therefore existing standards should be carried forward or strengthened in the new Plan.</p>	<p>Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).</p>	<p>** Check out Kaibab , p. 7, 1st comment &amp; p.8, 2nd comment &amp; p. 44 comment 1</p>	<p>Finally, I am dismayed that the new plan would rollback existing standards that currently constrain forest management for protection of the environment; there are only unclear statements like "desired conditions". Who's desired conditions? and "objectives" again who is deciding on these "objectives?" This will only allow too much agency discretion which historically has been guided (misguided) by political rather than scientific needs. This would also minimize public accountability in the decisions made. Therefore existing standards should be carried forward or strengthened in the new Plan.</p>	<p>Strengthening and Keeping Existing Standards , Objectives, and Guidelines</p>	<p>PC 150-4 The Forest Service should carry forward, strengthen and clarify the existing standards and guidelines to the new Forest Plan with binding standards and guidelines that provide consistency in meeting desired conditions. The Forest Service should keep the current standard and guidelines because it will protect the environment, ensure viability of federally listed and regionally sensitive wildlife populations, as well as old growth forests, protect the agency against inappropriate lobbying efforts, public pressure, and provide public accountability.</p>
<p>Concern with plan components</p>	<p>The proposed plan eliminates existing standards and guidelines that protect the environment; it replaces them with vaguely worded "desired conditions" and "objectives" that maximize agency discretion and minimize public accountability. Existing standards and guidelines should be carried forward and strengthened in the new plan.</p>	<p>Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).</p>	<p>** Check out Kaibab , p. 7, 1st comment &amp; p.8, 2nd comment &amp; p. 44 comment 1</p>	<p>The proposed plan eliminates existing standards and guidelines that protect the environment; it replaces them with vaguely worded "desired conditions" and "objectives" that maximize agency discretion and minimize public accountability. Existing standards and guidelines should be carried forward and strengthened in the new plan.</p>	<p>Strengthening and Keeping Existing Standards , Objectives, and Guidelines</p>	<p>PC 150-4 The Forest Service should carry forward, strengthen and clarify the existing standards and guidelines to the new Forest Plan with binding standards and guidelines that provide consistency in meeting desired conditions. The Forest Service should keep the current standard and guidelines because it will protect the environment, ensure viability of federally listed and regionally sensitive wildlife populations, as well as old growth forests, protect the agency against inappropriate lobbying efforts, public pressure, and provide public</p>

							accountability.
Concern with plan components	The Forest Plan must ...establish clear, binding standards to ensure the recovery of each at-risk plant and animal species that may occur on the Forest.	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).	** Check out Kaibab , p. 7, 1st comment & p.8, 2nd comment & p. 44 comment 1	The Forest Plan must ...establish clear, binding standards to ensure the recovery of each at-risk plant and animal species that may occur on the Forest.		Binding Standards	PC 959-1 The Forest Plan must implement formal recovery plans rather than merely reference them, and establish clear, binding standards to ensure the recovery of each at-risk plant and animal species that may occur on the Forest.
Concern with plan components	Protective plan standards are needed to provide for viable populations of fish and wildlife species that depend on aquatic and riparian habitats	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).	** Check out Kaibab , p. 7, 1st comment & p.8, 2nd comment & p. 44 comment 1	Protective plan standards are needed to provide for viable populations of fish and wildlife species that depend on aquatic and riparian habitats		Protective Plan Standards Are Needed	PC 608-1 The Forest Service should add protective standards to provide for viable populations of fish and wildlife species that depend on aquatic and riparian habitats and restore aquatic ecosystems.

<p>Concern with plan components</p>	<p>We need to be strengthening our guidelines, not weakening them.</p>	<p>Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).</p>	<p>** Check out Kaibab , p. 7, 1st comment &amp; p.8, 2nd comment &amp; p. 44 comment 1</p>	<p>We need to be strengthening our guidelines, not weakening them.</p>	<p>Strengthening and Keeping Existing Standards , Objectives, and Guidelines</p>	
<p>Concern with plan components</p>	<p>Instead of watered down plans that protect nothing, the people of the United States WANT/DEMAND stronger standards and guidelines that will ensure we will have this precious wilderness area and those priceless species that we CANNOT afford to lose.</p>	<p>Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).</p>	<p>** Check out Kaibab , p. 7, 1st comment &amp; p.8, 2nd comment &amp; p. 44 comment 1</p>	<p>Instead of watered down plans that protect nothing, the people of the United States WANT/DEMAND stronger standards and guidelines that will ensure we will have this precious wilderness area and those priceless species that we CANNOT afford to lose.</p>	<p>Strengthening and Keeping Existing Standards , Objectives, and Guidelines</p>	<p>PC 150-4 The Forest Service should carry forward, strengthen and clarify the existing standards and guidelines to the new Forest Plan with binding standards and guidelines that provide consistency in meeting desired conditions. The Forest Service should keep the current standard and guidelines because it will protect the environment, ensure viability of federally listed and regionally sensitive wildlife populations, as well as old growth forests, protect the agency against inappropriate lobbying efforts, public pressure, and provide public accountability.</p>

<p>Concern with plan components</p>	<p>This plan eliminates some of the existing standards that protect this environment. When we replace specific guidelines with vague wording, we basically give over power in decision making to the discretion of agencies and reduce the input of the public. This leaves the door too open for the influence of special interests. Existing standards should be carried forward and strengthened, not reduced.</p>	<p>Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).</p>	<p>** Check out Kaibab , p. 7, 1st comment &amp; p.8, 2nd comment &amp; p. 44 comment 1</p>	<p>This plan eliminates some of the existing standards that protect this environment. When we replace specific guidelines with vague wording, we basically give over power in decision making to the discretion of agencies and reduce the input of the public. This leaves the door too open for the influence of special interests. Existing standards should be carried forward and strengthened, not reduced.</p>	<p>Strengthening and Keeping Existing Standards , Objectives, and Guidelines</p>	<p>PC 150-4 The Forest Service should carry forward, strengthen and clarify the existing standards and guidelines to the new Forest Plan with binding standards and guidelines that provide consistency in meeting desired conditions. The Forest Service should keep the current standard and guidelines because it will protect the environment, ensure viability of federally listed and regionally sensitive wildlife populations, as well as old growth forests, protect the agency against inappropriate lobbying efforts, public pressure, and provide public accountability.</p>
<p>Concern with plan components</p>	<p>It is your responsibility to protect and restore these areas. This plan seriously curtails past standards, which were already weaker than they should be. We need to move in the opposite direction</p>	<p>Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).</p>	<p>** Check out Kaibab , p. 7, 1st comment &amp; p.8, 2nd comment &amp; p. 44 comment 1</p>	<p>It is your responsibility to protect and restore these areas. This plan seriously curtails past standards, which were already weaker than they should be. We need to move in the opposite direction</p>	<p>Strengthening and Keeping Existing Standards , Objectives, and Guidelines</p>	<p>PC 150-4 The Forest Service should carry forward, strengthen and clarify the existing standards and guidelines to the new Forest Plan with binding standards and guidelines that provide consistency in meeting desired conditions. The Forest Service should keep the current standard and guidelines because it will protect the environment, ensure viability of federally listed and regionally sensitive wildlife populations, as well as old growth forests, protect the agency against inappropriate lobbying efforts, public pressure, and provide public accountability.</p>

Concern with plan components	With ongoing drought of epic proportion, now is not the time to be vague about planning or strategy.	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).	** Check out Kaibab , p. 7, 1st comment & p.8, 2nd comment & p. 44 comment 1	With ongoing drought of epic proportion, now is not the time to be vague about planning or strategy.	Provide Science and Fact Based Measurable Specifics	PC 175-2 The Forest Service should revise the plan to include:
Concern with plan components	Unfortunately your draft plan is nearly devoid of enforceable standards that protect species and their habitat. It eliminates existing guidelines that protect the region's endangered species and replaces clear standards with vague promises.	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).	** Check out Kaibab , p. 7, 1st comment & p.8, 2nd comment & p. 44 comment 1	Unfortunately your draft plan is nearly devoid of enforceable standards that protect species and their habitat. It eliminates existing guidelines that protect the region's endangered species and replaces clear standards with vague promises.	Strengthening and Keeping Existing Standards , Objectives, and Guidelines	
Concern with plan components	I would like strong language in the plan that will protect all habitats and the species that depend on them.	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the	** Check out Kaibab , p. 7, 1st comment & p.8, 2nd comment &	I would like strong language in the plan that will protect all habitats and the species that depend on them.	Binding Standards	PC 959-2 The Forest Service should strengthen and add clear direction binding standards and metrics in order to implement and monitor the standards for protecting species and habitat. Weakening or repealing environmental standards in a forest plan results in lesser or no environmental standards at the site-specific level.

		Forest Service may disregard them in project design and implementation).	p. 44 comment 1			
Concern with plan components	Please retain existing Standards and Guidelines, rather than watering them down into non-binding Desired Conditions and Objectives. This will provide public accountability.	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).	** Check out Kaibab , p. 7, 1st comment & p.8, 2nd comment & p. 44 comment 1	Please retain existing Standards and Guidelines, rather than watering them down into non-binding Desired Conditions and Objectives. This will provide public accountability.	Strengthening and Keeping Existing Standards , Objectives, and Guidelines	PC 150-4 The Forest Service should carry forward, strengthen and clarify the existing standards and guidelines to the new Forest Plan with binding standards and guidelines that provide consistency in meeting desired conditions. The Forest Service should keep the current standard and guidelines because it will protect the environment, ensure viability of federally listed and regionally sensitive wildlife populations, as well as old growth forests, protect the agency against inappropriate lobbying efforts, public pressure, and provide public accountability.
Concern with plan components	Establish clear, binding standards to ensure the recovery of at-risk plant and animal species such as the Mexican gray wolf.	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the	** Check out Kaibab , p. 7, 1st comment & p.8, 2nd comment &	Establish clear, binding standards to ensure the recovery of at-risk plant and animal species such as the Mexican gray wolf.	Binding Standards	PC 959-2 The Forest Service should strengthen and add clear direction binding standards and metrics in order to implement and monitor the standards for protecting species and habitat. Weakening or repealing environmental standards in a forest plan results in lesser or no environmental standards at the site-specific level.

		Forest Service may disregard them in project design and implementation).	p. 44 comment 1			
Concern with plan components	Restore aquatic ecosystems. Protective plan standards are needed to provide for viable populations of fish and wildlife species that depend on aquatic and riparian habitat.	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).	** Check out Kaibab, p. 7, 1st comment & p.8, 2nd comment & p. 44 comment 1	Restore aquatic ecosystems. Protective plan standards are needed to provide for viable populations of fish and wildlife species that depend on aquatic and riparian habitat.	Protective Plan Standards Are Needed	PC 608-1 The Forest Service should add protective standards to provide for viable populations of fish and wildlife species that depend on aquatic and riparian habitats and restore aquatic ecosystems.
Concern with plan components	The Draft Plan mostly proposes guidelines that forest managers “should” consider in project-level decisions affecting wildlife habitat. See Draft Plan at 60-61 (“Guidelines for Wildlife and Rare Plants”); also see PDEIS at 110 (Table 18 references guidelines but not standards expected to contribute to viability of at-risk fish populations); 117-120 (describing five proposed standards and 28 guidelines for invasive species, landscape disturbance, riparian areas, water resources, motorized	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).	** Check out Kaibab, p. 7, 1st comment & p.8, 2nd comment & p. 44 comment 1	The Draft Plan mostly proposes guidelines that forest managers “should” consider in project-level decisions affecting wildlife habitat. See Draft Plan at 60-61 (“Guidelines for Wildlife and Rare Plants”); also see PDEIS at 110 (Table 18 references guidelines but not standards expected to contribute to viability of at-risk fish populations); 117-120 (describing five proposed standards and 28 guidelines for invasive species, landscape disturbance, riparian areas, water resources, motorized	Standards and Guidelines	

	opportunities, aquatic habitat and livestock grazing). The only proposed standards relevant to the viability of “ESA species” are listed in PDEIS Table 84. See id. 267-268 (standards for “Aquatic Habitat and Species, Invasive Species, Forest Products, Livestock Grazing, Special Uses, Water Uses”).			opportunities, aquatic habitat and livestock grazing). The only proposed standards relevant to the viability of “ESA species” are listed in PDEIS Table 84. See id. 267-268 (standards for “Aquatic Habitat and Species, Invasive Species, Forest Products, Livestock Grazing, Special Uses, Water Uses”).		
Concern with plan components	It is not adequate, per the NFMA or the ESA, to rely on monitoring and adaptive management in lieu of binding standards that constrain project-level management to ensure conservation and recovery of threatened and endangered species, let alone the viability of sensitive species populations.	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).	** Check out Kaibab, p. 7, 1st comment & p.8, 2nd comment & p. 44 comment 1	It is not adequate, per the NFMA or the ESA, to rely on monitoring and adaptive management in lieu of binding standards that constrain project-level management to ensure conservation and recovery of threatened and endangered species, let alone the viability of sensitive species populations.	Monitoring	
Concern with plan components	Reliance on forest planning guidelines in lieu of binding standards is a controversial means of providing for wildlife viability because only the Forest Service can interpret the “intent” of guidelines.	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).	** Check out Kaibab, p. 7, 1st comment & p.8, 2nd comment & p. 44 comment 1	Reliance on forest planning guidelines in lieu of binding standards is a controversial means of providing for wildlife viability because only the Forest Service can interpret the “intent” of guidelines.	Viability and Wildlife Habitat	

<p>Concern with plan components</p>	<p>All proposed guidelines contain the discretionary word “should,” not mandatory terms such as “will” or “shall.” See U.S. v. UPS Customhouse Brokerage, Inc., 575 F.3d 1376, 1382 (Fed. Cir. 2009) (“‘Will’ is a mandatory term, not a discretionary one.”); New England Tank Indus. of N.H., Inc. v. United States, 861 F.2d 685, 694 (Fed. Cir. 1988) (noting difference between mandatory term “will” and discretionary term “should”)</p>	<p>Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).</p>	<p>** Check out Kaibab, p. 7, 1st comment &amp; p.8, 2nd comment &amp; p. 44 comment 1</p>	<p>All proposed guidelines contain the discretionary word “should,” not mandatory terms such as “will” or “shall.” See U.S. v. UPS Customhouse Brokerage, Inc., 575 F.3d 1376, 1382 (Fed. Cir. 2009) (“‘Will’ is a mandatory term, not a discretionary one.”); New England Tank Indus. of N.H., Inc. v. United States, 861 F.2d 685, 694 (Fed. Cir. 1988) (noting difference between mandatory term “will” and discretionary term “should”)</p>	<p>Terminology and Use of “Should”</p>	
<p>Concern with plan components</p>	<p>Once again, the Forest Service proposes to rely on hopeful aspiration statements instead of affirmative direction which forest managers must obey to provide for species viability.</p>	<p>Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).</p>	<p>** Check out Kaibab, p. 7, 1st comment &amp; p.8, 2nd comment &amp; p. 44 comment 1</p>	<p>Once again, the Forest Service proposes to rely on hopeful aspiration statements instead of affirmative direction which forest managers must obey to provide for species viability.</p>	<p>Viability and Wildlife Habitat</p>	
<p>Concern with plan components</p>	<p>The Draft Plan contains no affirmative direction (i.e., standards which forest managers must obey) to adopt such measures, nor does it require managers to follow the guidelines as written.</p>	<p>Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the</p>	<p>** Check out Kaibab, p. 7, 1st comment &amp; p.8, 2nd comment &amp;</p>	<p>The Draft Plan contains no affirmative direction (i.e., standards which forest managers must obey) to adopt such measures, nor does it require managers to follow the guidelines as written. See Draft Plan at 7 (guidelines “may be modified for a specific project”); 135 (“[T]he forest supervisor may amend the plan at any time.”).</p>	<p>Amending Plan</p>	

		Forest Service may disregard them in project design and implementation).	p. 44 comment 1			
Concern with plan components	All management direction in the Draft Plan affecting flycatcher habitat is discretionary. See Draft Plan at 33-36 (desired conditions, objectives, guidelines, management approaches and related content for riparian areas). Forest managers may ignore all of the proposed plan components affecting flycatcher habitat in project-level decisions.	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).	** Check out Kaibab, p. 7, 1st comment & p.8, 2nd comment & p. 44 comment 1	All management direction in the Draft Plan affecting flycatcher habitat is discretionary. See Draft Plan at 33-36 (desired conditions, objectives, guidelines, management approaches and related content for riparian areas). Forest managers may ignore all of the proposed plan components affecting flycatcher habitat in project-level decisions. See id. 7 (guidelines “may be modified for a specific project”); 135 (“[T]he forest supervisor may amend the plan at any time.”).		Amending Plan
Concern with plan components	The Draft Plan would delete existing standards and guidelines for Mexican spotted owl	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).	** Check out Kaibab, p. 7, 1st comment & p.8, 2nd comment & p. 44 comment 1	The Draft Plan would delete existing standards and guidelines for Mexican spotted owl		Proposed Reversal of MSO Standards and Guidelines

Concern with plan components	Weakening or repealing environmental standards in a forest plan results in lesser or no environmental standards at the site-specific level. Id. at 975. “[A]n agency changing its course must supply a reasoned analysis.”	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).	** Check out Kaibab, p. 7, 1st comment & p.8, 2nd comment & p. 44 comment 1	Weakening or repealing environmental standards in a forest plan results in lesser or no environmental standards at the site-specific level. Id. at 975. “[A]n agency changing its course must supply a reasoned analysis.”		Site Specific Level	
Concern with plan components	No standards apply specifically to management of riparian areas. Instead, desired conditions, objectives and guidelines in the Draft Plan are discretionary and may be ignored in project-level decisions.	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).	** Check out Kaibab, p. 7, 1st comment & p.8, 2nd comment & p. 44 comment 1	No standards apply specifically to management of riparian areas. Instead, desired conditions, objectives and guidelines in the Draft Plan are discretionary and may be ignored in project-level decisions.		Management of Riparian Areas	
Concern with plan components	Lowering or repealing environmental standards in a forest plan will result in lesser or no environmental standards at the site-specific level.	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the	** Check out Kaibab, p. 7, 1st comment & p.8, 2nd comment &	Lowering or repealing environmental standards in a forest plan will result in lesser or no environmental standards at the site-specific level.		Site Specific Level	

		Forest Service may disregard them in project design and implementation).	p. 44 comment 1			
Concern with plan components	The Draft Plan would roll back virtually all of the standards and guidelines pertaining to aquatic habitat conservation in the current Forest Plan (USDA 1987a), and replace them with discretionary “desired conditions,” “objectives,” and “guidelines” that will fail to maintain or restore riparian areas in the forests. Clearly, more protective standards and guidelines are required.	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).	** Check out Kaibab , p. 7, 1st comment & p.8, 2nd comment & p. 44 comment 1	The Draft Plan would roll back virtually all of the standards and guidelines pertaining to aquatic habitat conservation in the current Forest Plan (USDA 1987a), and replace them with discretionary “desired conditions,” “objectives,” and “guidelines” that will fail to maintain or restore riparian areas in the forests. Clearly, more protective standards and guidelines are required.		Aquatic Habitat
Concern with plan components	Carrying forward or modifying existing standards and guidelines to make them more protective of aquatic ecosystems would help the Forest Service meet statutory and regulatory requirements under NFMA.	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).	** Check out Kaibab , p. 7, 1st comment & p.8, 2nd comment & p. 44 comment 1	Carrying forward or modifying existing standards and guidelines to make them more protective of aquatic ecosystems would help the Forest Service meet statutory and regulatory requirements under NFMA.		Aquatic Habitat

<p>Concern with plan components</p>	<p>Taking the words of those who know this wilderness and finding agreement, I wish to comment and to plead that the existing Standards and Guidelines not be weakened with nonbinding conditions and objectives, and that there be public accountability.</p>	<p>Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).</p>	<p>** Check out Kaibab , p. 7, 1st comment &amp; p.8, 2nd comment &amp; p. 44 comment 1</p>	<p>Taking the words of those who know this wilderness and finding agreement, I wish to comment and to plead that the existing Standards and Guidelines not be weakened with nonbinding conditions and objectives, and that there be public accountability.</p>	<p>Strengthening and Keeping Existing Standards , Objectives, and Guidelines</p>	<p>PC 150-4 The Forest Service should carry forward, strengthen and clarify the existing standards and guidelines to the new Forest Plan with binding standards and guidelines that provide consistency in meeting desired conditions. The Forest Service should keep the current standard and guidelines because it will protect the environment, ensure viability of federally listed and regionally sensitive wildlife populations, as well as old growth forests, protect the agency against inappropriate lobbying efforts, public pressure, and provide public accountability.</p>
<p>Concern with plan components</p>	<p>Protective plan standards are needed to provide for viable populations of fish and wildlife species that depend on aquatic and riparian habitat, including the Chiricahua leopard frog and Apache trout.</p>	<p>Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).</p>	<p>** Check out Kaibab , p. 7, 1st comment &amp; p.8, 2nd comment &amp; p. 44 comment 1</p>	<p>Protective plan standards are needed to provide for viable populations of fish and wildlife species that depend on aquatic and riparian habitat, including the Chiricahua leopard frog and Apache trout.</p>	<p>Aquatic Habitat</p>	

<p>Concern with plan components</p>	<p>Although collectively, many of the desired conditions, guidelines, standards, and objectives included in the Plan would help support and improve wildlife habitat and wildlife recreational opportunities on the A-S, the Department is concerned that the Plan relies too heavily on desired conditions. As defined in the Plan, desired conditions are normally expressed in broad, general terms, have no specific date by which they are to be completed, and are aspirations and not commitments. As such, the Department questions how these desired conditions will translate into the necessary implementable management actions that are vital to making significant progress toward realizing the Plan's emphasis of ecological restoration. The Department therefore recommends translation of these desired conditions into more actionable standards or guidelines, where doing so, would better enable achievement of the ecological restoration identified in the plan.</p>	<p>Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).</p>	<p>** Check out Kaibab, p. 7, 1st comment &amp; p.8, 2nd comment &amp; p. 44 comment 1</p>	<p>Although collectively, many of the desired conditions, guidelines, standards, and objectives included in the Plan would help support and improve wildlife habitat and wildlife recreational opportunities on the A-S, the Department is concerned that the Plan relies too heavily on desired conditions. As defined in the Plan, desired conditions are normally expressed in broad, general terms, have no specific date by which they are to be completed, and are aspirations and not commitments. As such, the Department questions how these desired conditions will translate into the necessary implementable management actions that are vital to making significant progress toward realizing the Plan's emphasis of ecological restoration. The Department therefore recommends translation of these desired conditions into more actionable standards or guidelines, where doing so, would better enable achievement of the ecological restoration identified in the plan.</p>	<p>Desired Conditions</p>	
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Concern with plan components	Page 15 "...desired conditions...may only be achievable over...(several hundred years)...." To consider setting an objective only attainable over several hundred years, while at the same time accepting that climate change will occur makes no sense.	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).	** Check out Kaibab , p. 7, 1st comment & p.8, 2nd comment & p. 44 comment 1	Page 15 "...desired conditions...may only be achievable over...(several hundred years)...." To consider setting an objective only attainable over several hundred years, while at the same time accepting that climate change will occur makes no sense.	Clarify Time Line	PC 2655-2 The Forest Service should address and provide that basis for historical soil condition being 5% impaired, discuss the significance of naturally unstable areas contribute to sediment loads, and why naturally unstable areas did not apparently contribute sediment in the past.
Concern with plan components	Page 35: The section describes Objectives and Guidelines for Riparian Areas. We recommend adding a discussion of Standards for Riparian Areas in this section.	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).	** Check out Kaibab , p. 7, 1st comment & p.8, 2nd comment & p. 44 comment 1	Page 35: The section describes Objectives and Guidelines for Riparian Areas. We recommend adding a discussion of Standards for Riparian Areas in this section.	Ading Discussion of Standards	PC 565-8 The Forest Service should add strong standards to protect and improve riparian areas that include standards for resiliency of riparian systems, streams recovery, improvement , preservation of minimum levels of water flow, and vegetation along creeks and adjacent flooding areas.
Concern with plan components	Standards and Guidelines have been transformed into wholly discretionary, aspirational goals, and do not serve the statute's requirement to protect wildlife habitat, water quality, and soil productivity	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the	** Check out Kaibab , p. 7, 1st comment & p.8, 2nd comment &	Standards and Guidelines have been transformed into wholly discretionary, aspirational goals, and do not serve the statute's requirement to protect wildlife habitat, water quality, and soil productivity	Meeting Statute's Requirements	

		Forest Service may disregard them in project design and implementation).	p. 44 comment 1			
Concern with plan components	As discussed above, the statute and the regulations envision “standards and guidelines” that set minimum requirements below which the Forest Service cannot go without a formal Forest Plan amendment. Neither the statute nor the regulations define standards and guidelines, and both appear to use “standard” and “guideline” interchangeably. (Notably, the regulations do define “objectives” and “goals,” both of which are things to be obtained in the future.)	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).	** Check out Kaibab, p. 7, 1st comment & p.8, 2nd comment & p. 44 comment 1	As discussed above, the statute and the regulations envision “standards and guidelines” that set minimum requirements below which the Forest Service cannot go without a formal Forest Plan amendment. Neither the statute nor the regulations define standards and guidelines, and both appear to use “standard” and “guideline” interchangeably. (Notably, the regulations do define “objectives” and “goals,” both of which are things to be obtained in the future.)	Meeting Statute’s Requirements	PC 2613-2 The Forest Service should define standards and guidelines that meet minimum requirements, and not use the terms interchangeably
Concern with plan components	Because the agency is given deference in legal proceedings as to how it has interpreted its own plan, See <i>Lands Council v. McNair</i> , 537 F.3d 981,992-994 (requiring “particularly deferential review” within agency’s “field of discretion”), the word “should” thereby casts an opening as wide as the sea for forest managers who prefer not to include features to protect, say, water quality—if they can come up with some reason not to, such as it would cost too much. That will	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).	** Check out Kaibab, p. 7, 1st comment & p.8, 2nd comment & p. 44 comment 1	Because the agency is given deference in legal proceedings as to how it has interpreted its own plan, See <i>Lands Council v. McNair</i> , 537 F.3d 981,992-994 (requiring “particularly deferential review” within agency’s “field of discretion”), the word “should” thereby casts an opening as wide as the sea for forest managers who prefer not to include features to protect, say, water quality—if they can come up with some reason not to, such as it would cost too much. That will	Meeting Statute’s Requirements	PC 2613-3 The Forest Service should address how removing the binding requirements and replacing them with discretionary unenforceable requirements will result in ecological improvement, protection for wildlife habitat, water quality, and soil productivity.

	<p>suffice. The result is that the guidelines prepared in this proposed plan are not just toothless, they are literally meaningless. The guidelines do not actually afford any protection at all, because they enable the Forest Service to decline to follow them whenever the agency doesn't want to</p>			<p>suffice. The result is that the guidelines prepared in this proposed plan are not just toothless, they are literally meaningless. The guidelines do not actually afford any protection at all, because they enable the Forest Service to decline to follow them whenever the agency doesn't want to</p>		
<p>Concern with plan components</p>	<p>But the statute makes clear that standards and guidelines are to be baseline, minimum management requirements below which the agency cannot go without amending the Plan. These guidelines do not accomplish that.</p>	<p>Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).</p>	<p>** Check out Kaibab, p. 7, 1st comment &amp; p.8, 2nd comment &amp; p. 44 comment 1</p>	<p>But the statute makes clear that standards and guidelines are to be baseline, minimum management requirements below which the agency cannot go without amending the Plan. These guidelines do not accomplish that.</p>	<p>Meeting Statute's Requirements</p>	<p>PC 2613-2 The Forest Service should define standards and guidelines that meet minimum requirements, and not use the terms interchangeably</p>
<p>Concern with plan components</p>	<p>As you know, NEPA requires the Forest Service to take a "hard look" at its actions. Currently, if the Forest Service wished to depart from a Forest Plan standard, it would have to write a Forest Plan amendment. Should this plan be put into place, there won't be any Forest Plan standards that have much meaning. There won't be any water quality standards, wildlife standards (the whole of the 1996 Mexican Spotted Owl Forest Plan Amendments have</p>	<p>Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).</p>	<p>** Check out Kaibab, p. 7, 1st comment &amp; p.8, 2nd comment &amp; p. 44 comment 1</p>	<p>As you know, NEPA requires the Forest Service to take a "hard look" at its actions. Currently, if the Forest Service wished to depart from a Forest Plan standard, it would have to write a Forest Plan amendment. Should this plan be put into place, there won't be any Forest Plan standards that have much meaning. There won't be any water quality standards, wildlife standards (the whole of the 1996 Mexican Spotted Owl Forest Plan Amendments have</p>	<p>Viability and Wildlife Habitat</p>	<p>PC 150-4 The Forest Service should carry forward, strengthen and clarify the existing standards and guidelines to the new Forest Plan with binding standards and guidelines that provide consistency in meeting desired conditions. The Forest Service should keep the current standard and guidelines because it will protect the environment, ensure viability of federally listed and regionally sensitive wildlife populations, as well as old</p>

	been discarded) or soil standards because they've all been excised and replaced with vague, empty, and unenforceable promises about what the agency "should" do. There are no wildlife standards at all—zero—in the proposed plan.			been discarded) or soil standards because they've all been excised and replaced with vague, empty, and unenforceable promises about what the agency "should" do. There are no wildlife standards at all—zero—in the proposed plan.			growth forests, protect the agency against inappropriate lobbying efforts, public pressure, and provide public accountability.
Concern with plan components	I have never been able to understand why the Forest Service cannot see that strong standards and guidelines do more than just protect the landscape—the immunize the agency against inappropriate lobbying efforts and pressure from the users.	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).	** Check out Kaibab , p. 7, 1st comment & p.8, 2nd comment & p. 44 comment 1	I have never been able to understand why the Forest Service cannot see that strong standards and guidelines do more than just protect the landscape—the immunize the agency against inappropriate lobbying efforts and pressure from the users.		Strengthening and Keeping Existing Standards , Objectives, and Guidelines	PC 150-4 The Forest Service should carry forward, strengthen and clarify the existing standards and guidelines to the new Forest Plan with binding standards and guidelines that provide consistency in meeting desired conditions. The Forest Service should keep the current standard and guidelines because it will protect the environment, ensure viability of federally listed and regionally sensitive wildlife populations, as well as old growth forests, protect the agency against inappropriate lobbying efforts, public pressure, and provide public accountability.
Concern with plan components	The Plan does not contain Management Indicator Species that address its purpose and need or its stated Issues. You state on page 3 of the proposed plan that there is a need to "include appropriate standards and guidelines to provide direction to maintain species diversity and viability across the planning area," yet you have responded to this	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the	** Check out Kaibab , p. 7, 1st comment & p.8, 2nd comment &	The Plan does not contain Management Indicator Species that address its purpose and need or its stated Issues. You state on page 3 of the proposed plan that there is a need to "include appropriate standards and guidelines to provide direction to maintain species diversity and viability across the planning area," yet you have responded to this		Standards and Guidelines	PC 980-12 The Forest Service should address why the plan does not contain Management Indicator Species that address its purpose and need or its stated Issues. One example found on page 3 of the proposed plan is that there is a need to "include appropriate standards and guidelines to provide direction to maintain species diversity and viability

	<p>“need” by removing the standard that says exactly that in the 1987 Plan, along with every other standard that protected wildlife. How is this helping meet the need? You certainly do not pick up any slack with the MIS, which standards are similarly gutted</p>	<p>Forest Service may disregard them in project design and implementation).</p>	<p>p. 44 comm ent 1</p>	<p>“need” by removing the standard that says exactly that in the 1987 Plan, along with every other standard that protected wildlife. How is this helping meet the need? You certainly do not pick up any slack with the MIS, which standards are similarly gutted</p>		<p>across the planning area,” yet this “need” was not met by removing the standard that says exactly that in the 1987 Plan, along with every other standard that protected wildlife.</p>
<p>Concern with plan components</p>	<p>I can’t go along with any of the proposals that you (the Forest Service) have proposed in your books. They are all too vague. You have not been specific about anything that you plan to do. You have left it so that you could change any time you please and do whatever you wanted to do.</p>	<p>Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).</p>	<p>** Check out Kaibab , p. 7, 1st comm ent &amp; p.8, 2nd comm ent &amp; p. 44 comm ent 1</p>	<p>I can’t go along with any of the proposals that you (the Forest Service) have proposed in your books. They are all too vague. You have not been specific about anything that you plan to do. You have left it so that you could change any time you please and do whatever you wanted to do.</p>	<p>Provide Science and Fact Based Measura ble Specifics</p>	<p>PC 175-2 The Forest Service should revise the plan to include:</p>
<p>Concern with plan components</p>	<p>Respectfully, I can’t go along with any of the proposals that you (the Forest Service) have proposed in your books. They are all too vague. You have not been specific about anything that you plan to do. You have left it so that you could change at any time you please and do whatever you wanted to do.</p>	<p>Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).</p>	<p>** Check out Kaibab , p. 7, 1st comm ent &amp; p.8, 2nd comm ent &amp; p. 44 comm ent 1</p>	<p>Respectfully, I can’t go along with any of the proposals that you (the Forest Service) have proposed in your books. They are all too vague. You have not been specific about anything that you plan to do. You have left it so that you could change at any time you please and do whatever you wanted to do.</p>	<p>Provide Science and Fact Based Measura ble Specifics</p>	<p>PC 175-2 The Forest Service should revise the plan to include:</p>

<p>Concern with plan components</p>	<p>The draft forest plan (“Proposed Plan”) proposes to significantly roll back existing standards and requirements that protect the environment. The Forest Service is not revising its plan on a blank slate, but rather it is significantly revising and weakening the existing Forest Plan, which has been in effect for many years</p>	<p>Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).</p>	<p>** Check out Kaibab, p. 7, 1st comment &amp; p.8, 2nd comment &amp; p. 44 comment 1</p>	<p>The draft forest plan (“Proposed Plan”) proposes to significantly roll back existing standards and requirements that protect the environment. The Forest Service is not revising its plan on a blank slate, but rather it is significantly revising and weakening the existing Forest Plan, which has been in effect for many years</p>		<p>Rolling Back Standards and Requirements</p>
<p>Concern with plan components</p>	<p>Standards and guidelines in the current Forest Plan are designed to ensure viability of federally listed and regionally sensitive wildlife populations, as well as old growth forests. In contrast, the Proposed Plan would repeal virtually all existing standards and guidelines and replace them with vaguely worded “desired conditions” and “objectives,” which appear designed to maximize agency discretion and evade public accountability. Only standards and guidelines constrain project-level management. However, standards are binding, whereas guidelines are flexible and may be modified.</p>	<p>Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).</p>	<p>** Check out Kaibab, p. 7, 1st comment &amp; p.8, 2nd comment &amp; p. 44 comment 1</p>	<p>Standards and guidelines in the current Forest Plan are designed to ensure viability of federally listed and regionally sensitive wildlife populations, as well as old growth forests. In contrast, the Proposed Plan would repeal virtually all existing standards and guidelines and replace them with vaguely worded “desired conditions” and “objectives,” which appear designed to maximize agency discretion and evade public accountability. Only standards and guidelines constrain project-level management. However, standards are binding, whereas guidelines are flexible and may be modified.</p>	<p>Viability and Wildlife Habitat</p>	<p>PC 150-4 The Forest Service should carry forward, strengthen and clarify the existing standards and guidelines to the new Forest Plan with binding standards and guidelines that provide consistency in meeting desired conditions. The Forest Service should keep the current standard and guidelines because it will protect the environment, ensure viability of federally listed and regionally sensitive wildlife populations, as well as old growth forests, protect the agency against inappropriate lobbying efforts, public pressure, and provide public accountability.</p>

Concern with plan components	The Proposed Plan mostly proposes guidelines that forest managers “should” consider in project-level decisions. The proposed standards are very limited in scope and effect, and the Forest Service admits uncertainty regarding their contribution to species viability	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).	** Check out Kaibab , p. 7, 1st comment & p.8, 2nd comment & p. 44 comment 1	The Proposed Plan mostly proposes guidelines that forest managers “should” consider in project-level decisions. The proposed standards are very limited in scope and effect, and the Forest Service admits uncertainty regarding their contribution to species viability	Terminology and Use of “Should”	PC 150-8 The Forest Service should add enforceable standards that add contributions to species viability.
Concern with plan components	The general lack of enforceable standards in the Proposed Plan contradicts NFMA and its planning regulations.3	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).	** Check out Kaibab , p. 7, 1st comment & p.8, 2nd comment & p. 44 comment 1	The general lack of enforceable standards in the Proposed Plan contradicts NFMA and its planning regulations.3	NFMA	
Concern with plan components	The 1987 Plan contained a non-discretionary standard that surface water runoff and erosion from logging or grazing or mining would always be controlled at less than tolerance conditions. Plan at 69. In the new Plan, however, this is merely a “desired condition” (Proposed Plan at 20) and the standard is completely gone. The legal	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the	** Check out Kaibab , p. 7 last comment & p. 38 last comment	The 1987 Plan contained a non-discretionary standard that surface water runoff and erosion from logging or grazing or mining would always be controlled at less than tolerance conditions. Plan at 69. In the new Plan, however, this is merely a “desired condition” (Proposed Plan at 20) and the standard is completely gone. The legal	Meeting Statute’s Requirements	

	effect of this will be that the Forest Service will no longer estimate or calculate either soil tolerance or the amount of erosion over runoff, because it will not legally be required to. The very first cost-saving measures to go will be the ones that are not required.	Forest Service may disregard them in project design and implementation).		effect of this will be that the Forest Service will no longer estimate or calculate either soil tolerance or the amount of erosion over runoff, because it will not legally be required to. The very first cost-saving measures to go will be the ones that are not required.		
Concern with plan components	Along the same lines, the old Plan made it mandatory to “maintain and enhance riparian vegetation along streams to maintain suitable water temperature and other conditions for stream flow.” 1987 Plan at 71. Now there is a wishy-washy “guideline” that is discretionary to begin with but that, even so, the Forest Service had to water down, to say that the Forest Service “should” protect riparian areas “from detrimental changes.”	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).	** Check out Kaibab, p. 7 last comment	Along the same lines, the old Plan made it mandatory to “maintain and enhance riparian vegetation along streams to maintain suitable water temperature and other conditions for stream flow.” 1987 Plan at 71. Now there is a wishy-washy “guideline” that is discretionary to begin with but that, even so, the Forest Service had to water down, to say that the Forest Service “should” protect riparian areas “from detrimental changes.”		Meeting Statute’s Requirements
Concern with plan components	The Draft Plan would roll back, delete or weaken existing standards and guidelines that constrain management of riparian areas under the current Forest Plan (USDA 1987a). The Center listed those standards and guidelines in scoping comments, and repeats them here because the Forest Service appears to have disregarded the comment: • Riparian areas will be mapped as separate areas when they are at least 10 acres; otherwise, they will be considered as areas which require special consideration	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).	** Check out Kaibab, p. 7 last comment	The Draft Plan would roll back, delete or weaken existing standards and guidelines that constrain management of riparian areas under the current Forest Plan (USDA 1987a). The Center listed those standards and guidelines in scoping comments, and repeats them here because the Forest Service appears to have disregarded the comment: • Riparian areas will be mapped as separate areas when they are at least 10 acres; otherwise, they will be considered as areas which require special consideration		Management of Riparian Areas

<p>even though they are part of a larger stand. Forest Plan at 80.</p> <ul style="list-style-type: none"><li>• Implement best management practices to prevent water quality degradation. Id. 81.</li><li>• Implement improvement action where water quality degradation does occur, except for special cases where temporary or short term degradation is occurring from road crossing construction or similar situations. Id.</li><li>• Provide adequate drainage to prevent concentrated flow and sediment laden runoff from entering water courses. Id.</li><li>• Designate stream courses to receive protection during projects. Those streams shown on 7.5' quads as a stream course should be considered for designated stream courses. Id.</li><li>• Roads will be located away from stream bottoms to minimize sediment delivery to the stream course whenever possible. Id.</li><li>• Maintain suitable filter/buffer strips between stream courses and disturbed areas and/or road locations to: (a) Maintain suitable stream temperature, and (b) Maintain water quality standards. Id. 83.</li><li>• Maintain and enhance riparian vegetation along streams to maintain suitable water temperature and other conditions for streamflow. Id.</li><li>• Effectively close or obliterate roads causing intolerable</li></ul>		<p>even though they are part of a larger stand. Forest Plan at 80.</p> <ul style="list-style-type: none"><li>• Implement best management practices to prevent water quality degradation. Id. 81.</li><li>• Implement improvement action where water quality degradation does occur, except for special cases where temporary or short term degradation is occurring from road crossing construction or similar situations. Id.</li><li>• Provide adequate drainage to prevent concentrated flow and sediment laden runoff from entering water courses. Id.</li><li>• Designate stream courses to receive protection during projects. Those streams shown on 7.5' quads as a stream course should be considered for designated stream courses. Id.</li><li>• Roads will be located away from stream bottoms to minimize sediment delivery to the stream course whenever possible. Id.</li><li>• Maintain suitable filter/buffer strips between stream courses and disturbed areas and/or road locations to: (a) Maintain suitable stream temperature, and (b) Maintain water quality standards. Id. 83.</li><li>• Maintain and enhance riparian vegetation along streams to maintain suitable water temperature and other conditions for streamflow. Id.</li><li>• Effectively close or obliterate roads causing intolerable</li></ul>		
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<p>resource damage (relocate roads as needed). Id. • Limit use of herbicides, insecticides, rodenticides, or other chemical agents as part of management activities to times and places where possible transport to or by surface or groundwater has a low probability of occurrence. Limit the use of certain facilities in floodplains to non-flood seasons or daylight hours only. Id. • Maintain water resource improvement projects where improvement and downstream values will be jeopardized if work is not accomplished. Id. • Control surface uses in mineral operations through plans of operations and permits which provide for: preservation of water quality, protection of watershed values, reforestation or revegetation to attain soil stability and protect threatened, endangered, and sensitive species. Id. 88. • No streambed alteration or removal of material is allowed if it significantly affects riparian-dependent resources, channel morphology, or stream bank stability. Id. 90. • Road Maintenance and Management - Erosion control measures will be included in road plans. Construct roads to keep sediment out of riparian and aquatic habitats. Minimize clearing widths and vegetative</p>		<p>resource damage (relocate roads as needed). Id. • Limit use of herbicides, insecticides, rodenticides, or other chemical agents as part of management activities to times and places where possible transport to or by surface or groundwater has a low probability of occurrence. Limit the use of certain facilities in floodplains to non-flood seasons or daylight hours only. Id. • Maintain water resource improvement projects where improvement and downstream values will be jeopardized if work is not accomplished. Id. • Control surface uses in mineral operations through plans of operations and permits which provide for: preservation of water quality, protection of watershed values, reforestation or revegetation to attain soil stability and protect threatened, endangered, and sensitive species. Id. 88. • No streambed alteration or removal of material is allowed if it significantly affects riparian-dependent resources, channel morphology, or stream bank stability. Id. 90. • Road Maintenance and Management - Erosion control measures will be included in road plans. Construct roads to keep sediment out of riparian and aquatic habitats. Minimize clearing widths and vegetative</p>		
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	clearing. Id. 104-05. • Seasonally or permanently close existing roads, prohibit off-road vehicle use or manage use when conflicts occur with wildlife and soil resource objectives. Generally limit closures to local roads in erosive soil areas, riparian areas, or wildlife areas that require specific management practices. Id. 106. • Total road density should average 3.5 miles/sq. mile or less. Open road densities should average 2.0 miles/sq. mile or less. Id. 106.			clearing. Id. 104-05. • Seasonally or permanently close existing roads, prohibit off-road vehicle use or manage use when conflicts occur with wildlife and soil resource objectives. Generally limit closures to local roads in erosive soil areas, riparian areas, or wildlife areas that require specific management practices. Id. 106. • Total road density should average 3.5 miles/sq. mile or less. Open road densities should average 2.0 miles/sq. mile or less. Id. 106.		
Concern with plan components	The Proposed Plan would roll back, delete, or weaken existing standards and guidelines that constrain management of riparian areas under the current Forest Plan, including: • Riparian areas will be mapped as separate areas when they are at least 10 acres; otherwise, they will be considered as areas which require special consideration even though they are part of a larger stand. • Implement best management practices to prevent water quality degradation. • Implement improvement action where water quality degradation does occur, except for special cases where temporary or short term degradation is occurring from road crossing construction or similar situations. • Provide adequate drainage to prevent	Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).	** Check out Kaibab, p. 7 last comment	The Proposed Plan would roll back, delete, or weaken existing standards and guidelines that constrain management of riparian areas under the current Forest Plan, including: • Riparian areas will be mapped as separate areas when they are at least 10 acres; otherwise, they will be considered as areas which require special consideration even though they are part of a larger stand. • Implement best management practices to prevent water quality degradation. • Implement improvement action where water quality degradation does occur, except for special cases where temporary or short term degradation is occurring from road crossing construction or similar situations. • Provide adequate drainage to prevent	Management of Riparian Areas	PC 559-3 The Forest Service should not roll back the existing guidelines (and standards) in the current plan that constrain management of riparian areas under the current plan. (see comment for complete list of 15 items)

<p>concentrated flow and sediment laden runoff from entering water courses. • Designate stream courses to receive protection during projects. Those streams shown on 7.5' quads as a stream course should be considered for designated stream courses.</p> <ul style="list-style-type: none"><li>• Roads will be located away from stream bottoms to minimize sediment delivery to the stream course whenever possible.</li><li>• Maintain suitable filter/buffer strips between stream courses and disturbed areas and/or road locations to: (a) Maintain suitable stream temperature, and (b) Maintain water quality standards.</li></ul> <p>Maintain water resource improvement projects where improvement and downstream values will be jeopardized if work is not accomplished. • Control surface uses in mineral operations through plans of operations and permits which provide for: preservation of water quality, protection of watershed values, reforestation or revegetation to attain soil stability and protect threatened, endangered, and sensitive species. • No streambed alteration or removal of material is allowed if it significantly affects riparian-dependent resources, channel morphology, or stream bank stability. • Road Maintenance</p>		<p>concentrated flow and sediment laden runoff from entering water courses. • Designate stream courses to receive protection during projects. Those streams shown on 7.5' quads as a stream course should be considered for designated stream courses.</p> <ul style="list-style-type: none"><li>• Roads will be located away from stream bottoms to minimize sediment delivery to the stream course whenever possible.</li><li>• Maintain suitable filter/buffer strips between stream courses and disturbed areas and/or road locations to: (a) Maintain suitable stream temperature, and (b) Maintain water quality standards.</li></ul> <p>Maintain water resource improvement projects where improvement and downstream values will be jeopardized if work is not accomplished. • Control surface uses in mineral operations through plans of operations and permits which provide for: preservation of water quality, protection of watershed values, reforestation or revegetation to attain soil stability and protect threatened, endangered, and sensitive species. • No streambed alteration or removal of material is allowed if it significantly affects riparian-dependent resources, channel morphology, or stream bank stability. • Road Maintenance</p>		
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<p>and Management - Erosion control measures will be included in road plans. Construct roads to keep sediment out of riparian and aquatic habitats. Minimize clearing widths and vegetative clearing. Id. 104-05. • Seasonally or permanently close existing roads, prohibit off-road vehicle use or manage use when conflicts occur with wildlife and soil resource objectives. Generally limit closures to local roads in erosive soil areas, riparian areas, or wildlife areas that require specific management practices. • Total road density should average 3.5 miles/sq. mile or less. Open road densities should average 2.0 miles/sq. mile or less • Maintain and enhance riparian vegetation along streams to maintain suitable water temperature and other conditions for streamflow. • Effectively close or obliterate roads causing intolerable resource damage (relocate roads as needed). • Limit use of herbicides, insecticides, rodenticides, or other chemical agents as part of management activities to times and places where possible transport to or by surface or groundwater has a low probability of occurrence. Limit the use of certain facilities in floodplains to non-flood seasons or</p>		<p>and Management - Erosion control measures will be included in road plans. Construct roads to keep sediment out of riparian and aquatic habitats. Minimize clearing widths and vegetative clearing. Id. 104-05. • Seasonally or permanently close existing roads, prohibit off-road vehicle use or manage use when conflicts occur with wildlife and soil resource objectives. Generally limit closures to local roads in erosive soil areas, riparian areas, or wildlife areas that require specific management practices. • Total road density should average 3.5 miles/sq. mile or less. Open road densities should average 2.0 miles/sq. mile or less • Maintain and enhance riparian vegetation along streams to maintain suitable water temperature and other conditions for streamflow. • Effectively close or obliterate roads causing intolerable resource damage (relocate roads as needed). • Limit use of herbicides, insecticides, rodenticides, or other chemical agents as part of management activities to times and places where possible transport to or by surface or groundwater has a low probability of occurrence. Limit the use of certain facilities in floodplains to non-flood seasons or</p>		
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	daylight hours only.			daylight hours only.		
Concern with plan components	<p>With respect to grazing, all standards from the current plan have been removed, and replaced with largely symbolic guidelines that are completely unenforceable. The ranchers are going to have a heyday with these phony requirements! An old standard that said “the needs of wildlife will be considered when establishing livestock capacity” has been transformed into one that puts livestock in the same category as livestock and argues that they “should” be in balance. An old standard that stated that Allotment Management Plan “will” implement Forest Plan objectives has vanished without a trace. It seems the Forest Service could not even bring itself to retain the old standard that key areas be identified to the public, or that salt blocks not be put within ¼ mile of streams. Do you really need the “flexibility” to be able to put salt blocks within ¼ mile of a stream? Was that standard just too much for you to bear?</p>	<p>Concern that standards from the 1987 plan have been removed or replaced with unenforceable guidelines. The plan should contain stronger binding standards and guidelines. There is a concern that the plan relies too heavily on desired conditions (aspirations) and that standards and guidelines are discretionary (meaning the Forest Service may disregard them in project design and implementation).</p>	<p><b>** Check out Kaibab, p. 7, last comment</b></p>	<p>With respect to grazing, all standards from the current plan have been removed, and replaced with largely symbolic guidelines that are completely unenforceable. The ranchers are going to have a heyday with these phony requirements! An old standard that said “the needs of wildlife will be considered when establishing livestock capacity” has been transformed into one that puts livestock in the same category as livestock and argues that they “should” be in balance. An old standard that stated that Allotment Management Plan “will” implement Forest Plan objectives has vanished without a trace. It seems the Forest Service could not even bring itself to retain the old standard that key areas be identified to the public, or that salt blocks not be put within ¼ mile of streams. Do you really need the “flexibility” to be able to put salt blocks within ¼ mile of a stream? Was that standard just too much for you to bear?</p>	Range Management	

<p>Plan components - how long to implement?</p>	<p>I do see that some of the information in the riparian section will be beneficial to plants and animals. Having dense and tall plants along creeks and their adjacent flooding areas is really important to keep water clean for fish and give good habitat for other critters. There are a few areas now where this is happening and it was amazing to see how much of the fire's heavy soil run off were trapped in them. However, most of the drainages on the forest don't have this now. So if that direction is actually followed, it will help. But will it be followed? And when will that requirement be required to be in place?</p>	<p>Explain how improvements to the land will actually happen on the ground when the plan does not provide a specific date for achieving desired conditions.</p>	<p>XXXX</p>	<p>I do see that some of the information in the riparian section will be beneficial to plants and animals. Having dense and tall plants along creeks and their adjacent flooding areas is really important to keep water clean for fish and give good habitat for other critters. There are a few areas now where this is happening and it was amazing to see how much of the fire's heavy soil run off were trapped in them. However, most of the drainages on the forest don't have this now. So if that direction is actually followed, it will help. But will it be followed? And when will that requirement be required to be in place?</p>	<p>Riparian</p>	
<p>Plan components - how long to implement?</p>	<p>The thing about this is that your plan says there is no "specific date" for the "desired conditions." Isn't this an empty promise if there is no requirement to get to needed conditions in any realistic time frame and no penalty for failing to do so? Then what about in the meantime, as plants and animals continue to suffer and decline? This is particularly disturbing when one of the specialist reports shows current riparian areas to be a long way from good condition now ranging from 49% to 89% in poor and very poor condition.</p>	<p>Explain how improvements to the land will actually happen on the ground when the plan does not provide a specific date for achieving desired conditions.</p>	<p>XXXX</p>	<p>The thing about this is that your plan says there is no "specific date" for the "desired conditions." Isn't this an empty promise if there is no requirement to get to needed conditions in any realistic time frame and no penalty for failing to do so? Then what about in the meantime, as plants and animals continue to suffer and decline? This is particularly disturbing when one of the specialist reports shows current riparian areas to be a long way from good condition now ranging from 49% to 89% in poor and very poor condition.</p>	<p>Desired Conditions</p>	<p>150-3 The Forest Service should provide specifics, details, and add an enforceable end date to the desired conditions to provide public assurance that improvements to the land will happen in the future.</p>

Plan components - how long to implement?	And, the discussions in the environmental document in a number of cases (especially grazing) don't make the link on how the plan will get to "desired conditions" or talk about what happens until those conditions come about.	Explain how improvements to the land will actually happen on the ground when the plan does not provide a specific date for achieving desired conditions.	XXXX	In summary, your plan seems pretty heavy on dealing with trees but weak on other plant layers. And, the discussions in the environmental document in a number of cases (especially grazing) don't make the link on how the plan will get to "desired conditions" or talk about what happens until those conditions come about.			
Plan components - how long to implement?	Review of the proposed / draft plan, due to the lack of any specificity and details, it looks pretty much like the first plan. We find no details which would provide the public any assurance that any improvements to the land will actually happen in the future, rather we see nice sounding Desired Conditions, however they lack an end date.	Explain how improvements to the land will actually happen on the ground when the plan does not provide a specific date for achieving desired conditions.	XXXX	Review of the proposed / draft plan, due to the lack of any specificity and details, it looks pretty much like the first plan. We find no details which would provide the public any assurance that any improvements to the land will actually happen in the future, rather we see nice sounding Desired Conditions, however they lack an end date.		Specificity , Details and ending Date Needed	
Plan components - how long to implement?	The concept of a desired condition implies that it can be reached within the time frames for which it is based. Whenever the current condition is referred to as "(2011) severely departed from referenced condition" then any measurement of success during the life of this plan will show little accomplishment or even a trend.	Explain how improvements to the land will actually happen on the ground when the plan does not provide a specific date for achieving desired conditions.	XXXX	The concept of a desired condition implies that it can be reached within the time frames for which it is based. Whenever the current condition is referred to as "(2011) severely departed from referenced condition" then any measurement of success during the life of this plan will show little accomplishment or even a trend.		Time Frame	

Plan components - how long to implement?	Perhaps the desired condition should be modified to a realistic 15-year condition.	Explain how improvements to the land will actually happen on the ground when the plan does not provide a specific date for achieving desired conditions.	XXXX	Perhaps the desired condition should be modified to a realistic 15-year condition.	Ecosystem Diversity
Plan components - how long to implement?	This plan effort is not programmatically measurable and no reasonable accomplishment can be identified.	Explain how improvements to the land will actually happen on the ground when the plan does not provide a specific date for achieving desired conditions.	XXXX	This plan effort is not programmatically measurable and no reasonable accomplishment can be identified.	Provide Science and Fact Based Measurable Specifics
Removal of S&Gs - effect?	There is no reasonable basis for the Forest Service to rely on non-binding plan components (i.e., desired conditions, objectives and guidelines) to ensure viability of any wildlife species in light of its admittedly insufficient organizational capacity to monitor threatened, endangered and sensitive ("TES") species, as required by the current Forest Plan (USDA 1987a), as amended (USDA 1996), and applicable biological opinions and incidental take statements	The Forest Service should analyze how the proposed plan's standards and guidelines are different from the 1987 plan's and how those differences may effect forest resources (e.g. Mexican spotted owl, northern goshawk, riparian).	** Check out Kaibab, p. 7 last comment & p. 27	There is no reasonable basis for the Forest Service to rely on non-binding plan components (i.e., desired conditions, objectives and guidelines) to ensure viability of any wildlife species in light of its admittedly insufficient organizational capacity to monitor threatened, endangered and sensitive ("TES") species, as required by the current Forest Plan (USDA 1987a), as amended (USDA 1996), and applicable biological opinions and incidental take statements	Viability and Wildlife Habitat

Removal of S&Gs - effect?	The viability analysis of Mexican spotted owl also is flawed because the Forest Service has failed to provide reasonably explain and candidly disclose impacts of proposed reversal of standards and guidelines in the current Forest Plan (USDA 1987a), as amended (USDA 1996), that constrain management of Mexican spotted owl critical habitat	The Forest Service should analyze how the proposed plan's standards and guidelines are different from the 1987 plan's and how those differences may effect forest resources (e.g. Mexican spotted owl, northern goshawk, riparian).	** Check out Kaibab , p. 7 last comment & p. 27	The viability analysis of Mexican spotted owl also is flawed because the Forest Service has failed to provide reasonably explain and candidly disclose impacts of proposed reversal of standards and guidelines in the current Forest Plan (USDA 1987a), as amended (USDA 1996), that constrain management of Mexican spotted owl critical habitat	Proposed Reversal of MSO Standards and Guidelines	
Removal of S&Gs - effect?	Removal of standards and guidelines affecting Mexican spotted owl can be viewed as a negative effect of the Draft Plan, which will result in an actual physical effect on the environment.	The Forest Service should analyze how the proposed plan's standards and guidelines are different from the 1987 plan's and how those differences may effect forest resources (e.g. Mexican spotted owl, northern goshawk, riparian).	** Check out Kaibab , p. 7 last comment & p. 27	Removal of standards and guidelines affecting Mexican spotted owl can be viewed as a negative effect of the Draft Plan, which will result in an actual physical effect on the environment.	Mexican Spotted Owl	
Removal of S&Gs - effect?	The Forest Service must consider effects of the existing Forest Plan (USDA 1987a), as amended (USDA 1996), on Mexican spotted owl viability and explain why it is changing course by deleting or weakening standards and guidelines.	The Forest Service should analyze how the proposed plan's standards and guidelines are different from the 1987 plan's and how those differences may effect forest resources (e.g. Mexican spotted owl, northern goshawk, riparian).	** Check out Kaibab , p. 7 last comment & p. 27	The Forest Service must consider effects of the existing Forest Plan (USDA 1987a), as amended (USDA 1996), on Mexican spotted owl viability and explain why it is changing course by deleting or weakening standards and guidelines.	Proposed Reversal of MSO Standards and Guidelines	
Removal of S&Gs - effect?	The Forest Service provides no explanation in the PDEIS why it now proposes to abandon the standards and guidelines listed above. It is not revising this plan on a blank slate, but rather it is significantly weakening the existing Forest Plan (USDA 1987a), which has been in effect for many years.	The Forest Service should analyze how the proposed plan's standards and guidelines are different from the 1987 plan's and how those differences may effect forest resources (e.g. Mexican spotted owl, northern goshawk, riparian).	** Check out Kaibab , p. 7 last comment & p. 27	The Forest Service provides no explanation in the PDEIS why it now proposes to abandon the standards and guidelines listed above. It is not revising this plan on a blank slate, but rather it is significantly weakening the existing Forest Plan (USDA 1987a), which has been in effect for many years.	Strengthening and Keeping Existing Standards , Objectives, and Guidelines	

Removal of S&Gs - effect?	The Forest Service must explain why it is changing course by deleting or weakening standards and guidelines in the current Forest Plan (USDA 1987a), as amended (USDA 1996), and disclose how those changes will impact the environment.	The Forest Service should analyze how the proposed plan's standards and guidelines are different from the 1987 plan's and how those differences may effect forest resources (e.g. Mexican spotted owl, northern goshawk, riparian).	** Check out Kaibab , p. 7 last comment & p. 27	The Forest Service must explain why it is changing course by deleting or weakening standards and guidelines in the current Forest Plan (USDA 1987a), as amended (USDA 1996), and disclose how those changes will impact the environment.		Strengthening and Keeping Existing Standards , Objectives, and Guidelines	
Removal of S&Gs - effect?	Any change to existing standards and guidelines must include analysis of impacts to old growth forest and associated species, including how the Forest Service will satisfy the NFMA diversity requirement and ESA prohibition against species jeopardy or federal listing.	The Forest Service should analyze how the proposed plan's standards and guidelines are different from the 1987 plan's and how those differences may effect forest resources (e.g. Mexican spotted owl, northern goshawk, riparian).	** Check out Kaibab , p. 7 last comment & p. 27	Any change to existing standards and guidelines must include analysis of impacts to old growth forest and associated species, including how the Forest Service will satisfy the NFMA diversity requirement and ESA prohibition against species jeopardy or federal listing.		NFMA	
Removal of S&Gs - effect?	Reducing or repealing environmental standards in a forest plan will result in lesser or no environmental standards at the site-specific level. Id. at 975. The absence of enforceable standards in the Draft Plan affecting management of wildlife habitat contradicts NFMA and its planning regulations.	The Forest Service should analyze how the proposed plan's standards and guidelines are different from the 1987 plan's and how those differences may effect forest resources (e.g. Mexican spotted owl, northern goshawk, riparian).	** Check out Kaibab , p. 7 last comment & p. 27				
Removal of S&Gs - effect?	The Forest Service must consider the effect of the existing Forest Plan on NFMA mandates (e.g., riparian areas), explain why it is changing course by deleting or weakening standards and guidelines, and assess how those changes will impact the environment.	The Forest Service should analyze how the proposed plan's standards and guidelines are different from the 1987 plan's and how those differences may effect forest resources (e.g. Mexican spotted owl, northern goshawk, riparian).	** Check out Kaibab , p. 7 last comment & p. 27				

Removal of S&Gs - effect?	It reduces the standards and guidelines from the former plan to a series of unenforceable guidelines that have no actual meaning, completely guts wildlife protections offered by the previous plan, and utterly fails to analyze how this Plan is different from the old Plan in terms of standards and guidelines.	The Forest Service should analyze how the proposed plan's standards and guidelines are different from the 1987 plan's and how those differences may effect forest resources (e.g. Mexican spotted owl, northern goshawk, riparian).	** Check out Kaibab , p. 7 last comment & p. 27	It reduces the standards and guidelines from the former plan to a series of unenforceable guidelines that have no actual meaning, completely guts wildlife protections offered by the previous plan, and utterly fails to analyze how this Plan is different from the old Plan in terms of standards and guidelines.	Protection Reduction in Standards and Guidelines	PC 2667-5 the Forest Service should address how removal of important protections are going to affect natural resources, the failings of the previous plan, and why the proposed guidelines are unenforceable.
Removal of S&Gs - effect?	It does not address how removal of important protections are going to affect natural resources and does not acknowledge the failings of the previous plan in terms of its predictions. Such acknowledgement is needed in order to judge the current plan's similar predictions.	The Forest Service should analyze how the proposed plan's standards and guidelines are different from the 1987 plan's and how those differences may effect forest resources (e.g. Mexican spotted owl, northern goshawk, riparian).	** Check out Kaibab , p. 7 last comment & p. 27	It does not address how removal of important protections are going to affect natural resources and does not acknowledge the failings of the previous plan in terms of its predictions. Such acknowledgement is needed in order to judge the current plan's similar predictions.	Protection Reduction in Standards and Guidelines	PC 2667-5 the Forest Service should address how removal of important protections are going to affect natural resources, the failings of the previous plan, and why the proposed guidelines are unenforceable.
Removal of S&Gs - effect?	Where the 1987 Plan made an attempt at forceful articulations of its minimum management requirements, the proposed plan offers nothing but empty promises, carefully worded so that they can never be enforced. The Forest Service discarded the Regional Guide requirements years ago, but they were still enforceable through the Forest Plans. Now they are not. What will be the effect of this, and what has been the effect of the Forest Service's failure to comply with them in the past decade?	The Forest Service should analyze how the proposed plan's standards and guidelines are different from the 1987 plan's and how those differences may effect forest resources (e.g. Mexican spotted owl, northern goshawk, riparian).	** Check out Kaibab , p. 7 last comment & p. 27	Where the 1987 Plan made an attempt at forceful articulations of its minimum management requirements, the proposed plan offers nothing but empty promises, carefully worded so that they can never be enforced. The Forest Service discarded the Regional Guide requirements years ago, but they were still enforceable through the Forest Plans. Now they are not. What will be the effect of this, and what has been the effect of the Forest Service's failure to comply with them in the past decade?	Meeting Statute's Requirements	PC 2613-1 The Forest Service should address the effects and failures of enforcement and the reasons that formerly strong standards failed to achieve the protection they assured.

Removal of S&Gs - effect?	Similarly, what will be the effect of discarding the Mexican spotted owl and Northern goshawk Forest Plan Amendments? These should at least be discussed in the body of the EIS.	The Forest Service should analyze how the proposed plan's standards and guidelines are different from the 1987 plan's and how those differences may effect forest resources (e.g. Mexican spotted owl, northern goshawk, riparian).	** Check out Kaibab , p. 7 last comment & p. 27	Similarly, what will be the effect of discarding the Mexican spotted owl and Northern goshawk Forest Plan Amendments? These should at least be discussed in the body of the EIS.		Including Mexican Spotted Owl and Northern Goshawk Forest Plan Amendments in EIS	
Removal of S&Gs - effect?	Throughout, the EIS suggests that the new Plan will result in ecological improvement, but this is based on wild guesses about what is going to happen on the landscape in the next ten years and fails to consider the wholesale erasure of the formerly legally binding requirements such as those discussed above	The Forest Service should analyze how the proposed plan's standards and guidelines are different from the 1987 plan's and how those differences may effect forest resources (e.g. Mexican spotted owl, northern goshawk, riparian).	** Check out Kaibab , p. 7 last comment & p. 27	Throughout, the EIS suggests that the new Plan will result in ecological improvement, but this is based on wild guesses about what is going to happen on the landscape in the next ten years and fails to consider the wholesale erasure of the formerly legally binding requirements such as those discussed above		Meeting Statute's Requirements	PC 2613-3 The Forest Service should address how removing the binding requirements and replacing them with discretionary unenforceable requirements will result in ecological improvement, protection for wildlife habitat, water quality, and soil productivity.
Removal of S&Gs - effect?	The Plan does not reiterate the need to maintain viable populations. The goshawk and Mexican spotted owl standards and guidelines, implemented after much litigation, are gone without any discussion of how their absence will make a difference. The EIS fails to acknowledge, must less discuss, this difference.	The Forest Service should analyze how the proposed plan's standards and guidelines are different from the 1987 plan's and how those differences may effect forest resources (e.g. Mexican spotted owl, northern goshawk, riparian).	** Check out Kaibab , p. 7 last comment & p. 27	The Plan does not reiterate the need to maintain viable populations. The goshawk and Mexican spotted owl standards and guidelines, implemented after much litigation, are gone without any discussion of how their absence will make a difference. The EIS fails to acknowledge, must less discuss, this difference.		Viability Requirements	PC 990-7 The Forest Service should explain in the viability analysis of proposed MIS the proposed reversal of standards and guidelines in the current Forest Plan that constrain management of habitat for threatened Mexican spotted owl and sensitive northern goshawk
Removal of S&Gs - effect?	In sum, the EIS does not examine how management will change or acknowledge important differences between the proposed plan and the current plan at all. This is a major shortcoming of the EIS.	The Forest Service should analyze how the proposed plan's standards and guidelines are different from the 1987 plan's and how those differences may effect forest resources (e.g. Mexican spotted owl, northern goshawk, riparian).	** Check out Kaibab , p. 7 last comment & p. 27	In sum, the EIS does not examine how management will change or acknowledge important differences between the proposed plan and the current plan at all. This is a major shortcoming of the EIS.		Managing Differences between Old and New Plan	PC 175-18 The Forest Service should examine the major shortcoming of the EIS in how management will change or acknowledge important differences between the proposed plan and the current plan at all and the movement by Forest Service per se away

							from the original intent and direction of the National Forest Management Act of 1976. The Forest Service should apply principles, not policies, as the basis of management
Removal of S&Gs - effect?	The viability analysis of proposed MIS is flawed because the Forest Service has failed to explain the proposed reversal of standards and guidelines in the current Forest Plan that constrain management of habitat for threatened Mexican spotted owl and sensitive northern goshawk.	The Forest Service should analyze how the proposed plan's standards and guidelines are different from the 1987 plan's and how those differences may effect forest resources (e.g. Mexican spotted owl, northern goshawk, riparian).	** Check out Kaibab , p. 7 last comment & p. 27	The viability analysis of proposed MIS is flawed because the Forest Service has failed to explain the proposed reversal of standards and guidelines in the current Forest Plan that constrain management of habitat for threatened Mexican spotted owl and sensitive northern goshawk.		Standards and Guidelines	PC 990-7 The Forest Service should explain in the viability analysis of proposed MIS the proposed reversal of standards and guidelines in the current Forest Plan that constrain management of habitat for threatened Mexican spotted owl and sensitive northern goshawk
Removal of S&Gs - effect?	The Forest Service has based two environmental impact statements about forest planning in the Southwestern Region on these standards and guidelines, but it now reverses course and appears to sweep under the rug its prior scientific analysis. Weakening or repealing environmental standards in a forest plan results in lesser or no environmental standards at the site-specific level	The Forest Service should analyze how the proposed plan's standards and guidelines are different from the 1987 plan's and how those differences may effect forest resources (e.g. Mexican spotted owl, northern goshawk, riparian).	** Check out Kaibab , p. 7 last comment & p. 27	The Forest Service has based two environmental impact statements about forest planning in the Southwestern Region on these standards and guidelines, but it now reverses course and appears to sweep under the rug its prior scientific analysis. Weakening or repealing environmental standards in a forest plan results in lesser or no environmental standards at the site-specific level		Site specific Level	

Removal of S&Gs - effect?	In particular, the Proposed Plan would delete existing standards and guidelines for Mexican spotted owl that require survey of suitable Mexican spotted owl habitat, limit vegetation "treatments" such as timber sales, and further require monitoring of habitat and population trends.	The Forest Service should analyze how the proposed plan's standards and guidelines are different from the 1987 plan's and how those differences may effect forest resources (e.g. Mexican spotted owl, northern goshawk, riparian).	** Check out Kaibab , p. 7 last comment & p. 27	In particular, the Proposed Plan would delete existing standards and guidelines for Mexican spotted owl that require survey of suitable Mexican spotted owl habitat, limit vegetation "treatments" such as timber sales, and further require monitoring of habitat and population trends.	Proposed Reversal of MSO Standards and Guidelines	
Removal of S&Gs - effect?	The draft analysis contains no explanation why the Forest Service proposes to abandon the standards and guidelines listed above. It is not revising this plan on a blank slate, but rather it is significantly weakening the existing Forest Plan, which has been in effect for many years. The agency must consider the effect of existing management direction on NFMA requirements (e.g., riparian areas), explain why it is changing course by deleting or weakening standards and guidelines, and assess how those changes will impact the environment	The Forest Service should analyze how the proposed plan's standards and guidelines are different from the 1987 plan's and how those differences may effect forest resources (e.g. Mexican spotted owl, northern goshawk, riparian).	** Check out Kaibab , p. 7 last comment & p. 27	The draft analysis contains no explanation why the Forest Service proposes to abandon the standards and guidelines listed above. It is not revising this plan on a blank slate, but rather it is significantly weakening the existing Forest Plan, which has been in effect for many years. The agency must consider the effect of existing management direction on NFMA requirements (e.g., riparian areas), explain why it is changing course by deleting or weakening standards and guidelines, and assess how those changes will impact the environment	NFMA	
Desired conditions - achievable, based on science	The Forests and its clients would be much better served by a fact based plan that realistically describes the present situation and the desired conditions to meet human needs (which includes sustainability) and the practices that will be used to reach those conditions, taking in to account the uncertainties of climate change.	Desired conditions should be achievable and based on science.	XXXX	The Forests and its clients would be much better served by a fact based plan that realistically describes the present situation and the desired conditions to meet human needs (which includes sustainability) and the practices that will be used to reach those conditions, taking in to account the uncertainties of climate change.	Provide Science and Fact Based Measurable Specifics	

Desired conditions - achievable, based on science	Desired condition must be expressed as ideals that are achievable and based on valid and reliable science.	Desired conditions should be achievable and based on science.	XXXX	Desired condition must be expressed as ideals that are achievable and based on valid and reliable science.	Desired Conditions	PC 2610-9 The Forest Service should base the plan on desired conditions that are measurable, achievable and based on valid and reliable science because some of the items in the plan, if put in place would make ranching unattainable and could lead to deteriorating forest conditions in view of climatic variability.
Desired conditions - achievable, based on science	To reiterate the critical point to all of it, it must be based on real science: the USFS with the best of intentions cannot successfully apply guidelines to undefined or untested processes; neither can we; and neither can anyone else regardless of credentials or motivation. We therefore urge your solid commitment to doing the groundwork; and applying principles, not policies, as the basis of management	Desired conditions should be achievable and based on science.	XXXX	To reiterate the critical point to all of it, it must be based on real science: the USFS with the best of intentions cannot successfully apply guidelines to undefined or untested processes; neither can we; and neither can anyone else regardless of credentials or motivation.	Based on Science	
Desired conditions - achievable, based on science	Many citations and references that are documented in the text lack peer review and or acceptance by current land managers especially when applied to the proposed area.	Desired conditions should be achievable and based on science.	XXXX	Many citations and references that are documented in the text lack peer review and or acceptance by current land managers especially when applied to the proposed area.	Citations and References	

Desired conditions - achievable, based on science	It would benefit the public and land management specialist if the desired condition could be clearly identified even if they were expressed in objectives that could be stated in 15-year frames. Show how these objectives support the mission statement and let congress fund their expectations.	Desired conditions should be achievable and based on science.	XXXX	It would benefit the public and land management specialist if the desired condition could be clearly identified even if they were expressed in objectives that could be stated in 15-year frames. Show how these objectives support the mission statement and let congress fund their expectations.		Desired Conditions	
Desired conditions - based on ?	6. All chapters, the phrase "desired conditions: is used hundreds of times. My Question is –who's desires: Not mine. Not one part of the words desired conditions makes any sense.	Desired conditions should meet the need of the public.	XXXX	6. All chapters, the phrase "desired conditions: is used hundreds of times. My Question is –who's desires: Not mine. Not one part of the words desired conditions makes any sense.		Current Conditions and Desired Conditions	PC 175-21 The Forest Service should address that the desired conditions are not acceptable because it is never spelled out specifically leaving USFS in total control. The Forest Service should explain "who's" desired conditions are being discussed
Desired conditions - based on ?	This plan is to meet our needs and those of the nation in general, not the desires of the vocal few. It should be designed so that the goals are attainable, measurable and meet the needs of the public and the environment.	Desired conditions should meet the need of the public.	XXXX	This plan is to meet our needs and those of the nation in general, not the desires of the vocal few. It should be designed so that the goals are attainable, measurable and meet the needs of the public and the environment.		Attainable and Measurable Goals	
Plan Consistency Livestock grazing - observable conditions vs. gl or dc	Note also that, as on Page 35 and 56, observable conditions at any point, at any time, are likely to vary significantly from the guidelines or desired conditions. Is this therefore an infraction of regulations, whether any grazing (by domestic livestock?) has occurred or not?	If observable on-the-ground conditions differ from plan guidelines or desired conditions, would this be a violation of the plan?	XXXX	Note also that, as on Page 35 and 56, observable conditions at any point, at any time, are likely to vary significantly from the guidelines or desired conditions. Is this therefore an infraction of regulations, whether any grazing (by domestic livestock?) has occurred or not?		Observable Conditions	

DC and potential	<p>p. 28 ...changing environmental and climatic conditions</p> <p>Resilience by definition implies going back to a former state.</p> <p>Changing environmental and climatic conditions may or may not create the potential for a return to a historical condition or conditions.</p>	<p>Concern that areas may not have the potential to meet desired conditions because of site characteristics or changing climate.</p>	XXXX				
DC and potential	<p>P.29 Ecosystem services are available as forests, woodlands, grasslands, and riparian communities adapt to a changing and variable climate.</p> <p>Changing and variable climate is incongruous with a return to historic conditions.</p>	<p>Concern that areas may not have the potential to meet desired conditions because of site characteristics or changing climate.</p>	XXXX				
DC and potential	<p>p.29 Ground cover, density, and height of vegetation exist ... reference conditions....</p> <p>Rather, ground cover, density, and height of vegetation meet the potential of the site location and climatic conditions. The referenced conditions are atypical of potential with the present climatic trend.</p>	<p>Concern that areas may not have the potential to meet desired conditions because of site characteristics or changing climate.</p>	XXXX				

DC and potential	p.33 Natural ecological processes ... tree species of all ages and size classes ... This desired condition can only occur where the site potential exists so what would the management strategy be to achieve this desired condition be?	Concern that areas may not have the potential to meet desired conditions because of site characteristics or changing climate.	XXXX				
Constructed features	Pages 61 and 69 Last bullet statement under Guidelines reads: "Constructed features should be maintained to standard or removed when no longer needed." This statement is ridiculous. Hundreds of features on the ASNFs (both public and private) are not maintained to standard and will not be maintained any time soon. Many can be considered abandoned. If something will not be done then don't include it in this document.	Consider removing the guideline "constructed features should be maintained to standard or removed when no longer needed" in the Wildlife and Rare Plants and Overall Recreation sections. Hundreds of features are not maintained to standard and will not be maintained any time soon.	XXXX	Pages 61 and 69 Last bullet statement under Guidelines reads: "Constructed features should be maintained to standard or removed when no longer needed." This statement is ridiculous. Hundreds of features on the ASNFs (both public and private) are not maintained to standard and will not be maintained any time soon. Many can be considered abandoned. If something will not be done then don't include it in this document.		Constructed Features Maintained to Standard or Removed	PC 960-1 The Forest Service should not include the statement( Pages 61 and 69 Last bullet ) under Guidelines "Constructed features should be maintained to standard or removed when no longer needed." because hundreds of features on the ASNFs (both public and private) are not maintained to standard and will not be maintained any time soon. If something will not be done then don't include it in this document.
Constructed features2	Suggest changing 14th bullet statement to read: Constructed features shall be maintained to standard or removed when no longer needed.	Convert the guideline "constructed features should be maintained to standard or removed when no longer needed" in the Special Uses section to a standard.	XXXX	Suggest changing 14th bullet statement to read: Constructed features shall be maintained to standard or removed when no longer needed.		Constructed Features	PC 1409-2 Forest Service should change Guidelines bullet statement to read: Constructed features shall be maintained to standard or removed when no longer needed.

Revise and republish DEIS	We ask that the DEIS and plan be significantly revised and a second DEIS released for public comment prior to a final.	The DEIS and proposed plan should be revised and a second DEIS released for public comment prior to a final.	** See Prescott	We ask that the DEIS and plan be significantly revised and a second DEIS released for public comment prior to a final.	Revise DEIS and Plan	
Alt A doesn't equal 'no action'	First of alt in the summary of the DEIS, alternative A is said to be the "no action alternative and represents the 1987 Plan as amended." The 1987 Forest Plan map is nothing like the Alternative A map. There are wild and scenic rivers and wilderness added. There are roads missing. Even closed roads should be on the map	Alternative A can not be labeled the "no action" alternative because the map is inconsistent with the 1987 plan (displays wild and scenic rivers and wilderness, does not display all roads).	XXXX	First of alt in the summary of the DEIS, alternative A is said to be the "no action alternative and represents the 1987 Plan as amended." The 1987 Forest Plan map is nothing like the Alternative A map. There are wild and scenic rivers and wilderness added. There are roads missing. Even closed roads should be on the map	Maps	
Alt A doesn't equal 'no action'	3. Alternative A "no action" alternative of 1987 did not have any National Wild and Scenic Rivers System. There for Alternative A is not a "no action" alternative. Page #5 chapter one of the DEIS bottom of the page states there may be NFS lands that "could" be recommended to Congress for designation into the National Wilderness Preservation System. The Forest Service cannot make wilderness or wild and scenic river designations part of a management plan before Congress has approved such designations. Creating de facto wildernesses is not part of any plan.	Alternative A can not be labeled the "no action" alternative because the map is inconsistent with the 1987 plan (displays wild and scenic rivers and wilderness, does not display all roads).	XXXX	3. Alternative A "no action" alternative of 1987 did not have any National Wild and Scenic Rivers System. There for Alternative A is not a "no action" alternative. Page #5 chapter one of the DEIS bottom of the page states there may be NFS lands that "could" be recommended to Congress for designation into the National Wilderness Preservation System. The Forest Service cannot make wilderness or wild and scenic river designations part of a management plan before Congress has approved such designations. Creating de facto wildernesses is not part of any plan.	Congressional Approval	PC 1156-5 The Forest Service cannot make wilderness or wild and scenic river designations part of a management plan before Congress can approve such designations.

Alt A doesn't equal 'no action'	4. Chapter2, Page 13 of the DEIS under alternative development – you will not find alternative A the “no action” alternative. You cannot call Alternative A the “no Action” alternative when existing roads cannot be found on the map labeled Alternative A. Alternative A,B,C,D maps are part of the DEIS and are legal documents and part of the process. There for the DEIS for the proposed land management plan for the Apache –Sitgreaves National Forest is incomplete and illegal.	Alternative A can not be labeled the "no action" alternative because the map is inconsistent with the 1987 plan (displays wild and scenic rivers and wilderness, does not display all roads).	XXXX	4. Chapter2, Page 13 of the DEIS under alternative development – you will not find alternative A the “no action” alternative. You cannot call Alternative A the “no Action” alternative when existing roads cannot be found on the map labeled Alternative A. Alternative A,B,C,D maps are part of the DEIS and are legal documents and part of the process. There for the DEIS for the proposed land management plan for the Apache –Sitgreaves National Forest is incomplete and illegal.		Maps	PC 201-4 The Forest Service cannot call Alternative A the “no Action” alternative when existing and closed roads are missing on the map, roads labeled Alternative A. The Forest Service should revise the maps for Alternative A,B,C,D maps that are part of the DEIS (and are legal documents and part of the process) because of the inconsistency between the maps of the data shown on the maps. The DEIS for the proposed land management plan for the Apache – Sitgreaves National Forest is incomplete and illegal
Alt A - support /reject	Sec. 1502.14 of the CEQ regulations (which require NEPA compliance) clearly states "include the alternative of no action." The 1987 Forest Plan has worked well and should be retained.	Some commenters supported or rejected all or portions of alternative A (1987 plan).	XXXX	Sec. 1502.14 of the CEQ regulations (which require NEPA compliance) clearly states "include the alternative of no action." The 1987 Forest Plan has worked well and should be retained.		Retain 1987 Plan	
Alt A - support /reject	The 1987 plan is sufficient.	Some commenters supported or rejected all or portions of alternative A (1987 plan).	XXXX	The 1987 plan is sufficient.		Retain 1987 Plan	

Alt A - support /reject	Navajo County wants to communicate unambiguously to the Apache- Sitgreaves National Forests its opposition to Alternative A, the no action alternative, as relates to watersheds restoration objectives.	Some commenters supported or rejected all or portions of alternative A (1987 plan).	XXXX	Navajo County wants to communicate unambiguously to the Apache- Sitgreaves National Forests its opposition to Alternative A, the no action alternative, as relates to watersheds restoration objectives. Navajo County believes that a clear distinction must be made between degrading factors and the effects of degrading factors, and between natural processes and management effects. The Programmatic Draft Environmental Impact Statement for the Apache- Sitgreaves National Forests Land Management Plan lists as common degrading factors: high road density, poor aquatic habitat conditions, poor fire regime conditions, poor aquatic biota conditions, impaired soil conditions (PDEIS p. 65). High road density and poor fire regime conditions may contribute to watersheds degradation, but impaired soil condition, non-functioning riparian or aquatic areas and sedimentation are not degrading factors but the effects of degrading factors. Navajo County is concerned that a proper causality analysis is required to design effective restoration actions	Watershed Restoration	
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Alt A - did it work?	The Forest Service must take a hard look at the success or failure of the existing Forest Plan and so-called "best management practices" at meeting statutory and regulatory requirements to provide for fish and wildlife.	The Forest Service should discuss the successes and failures of the 1987 plan to determine what management actions will succeed in the future.	**Check out Kaibab p. 5, 3rd comment & p.7	The Forest Service must take a hard look at the success or failure of the existing Forest Plan and so-called "best management practices" at meeting statutory and regulatory requirements to provide for fish and wildlife.		Wildlife	
Alt A - did it work?	The agency also must take a hard look at the success or failure of the existing Forest Plan at meeting statutory and regulatory requirements to provide for fish and wildlife.	The Forest Service should discuss the successes and failures of the 1987 plan to determine what management actions will succeed in the future.	**Check out Kaibab p. 5, 3rd comment & p.7	The agency also must take a hard look at the success or failure of the existing Forest Plan at meeting statutory and regulatory requirements to provide for fish and wildlife.		Meeting Statutory and Regulatory Requirements	
Alt A - did it work?	Why does this Plan not discuss the failures of enforcement and the reasons that formerly strong standards failed to achieve the protection they assured?	The Forest Service should discuss the successes and failures of the 1987 plan to determine what management actions will succeed in the future.	**Check out Kaibab p. 5, 3rd comment & p.7	Why does this Plan not discuss the failures of enforcement and the reasons that formerly strong standards failed to achieve the protection they assured?		Meeting Statute's Requirements	PC 2613-1 The Forest Service should address the effects and failures of enforcement and the reasons that formerly strong standards failed to achieve the protection they assured.
Alt A - did it work?	Why do you not discuss the massive failures with monitoring and updating grazing plans, and the monumental failure of the Forest Service to achieve its targets in this regard? Surely you are aware that these past problems may shine a light on the efficacy of future promises?	The Forest Service should discuss the successes and failures of the 1987 plan to determine what management actions will succeed in the future.	**Check out Kaibab p. 5, 3rd comment & p.7	Why do you not discuss the massive failures with monitoring and updating grazing plans, and the monumental failure of the Forest Service to achieve its targets in this regard? Surely you are aware that these past problems may shine a light on the efficacy of future promises?		Monitoring	

Alt A - did it work?	The Plan does not reveal the extent to which monitoring in the current plan has been completed.	The Forest Service should discuss the successes and failures of the 1987 plan to determine what management actions will succeed in the future.	<b>**Check out Kaibab p. 5, 3rd comment &amp; p.7</b>	The Plan does not reveal the extent to which monitoring in the current plan has been completed.	Complete Monitoring	PC 2900-3 The Forest Service should include the extent that monitoring in the current plan was conducted, past successes and failures, and include consequences if monitoring does not get completed.
Alt A - did it work?	Although monitoring is the most important issue here, your plan and EIS also need to address the failings of past ambitions. For example, you state that the “highest priority treatments” will be those that address riparian concerns. But you set similar aspirations in the 1987 Plan that never came to pass. You need to acknowledge this.	The Forest Service should discuss the successes and failures of the 1987 plan to determine what management actions will succeed in the future.	<b>**Check out Kaibab p. 5, 3rd comment &amp; p.7</b>	Although monitoring is the most important issue here, your plan and EIS also need to address the failings of past ambitions. For example, you state that the “highest priority treatments” will be those that address riparian concerns. But you set similar aspirations in the 1987 Plan that never came to pass. You need to acknowledge this.	Complete Monitoring	PC 2900-3 The Forest Service should include the extent that monitoring in the current plan was conducted, past successes and failures, and include consequences if monitoring does not get completed.
Alt A - did it work?	The NEPA requires a hard look at both the affected environment and the consequences of the plan, and where the agency does not have the needed information, both the NFMA and the NEPA require it to obtain it. Here, the shortcomings are legion. The DEIS needs a significantly improved Affected Environment section that discloses important ecological, economic, and historic information about the Apache-Sitgreaves National Forest, including how management under the old plan succeeded or failed.	The Forest Service should discuss the successes and failures of the 1987 plan to determine what management actions will succeed in the future.	<b>**Check out Kaibab p. 5, 3rd comment &amp; p.7</b>	The NEPA requires a hard look at both the affected environment and the consequences of the plan, and where the agency does not have the needed information, both the NFMA and the NEPA require it to obtain it. Here, the shortcomings are legion. The DEIS needs a significantly improved Affected Environment section that discloses important ecological, economic, and historic information about the Apache-Sitgreaves National Forest, including how management under the old plan succeeded or failed.	NEPA – Full Disclosure: Missing Information	PC 104-5 Since NEPA requires a hard look at consequence and affected environment, the Forest Service should improve the affected environment section to include ecological, economic, and historical information to include success and failures under the old plan.

Alt A - did it work?	Given this is the second Forest Plan, with the first / current plan – directing management spanning over 26 years with 14 amendments, we were surprised and dismayed not to find a comprehensive summary / discussions to just how well the first Forest Plan worked, both the good and the not-so good. It is well known and an accepted practice For any planning process to be successful, especially in a modification / update / coarse correction to management for another 10 – 25 years the successes as well as the failures of past plans and management must be understood to know “was the goal achieved or not” and in either case Why?	The Forest Service should discuss the successes and failures of the 1987 plan to determine what management actions will succeed in the future.	<b>**Check out Kaibab p. 5, 3rd comment &amp; p.7</b>	Given this is the second Forest Plan, with the first / current plan – directing management spanning over 26 years with 14 amendments, we were surprised and dismayed not to find a comprehensive summary / discussions to just how well the first Forest Plan worked, both the good and the not-so good. It is well known and an accepted practice For any planning process to be successful, especially in a modification / update / coarse correction to management for another 10 – 25 years the successes as well as the failures of past plans and management must be understood to know “was the goal achieved or not” and in either case Why?	Monitoring	
Alt A - did it work?	We request the PNF provide a comprehensive summary of its first – current plan and how this new plan especially the preferred alternative will actually move forward to reach the goals presented. Added to that must be a factual explanation to how funding will affect the outcomes / accomplishments for alternatives presented.	The Forest Service should discuss the successes and failures of the 1987 plan to determine what management actions will succeed in the future.	<b>**Check out Kaibab p. 5, 3rd comment &amp; p.7</b>	We request the PNF provide a comprehensive summary of its first – current plan and how this new plan especially the preferred alternative will actually move forward to reach the goals presented. Added to that must be a factual explanation to how funding will affect the outcomes / accomplishments for alternatives presented.	Current and New Plan Comparison	PC 207-25 The Forest Service should provide a summary of how the preferred alternative will move forward and explain how funding will affect the outcomes / accomplishments for alternatives presented. The Forest Service should address that “the alternatives were realistically designed to reflect anticipated budgets and workforce capabilities” (DEIS p. 440)and the reality that “none of the alternatives would actually treat enough acres fast enough to fully reach desired conditions within the first 5 decades” (DEIS p. 440).

Alt A - did it work?	2. If Alternative A is the no action alternative and represents the 1987 Forest Plan and the 1987 Forest Plan and the 1987 plan emphasizes timber management as a primary tool, then why did we end up with a forest that was so unhealthy and over grown that 830 square miles burned in the Wallow fire: the 1987 plan is good but you did not follow the plan	The Forest Service should discuss the successes and failures of the 1987 plan to determine what management actions will succeed in the future.	<b>**Check out Kaibab p. 5, 3rd comment &amp; p.7</b>	2. If Alternative A is the no action alternative and represents the 1987 Forest Plan and the 1987 Forest Plan and the 1987 plan emphasizes timber management as a primary tool, then why did we end up with a forest that was so unhealthy and over grown that 830 square miles burned in the Wallow fire: the 1987 plan is good but you did not follow the plan	Adhering to 1987 Plan	PC 201-2 The Forest Service should address if Alternative A is the no action alternative and represents the 1987 Forest Plan which emphasizes timber management as a primary tool, why did we end up with a forest that was so unhealthy and over grown that 830 square miles burned in the Wallow fire (the 1987 plan is good but you did not follow the plan)
Alt A - did it work?	The Forest Service must take a hard look at the success or failure of the existing management direction and so-called "best management practices" maintaining viable populations of native species.	The Forest Service should discuss the successes and failures of the 1987 plan to determine what management actions will succeed in the future.	<b>**Check out Kaibab p. 5, 3rd comment &amp; p.7</b>	The Forest Service must take a hard look at the success or failure of the existing management direction and so-called "best management practices" maintaining viable populations of native species.	Wildlife	
Monitoring - reliance upon	Another reason it is important to reveal the previous plan's monitoring successes is that neither the current plan nor the proposed one has any consequences if monitoring does not get completed. Under the current plan, livestock does not get reduced just because forty years goes by between ten-year monitoring events. If monitoring is to be used as feedback, then some consequences need to occur when it gets shunted aside. It is arbitrary and capricious to rely on monitoring to drive future actions when it has been proven the monitoring does not always occur.	The Forest Service should not rely on monitoring to drive future actions when monitoring does not always occur.	XXXX	Another reason it is important to reveal the previous plan's monitoring successes is that neither the current plan nor the proposed one has any consequences if monitoring does not get completed. Under the current plan, livestock does not get reduced just because forty years goes by between ten-year monitoring events. If monitoring is to be used as feedback, then some consequences need to occur when it gets shunted aside. It is arbitrary and capricious to rely on monitoring to drive future actions when it has been proven the monitoring does not always occur.	Completed Monitoring	PC 2900-3 The Forest Service should include the extent that monitoring in the current plan was conducted, past successes and failures, and include consequences if monitoring does not get completed.

Alt B - support /reject	we strongly support the Forest Service's support for Alternative B for the following reasons: Alternative B is permissive of both mechanical treatment and the use of fire as tools to restore forest health. As is being implemented in the Four Forest Initiative, no single approach is suitable to restore our forests to reference conditions. We believe that Alternative B is most appropriate as mechanical thinning is effective at treating pre- commercial stands while avoiding older, larger trees that are so important to a variety of wildlife species. Fire, on the other hand is very economical and has been used in several locations on the southern end of the A-S with great success. It has taken decades to arrive at current forest conditions and Alternative B provides a broad array of treatment approaches to restore forest health, which is essential.	Some commenters supported or rejected all or portions of alternative B (proposed plan).	XXXX	we strongly support the Forest Service's support for Alternative B for the following reasons: Alternative B is permissive of both mechanical treatment and the use of fire as tools to restore forest health. As is being implemented in the Four Forest Initiative, no single approach is suitable to restore our forests to reference conditions. We believe that Alternative B is most appropriate as mechanical thinning is effective at treating pre- commercial stands while avoiding older, larger trees that are so important to a variety of wildlife species. Fire, on the other hand is very economical and has been used in several locations on the southern end of the A-S with great success. It has taken decades to arrive at current forest conditions and Alternative B provides a broad array of treatment approaches to restore forest health, which is essential.	Treatments	1) more specific, clear language and strategy, 2) by reformatting to streamline presentation of information in a more logical flow, omitting duplication and conflicting information, and correcting format, grammar and punctuation for purposes of clarity., 3) provide links to downloadable reference materials available on the internet (and if documents are not yet on the internet, put them there).,4) add an alphabetic index of acronyms., 5) Add a comprehensive summary / discussions to just how well the first Forest Plan worked, both the good and the not-so good, 6) add a reference on the importance of litter, 7) define: "rare"; "unique"; "habitat" and " protection" (from what?) Page 61: Rare and unique habitats should be protected
Alt B - support /reject	SRP (Salt River Project) appreciates the proposed plan revision alternatives that improve forest ecosystem health and protect surface flows and groundwater, which conserve and provide a continuous water supply for current and future generations in Arizona. SRP supports preferred Alternative B which	Some commenters supported or rejected all or portions of alternative B (proposed plan).	XXXX	SRP (Salt River Project) appreciates the proposed plan revision alternatives that improve forest ecosystem health and protect surface flows and groundwater, which conserve and provide a continuous water supply for current and future generations in Arizona. SRP supports preferred Alternative B which	Watershed	PC 202-2 The Forest Service should support Alternative B because of: 1)strong best management practices, 2) soil and water conservation measures to protect sensitive resources during mechanical harvest and fire treatments, 3) rangeland restoration of 25,000 acres per year of grasslands (primarily the Great

	restores or maintains properly functioning watershed conditions and ecosystems within priority watersheds on the Apache-Sitgreaves National Forest.			restores or maintains properly functioning watershed conditions and ecosystems within priority watersheds on the Apache-Sitgreaves National Forest.		Basin and semi-desert types), 4) both mechanical treatment and the use of fire as tools to restore forest health,5) Restoration of ecological function and a more natural fire regime would undoubtedly benefit pronghorn., 6) more action oriented than the other three alternatives, 7) places a high priority on improving important watersheds, community protection, and retention of old growth., 8) restores or maintains properly functioning watershed conditions and ecosystems within priority watersheds
Alt B - support /reject	In summary, SRP (Salt River Project) encourages the development of a revised Plan that integrates and emphasizes the role the Forest has in protecting Arizona's water supply through the support of Alternative B and in incorporating the needs of power utilities in order to provide safe and reliable generation and transmission to meet local and regional public energy demands.	Some commenters supported or rejected all or portions of alternative B (proposed plan).	XXXX	In summary, SRP (Salt River Project) encourages the development of a revised Plan that integrates and emphasizes the role the Forest has in protecting Arizona's water supply through the support of Alternative B and in incorporating the needs of power utilities in order to provide safe and reliable generation and transmission to meet local and regional public energy demands.	Watershed	PC 202-7 The Forest Service should revise alternative B to include: ,1) incorporating the needs of power utilities in order to provide safe and reliable generation and transmission to meet local and regional public energy demands,2) Include the provisions of Alternative B relating to the restoration treatment of up to 25,000 acres per year of grasslands (primarily the Great Basin and semi-desert types) to remove encroaching woody species.,3) Include the provisions of Alternative C relating to Forest Products in order to: Increase the number of acres logged annually to accelerate the pace of ecological restoration; Increase the amount of forest byproducts resources by

						<p>prioritizing, wherever possible, mechanical thinning treatments over fire as a thinning tool treatment; Increase the maximum allowable sale quantity (ASQ) volume to 268,000 CCF per year to meet the foreseeable requirements of the existing and currently developing industry in the White Mountains., 4) Include the provisions of current Alternative C relating to motorized travel and recreation in order to retain the suitability of 80% of the lands of the Apache-Sitgreaves National Forests for future consideration of new motorized areas and trails.,5) Include the provisions of Alternative C relating to forested ecosystems restoration and catastrophic wildfire prevention treatment types, scale, pace and prioritization, 6) Include the provisions of Alternative C relating to watershed restoration objectives.,7) Include the provisions of Alternatives B and C relating to the designation of management areas,8) Include restoration of watersheds as a core management objective,9) include specific information on the potential location of the proposed 405,000 acres of Natural Landscape Areas under Alternative B</p>
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Alt B - support /reject	But it appears to me that the A-S NFs' preferred alternative (Alternative B) does not follow through adequately to realize the stated goals and desired future conditions as expressed in the plan.	Some commenters supported or rejected all or portions of alternative B (proposed plan).	XXXX	But it appears to me that the A-S NFs' preferred alternative (Alternative B) does not follow through adequately to realize the stated goals and desired future conditions as expressed in the plan.	Follow Through on Goals and Desired Conditions	
Alt B - support /reject	We commend the Forest Service for committing, in the Preferred Alternative, to strong best management practices and soil and water conservation measures to protect sensitive resources during mechanical harvest and fire treatments.	Some commenters supported or rejected all or portions of alternative B (proposed plan).	XXXX	We commend the Forest Service for committing, in the Preferred Alternative, to strong best management practices and soil and water conservation measures to protect sensitive resources during mechanical harvest and fire treatments.	Forest Health and Ecological Restoration	PC 202-2 The Forest Service should support Alternative B because of: 1)strong best management practices, 2) soil and water conservation measures to protect sensitive resources during mechanical harvest and fire treatments, 3) rangeland restoration of 25,000 acres per year of grasslands (primarily the Great Basin and semi-desert types), 4) both mechanical treatment and the use of fire as tools to restore forest health,5) Restoration of ecological function and a more natural fire regime would undoubtedly benefit pronghorn., 6) more action oriented than the other three alternatives, 7) places a high priority on improving important watersheds, community protection, and retention of old growth., 8) restores or maintains properly functioning watershed conditions and ecosystems within priority watersheds

Alt B - support /reject	Because very few grassland areas would be treated in Alternative A, the no action alternative, and in Alternative C, averaging around 500 acres per year (PDEIS p. 19 & 23), and, conversely, up to 25,000 acres per year of grasslands (primarily the Great Basin and semi-desert types) would be treated in Alternative B, the Preferred Alternative, and Alternative D, to remove encroaching woody species (PDEIS p. 21 & 25), Navajo County is supportive of Alternative B as relates to rangelands restoration.	Some commenters supported or rejected all or portions of alternative B (proposed plan).	XXXX	Because very few grassland areas would be treated in Alternative A, the no action alternative, and in Alternative C, averaging around 500 acres per year (PDEIS p. 19 & 23), and, conversely, up to 25,000 acres per year of grasslands (primarily the Great Basin and semi-desert types) would be treated in Alternative B, the Preferred Alternative, and Alternative D, to remove encroaching woody species (PDEIS p. 21 & 25), Navajo County is supportive of Alternative B as relates to rangelands restoration.	Range Restorati on	PC 202-2 The Forest Service should support Alternative B because of: 1)strong best management practices, 2) soil and water conservation measures to protect sensitive resources during mechanical harvest and fire treatments, 3) rangeland restoration of 25,000 acres per year of grasslands (primarily the Great Basin and semi-desert types), 4) both mechanical treatment and the use of fire as tools to restore forest health,5) Restoration of ecological function and a more natural fire regime would undoubtedly benefit pronghorn., 6) more action oriented than the other three alternatives, 7) places a high priority on improving important watersheds, community protection, and retention of old growth., 8) restores or maintains properly functioning watershed conditions and ecosystems within priority watersheds
Alt B - support /reject	This is clearly in contradiction with the Navajo County objective of creating the wood supply conditions for private industry investments in a new economically viable small diameter trees and residual biomass utilization infrastructure capable of funding the initial ecological restoration thinning of at least 50,000 acres of ponderosa pine and/or mixed conifer	Some commenters supported or rejected all or portions of alternative B (proposed plan).	XXXX	This is clearly in contradiction with the Navajo County objective of creating the wood supply conditions for private industry investments in a new economically viable small diameter trees and residual biomass utilization infrastructure capable of funding the initial ecological restoration thinning of at least 50,000 acres of ponderosa pine and/or mixed conifer	Forest Products	PC 202-8 The Forest Service Should address the contradictions with the County objectives

	dominated forests annually for the next 20 years.			dominated forests annually for the next 20 years.		
Alt B - support /reject	Based on the merit of the action alternatives presented, and in further consideration of the monumental change that the elimination of indiscriminate cross-country travel will represent for the culture and custom of the residents of and visitors to the County, Navajo County wants to register its objection to further restrictions on future consideration of new motorized areas and trails in Alternative B.	Some commenters supported or rejected all or portions of alternative B (proposed plan).	XXXX	Based on the merit of the action alternatives presented, and in further consideration of the monumental change that the elimination of indiscriminate cross-country travel will represent for the culture and custom of the residents of and visitors to the County, Navajo County wants to register its objection to further restrictions on future consideration of new motorized areas and trails in Alternative B.	Motorized Travel and Recreation	
Alt B - support /reject	Navajo County respectfully requests that the current Alternative B in the Programmatic Draft Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan be rejected as relates to motorized travel and recreation.	Some commenters supported or rejected all or portions of alternative B (proposed plan).	XXXX	Navajo County respectfully requests that the current Alternative B in the Programmatic Draft Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan be rejected as relates to motorized travel and recreation.	Motorized Travel and Recreation	PC 202-4 The Forest Service should reject Alternative B as it relates to motorized travel and recreation

Alt B - support /reject	However, Navajo County believes that even though the priorities of Alternative B are adequate, the pace of restoration under Alternative B does not meet the ecological needs of the Apache-Sitgreaves National Forests, nor the safety, health and economic well-being needs of the White Mountains residents and visitors, nor the Navajo County Forested Ecosystems Restoration and Catastrophic Wildfire Prevention Objectives.	Some commenters supported or rejected all or portions of alternative B (proposed plan).	XXXX	However, Navajo County believes that even though the priorities of Alternative B are adequate, the pace of restoration under Alternative B does not meet the ecological needs of the Apache-Sitgreaves National Forests, nor the safety, health and economic well-being needs of the White Mountains residents and visitors, nor the Navajo County Forested Ecosystems Restoration and Catastrophic Wildfire Prevention Objectives.	Forest Health and Ecological Restoration	PC 202-8 The Forest Service Should address the contradictions with the County objectives
Alt B - support /reject	the County is concerned that such management activities for ecological restoration purposes are limited (PDEIS p. 608), and that such Natural Landscape Areas may therefore remain at high risk of uncharacteristic landscape scale disturbances such as non-natural high severity crown fires or insect infestation	Some commenters supported or rejected all or portions of alternative B (proposed plan).	XXXX	the County is concerned that such management activities for ecological restoration purposes are limited (PDEIS p. 608), and that such Natural Landscape Areas may therefore remain at high risk of uncharacteristic landscape scale disturbances such as non-natural high severity crown fires or insect infestation	Forest Health and Ecological Restoration	PC 202-8 The Forest Service Should address the contradictions with the County objectives
Alt B - support /reject	In 2010 the U.S. Department of Agriculture identified the restoration of watersheds as a core management objective of the National Forests 19. This emphasis on protection of watersheds is particularly important in the Southwest. As the Proposed Plan DEIS points out, the Apache-Sitgreaves National Forests provide just under 400,000 acre-feet of water to the lowland desert areas of the Southwest each year <sup>20</sup> . Healthy watersheds are also important to the plant,	Some commenters supported or rejected all or portions of alternative B (proposed plan).	XXXX	In 2010 the U.S. Department of Agriculture identified the restoration of watersheds as a core management objective of the National Forests 19. This emphasis on protection of watersheds is particularly important in the Southwest. As the Proposed Plan DEIS points out, the Apache-Sitgreaves National Forests provide just under 400,000 acre-feet of water to the lowland desert areas of the Southwest each year <sup>20</sup> . Healthy watersheds are also important to the plant,	Watershed	PC 202-7 The Forest Service should revise alternative B to include: ,1) incorporating the needs of power utilities in order to provide safe and reliable generation and transmission to meet local and regional public energy demands,2) Include the provisions of Alternative B relating to the restoration treatment of up to 25,000 acres per year of grasslands (primarily the Great Basin and semi-desert types) to remove encroaching woody species.,3)

	<p>animals, and insect species. The preferred alternative does not do enough to protect and restore watersheds in the Apache-Sitgreaves National Forests.</p>		<p>animals, and insect species. The preferred alternative does not do enough to protect and restore watersheds in the Apache-Sitgreaves National Forests.</p>		<p>Include the provisions of Alternative C relating to Forest Products in order to: Increase the number of acres logged annually to accelerate the pace of ecological restoration; Increase the amount of forest byproducts resources by prioritizing, wherever possible, mechanical thinning treatments over fire as a thinning tool treatment; Increase the maximum allowable sale quantity (ASQ) volume to 268,000 CCF per year to meet the foreseeable requirements of the existing and currently developing industry in the White Mountains., 4) Include the provisions of current Alternative C relating to motorized travel and recreation in order to retain the suitability of 80% of the lands of the Apache-Sitgreaves National Forests for future consideration of new motorized areas and trails.,5) Include the provisions of Alternative C relating to forested ecosystems restoration and catastrophic wildfire prevention treatment types, scale, pace and prioritization, 6) Include the provisions of Alternative C relating to watershed restoration objectives.,7) Include the provisions of Alternatives B and C relating to the designation of</p>
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							management areas,8) Include restoration of watersheds as a core management objective,9) include specific information on the potential location of the proposed 405,000 acres of Natural Landscape Areas under Alternative B
Alt C - support /reject	In closing, I strongly recommend that Option C be selected for the Recreation Management as there are areas better suited for management as primitive areas where there is currently no OHV use and thus would reduce user conflicts.	Some commenters supported or rejected all or portions of alternative C.	XXXX	In closing, I strongly recommend that Option C be selected for the Recreation Management as there are areas better suited for management as primitive areas where there is currently no OHV use and thus would reduce user conflicts.		Recreation	PC 203-2 The Forest Service should select Alternative C for the Recreation Management as there are areas better suited for management as primitive areas where there is currently no OHV use and would reduce user conflicts and engage the local OHV community to implement what is known to work
Alt C - support /reject	Say NO to Alternative C.	Some commenters supported or rejected all or portions of alternative C.	XXXX	Say NO to Alternative C.		Opposition to Alternative C	PC 203-4 The Forest Service should not select alternative C, but work with the lumber industry to develop new materials that do not require destroying timberlands.
Alt C - support /reject	Nix on "Alternative C"!	Some commenters supported or rejected all or portions of alternative C.	XXXX	Nix on "Alternative C"!		Opposition to Alternative C	PC 203-1 The Forest Service should not select Alternative C because it would reduce the current level of protections for watersheds, wildlife, and recreation opportunities, repeal the Roadless Rule, be detrimental to wildlife and the environment, make Roadless areas vulnerable to being fragmented by road building and commercial logging, and is not legal. The Forest Service

							should provide the public a fair understanding of a plan's impacts.
Alt C - support /reject	Alternate C returns to the bad old days of the 1950's into the 1970's when the goal of forest management was "to get the cut out", resulting in tens of thousands of acres throughout the western US being clear cut and otherwise devastated through a totally misguided approach to management which had no relation to the best available science for ecological sustainability of ALL forest resources, not just timber production.	Some commenters supported or rejected all or portions of alternative C.	XXXX	Alternate C returns to the bad old days of the 1950's into the 1970's when the goal of forest management was "to get the cut out", resulting in tens of thousands of acres throughout the western US being clear cut and otherwise devastated through a totally misguided approach to management which had no relation to the best available science for ecological sustainability of ALL forest resources, not just timber production.		Forest Products	PC 203-5 The Forest Service should add to Alternative C the best available science for ecological sustainability of ALL forest resources, not just timber production.
Alt C - support /reject	A better option would be to select Alternative C in the Recreation Spectrum and engage the local OHV community to implement what we know works.	Some commenters supported or rejected all or portions of alternative C.	XXXX	A better option would be to select Alternative C in the Recreation Spectrum and engage the local OHV community to implement what we know works.		Recreation	PC 203-2 The Forest Service should select Alternative C for the Recreation Management as there are areas better suited for management as primitive areas where there is currently no OHV use and would reduce user conflicts and engage the local OHV community to implement what is known to work

Alt C - support /reject	After review of Title 42, Chapter 55, Subsection 1,4332, I have to recommend Alternative C be selected under the Recreation Spectrum. This is due to the NEPA requiring the impact on MAN'S environment be evaluated.	Some commenters supported or rejected all or portions of alternative C.	XXXX	After review of Title 42, Chapter 55, Subsection 1,4332, I have to recommend Alternative C be selected under the Recreation Spectrum. This is due to the NEPA requiring the impact on MAN'S environment be evaluated.	Recreation	PC 203-2 The Forest Service should select Alternative C for the Recreation Management as there are areas better suited for management as primitive areas where there is currently no OHV use and would reduce user conflicts and engage the local OHV community to implement what is known to work
Alt C - support /reject	Despite the fact that Alternative C does not include significant grassland restoration as currently planned, Navajo County believes that the priorities and pace of restoration under Alternative C provide the closest match to the ecological needs of the Apache-Sitgreaves National Forests, the safety, health and economic well-being needs of the White Mountains residents and visitors, and the Navajo County Forested Ecosystems Restoration and Catastrophic Wildfire Prevention Objectives.	Some commenters supported or rejected all or portions of alternative C.	XXXX	Despite the fact that Alternative C does not include significant grassland restoration as currently planned, Navajo County believes that the priorities and pace of restoration under Alternative C provide the closest match to the ecological needs of the Apache-Sitgreaves National Forests, the safety, health and economic well-being needs of the White Mountains residents and visitors, and the Navajo County Forested Ecosystems Restoration and Catastrophic Wildfire Prevention Objectives.	Grassland Restoration	PC 203-10 The Forest Service should include significant grassland restoration as currently planned and then the alternative will provide the closest match to the ecological needs of the Apache-Sitgreaves National Forests, the safety, health and economic well-being needs of the White Mountains residents and visitors, and the Navajo County Forested Ecosystems Restoration and Catastrophic Wildfire Prevention Objectives.
Alt C - support /reject	Since it is unclear to Navajo County whether the 10 priority watersheds designated under Alternatives, B, C and D have higher or lower priority levels as compared to each other, the County favors Alternative C as relates to watersheds restoration objectives due to the fact that generally Alternative C meets more closely the various Navajo County Objectives.	Some commenters supported or rejected all or portions of alternative C.	XXXX	Since it is unclear to Navajo County whether the 10 priority watersheds designated under Alternatives, B, C and D have higher or lower priority levels as compared to each other, the County favors Alternative C as relates to watersheds restoration objectives due to the fact that generally Alternative C meets more closely the various Navajo County Objectives.	Watershed	PC 203-9 The Forest Service should clarify whether the 10 priority watersheds designated under Alternatives, B, C and D have higher or lower priority levels as compared to each other. The County favors Alternative C as relates to watersheds restoration objectives due to the fact that generally Alternative C meets more closely the various Navajo County Objectives.

Alt C - support /reject	Navajo County further respectfully suggests that the Selected Alternative in the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan include information on the rationale supporting the proposed elimination of the existing 322,000 acres of Inventoried Roadless Areas (IRAs) under Alternative C.	Some commenters supported or rejected all or portions of alternative C.	XXXX	Navajo County further respectfully suggests that the Selected Alternative in the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan include information on the rationale supporting the proposed elimination of the existing 322,000 acres of Inventoried Roadless Areas (IRAs) under Alternative C.		Inventoried Roadless Areas	
Alt C - IRA/ roadless rule	and may even remove protections of the National Roadless Conservation Rule of 2001 from the Inventoried Roadless Areas on the Forest!	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	and may even remove protections of the National Roadless Conservation Rule of 2001 from the Inventoried Roadless Areas on the Forest!		National Conservation Roadless Rule	
Alt C - IRA/ roadless rule	Wild country is an important part of our American heritage as well as a natural ecological laboratory where we can observe nature at work without obstruction. Because of this, I strongly believe that the Apache-Sitgreaves National Forest should protect all of its roadless areas,	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	Wild country is an important part of our American heritage as well as a natural ecological laboratory where we can observe nature at work without obstruction. Because of this, I strongly believe that the Apache-Sitgreaves National Forest should protect all of its roadless areas,		Protect IRA's	PC 1205-7 The Forest Service should maintain, restore degraded areas, and expand roadless and wilderness areas as a high priority to include strengthening protection for these areas because they are an important part of our American heritage as well as a natural ecological laboratory where nature can be observed at work without obstruction. The Forest Service should specifically protect Pipestem, Lower San Francisco, Mitchel Peak and Sunset Inventoried Roadless Areas as potential wilderness in order to protect the largest and most

							ecologically productive wildland unit on National Forest Lands in Arizona.
Alt C - IRA/roadless rule	I am deeply concerned with the Forest's analysis of a potential management plan known as "Alternative C."	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	I am deeply concerned with the Forest's analysis of a potential management plan known as "Alternative C."		Forest Analysis of Alternative C	PC 203-1 The Forest Service should not select Alternative C because it would reduce the current level of protections for watersheds, wildlife, and recreation opportunities, repeal the Roadless Rule, be detrimental to wildlife and the environment, make Roadless areas vulnerable to being fragmented by road building and commercial logging, and is not legal. The Forest Service should provide the public a fair understanding of a plan's impacts.
Alt C - IRA/roadless rule	Alternative C would effectively repeal the Roadless Rule and make Roadless areas vulnerable to being fragmented by road building and commercial logging.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	Alternative C would effectively repeal the Roadless Rule and make Roadless areas vulnerable to being fragmented by road building and commercial logging.		National Roadless Area Conservation Rule	

Alt C - IRA/ roadless rule	I strongly oppose Alternative C, which would reduce the current level of protections	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	I strongly oppose Alternative C, which would reduce the current level of protections		Protections of National Roadless Area Conservation Rule	
Alt C - IRA/ roadless rule	I have been told it is illegal even to consider such an alternative (under 40 C.F.R. 1502.2(d)),	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	I have been told it is illegal even to consider such an alternative (under 40 C.F.R. 1502.2(d)),		Legality of Adopting Alternatives	
Alt C - IRA/ roadless rule	and that you should withdraw the DEIS and remove this alternative from it.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	and that you should withdraw the DEIS and remove this alternative from it.		Withdraw DEIS	
Alt C - IRA/ roadless rule	I urge you not to reduce the protection provided by the National Roadless Area Conservation Rule and to continue to protect the Inventoried Roadless Areas as well as other roadless areas.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	I urge you not to reduce the protection provided by the National Roadless Area Conservation Rule and to continue to protect the Inventoried Roadless Areas as well as other roadless areas.		Protect IRA's	PC 1205-7 The Forest Service should maintain, restore degraded areas, and expand roadless and wilderness areas as a high priority to include strengthening protection for these areas because they are an important part of our American heritage as well as a natural ecological laboratory where nature can be observed at work without obstruction. The Forest Service should specifically protect Pipestem, Lower San Francisco, Mitchel

							Peak and Sunset Inventoried Roadless Areas as potential wilderness in order to protect the largest and most ecologically productive wildland unit on National Forest Lands in Arizona.
Alt C - IRA/roadless rule	Protect Inventoried Roadless Areas (IRA) and other roadless places on the forest.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	Protect Inventoried Roadless Areas (IRA) and other roadless places on the forest.		Protect IRA's	PC 1205-7 The Forest Service should maintain, restore degraded areas, and expand roadless and wilderness areas as a high priority to include strengthening protection for these areas because they are an important part of our American heritage as well as a natural ecological laboratory where nature can be observed at work without obstruction. The Forest Service should specifically protect Pipestem, Lower San Francisco, Mitchel Peak and Sunset Inventoried Roadless Areas as potential wilderness in order to protect the largest and most ecologically productive wildland unit on National Forest Lands in Arizona.
Alt C - IRA/roadless rule	Absolutely do not reduce current protections, including those afforded by the National Roadless Area Conservation Rule, to these areas, as proposed in Alternative C.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	Absolutely do not reduce current protections, including those afforded by the National Roadless Area Conservation Rule, to these areas, as proposed in Alternative C.		Protections of National Roadless Area Conservation Rule	PC 203-1 The Forest Service should not select Alternative C because it would reduce the current level of protections for watersheds, wildlife, and recreation opportunities, repeal the Roadless Rule, be detrimental to wildlife and the environment, make Roadless areas vulnerable to being fragmented by road building

							and commercial logging, and is not legal. The Forest Service should provide the public a fair understanding of a plan's impacts.
Alt C - IRA/ roadless rule	It would be illegal for the ASNF, within this process, to reduce the protections of the National Roadless Area Conservation Rule within this planning process.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	It would be illegal for the ASNF, within this process, to reduce the protections of the National Roadless Area Conservation Rule within this planning process. It is illegal under provisions of the National Environmental Policy Act to consider an alternative that without disclosing how "decisions based on it will or will not achieve the requirements of ... environmental laws and policies" (40 C.F.R. 1502.2(d).		National Roadless Area Conservation Rule	
Alt C - IRA/ roadless rule	This DEIS should be withdrawn and the provisions--to no longer apply the protections of the National Roadless Area Conservation Rule as considered under Alternative C--must be removed	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	This DEIS should be withdrawn and the provisions--to no longer apply the protections of the National Roadless Area Conservation Rule as considered under Alternative C--must be removed		Withdraw DEIS	
Alt C - IRA/ roadless rule	It is illegal under provisions of the National Environmental Policy Act to consider an alternative that without disclosing how "decisions based on it will or will not achieve the requirements of ... environmental laws and policies" (40 C.F.R. 1502.2(d).	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX				

Alt C - IRA/roadless rule	I urge the Forest Service to withdraw the draft environmental impact statement and remove the illegal Roadless Rule repeal from any alternatives considered in any new impact statement.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	I urge the Forest Service to withdraw the draft environmental impact statement and remove the illegal Roadless Rule repeal from any alternatives considered in any new impact statement.	Withdraw DEIS	
Alt C - IRA/roadless rule	The Forest Service adopted the national Roadless Area Conservation Rule in 2001 in large part to halt the piecemeal development of roadless areas through forest-by-forest management decisions. The old forest-by-forest approach ignored the large, landscape-scale value of these areas, and was leading to the elimination of roadless values in many areas.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	The Forest Service adopted the national Roadless Area Conservation Rule in 2001 in large part to halt the piecemeal development of roadless areas through forest-by-forest management decisions. The old forest-by-forest approach ignored the large, landscape-scale value of these areas, and was leading to the elimination of roadless values in many areas.	National Conservation Roadless Rule	
Alt C - IRA/roadless rule	In addition to the following content, I would like to say that I feel that Forest Service plans to open up roadless areas in Arizona to road construction would open a can of worms and, if approved, would be a "foot in the door" for other Forest Service districts to follow suit and do the same thing.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	In addition to the following content, I would like to say that I feel that Forest Service plans to open up roadless areas in Arizona to road construction would open a can of worms and, if approved, would be a "foot in the door" for other Forest Service districts to follow suit and do the same thing.	Protect IRA's	PC 1205-7 The Forest Service should maintain, restore degraded areas, and expand roadless and wilderness areas as a high priority to include strengthening protection for these areas because they are an important part of our American heritage as well as a natural ecological laboratory where nature can be observed at work without obstruction. The Forest Service should specifically protect Pipestem, Lower San Francisco, Mitchel Peak and Sunset Inventoried Roadless Areas as potential wilderness in order to protect the largest and most ecologically productive

							wildland unit on National Forest Lands in Arizona.
Alt C - IRA/ roadless rule	The roadless features of our National properties is a value to all Americans. We are short on this type of nature, so the few remaining roadless areas must be strongly preserved. We urge the Forest Service to stand strong to preserve this public property	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	The roadless features of our National properties is a value to all Americans. We are short on this type of nature, so the few remaining roadless areas must be strongly preserved. We urge the Forest Service to stand strong to preserve this public property		Protect IRA's	PC 1205-7 The Forest Service should maintain, restore degraded areas, and expand roadless and wilderness areas as a high priority to include strengthening protection for these areas because they are an important part of our American heritage as well as a natural ecological laboratory where nature can be observed at work without obstruction. The Forest Service should specifically protect Pipestem, Lower San Francisco, Mitchell Peak and Sunset Inventoried Roadless Areas as potential wilderness in order to protect the largest and most ecologically productive wildland unit on National Forest Lands in Arizona.
Alt C - IRA/ roadless rule	On top of everything else, the "Alternative C" proposal would overall be bad for the environment. It would be unconscionable to gut the Roadless Area Conservation Rule. Please do not adopt the "C" proposal.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	On top of everything else, the "Alternative C" proposal would overall be bad for the environment. It would be unconscionable to gut the Roadless Area Conservation Rule. Please do not adopt the "C" proposal.		Protections of National Roadless Area Conservation Rule	PC 203-1 The Forest Service should not select Alternative C because it would reduce the current level of protections for watersheds, wildlife, and recreation opportunities, repeal the Roadless Rule, be detrimental to wildlife and the environment, make Roadless areas vulnerable to being fragmented by road building

							and commercial logging, and is not legal. The Forest Service should provide the public a fair understanding of a plan's impacts.
Alt C - IRA/ roadless rule	At present there is little left of natural forest ecosystems in this region. It is shameful you even consider opening our forest lands to additional development! Too much public monies have gone to roads where they don't belong. The citizens will not tolerate the FS becoming a further patsy for the timber industry, the 1% ers! We demand these areas remain roadless, this is our land, not the corps!	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	At present there is little left of natural forest ecosystems in this region. It is shameful you even consider opening our forest lands to additional development! Too much public monies have gone to roads where they don't belong. The citizens will not tolerate the FS becoming a further patsy for the timber industry, the 1% ers! We demand these areas remain roadless, this is our land, not the corps!		No additional Development	
Alt C - IRA/ roadless rule	I am also concerned that the change in the roadless rule would generalize to roadless areas in other states like New Mexico.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	I am also concerned that the change in the roadless rule would generalize to roadless areas in other states like New Mexico.		National Conservation Roadless Rule	PC 1205-3 The Forest Service should address the concerns that the change in the roadless rule would generalize to roadless areas in other states like New Mexico.
Alt C - IRA/ roadless rule	Apparently you, the Forest Service, are considering a proposal that would eliminate Roadless Rule protection for the Apache-Sitgreaves National Forests in Arizona, opening these special places to the chainsaw and the bulldozer	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	Apparently you, the Forest Service, are considering a proposal that would eliminate Roadless Rule protection for the Apache-Sitgreaves National Forests in Arizona, opening these special places to the chainsaw and the bulldozer		Protections of National Roadless Area Conservation Rule	PC 203-1 The Forest Service should not select Alternative C because it would reduce the current level of protections for watersheds, wildlife, and recreation opportunities, repeal the Roadless Rule, be detrimental to wildlife and the environment, make Roadless areas vulnerable to being

							fragmented by road building and commercial logging, and is not legal. The Forest Service should provide the public a fair understanding of a plan's impacts.
Alt C - IRA/roadless rule	This back-door attempt to repeal Roadless Rule protections based is not legal and not right. This bad idea could spread, threatening more of the 50+ million acres of roadless areas across the country. Such illegal proposals should not even be considered.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	This back-door attempt to repeal Roadless Rule protections based is not legal and not right. This bad idea could spread, threatening more of the 50+ million acres of roadless areas across the country. Such illegal proposals should not even be considered.		Protection of National Roadless Area Conservation Rule	PC 203-1 The Forest Service should not select Alternative C because it would reduce the current level of protections for watersheds, wildlife, and recreation opportunities, repeal the Roadless Rule, be detrimental to wildlife and the environment, make Roadless areas vulnerable to being fragmented by road building and commercial logging, and is not legal. The Forest Service should provide the public a fair understanding of a plan's impacts.
Alt C - IRA/roadless rule	This back-door attempt to repeal Roadless Rule protections based on the decision of one Forest Service manager is not legal and not right. This bad idea could spread, threatening more of the 50+ million acres of roadless areas across the country. The Forest Service knows better, that such illegal proposals should not even be considered.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	This back-door attempt to repeal Roadless Rule protections based on the decision of one Forest Service manager is not legal and not right. This bad idea could spread, threatening more of the 50+ million acres of roadless areas across the country. The Forest Service knows better, that such illegal proposals should not even be considered.		Protection	

Alt C - IRA/roadless rule	I ask the Forest Service not to even consider unraveling the Roadless Rule in this underhanded way. Protecting roadless forests is the law of the land, even in Arizona!	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	I ask the Forest Service not to even consider unraveling the Roadless Rule in this underhanded way. Protecting roadless forests is the law of the land, even in Arizona!		Protection of National Roadless Area Conservation Rule	
Alt C - IRA/roadless rule	Use science, not financial gains/incentives to dictate policy. Roadless areas should remain roadless!	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	Use science, not financial gains/incentives to dictate policy. Roadless areas should remain roadless!		Protect IRA's	PC 1205-1 The Forest Service should address keeping Roadless areas roadless and use science, not financial gains/incentives to dictate policy.
Alt C - IRA/roadless rule	Shame on the Forest Service's proposal of "Alternative C" - it goes against everything you supposedly stand for - protection of forests and wildlife for the health of our planet. Not to mention it's illegal! Please reconsider and do the right thing for all of us!	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	Shame on the Forest Service's proposal of "Alternative C" - it goes against everything you supposedly stand for - protection of forests and wildlife for the health of our planet. Not to mention it's illegal! Please reconsider and do the right thing for all of us!		Opposition to Alternative C	PC 203-1 The Forest Service should not select Alternative C because it would reduce the current level of protections for watersheds, wildlife, and recreation opportunities, repeal the Roadless Rule, be detrimental to wildlife and the environment, make Roadless areas vulnerable to being fragmented by road building and commercial logging, and is not legal. The Forest Service should provide the public a fair understanding of a plan's impacts.

Alt C - IRA/roadless rule	Please dismiss this proposal. It is absurd and against the law of the Roadless Rule protection	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	Please dismiss this proposal. It is absurd and against the law of the Roadless Rule protection		National Roadless Area Conservation Rule	
Alt C - IRA/roadless rule	Our roadless forests need to be left without roads. There are many good reasons the roadless restrictions were put in place.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	Our roadless forests need to be left without roads. There are many good reasons the roadless restrictions were put in place.		Protect IRA's	PC 1205-7 The Forest Service should maintain, restore degraded areas, and expand roadless and wilderness areas as a high priority to include strengthening protection for these areas because they are an important part of our American heritage as well as a natural ecological laboratory where nature can be observed at work without obstruction. The Forest Service should specifically protect Pipestem, Lower San Francisco, Mitchel Peak and Sunset Inventoried Roadless Areas as potential wilderness in order to protect the largest and most ecologically productive wildland unit on National Forest Lands in Arizona.
Alt C - IRA/roadless rule	I am alarmed because I live in a state where the Forest Service manages hundreds of thousands of acres of wilderness and this action sets a precedent that potentially defeats the very idea of wilderness and the concept of preserving wilderness and threatens some of the most beautiful areas on earth.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	I am alarmed because I live in a state where the Forest Service manages hundreds of thousands of acres of wilderness and this action sets a precedent that potentially defeats the very idea of wilderness and the concept of preserving wilderness and threatens some of the most beautiful areas on earth.		Preservation and Restoration	

Alt C - IRA/ roadless rule	It is the Forest Service's committed job to protect all roadless lands; ...instead, Forest Managers are obviously attempting to illegally open the door to change that, i.e. breach their commitment to uphold the binding law of safeguarding the national Roadless Area Conservation Rule ~ in this case for the Apache-Sitgreaves National Forest and all of its magnificent animals who live there.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	It is the Forest Service's committed job to protect all roadless lands; ...instead, Forest Managers are obviously attempting to illegally open the door to change that, i.e. breach their commitment to uphold the binding law of safeguarding the national Roadless Area Conservation Rule ~ in this case for the Apache-Sitgreaves National Forest and all of its magnificent animals who live there.		National Roadless Area Conservation Rule	
Alt C - IRA/ roadless rule	I was told by representatives of the Forest Service that they only allow what the majority of the public wants to happen on public lands to happen. So I do not believe that the majority of the public wants these areas opened up to destructive road building and the devastation of commercial logging. So any plan to do so needs to stop before it even starts.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	I was told by representatives of the Forest Service that they only allow what the majority of the public wants to happen on public lands to happen. So I do not believe that the majority of the public wants these areas opened up to destructive road building and the devastation of commercial logging. So any plan to do so needs to stop before it even starts.		No additional Development	
Alt C - IRA/ roadless rule	I don't understand why the forest service want to give the forest management to the inevitable developers waiting for the opportunities provided by alt. C. perhaps, you could provide a detailed analysis of the benefits to your doubt grateful nation?	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	I don't understand why the forest service want to give the forest management to the inevitable developers waiting for the opportunities provided by alt. C. perhaps, you could provide a detailed analysis of the benefits to your doubt grateful nation?		No additional Development	

Alt C - IRA/ roadless rule	The Apache-Sitgreaves National Forests in Arizona feature some of the most spectacular wild lands in the Southwest. Unfortunately, these roadless areas are now at risk from an unexpected foe-the forest managers themselves.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	The Apache-Sitgreaves National Forests in Arizona feature some of the most spectacular wild lands in the Southwest. Unfortunately, these roadless areas are now at risk from an unexpected foe-the forest managers themselves.		Protection	
Alt C - IRA/ roadless rule	This bad idea could spread, threatening more of the 50+ million acres of roadless areas across the country. Such illegal proposals should not even be considered.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	This bad idea could spread, threatening more of the 50+ million acres of roadless areas across the country. Such illegal proposals should not even be considered.		Protection	
Alt C - IRA/ roadless rule	The American population is so great today that we cannot spare any more wild lands to be developed. We have to manage the areas already under development and leave what's left alone, not just for people, but for all the species of plants and animals that need roadless areas to thrive	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	The American population is so great today that we cannot spare any more wild lands to be developed. We have to manage the areas already under development and leave what's left alone, not just for people, but for all the species of plants and animals that need roadless areas to thrive		No additional Development	
Alt C - IRA/ roadless rule	The US Forest Service adopted the national Roadless Area Conservation Rule in 2001; this rule should stand	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	The US Forest Service adopted the national Roadless Area Conservation Rule in 2001; this rule should stand		National Roadless Area Conservation Rule	

Alt C - IRA/ roadless rule	The USFS is obligated by NEPA and the several other forest management laws to inform the public of the full and honest impact of its proposed rule development and implementation. Alternative C does NOT achieve this mandatory obligation. Consequently it must not be developed further NOR should it be presented to the public as a legally appropriate alternative when it is in fact a clear violation of the Roadless Area Conservation Rule!	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	The USFS is obligated by NEPA and the several other forest management laws to inform the public of the full and honest impact of its proposed rule development and implementation. Alternative C does NOT achieve this mandatory obligation. Consequently it must not be developed	National Roadless Area Conservation Rule	
Alt C - IRA/ roadless rule	I deeply admire and treasure America's unique lands and wildlife; I strongly believe that the Apache-Sitgreaves National Forest should protect all of its roadless areas. Please do not open these special places to the chainsaw and the bulldozer.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	I deeply admire and treasure America's unique lands and wildlife; I strongly believe that the Apache-Sitgreaves National Forest should protect all of its roadless areas. Please do not open these special places to the chainsaw and the bulldozer.	Inventoried Roadless Areas	
Alt C - IRA/ roadless rule	Do not reduce any protections provided by the National Roadless Area Conservation Rule on the ASNF as proposed in Alternative C	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	Do not reduce any protections provided by the National Roadless Area Conservation Rule on the ASNF as proposed in Alternative C	Protections of National Roadless Area Conservation Rule	PC 203-1 The Forest Service should not select Alternative C because it would reduce the current level of protections for watersheds, wildlife, and recreation opportunities, repeal the Roadless Rule, be detrimental to wildlife and the environment, make Roadless areas vulnerable to being fragmented by road building and commercial logging, and is not legal. The Forest Service should provide the public a fair understanding of a plan's impacts.

Alt C - IRA/ roadless rule	further NOR should it presented to the public as a legally appropriate alternative when it is in fact a clear violation of the Roadless Area Conservation Rule!	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	further NOR should it presented to the public as a legally appropriate alternative when it is in fact a clear violation of the Roadless Area Conservation Rule!		Intergovernmental Coordination with State and Local Requirements	
Alt C - IRA/ roadless rule	It is essential, for the sanity of this nation and the legacy of our children that you continue to protect Inventoried Roadless Areas and other roadless places in the forest.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	It is essential, for the sanity of this nation and the legacy of our children that you continue to protect Inventoried Roadless Areas and other roadless places in the forest.		Protect IRA's	
Alt C - IRA/ roadless rule	The DEIS should be withdrawn and the provisions in Alternative C, to no longer apply the protections of the National Roadless Area Conservation Rule, must be removed.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	The DEIS should be withdrawn and the provisions in Alternative C, to no longer apply the protections of the National Roadless Area Conservation Rule, must be removed.		Protections of National Roadless Area Conservation Rule	PC 203-1 The Forest Service should not select Alternative C because it would reduce the current level of protections for watersheds, wildlife, and recreation opportunities, repeal the Roadless Rule, be detrimental to wildlife and the environment, make Roadless areas vulnerable to being fragmented by road building and commercial logging, and is not legal. The Forest Service should provide the public a fair understanding of a plan's impacts.

Alt C - IRA/ roadless rule	I am really appalled at the draft deis. Even a suggestion of removing the National Roadless Conservation Rule of 2001 would be a crime towards our grandkids and their legacies.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	I am really appalled at the draft deis. Even a suggestion of removing the National Roadless Conservation Rule of 2001 would be a crime towards our grandkids and their legacies.	National Roadless Area Conservation Rule
Alt C - IRA/ roadless rule	Protect all current roadless areas.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	Protect all current roadless areas.	Protect IRA's
Alt C - IRA/ roadless rule	The Wilderness Society and Arizona Wilderness Coalition are dismayed that the Draft EIS considers an alternative – Alternative C – that is not compliant with the Roadless Area Conservation Rule (“Roadless Rule”). Although as a general matter, the Forest Service under the 1982 planning rule can consider reasonable alternatives that may require a change in existing policy or law, in this case, the A-S NF’s consideration of Alternative C is not legal. Specifically, consideration of this alternative violates the Roadless Rule, which prohibits the “reconsideration” of the Rule’s protections in the forest plan revision process.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	The Wilderness Society and Arizona Wilderness Coalition are dismayed that the Draft EIS considers an alternative – Alternative C – that is not compliant with the Roadless Area Conservation Rule (“Roadless Rule”). Although as a general matter, the Forest Service under the 1982 planning rule can consider reasonable alternatives that may require a change in existing policy or law, in this case, the A-S NF’s consideration of Alternative C is not legal. Specifically, consideration of this alternative violates the Roadless Rule, which prohibits the “reconsideration” of the Rule’s protections in the forest plan revision process.	National Roadless Area Conservation Rule

Alt C - IRA/ roadless rule	In addition, because the draft EIS fails to disclose that the Alternative C is non-compliant with the Roadless Rule and cannot be implemented absent a time-consuming national rulemaking, the draft EIS violates NEPA's "hard look" requirement.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	Also, the draft EIS fails to consider a range of reasonable alternatives because it considers so few action alternatives that can legally be implemented.		Range of Alternatives
Alt C - IRA/ roadless rule	The Wilderness Society and Arizona Wilderness Coalition request that the Apache-Sitgreaves National Forest: (1) withdraw its draft EIS and publish a revised draft EIS that removes Alternative C as currently drafted; (2) fully and fairly notify the public of the illegality of adopting such an alternative as crafted. The revised draft EIS must contain a range of reasonable, legal alternatives.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	The Wilderness Society and Arizona Wilderness Coalition request that the Apache-Sitgreaves National Forest: (1) withdraw its draft EIS and publish a revised draft EIS that removes Alternative C as currently drafted; (2) fully and fairly notify the public of the illegality of adopting such an alternative as crafted. The revised draft EIS must contain a range of reasonable, legal alternatives.		Withdraw DEIS
Alt C - IRA/ roadless rule	The draft EIS does not acknowledge that the Forest Service must manage IRAs consistent with the Roadless Rule, nor does it acknowledge that Alternative C would not be consistent with law, regulation, or policy. In fact, the draft EIS states that Alternative C and all other alternatives "[c]omply with applicable laws, regulations, and policies." Id. at 17.3 Further, the draft EIS apparently does not consider a proposal to eliminate protection of IRAs a significant distinction among the alternatives. The Draft EIS contains an 11-page section	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	The draft EIS does not acknowledge that the Forest Service must manage IRAs consistent with the Roadless Rule, nor does it acknowledge that Alternative C would not be consistent with law, regulation, or policy. In fact, the draft EIS states that Alternative C and all other alternatives "[c]omply with applicable laws, regulations, and policies." Id. at 17.3 Further, the draft EIS apparently does not consider a proposal to eliminate protection of IRAs a significant distinction among the alternatives. The Draft EIS contains an 11-page section		Cosistency with Laws and Regulations

	entitled "Main Differences Among Alternatives," and an additional 11 pages of tables in a section entitled "Comparison of Alternatives." Id. at 19-40. In neither of these sections can one find the word "roadless" or any reference roadless area management.			entitled "Main Differences Among Alternatives," and an additional 11 pages of tables in a section entitled "Comparison of Alternatives." Id. at 19-40. In neither of these sections can one find the word "roadless" or any reference roadless area management.		
Alt C - IRA/roadless rule	The Draft EIS does not directly explain why the Forest chose to analyze an alternative that would require repeal of the Roadless Rule across the A-S NF. The draft EIS does explain generally that "Alternative C responds to public comments that forest management should provide increased benefits to local communities through management emphasis on commodity outputs and motorized and developed recreation."	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	The Draft EIS does not directly explain why the Forest chose to analyze an alternative that would require repeal of the Roadless Rule across the A-S NF. The draft EIS does explain generally that "Alternative C responds to public comments that forest management should provide increased benefits to local communities through management emphasis on commodity outputs and motorized and developed recreation."		Alternatives
Alt C - IRA/roadless rule	This provision has two components. First, no Forest can rescind or revise any restriction in the Roadless Rule through a decision to amend or revise a forest plan. The Forest Service adopted this limitation because "[t]he prohibitions established in [the Roadless Rule] are permanent limitations, which may only be changed through rulemaking, not through forest plan amendment or revision." 65 Fed. Reg. 30,276, 30,281 (May 10, 2000). The A-S NF thus may not adopt an alternative that would require repeal of the	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	This provision has two components. First, no Forest can rescind or revise any restriction in the Roadless Rule through a decision to amend or revise a forest plan. The Forest Service adopted this limitation because "[t]he prohibitions established in [the Roadless Rule] are permanent limitations, which may only be changed through rulemaking, not through forest plan amendment or revision." 65 Fed. Reg. 30,276, 30,281 (May 10, 2000). The A-S NF thus may not adopt an alternative that would require repeal of the		National Roadless Area Conservation Rule

	Rule.			Rule.		
Alt C - IRA/roadless rule	Second, by stating that Roadless Rule's mandates "are not subject to reconsideration," the Rule goes further, prohibiting Forests from expending time and resources reconsidering the Rule's requirements in Forest planning. Inclusion of the word "reconsideration" would have been unnecessary if the Forest Service sought only to prohibit the adoption of forest plan revisions that purported to undo the Roadless Rule. <sup>5</sup> In its preamble to the final Rule, the Forest Service affirms that local Forest Service officials are "not free to re-examine the prohibitions established by this rule."	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	Second, by stating that Roadless Rule's mandates "are not subject to reconsideration," the Rule goes further, prohibiting Forests from expending time and resources reconsidering the Rule's requirements in Forest planning. Inclusion of the word "reconsideration" would have been unnecessary if the Forest Service sought only to prohibit the adoption of forest plan revisions that purported to undo the Roadless Rule. <sup>5</sup> In its preamble to the final Rule, the Forest Service affirms that local Forest Service officials are "not free to re-examine the prohibitions established by this rule."		National Roadless Area Conservation Rule
Alt C - IRA/roadless rule	The Roadless Rule's plain language forbids the A-S NF from considering any alternative premised on repealing or modifying the Rule in forest planning. The Draft EIS does not even acknowledge the prohibition, nor explain why this provision would not apply to this draft EIS. Because the draft EIS for the plan revisions contains language	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	The Roadless Rule's plain language forbids the A-S NF from considering any alternative premised on repealing or modifying the Rule in forest planning. The Draft EIS does not even acknowledge the prohibition, nor explain why this provision would not apply to this draft EIS. Because the draft EIS for the plan revisions contains language		National Roadless Area Conservation Rule

	barred by regulation, the Forest Service must withdraw the Draft EIS and issue new draft EIS that complies with law.			barred by regulation, the Forest Service must withdraw the Draft EIS and issue new draft EIS that complies with law.			
Alt C - IRA/roadless rule	The draft EIS violates NEPA in at least two ways. First, the draft EIS fails to acknowledge the existence of the Roadless Rule's provision barring reconsideration of the Roadless Rule in forest plan revisions. By omitting this key fact from its description of Alternative C, the Forest Service has not "rigorously explored" or permitted the public to effectively "evaluate the[] comparative merit[]" of that alternative which presumes away the existence of the Roadless Rule. Failure to reveal this controlling law deprives the public of information critical to comparing alternatives and to understanding the Forest Service's duties concerning the management of IRAs	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	The draft EIS violates NEPA in at least two ways. First, the draft EIS fails to acknowledge the existence of the Roadless Rule's provision barring reconsideration of the Roadless Rule in forest plan revisions. By omitting this key fact from its description of Alternative C, the Forest Service has not "rigorously explored" or permitted the public to effectively "evaluate the[] comparative merit[]" of that alternative which presumes away the existence of the Roadless Rule. Failure to reveal this controlling law deprives the public of information critical to comparing alternatives and to understanding the Forest Service's duties concerning the management of IRAs		National Roadless Area Conservation Rule	PC 104-4 The Forest Service is violating NEPA by failing to acknowledge the provision of the Roadless Rule barring reconsideration of the rule in forest plan revisions, by not including information critical to understanding the FS duties concerning management of inventoried roadless areas. NEPA and NFMA require the Forest Service to ensure the public receives the accurate and high quality information needed to analyze a full range of legal alternatives.
Alt C - IRA/roadless rule	The draft EIS violates NEPA in at least two ways. Second, the Draft EIS affirmatively misleads the public by asserting that Alternative C, like all other alternatives, "follow[s] existing laws, regulations, and policies" when in fact Alternative C is premised on repeal (or non-	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	The draft EIS violates NEPA in at least two ways. Second, the Draft EIS affirmatively misleads the public by asserting that Alternative C, like all other alternatives, "follow[s] existing laws, regulations, and policies" when in fact Alternative C is premised on repeal (or non-		NEPA – Full Disclosure: Missing Information	PC 104-4 The Forest Service is violating NEPA by failing to acknowledge the provision of the Roadless Rule barring reconsideration of the rule in forest plan revisions, by not including information critical to understanding the FS duties concerning management of

	<p>existence) of the Roadless Rule for the A-S NF. Draft EIS at 14. Alternative C’s proposed management for IRAs could only be implemented if the Forest Service subsequently undertook and implemented a national rulemaking, a separate, years-long process that the agency has not proposed. The Draft EIS wrongly informs readers that Alternative C could be implemented in the same manner as other alternatives. This misleading analysis subverts the NEPA process, a key goal of which is to insure that the public receives “accurate” and “high-quality” information.</p>			<p>existence) of the Roadless Rule for the A-S NF. Draft EIS at 14. Alternative C’s proposed management for IRAs could only be implemented if the Forest Service subsequently undertook and implemented a national rulemaking, a separate, years-long process that the agency has not proposed. The Draft EIS wrongly informs readers that Alternative C could be implemented in the same manner as other alternatives. This misleading analysis subverts the NEPA process, a key goal of which is to insure that the public receives “accurate” and “high-quality” information.</p>		<p>inventoried roadless areas. NEPA and NFMA require the Forest Service to ensure the public receives the accurate and high quality information needed to analyze a full range of legal alternatives.</p>
<p>Alt C - IRA/roadless rule</p>	<p>Here, Alternative C – the alternative that would manage large swathes of IRAs on the A-S NFs in violation of the Roadless Rule – is both “unlikely to be implemented” and “inconsistent with [the Forest Service’s] basic policy objectives.” Alternative C is unlikely to be implemented any time during the 15-year life of the management plan because it would require the Forest Service to initiate and complete a national rulemaking – an expensive, time-consuming, and almost certainly controversial process.</p>	<p>Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.</p>	<p>XXXX</p>	<p>Here, Alternative C – the alternative that would manage large swathes of IRAs on the A-S NFs in violation of the Roadless Rule – is both “unlikely to be implemented” and “inconsistent with [the Forest Service’s] basic policy objectives.” Alternative C is unlikely to be implemented any time during the 15-year life of the management plan because it would require the Forest Service to initiate and complete a national rulemaking – an expensive, time-consuming, and almost certainly controversial process.</p>	<p>National Roadless Area Conservation Rule</p>	

Alt C - IRA/roadless rule	Further, while the Forest Service has adopted two state-specific rules that modify implementation of the Roadless Rule, neither the Idaho nor the Colorado roadless rules involves wholesale repeal of roadless protections for all IRAs statewide or on a particular national forest, as Alternative C appears to assume. It is extremely unlikely that an alternative premised on repeal of the Roadless Rule would be implemented.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	Further, while the Forest Service has adopted two state-specific rules that modify implementation of the Roadless Rule, neither the Idaho nor the Colorado roadless rules involves wholesale repeal of roadless protections for all IRAs statewide or on a particular national forest, as Alternative C appears to assume. It is extremely unlikely that an alternative premised on repeal of the Roadless Rule would be implemented.	National Roadless Area Conservation Rule	
Alt C - IRA/roadless rule	Alternative C is also inconsistent with the Forest Service's basic policy objectives, which include protection of watersheds, wildlife, recreation opportunities, and the agency's budget, all of which will be degraded if road construction is permitted in IRAs.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	Alternative C is also inconsistent with the Forest Service's basic policy objectives, which include protection of watersheds, wildlife, recreation opportunities, and the agency's budget, all of which will be degraded if road construction is permitted in IRAs.	Inventoried Roadless Areas	PC 203-1 The Forest Service should not select Alternative C because it would reduce the current level of protections for watersheds, wildlife, and recreation opportunities, repeal the Roadless Rule, be detrimental to wildlife and the environment, make Roadless areas vulnerable to being fragmented by road building and commercial logging, and is not legal. The Forest Service should provide the public a fair understanding of a plan's impacts.
Alt C - IRA/roadless rule	Further, adoption of an alternative premised on Roadless Rule repeal for an individual forest would undermine one of the Forest Service's basic policy objectives in adopting the Roadless Rule: providing for more protective, national management of IRAs.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	Further, adoption of an alternative premised on Roadless Rule repeal for an individual forest would undermine one of the Forest Service's basic policy objectives in adopting the Roadless Rule: providing for more protective, national management of IRAs.	Protection	

Alt C - IRA/roadless rule	We believe strongly that the Roadless Rule is good environmental and economic policy, and that A-S NF should take strong steps to protect not only IRAs but those roadless lands outside of IRAs.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	We believe strongly that the Roadless Rule is good environmental and economic policy, and that A-S NF should take strong steps to protect not only IRAs but those roadless lands outside of IRAs.	Protection	
Alt C - IRA/roadless rule	Because the consideration of an alternative that assumes repeal of the Roadless Rule is illegal, skews the analysis of alternatives, misleads the public, and is bad forest policy, we urge the Forest Service to: (1) withdraw its draft EIS and publish a revised draft EIS that removes Alternative C as currently drafted to assume the Roadless Rule's repeal; (2) fully and fairly notify the public of the illegality of adopting such an alternative. The revised draft EIS must contain a range of reasonable, legal alternatives.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	Because the consideration of an alternative that assumes repeal of the Roadless Rule is illegal, skews the analysis of alternatives, misleads the public, and is bad forest policy, we urge the Forest Service to: (1) withdraw its draft EIS and publish a revised draft EIS that removes Alternative C as currently drafted to assume the Roadless Rule's repeal; (2) fully and fairly notify the public of the illegality of adopting such an alternative. The revised draft EIS must contain a range of reasonable, legal alternatives.	Withdraw DEIS	
Alt C - IRA/roadless rule	the Forest Service can't adopt Alternative C through the planning process because it is illegal	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	the Forest Service can't adopt Alternative C through the planning process because it is illegal	Opposition to Alternative C	PC 203-1 The Forest Service should not select Alternative C because it would reduce the current level of protections for watersheds, wildlife, and recreation opportunities, repeal the Roadless Rule, be detrimental to wildlife and the environment, make Roadless areas vulnerable to being fragmented by road building and commercial logging, and is not legal. The Forest Service should provide the public a fair understanding of a plan's

							impacts.
Alt C - IRA/roadless rule	The Roadless Area Conservation Rule is the law of the land, and it protects all of the Apache-Sitgreaves' roadless areas from road building and commercial logging. No forest management plan can undo those protections	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	The Roadless Area Conservation Rule is the law of the land, and it protects all of the Apache-Sitgreaves' roadless areas from road building and commercial logging. No forest management plan can undo those protections		National Roadless Area Conservation Rule	
Alt C - IRA/roadless rule	It is also misleading for the Forest Service to tell the public that the Service can adopt this alternative.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	It is also misleading for the Forest Service to tell the public that the Service can adopt this alternative.		Opposition to Alternative C	
Alt C - IRA/roadless rule	I urge the Forest Service to withdraw the draft environmental impact statement and remove the illegal Roadless Rule repeal from any alternatives considered in any new impact statement.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	I urge the Forest Service to withdraw the draft environmental impact statement and remove the illegal Roadless Rule repeal from any alternatives considered in any new impact statement.		Withdraw DEIS	PC 176-2 The Forest Service should withdraw the draft environmental impact statement and remove the illegal Roadless Rule repeal from any alternatives considered in any new impact statement.

Alt C - IRA/ roadless rule	Because I strongly believe that the Apache-Sitgreaves National Forests should protect all of its roadless areas, I am deeply concerned with the Forest Service's analysis of a potential management plan known as "Alternative C."	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	Because I strongly believe that the Apache-Sitgreaves National Forests should protect all of its roadless areas, I am deeply concerned with the Forest Service's analysis of a potential management plan known as "Alternative C."		National Roadless Area Conservation Rule	
Alt C - IRA/ roadless rule	Roadless areas are vital to wildlife, plant life, and to people who want to experience the land without intruding on it with noise, destructive wheels, air pollution, litter, etc. Please protect IRAs on the forests and follow the National Roadless Area Conservation Rule.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	Roadless areas are vital to wildlife, plant life, and to people who want to experience the land without intruding on it with noise, destructive wheels, air pollution, litter, etc. Please protect IRAs on the forests and follow the National Roadless Area Conservation Rule.		Protect IRA's	PC 1205-4 The Forest Service should address that the Apache-Sitgreaves roadless areas are contiguous, adjacent, or in close proximity to the Blue Range Primitive Area, and include the ecological value for plants, wildlife, and endangered species by providing habitat, refuge, and in keeping the remote areas roadless. The Forest Service should also address the ecological value to people who want to experience the land without intruding on it with noise, destructive wheels, air pollution, litter, etc.
Alt C - IRA/ roadless rule	I've been told that Alternative C, in this respect, is a bad idea that is probably illegal and should be rejected.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	I've been told that Alternative C, in this respect, is a bad idea that is probably illegal and should be rejected.		Opposition to Alternative C	PC 203-1 The Forest Service should not select Alternative C because it would reduce the current level of protections for watersheds, wildlife, and recreation opportunities, repeal the Roadless Rule, be detrimental to wildlife and the environment, make Roadless areas vulnerable to being fragmented by road building and commercial logging, and is not legal. The Forest Service should provide the public a fair understanding of a plan's

							impacts.
Alt C - IRA/roadless rule	Because I strongly believe that the Apache-Sitgreaves National Forests should protect all of its roadless areas, I am deeply concerned with the Forest Service's analysis of a potential management plan known as "Alternative C." Alternative C would manage nearly all Apache-Sitgreaves roadless areas as open to road construction and commercial logging. Such a proposal would be bad for the forest, for wildlife, and for people who recreate on these lands.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	Because I strongly believe that the Apache-Sitgreaves National Forests should protect all of its roadless areas, I am deeply concerned with the Forest Service's analysis of a potential management plan known as "Alternative C." Alternative C would manage nearly all Apache-Sitgreaves roadless areas as open to road construction and commercial logging. Such a proposal would be bad for the forest, for wildlife, and for people who recreate on these lands.		Inventoried Roadless Areas	PC 203-1 The Forest Service should not select Alternative C because it would reduce the current level of protections for watersheds, wildlife, and recreation opportunities, repeal the Roadless Rule, be detrimental to wildlife and the environment, make Roadless areas vulnerable to being fragmented by road building and commercial logging, and is not legal. The Forest Service should provide the public a fair understanding of a plan's impacts.
Alt C - IRA/roadless rule	Protect Inventoried Roadless Areas (IRAs) on the forest. Absolutely do not reduce current protections, including those afforded by the National Roadless Area Conservation Rule, to these areas, as proposed in Alternative C. It is not possible and therefore would be illegal for the ASNF to reduce the protections provided by the National Roadless Area Conservation Rule within this planning process. Also, it is illegal under provisions of the National Environmental Policy Act to	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	Protect Inventoried Roadless Areas (IRAs) on the forest. Absolutely do not reduce current protections, including those afforded by the National Roadless Area Conservation Rule, to these areas, as proposed in Alternative C. It is not possible and therefore would be illegal for the ASNF to reduce the protections provided by the National Roadless Area Conservation Rule within this planning process. Also, it is illegal under provisions of the National Environmental Policy Act to		Withdraw DEIS	

	<p>consider an alternative without disclosing how "decisions based on it will or will not achieve the requirements of ... environmental laws and policies" (40 C.F.R. 1502.2(d). Alternative C provides an alternative that would drastically reduce protections to areas with wild and roadless character across the entire Forest. By evaluating this unfeasible Alternative C, the ASNF has unrealistically skewed the range of alternatives to allow Alternative B, which recommends protecting less than 2 percent of the wilderness quality lands, to seem more of a compromise position when in fact it is not. Unfortunately this DEIS should be withdrawn and the provisions, to no longer apply the protections of the National Roadless Area Conservation Rule as considered under Alternative C, must be removed.</p>			<p>consider an alternative without disclosing how "decisions based on it will or will not achieve the requirements of ... environmental laws and policies" (40 C.F.R. 1502.2(d). Alternative C provides an alternative that would drastically reduce protections to areas with wild and roadless character across the entire Forest. By evaluating this unfeasible Alternative C, the ASNF has unrealistically skewed the range of alternatives to allow Alternative B, which recommends protecting less than 2 percent of the wilderness quality lands, to seem more of a compromise position when in fact it is not. Unfortunately this DEIS should be withdrawn and the provisions, to no longer apply the protections of the National Roadless Area Conservation Rule as considered under Alternative C, must be removed.</p>		
Alt C - IRA/roadless rule	<p>Protect Inventoried Roadless Areas (IRAs) on the forest. Absolutely do not reduce current protections, including those afforded by the National Roadless Area Conservation Rule, to these areas, as proposed in Alternative C. It is not possible and therefore would be illegal for the ASNF to reduce the protections provided by the National</p>	<p>Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.</p>	XXXX	<p>Protect Inventoried Roadless Areas (IRAs) on the forest. Absolutely do not reduce current protections, including those afforded by the National Roadless Area Conservation Rule, to these areas, as proposed in Alternative C. It is not possible and therefore would be illegal for the ASNF to reduce the protections provided by the National</p>	Protect IRA's	<p>PC 1205-5 The Forest Service should revise the DEIS to manage IRAs consistent with the Roadless Rule, and acknowledge that Alternative C would not be consistent with law, regulation, or policy. The draft EIS should address the proposal to eliminate protection of IRAs a significant distinction among the alternatives and include it in</p>

	Roadless Area Conservation Rule within this planning process.			Roadless Area Conservation Rule within this planning process.			the 11-page section entitled “Main Differences among Alternatives,” and an additional 11 pages of tables in a section entitled “Comparison of Alternatives. Forest Service’s consideration of Roadless Rule repeal in Alternative C is not illegal, consideration of such an alternative is poor policy, and appears to contradict the Forest Service’s stated commitment to roadless area protection.
Alt C - IRA/roadless rule	Unfortunately this DEIS should be withdrawn and the provisions, to no longer apply the protections of the National Roadless Area Conservation Rule as considered under Alternative C, must be removed.	Alternative C should not be considered because it violates the Roadless Area Conservation Rule by removing protections for inventoried roadless areas.	XXXX	Unfortunately this DEIS should be withdrawn and the provisions, to no longer apply the protections of the National Roadless Area Conservation Rule as considered under Alternative C, must be removed.		Protections of National Roadless Area Conservation Rule	PC 203-1 The Forest Service should not select Alternative C because it would reduce the current level of protections for watersheds, wildlife, and recreation opportunities, repeal the Roadless Rule, be detrimental to wildlife and the environment, make Roadless areas vulnerable to being fragmented by road building and commercial logging, and is not legal. The Forest Service should provide the public a fair understanding of a plan's impacts.
Alt D - support /reject	I support the priorities for restoration treatments set out in Alternative D (page 25) which emphasizes retaining old-growth and large trees. These stands and trees provide important habitat for wildlife, along with climate mitigation, water filtration, nutrient cycling, and carbon storage.	Commenters supported or rejected all or portions of alternative D.	XXXX	I support the priorities for restoration treatments set out in Alternative D (page 25) which emphasizes retaining old-growth and large trees. These stands and trees provide important habitat for wildlife, along with climate mitigation, water filtration, nutrient cycling, and carbon storage.		Old Growth	PC 204-8 The Forest Service should support the priorities for restoration treatments set out in Alternative D (page 25) which emphasizes retaining old-growth and large trees. These stands and trees provide important habitat for wildlife, along with climate mitigation, water filtration, nutrient cycling, and carbon storage.

Alt D - support /reject	I do not support allocating any part of the ASNF to timber production (Alternative D, page 27 ). The surrounding communities and regions are well able to find uses for the forest products generated through restoration treatments.	Commenters supported or rejected all or portions of alternative D.	XXXX	I do not support allocating any part of the ASNF to timber production (Alternative D, page 27 ).	Timber Production	PC 204-1 The Forest Service should not allocate any of the ASNF to timber production under alternative D.
Alt D - support /reject	Accordingly, I support designating all of the proposed wilderness areas as set out in Alternative D (Appendix H, figs. 91 and 92), which includes the additions to Escudilla, Bear Wallow and Mount Baldy and also the new areas.	Commenters supported or rejected all or portions of alternative D.	XXXX	Accordingly, I support designating all of the proposed wilderness areas as set out in Alternative D (Appendix H, figs. 91 and 92), which includes the additions to Escudilla, Bear Wallow and Mount Baldy and also the new areas.	Proposed Wilderness	PC 204-3 The Forest Service should support and protect adding all the new proposed wilderness areas as set out in Alternative D (Appendix H, figs. 91 and 92), which includes the additions to Escudilla, Bear Wallow and Mount Baldy and also the new areas
Alt D - support /reject	I support keeping all the existing Wildlife Quiet Areas, and adding all the new proposed areas under Alternative D.	Commenters supported or rejected all or portions of alternative D.	XXXX	I support keeping all the existing Wildlife Quiet Areas, and adding all the new proposed areas under Alternative D.	Quiet Areas	PC 204-2 The Forest Service should support keeping all the existing and proposed Wildlife Quiet Areas because the small percentage of protected land would help preserve or restore that wildlife values
Alt D - support /reject	I support protecting all of potential wilderness units that are displayed under Alternative D as they would protect and market this remarkable wilderness resource that is unique to the ASNF Forest.	Commenters supported or rejected all or portions of alternative D.	XXXX	I support protecting all of potential wilderness units that are displayed under Alternative D as they would protect and market this remarkable wilderness resource that is unique to the ASNF Forest.	Wilderness Protection	PC 204-3 The Forest Service should support and protect adding all the new proposed wilderness areas as set out in Alternative D (Appendix H, figs. 91 and 92), which includes the additions to Escudilla, Bear Wallow and Mount Baldy and also the new areas

Alt D - support /reject	I strongly support protecting all of potential wilderness units that are displayed under Alternative D as they would protect and market this remarkable wilderness resource that is unique to the ASNF Forest.	Commenters supported or rejected all or portions of alternative D.	XXXX	I strongly support protecting all of potential wilderness units that are displayed under Alternative D as they would protect and market this remarkable wilderness resource that is unique to the ASNF Forest.		Wilderness Protection	
Alt D - support /reject	I support Alternative D, as it at least provides some wilderness protection.	Commenters supported or rejected all or portions of alternative D.	XXXX	I support Alternative D, as it at least provides some wilderness protection.		Wilderness Protection	PC 204-3 The Forest Service should support and protect adding all the new proposed wilderness areas as set out in Alternative D (Appendix H, figs. 91 and 92), which includes the additions to Escudilla, Bear Wallow and Mount Baldy and also the new areas
Alt D - support /reject	Please protect all of the potential wilderness units as proposed in Alternative D	Commenters supported or rejected all or portions of alternative D.	XXXX	Please protect all of the potential wilderness units as proposed in Alternative D		Wilderness Protection	PC 204-3 The Forest Service should support and protect adding all the new proposed wilderness areas as set out in Alternative D (Appendix H, figs. 91 and 92), which includes the additions to Escudilla, Bear Wallow and Mount Baldy and also the new areas
Alt D - support /reject	Based on the above, Navajo County wants to communicate unambiguously to the Apache-Sitgreaves National Forests its opposition to Alternative D.	Commenters supported or rejected all or portions of alternative D.	XXXX	Based on the above, Navajo County wants to communicate unambiguously to the Apache-Sitgreaves National Forests its opposition to Alternative D.		Opposition to Alternative D	

Alt D - support /reject	Navajo County believes that even though the pace of restoration under Alternative D is adequate, the priorities and types of treatment under Alternative D do not meet the ecological needs of the Apache-Sitgreaves National Forests, nor the custom, culture and economic well-being needs of the White Mountains residents and visitors, nor the Navajo County Forested Ecosystems Restoration and Catastrophic Wildfire Prevention Objectives.	Commenters supported or rejected all or portions of alternative D.	XXXX	Navajo County believes that even though the pace of restoration under Alternative D is adequate, the priorities and types of treatment under Alternative D do not meet the ecological needs of the Apache-Sitgreaves National Forests, nor the custom, culture and economic well-being needs of the White Mountains residents and visitors, nor the Navajo County Forested Ecosystems Restoration and Catastrophic Wildfire Prevention Objectives.	Meeting Ecological Needs	
Alt D - support /reject	The Forest Service should increase the number of riparian acres treated per year to at least the levels found in Alternative D.	Commenters supported or rejected all or portions of alternative D.	XXXX	The Forest Service should increase the number of riparian acres treated per year to at least the levels found in Alternative D.	Riparian Areas	
Alt D - support /reject	The forest treatments under Alternatives B and C will likely lead to a deterioration of overall watershed conditions. ... The Forest Service should institute the treatments listed under Alternative D since these would result in less sedimentation and less damage to watersheds.	Commenters supported or rejected all or portions of alternative D.	XXXX	The forest treatments under Alternatives B and C will likely lead to a deterioration of overall watershed conditions. Forest treatments under these two alternatives could temporarily The Forest Service should institute the treatments listed under Alternative D since these would result in less sedimentation and less damage to watersheds.	Watershed	

Alt D - support /reject	Alternative D provides for more removal of open roads near riparian areas or non-system roads than any of the other alternatives, With the clear threat that both authorized and unauthorized roads pose to watershed conditions, the Forest Service should choose an alternative that minimizes the threats to watersheds. The Forest Service should incorporate the elements of Alternative D related to acres available for motorized areas, roads, and trails and the removal of roads near riparian areas and non-system roads.	Commenters supported or rejected all or portions of alternative D.	XXXX	Alternative D provides for more removal of open roads near riparian areas or non-system The Forest Service should incorporate the elements of Alternative D related to acres available for motorized areas, roads, and trails and the removal of roads near riparian areas and non-system roads.	Roads	
Alt D - support /reject	Reduce the acres set aside for Community Forest Intermix to 58,610 as identified in Alternative D.	Commenters supported or rejected all or portions of alternative D.	XXXX	Reduce the acres set aside for Community Forest Intermix to 58,610 as identified in Alternative D.	Community Forest Intermix	
Alt D - support /reject	We support protecting all of potential wilderness units that are displayed under Alternative D as they would protect and market this remarkable wilderness resource that is unique to the ASNF Forest.	Commenters supported or rejected all or portions of alternative D.	XXXX	We support protecting all of potential wilderness units that are displayed under Alternative D as they would protect and market this remarkable wilderness resource that is unique to the ASNF Forest.	Wilderness Protection	PC 204-3 The Forest Service should support and protect adding all the new proposed wilderness areas as set out in Alternative D (Appendix H, figs. 91 and 92), which includes the additions to Escudilla, Bear Wallow and Mount Baldy and also the new areas

Alt D - support /reject	Alternative D includes proposed additional WQAs that would help, but the small percentage of protected land (approximately 3%) does not offer compelling assurances that wildlife values will be preserved or restored (DEIS, p. 306; Figure 50, p. 307). The potential wilderness units identified on page 360 (Figure 58) combined with the existing and proposed Wildlife Quiet Areas (WQA) depicted on the Alternative D WQA map (Figure 50:DEIS, p. 307) generally reflect our recommendations, and if implemented and properly managed, would provide effective levels of connectivity provided continued progress regarding wildlife movement analysis and construction of wildlife crossings of SR 260 continue.	Commenters supported or rejected all or portions of alternative D.	XXXX	Alternative D includes proposed additional WQAs that would help, but the small percentage of protected land (approximately 3%) does not offer compelling assurances that wildlife values will be preserved or restored (DEIS, p. 306; Figure 50, p. 307). The potential wilderness units identified on page 360 (Figure 58) combined with the existing and proposed Wildlife Quiet Areas (WQA) depicted on the Alternative D WQA map (Figure 50:DEIS, p. 307) generally reflect our recommendations, and if implemented and properly managed, would provide effective levels of connectivity provided continued progress regarding wildlife movement analysis and construction of wildlife crossings of SR 260 continue.	Quiet Areas	PC 204-2 The Forest Service should support keeping all the existing and proposed Wildlife Quiet Areas because the small percentage of protected land would help preserve or restore that wildlife values
Why consider some illegal alternatives, not others	While the Draft EIS fully evaluates an alternative that conflicts directly with the Roadless Rule, the draft EIS refuses to consider in detail several other alternatives at least in part on the grounds that those other alternatives would not be consistent with law. For example, the draft EIS declines to consider fully an alternative that would eliminate timber harvesting across the Forest in part because such an alternative would conflict with the Multiple Use-Sustained Yield	Explain why the DEIS evaluates an alternative that conflicts directly with the National Roadless Conservation Rule but will consider in detail other alternatives because those alternatives would not be consistent with the law (e.g., an alternative that would eliminate timber harvesting).	XXXX	While the Draft EIS fully evaluates an alternative that conflicts directly with the Roadless Rule, the draft EIS refuses to consider in detail several other alternatives at least in part on the grounds that those other alternatives would not be consistent with law. For example, the draft EIS declines to consider fully an alternative that would eliminate timber harvesting across the Forest in part because such an alternative would conflict with the Multiple Use-Sustained Yield	Considering Other Alternatives that Conflict with Law	PC 205-1 The Forest Service should address that the draft EIS refuses to consider in detail several other alternatives at least in part on the grounds that those other alternatives would not be consistent with law, while the Draft EIS fully evaluates an alternative that conflicts directly with the Roadless Rule.

	Act and would be “inconsistent with the mission of the Forest Service.”.			Act and would be “inconsistent with the mission of the Forest Service.”.			
Explain rationale for dismissing no livestock grazing	Chapter 2 – Alternatives At page 15, at the section titled, Alternative with no Livestock Grazing, we request the Forest provide specificity to the following statements. “.... The legal requirements of NFMA and MUSA requires the Forest to be managed using multiple use, sustained yield principals.” We request the Forest provide us the specific from the documents sighted, specifically stating that the Forest Must have Domestic Livestock use no matter what the current conditions or pending impacts to the ecosystem and the elements of those systems.	Explain the specific legal requirements of NFMA and MUUSA that state the forest must have domestic livestock use no matter what the current conditions or pending impacts to the ecosystem.	XXXX	Chapter 2 – Alternatives At page 15, at the section titled, Alternative with no Livestock Grazing, we request the Forest provide specificity to the following statements. “.... The legal requirements of NFMA and MUSA requires the Forest to be managed using multiple use, sustained yield principals.” We request the Forest provide us the specific from the documents sighted, specifically stating that the Forest Must have Domestic Livestock use no matter what the current conditions or pending impacts to the ecosystem and the elements of those systems.		Range Management	PC 207-34 The Forest should provide the specific from the documents sighted, specifically stating that the Forest Must have Domestic Livestock use no matter what the current conditions or pending impacts to the ecosystem and the elements of those systems
New Alt - Navajo + Proposal	Navajo County further requests that the Selected Alternative for the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan include up to 25,000 acres per year of grasslands restoration (primarily the Great Basin and semi-desert types) to remove encroaching woody species as identified in Alternative B	Suggest the selected alternative include: (1) provisions of Alternative B - up to 25,000 acres per year treated of grasslands, (2) provisions of Alternative C - to increase the number of acres logged annually to accelerate the pace of ecological restoration; increase the amount of forest byproducts resources by prioritizing mechanical thinning treatments over fire as a	XXXX	Navajo County further requests that the Selected Alternative for the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan include up to 25,000 acres per year of grasslands restoration (primarily the Great Basin and semi-desert types) to remove encroaching woody species as identified in Alternative B		Grassland Restoration	

		<p>thinning tool; and increase the maximum allowable sale quantity (ASQ) volume to 268,000 CCF per year to meet the foreseeable requirements of the existing and currently developing industry in the White Mountains, (3) provisions of Alternative C - retain the suitability of 80 percent of the lands of the Apache-Sitgreaves NFs for future consideration of new motorized areas and trails, (4) provisions of Alternative C - forested ecosystems restoration and catastrophic wildfire prevention treatment types, scale, pace and prioritization, (5) provisions of Alternative C - watersheds restoration objectives, (6) provisions of Alternatives B and C - designation of management areas as follows: Community Forest Intermix: ~61,000 acres (3%); High Use Developed Recreation Area: ~17,000 acres (1%); Energy Corridor: ~2,500 acres (&lt;1%); Wild Horse Territory: ~19,000 acres (1%); Wildlife Quiet Area: ~50,000 acres (2%); Research Natural Area: ~8,000 acres (&lt;1%); Primitive Area: ~200,000 acres (10%); and existing Wilderness: ~23,000 (1%). (7) removing the proposed Research Natural Areas from suitable rangelands for the specific purpose of quantifying and improving the</p>				
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		<p>understanding of the rangelands resources ecosystem processes and how they relate to improved management practices, (8) guidelines for a rangelands resources adaptive management plan that provides clear quantitative, qualitative and effectiveness monitoring requirements, and a more balanced approach between the goal of restoration and the goal of economic production, as the need for restoration in rangelands may not carry the same clear and present benefits as restoration in forestlands, (9) alternatively include a specific plan under conventional management to reach full utilization of the available animal unit months and to result in the full economic impact of approximately 120 jobs and \$1.3 million in labor income annually, (10) the necessary analysis, and the resulting authority for the Responsible Official to simultaneously implement a restoration program designed to support the existing and currently developing industry in the White Mountains, and the contract(s) expected to result from the second analysis of the Four Forest Restoration Initiative, including a maximum allowable sale quantity (ASQ)</p>					
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		<p>volume of 450,000 CCF annually, (11) guidance for the upcoming implementation of the national Travel Management Rule and for authorized cross-country travel, in order to simultaneously achieve the required preservation and conservation objectives and allow reasonable motorized access, travel and recreation for dispersed camping, big game retrieval, firewood collection and dispersed shooting as outlined in the above comments and the Navajo County Motorized Travel and Recreation Management Objectives, (12) guidelines to integrate the provisions of the Four Forest Restoration Initiative stakeholders-approved document Old Growth Protection and Large Tree Retention Strategy (OGPLTRS) to allow mechanical treatments to proceed without using 16-inch diameter caps, while retaining the social license necessary for an expeditious, non conflictual and non-litigious implementation of landscape scale restoration, (13) a comparative analysis of prioritization of the 10 priority watersheds designated under Alternatives, B, C and D, if they are different and have higher or lower priority levels as</p>				
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		<p>compared to each other, (14) include a revised analysis differentiating more clearly between degrading factors and the effects of degrading factors on watersheds physical and biological characteristics and processes that affect the hydrologic and soil functions, and between natural processes and management effects, (15) specific information on the potential location of the proposed 405,000 acres of Natural Landscape Areas under Alternative B, (16) specific information on the rationale supporting the proposed elimination of the existing 322,000 acres of Inventoried Roadless Areas (IRAs) under Alternative C, (17) the requirements for a quantitative, qualitative and effectiveness monitoring strategy, a very specific monitoring implementation plan, and a specific monitoring budget, required resources allocation and funding, to the planning and NEPA review process of all management projects, to be submitted to public review and comments in the Draft Environmental Impact Statements (DEIS), to be included in the Records of Decisions (ROD) and to be included in the Final Environmental Impact Statements (FEIS) of all</p>				
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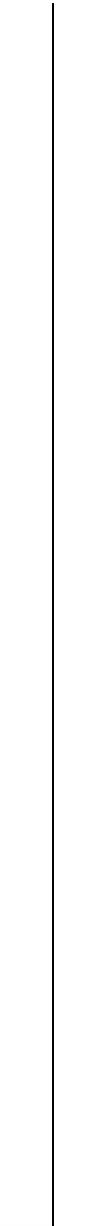
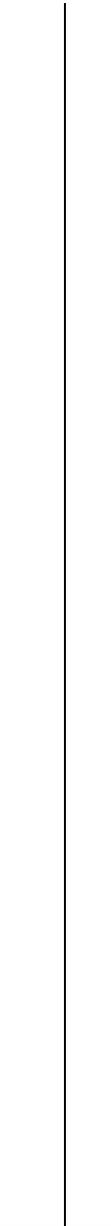
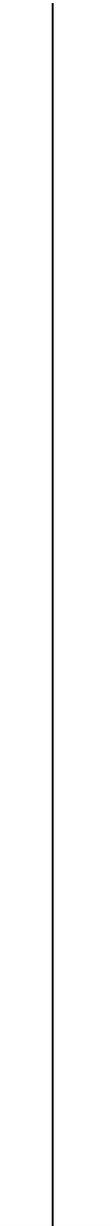
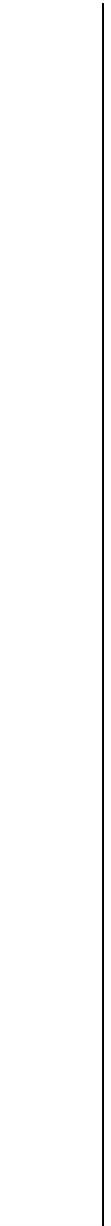
		<p>management projects, in order to insure that monitoring will actually be implemented and funded, (18) the responsible officials to be bound by the findings of multi-party monitoring boards and to act upon the findings of a multi-party monitoring boards in a manner that appropriately addresses the issues raised by the multi-party monitoring boards, (19) a fourth phase that outlines clearly the responsibility and authority of responsible officials to implement adaptive and if necessary corrective management action during the implementation of large scale long duration specific projects as a response to the quantitative, qualitative, and effectiveness monitoring of the project, in addition to the three phases of planning (assessment, planning, and monitoring) identified in Title 36, Code of Federal Regulations, part 219 (36 CFR part219) and designed to support a framework for adaptive management, (20) guidelines to responsible officials to integrate social and economic sustainability and social and economic science into the framework of best available scientific information to inform their land management planning process and their management</p>				
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		<p>decision making process, (21) guidelines to responsible officials to implement substantive - even though possibly scientifically imperfect - management actions that move the ecosystems significantly toward the desired future conditions, when such actions are supported by social consensus, rather than spend years attempting to forcibly impose, and possibly trigger litigation of management actions that may be deemed scientifically more perfect but that do not benefit from the support of the social consensus, (22) an emphasis on executing well less than perfect projects now, over developing scientifically perfect projects that are never implemented, (23) an emphasis on allowing the public to participate meaningfully in, influence substantially, and when appropriate alter the content of the decision of responsible officials while they retain their statutory decision making authority, (24) a special forum for local government elected officials such as County Supervisors to represent the socio economic interests of the local residents in the decision making process of the Forest Service responsible officials, (25) guidelines to reviewing officers to exercise careful</p>				
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		judgment in their resolution or rejection of objections, in relation to the true material importance of the objections – as opposed to their symbolic or emotional importance, and the potential effect of litigation on the implementation of the project.				
New Alt - Navajo + Proposal	Navajo County also requests that the Selected Alternative for the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan include a specific plan under conventional management to reach full utilization of the available animal unit months and to result in the full economic impact of approximately 120 jobs and \$1.3 million in labor income annually.	Suggest the selected alternative include: (1) provisions of Alternative B - up to 25,000 acres per year treated of grasslands, (2) provisions of Alternative C - to increase the number of acres logged annually to accelerate the pace of ecological restoration; increase the amount of forest byproducts resources by prioritizing mechanical thinning treatments over fire as a thinning tool; and increase the maximum allowable sale quantity (ASQ) volume to 268,000 CCF per year to meet the foreseeable requirements of the existing and currently developing industry in the White Mountains, (3) provisions of Alternative C - retain the suitability of 80 percent of the lands of the Apache-Sitgreaves NFs for future consideration of new motorized areas and trails, (4) provisions of Alternative C - forested ecosystems restoration and catastrophic wildfire prevention treatment types, scale, pace and	XXXX	Navajo County also requests that the Selected Alternative for the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan include a specific plan under conventional management to reach full utilization of the available animal unit months and to result in the full economic impact of approximately 120 jobs and \$1.3 million in labor income annually.	Alternatives	



prioritization, (5) provisions of Alternative C - watersheds restoration objectives, (6) provisions of Alternatives B and C - designation of management areas as follows: Community Forest Intermix: ~61,000 acres (3%); High Use Developed Recreation Area: ~17,000 acres (1%); Energy Corridor: ~2,500 acres (<1%); Wild Horse Territory: ~19,000 acres (1%); Wildlife Quiet Area: ~50,000 acres (2%); Research Natural Area: ~8,000 acres (<1%); Primitive Area: ~200,000 acres (10%); and existing Wilderness: ~23,000 (1%). (7) removing the proposed Research Natural Areas from suitable rangelands for the specific purpose of quantifying and improving the understanding of the rangelands resources ecosystem processes and how they relate to improved management practices, (8) guidelines for a rangelands resources adaptive management plan that provides clear quantitative, qualitative and effectiveness monitoring requirements, and a more balanced approach between the goal of restoration and the goal of economic production, as the need for restoration in rangelands may not carry the same clear and present benefits as restoration in



		<p>forestlands, (9) alternatively include a specific plan under conventional management to reach full utilization of the available animal unit months and to result in the full economic impact of approximately 120 jobs and \$1.3 million in labor income annually, (10) the necessary analysis, and the resulting authority for the Responsible Official to simultaneously implement a restoration program designed to support the existing and currently developing industry in the White Mountains, and the contract(s) expected to result from the second analysis of the Four Forest Restoration Initiative, including a maximum allowable sale quantity (ASQ) volume of 450,000 CCF annually, (11) guidance for the upcoming implementation of the national Travel Management Rule and for authorized cross-country travel, in order to simultaneously achieve the required preservation and conservation objectives and allow reasonable motorized access, travel and recreation for dispersed camping, big game retrieval, firewood collection and dispersed shooting as outlined in the above comments and the Navajo County Motorized Travel and Recreation</p>				
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		<p>Management Objectives, (12) guidelines to integrate the provisions of the Four Forest Restoration Initiative stakeholders-approved document Old Growth Protection and Large Tree Retention Strategy (OGPLTRS) to allow mechanical treatments to proceed without using 16-inch diameter caps, while retaining the social license necessary for an expeditious, non conflictual and non-litigious implementation of landscape scale restoration, (13) a comparative analysis of prioritization of the 10 priority watersheds designated under Alternatives, B, C and D, if they are different and have higher or lower priority levels as compared to each other, (14) include a revised analysis differentiating more clearly between degrading factors and the effects of degrading factors on watersheds physical and biological characteristics and processes that affect the hydrologic and soil functions, and between natural processes and management effects, (15) specific information on the potential location of the proposed 405,000 acres of Natural Landscape Areas under Alternative B, (16) specific information on the rationale supporting the proposed elimination of the existing</p>				
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		<p>322,000 acres of Inventoried Roadless Areas (IRAs) under Alternative C, (17) the requirements for a quantitative, qualitative and effectiveness monitoring strategy, a very specific monitoring implementation plan, and a specific monitoring budget, required resources allocation and funding, to the planning and NEPA review process of all management projects, to be submitted to public review and comments in the Draft Environmental Impact Statements (DEIS), to be included in the Records of Decisions (ROD) and to be included in the Final Environmental Impact Statements (FEIS) of all management projects, in order to insure that monitoring will actually be implemented and funded, (18) the responsible officials to be bound by the findings of multi-party monitoring boards and to act upon the findings of a multi-party monitoring boards in a manner that appropriately addresses the issues raised by the multi-party monitoring boards, (19) a fourth phase that outlines clearly the responsibility and authority of responsible officials to implement adaptive and if necessary corrective management action during the</p>				
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		<p>implementation of large scale long duration specific projects as a response to the quantitative, qualitative, and effectiveness monitoring of the project, in addition to the three phases of planning (assessment, planning, and monitoring) identified in Title 36, Code of Federal Regulations, part 219 (36 CFR part219) and designed to support a framework for adaptive management, (20) guidelines to responsible officials to integrate social and economic sustainability and social and economic science into the framework of best available scientific information to inform their land management planning process and their management decision making process, (21) guidelines to responsible officials to implement substantive - even though possibly scientifically imperfect - management actions that move the ecosystems significantly toward the desired future conditions, when such actions are supported by social consensus, rather than spend years attempting to forcibly impose, and possibly trigger litigation of management actions that may be deemed scientifically more perfect but that do not benefit from the support of the social consensus, (22) an emphasis</p>					
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		<p>on executing well less than perfect projects now, over developing scientifically perfect projects that are never implemented, (23) an emphasis on allowing the public to participate meaningfully in, influence substantially, and when appropriate alter the content of the decision of responsible officials while they retain their statutory decision making authority, (24) a special forum for local government elected officials such as County Supervisors to represent the socio economic interests of the local residents in the decision making process of the Forest Service responsible officials, (25) guidelines to reviewing officers to exercise careful judgment in their resolution or rejection of objections, in relation to the true material importance of the objections – as opposed to their symbolic or emotional importance, and the potential effect of litigation on the implementation of the project.</p>				
<p>New Alt - Navajo + Proposal</p>	<p>Navajo County therefore respectfully requests that the Selected Alternative for the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan at a minimum include the provisions of current</p>	<p>Suggest the selected alternative include: (1) provisions of Alternative B - up to 25,000 acres per year treated of grasslands, (2) provisions of Alternative C - to increase the number of acres logged annually to accelerate the pace of ecological restoration; increase the</p>	<p>XXXX</p>	<p>Navajo County therefore respectfully requests that the Selected Alternative for the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan at a minimum include the provisions of current</p>	<p>Forest Products</p>	

	<p>Alternative C as relates to Forest Products in order to: 1) Increase the number of acres logged annually in order to accelerate the pace of ecological restoration; 2) Increase the amount of forest byproducts resources by prioritizing wherever possible mechanical thinning treatments over fire as a thinning tool treatments; 3) Increase the maximum allowable sale quantity (ASQ) volume to 268,000 CCF per year to meet the short term foreseeable requirements of the existing and currently developing industry in the White Mountains.</p>	<p>amount of forest byproducts resources by prioritizing mechanical thinning treatments over fire as a thinning tool; and increase the maximum allowable sale quantity (ASQ) volume to 268,000 CCF per year to meet the foreseeable requirements of the existing and currently developing industry in the White Mountains, (3) provisions of Alternative C - retain the suitability of 80 percent of the lands of the Apache-Sitgreaves NFs for future consideration of new motorized areas and trails, (4) provisions of Alternative C - forested ecosystems restoration and catastrophic wildfire prevention treatment types, scale, pace and prioritization, (5) provisions of Alternative C - watersheds restoration objectives, (6) provisions of Alternatives B and C - designation of management areas as follows: Community Forest Intermix: ~61,000 acres (3%); High Use Developed Recreation Area: ~17,000 acres (1%); Energy Corridor: ~2,500 acres (&lt;1%); Wild Horse Territory: ~19,000 acres (1%); Wildlife Quiet Area: ~50,000 acres (2%); Research Natural Area: ~8,000 acres (&lt;1%); Primitive Area: ~200,000 acres (10%); and existing Wilderness: ~23,000 (1%). (7) removing the</p>		<p>Alternative C as relates to Forest Products in order to: 1) Increase the number of acres logged annually in order to accelerate the pace of ecological restoration; 2) Increase the amount of forest byproducts resources by prioritizing wherever possible mechanical thinning treatments over fire as a thinning tool treatments; 3) Increase the maximum allowable sale quantity (ASQ) volume to 268,000 CCF per year to meet the short term foreseeable requirements of the existing and currently developing industry in the White Mountains.</p>			
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		<p>proposed Research Natural Areas from suitable rangelands for the specific purpose of quantifying and improving the understanding of the rangelands resources ecosystem processes and how they relate to improved management practices, (8) guidelines for a rangelands resources adaptive management plan that provides clear quantitative, qualitative and effectiveness monitoring requirements, and a more balanced approach between the goal of restoration and the goal of economic production, as the need for restoration in rangelands may not carry the same clear and present benefits as restoration in forestlands, (9) alternatively include a specific plan under conventional management to reach full utilization of the available animal unit months and to result in the full economic impact of approximately 120 jobs and \$1.3 million in labor income annually, (10) the necessary analysis, and the resulting authority for the Responsible Official to simultaneously implement a restoration program designed to support the existing and currently developing industry in the White Mountains, and the contract(s) expected to result</p>				
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		<p>from the second analysis of the Four Forest Restoration Initiative, including a maximum allowable sale quantity (ASQ) volume of 450,000 CCF annually, (11) guidance for the upcoming implementation of the national Travel Management Rule and for authorized cross-country travel, in order to simultaneously achieve the required preservation and conservation objectives and allow reasonable motorized access, travel and recreation for dispersed camping, big game retrieval, firewood collection and dispersed shooting as outlined in the above comments and the Navajo County Motorized Travel and Recreation Management Objectives, (12) guidelines to integrate the provisions of the Four Forest Restoration Initiative stakeholders-approved document Old Growth Protection and Large Tree Retention Strategy (OGPLTRS) to allow mechanical treatments to proceed without using 16-inch diameter caps, while retaining the social license necessary for an expeditious, non conflictual and non-litigious implementation of landscape scale restoration, (13) a comparative analysis of prioritization of the 10 priority</p>					
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		<p>watersheds designated under Alternatives, B, C and D, if they are different and have higher or lower priority levels as compared to each other, (14) include a revised analysis differentiating more clearly between degrading factors and the effects of degrading factors on watersheds physical and biological characteristics and processes that affect the hydrologic and soil functions, and between natural processes and management effects, (15) specific information on the potential location of the proposed 405,000 acres of Natural Landscape Areas under Alternative B, (16) specific information on the rationale supporting the proposed elimination of the existing 322,000 acres of Inventoried Roadless Areas (IRAs) under Alternative C, (17) the requirements for a quantitative, qualitative and effectiveness monitoring strategy, a very specific monitoring implementation plan, and a specific monitoring budget, required resources allocation and funding, to the planning and NEPA review process of all management projects, to be submitted to public review and comments in the Draft Environmental Impact Statements (DEIS), to be included in the Records of</p>				
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		<p>Decisions (ROD) and to be included in the Final Environmental Impact Statements (FEIS) of all management projects, in order to insure that monitoring will actually be implemented and funded, (18) the responsible officials to be bound by the findings of multi-party monitoring boards and to act upon the findings of a multi-party monitoring boards in a manner that appropriately addresses the issues raised by the multi-party monitoring boards, (19) a fourth phase that outlines clearly the responsibility and authority of responsible officials to implement adaptive and if necessary corrective management action during the implementation of large scale long duration specific projects as a response to the quantitative, qualitative, and effectiveness monitoring of the project, in addition to the three phases of planning (assessment, planning, and monitoring) identified in Title 36, Code of Federal Regulations, part 219 (36 CFR part219) and designed to support a framework for adaptive management, (20) guidelines to responsible officials to integrate social and economic sustainability and social and economic science into the framework of best</p>				
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		<p>available scientific information to inform their land management planning process and their management decision making process, (21) guidelines to responsible officials to implement substantive - even though possibly scientifically imperfect - management actions that move the ecosystems significantly toward the desired future conditions, when such actions are supported by social consensus, rather than spend years attempting to forcibly impose, and possibly trigger litigation of management actions that may be deemed scientifically more perfect but that do not benefit from the support of the social consensus, (22) an emphasis on executing well less than perfect projects now, over developing scientifically perfect projects that are never implemented, (23) an emphasis on allowing the public to participate meaningfully in, influence substantially, and when appropriate alter the content of the decision of responsible officials while they retain their statutory decision making authority, (24) a special forum for local government elected officials such as County Supervisors to represent the socio economic interests of the local residents in the decision</p>				
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		making process of the Forest Service responsible officials, (25) guidelines to reviewing officers to exercise careful judgment in their resolution or rejection of objections, in relation to the true material importance of the objections – as opposed to their symbolic or emotional importance, and the potential effect of litigation on the implementation of the project.				
New Alt - Navajo + Proposal	Further, Navajo County respectfully suggests that the Selected Alternative for the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan include the necessary analysis, and the resulting authority for the Responsible Official to SIMULTANEOUSLY implement a restoration program designed to support the existing and currently developing industry in the White Mountains AND the contract(s) expected to result from the second analysis of the Four Forest Restoration Initiative, including a maximum allowable sale quantity (ASQ) volume of 450,000 CCF annually.	Suggest the selected alternative include: (1) provisions of Alternative B - up to 25,000 acres per year treated of grasslands, (2) provisions of Alternative C - to increase the number of acres logged annually to accelerate the pace of ecological restoration; increase the amount of forest byproducts resources by prioritizing mechanical thinning treatments over fire as a thinning tool; and increase the maximum allowable sale quantity (ASQ) volume to 268,000 CCF per year to meet the foreseeable requirements of the existing and currently developing industry in the White Mountains, (3) provisions of Alternative C - retain the suitability of 80 percent of the lands of the Apache-Sitgreaves NFs for future consideration of new motorized areas and trails, (4) provisions of Alternative C -	XXXX	Further, Navajo County respectfully suggests that the Selected Alternative for the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan include the necessary analysis, and the resulting authority for the Responsible Official to SIMULTANEOUSLY implement a restoration program designed to support the existing and currently developing industry in the White Mountains AND the contract(s) expected to result from the second analysis of the Four Forest Restoration Initiative, including a maximum allowable sale quantity (ASQ) volume of 450,000 CCF annually.	Forest Products	

		<p>forested ecosystems restoration and catastrophic wildfire prevention treatment types, scale, pace and prioritization, (5) provisions of Alternative C - watersheds restoration objectives, (6) provisions of Alternatives B and C - designation of management areas as follows: Community Forest Intermix: ~61,000 acres (3%); High Use Developed Recreation Area: ~17,000 acres (1%); Energy Corridor: ~2,500 acres (&lt;1%); Wild Horse Territory: ~19,000 acres (1%); Wildlife Quiet Area: ~50,000 acres (2%); Research Natural Area: ~8,000 acres (&lt;1%); Primitive Area: ~200,000 acres (10%); and existing Wilderness: ~23,000 (1%). (7) removing the proposed Research Natural Areas from suitable rangelands for the specific purpose of quantifying and improving the understanding of the rangelands resources ecosystem processes and how they relate to improved management practices, (8) guidelines for a rangelands resources adaptive management plan that provides clear quantitative, qualitative and effectiveness monitoring requirements, and a more balanced approach between the goal of restoration and the goal of economic production, as the</p>				
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		<p>need for restoration in rangelands may not carry the same clear and present benefits as restoration in forestlands, (9) alternatively include a specific plan under conventional management to reach full utilization of the available animal unit months and to result in the full economic impact of approximately 120 jobs and \$1.3 million in labor income annually, (10) the necessary analysis, and the resulting authority for the Responsible Official to simultaneously implement a restoration program designed to support the existing and currently developing industry in the White Mountains, and the contract(s) expected to result from the second analysis of the Four Forest Restoration Initiative, including a maximum allowable sale quantity (ASQ) volume of 450,000 CCF annually, (11) guidance for the upcoming implementation of the national Travel Management Rule and for authorized cross-country travel, in order to simultaneously achieve the required preservation and conservation objectives and allow reasonable motorized access, travel and recreation for dispersed camping, big game retrieval, firewood collection and dispersed</p>				
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		<p>shooting as outlined in the above comments and the Navajo County Motorized Travel and Recreation Management Objectives, (12) guidelines to integrate the provisions of the Four Forest Restoration Initiative stakeholders-approved document Old Growth Protection and Large Tree Retention Strategy (OGPLTRS) to allow mechanical treatments to proceed without using 16-inch diameter caps, while retaining the social license necessary for an expeditious, non conflictual and non-litigious implementation of landscape scale restoration, (13) a comparative analysis of prioritization of the 10 priority watersheds designated under Alternatives, B, C and D, if they are different and have higher or lower priority levels as compared to each other, (14) include a revised analysis differentiating more clearly between degrading factors and the effects of degrading factors on watersheds physical and biological characteristics and processes that affect the hydrologic and soil functions, and between natural processes and management effects, (15) specific information on the potential location of the proposed 405,000 acres of Natural Landscape Areas under</p>					
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		<p>Alternative B, (16) specific information on the rationale supporting the proposed elimination of the existing 322,000 acres of Inventoried Roadless Areas (IRAs) under Alternative C, (17) the requirements for a quantitative, qualitative and effectiveness monitoring strategy, a very specific monitoring implementation plan, and a specific monitoring budget, required resources allocation and funding, to the planning and NEPA review process of all management projects, to be submitted to public review and comments in the Draft Environmental Impact Statements (DEIS), to be included in the Records of Decisions (ROD) and to be included in the Final Environmental Impact Statements (FEIS) of all management projects, in order to insure that monitoring will actually be implemented and funded, (18) the responsible officials to be bound by the findings of multi-party monitoring boards and to act upon the findings of a multi-party monitoring boards in a manner that appropriately addresses the issues raised by the multi-party monitoring boards, (19) a fourth phase that outlines clearly the responsibility and authority of</p>				
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		<p>responsible officials to implement adaptive and if necessary corrective management action during the implementation of large scale long duration specific projects as a response to the quantitative, qualitative, and effectiveness monitoring of the project, in addition to the three phases of planning (assessment, planning, and monitoring) identified in Title 36, Code of Federal Regulations, part 219 (36 CFR part219) and designed to support a framework for adaptive management, (20) guidelines to responsible officials to integrate social and economic sustainability and social and economic science into the framework of best available scientific information to inform their land management planning process and their management decision making process, (21) guidelines to responsible officials to implement substantive - even though possibly scientifically imperfect - management actions that move the ecosystems significantly toward the desired future conditions, when such actions are supported by social consensus, rather than spend years attempting to forcibly impose, and possibly trigger litigation of management actions that may be deemed</p>					
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		<p>scientifically more perfect but that do not benefit from the support of the social consensus, (22) an emphasis on executing well less than perfect projects now, over developing scientifically perfect projects that are never implemented, (23) an emphasis on allowing the public to participate meaningfully in, influence substantially, and when appropriate alter the content of the decision of responsible officials while they retain their statutory decision making authority, (24) a special forum for local government elected officials such as County Supervisors to represent the socio economic interests of the local residents in the decision making process of the Forest Service responsible officials, (25) guidelines to reviewing officers to exercise careful judgment in their resolution or rejection of objections, in relation to the true material importance of the objections – as opposed to their symbolic or emotional importance, and the potential effect of litigation on the implementation of the project.</p>				
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<p>New Alt - Navajo + Proposal</p>	<p>Navajo County respectfully requests that the Selected Alternative in the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan include the provisions of Alternative C as relates to forested ecosystems restoration and catastrophic wildfire prevention treatment types, scale, pace and prioritization.</p>	<p>Suggest the selected alternative include: (1) provisions of Alternative B - up to 25,000 acres per year treated of grasslands, (2) provisions of Alternative C - to increase the number of acres logged annually to accelerate the pace of ecological restoration; increase the amount of forest byproducts resources by prioritizing mechanical thinning treatments over fire as a thinning tool; and increase the maximum allowable sale quantity (ASQ) volume to 268,000 CCF per year to meet the foreseeable requirements of the existing and currently developing industry in the White Mountains, (3) provisions of Alternative C - retain the suitability of 80 percent of the lands of the Apache-Sitgreaves NFs for future consideration of new motorized areas and trails, (4) provisions of Alternative C - forested ecosystems restoration and catastrophic wildfire prevention treatment types, scale, pace and prioritization, (5) provisions of Alternative C - watersheds restoration objectives, (6) provisions of Alternatives B and C - designation of management areas as follows: Community Forest Intermix: ~61,000 acres (3%); High Use Developed Recreation Area:</p>	<p>XXXX</p>	<p>Navajo County respectfully requests that the Selected Alternative in the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan include the provisions of Alternative C as relates to forested ecosystems restoration and catastrophic wildfire prevention treatment types, scale, pace and prioritization.</p>	<p>Including Provisions of Alternative C</p>	
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		<p>~17,000 acres (1%); Energy Corridor: ~2,500 acres (&lt;1%); Wild Horse Territory: ~19,000 acres (1%); Wildlife Quiet Area: ~50,000 acres (2%); Research Natural Area: ~8,000 acres (&lt;1%); Primitive Area: ~200,000 acres (10%); and existing Wilderness: ~23,000 (1%). (7) removing the proposed Research Natural Areas from suitable rangelands for the specific purpose of quantifying and improving the understanding of the rangelands resources ecosystem processes and how they relate to improved management practices, (8) guidelines for a rangelands resources adaptive management plan that provides clear quantitative, qualitative and effectiveness monitoring requirements, and a more balanced approach between the goal of restoration and the goal of economic production, as the need for restoration in rangelands may not carry the same clear and present benefits as restoration in forestlands, (9) alternatively include a specific plan under conventional management to reach full utilization of the available animal unit months and to result in the full economic impact of approximately 120 jobs and \$1.3 million in labor income</p>				
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		<p>annually, (10) the necessary analysis, and the resulting authority for the Responsible Official to simultaneously implement a restoration program designed to support the existing and currently developing industry in the White Mountains, and the contract(s) expected to result from the second analysis of the Four Forest Restoration Initiative, including a maximum allowable sale quantity (ASQ) volume of 450,000 CCF annually, (11) guidance for the upcoming implementation of the national Travel Management Rule and for authorized cross-country travel, in order to simultaneously achieve the required preservation and conservation objectives and allow reasonable motorized access, travel and recreation for dispersed camping, big game retrieval, firewood collection and dispersed shooting as outlined in the above comments and the Navajo County Motorized Travel and Recreation Management Objectives, (12) guidelines to integrate the provisions of the Four Forest Restoration Initiative stakeholders-approved document Old Growth Protection and Large Tree Retention Strategy (OGPLTRS) to allow mechanical</p>				
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		<p>treatments to proceed without using 16-inch diameter caps, while retaining the social license necessary for an expeditious, non conflictual and non-litigious implementation of landscape scale restoration, (13) a comparative analysis of prioritization of the 10 priority watersheds designated under Alternatives, B, C and D, if they are different and have higher or lower priority levels as compared to each other, (14) include a revised analysis differentiating more clearly between degrading factors and the effects of degrading factors on watersheds physical and biological characteristics and processes that affect the hydrologic and soil functions, and between natural processes and management effects, (15) specific information on the potential location of the proposed 405,000 acres of Natural Landscape Areas under Alternative B, (16) specific information on the rationale supporting the proposed elimination of the existing 322,000 acres of Inventoried Roadless Areas (IRAs) under Alternative C, (17) the requirements for a quantitative, qualitative and effectiveness monitoring strategy, a very specific monitoring implementation plan, and a specific monitoring</p>					
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		<p>budget, required resources allocation and funding, to the planning and NEPA review process of all management projects, to be submitted to public review and comments in the Draft Environmental Impact Statements (DEIS), to be included in the Records of Decisions (ROD) and to be included in the Final Environmental Impact Statements (FEIS) of all management projects, in order to insure that monitoring will actually be implemented and funded, (18) the responsible officials to be bound by the findings of multi-party monitoring boards and to act upon the findings of a multi-party monitoring boards in a manner that appropriately addresses the issues raised by the multi-party monitoring boards, (19) a fourth phase that outlines clearly the responsibility and authority of responsible officials to implement adaptive and if necessary corrective management action during the implementation of large scale long duration specific projects as a response to the quantitative, qualitative, and effectiveness monitoring of the project, in addition to the three phases of planning (assessment, planning, and monitoring) identified in Title</p>				
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		<p>36, Code of Federal Regulations, part 219 (36 CFR part 219) and designed to support a framework for adaptive management, (20) guidelines to responsible officials to integrate social and economic sustainability and social and economic science into the framework of best available scientific information to inform their land management planning process and their management decision making process, (21) guidelines to responsible officials to implement substantive - even though possibly scientifically imperfect - management actions that move the ecosystems significantly toward the desired future conditions, when such actions are supported by social consensus, rather than spend years attempting to forcibly impose, and possibly trigger litigation of management actions that may be deemed scientifically more perfect but that do not benefit from the support of the social consensus, (22) an emphasis on executing well less than perfect projects now, over developing scientifically perfect projects that are never implemented, (23) an emphasis on allowing the public to participate meaningfully in, influence substantially, and when</p>				
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		<p>appropriate alter the content of the decision of responsible officials while they retain their statutory decision making authority, (24) a special forum for local government elected officials such as County Supervisors to represent the socio economic interests of the local residents in the decision making process of the Forest Service responsible officials, (25) guidelines to reviewing officers to exercise careful judgment in their resolution or rejection of objections, in relation to the true material importance of the objections – as opposed to their symbolic or emotional importance, and the potential effect of litigation on the implementation of the project.</p>				
<p>New Alt - Navajo + Proposal</p>	<p>Navajo County further respectfully requests that the Selected Alternative in the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan include the provisions of Alternative B as relates to the restoration of 25,000 acres per year of grasslands (primarily the Great Basin and semi-desert types).</p>	<p>Suggest the selected alternative include: (1) provisions of Alternative B - up to 25,000 acres per year treated of grasslands, (2) provisions of Alternative C - to increase the number of acres logged annually to accelerate the pace of ecological restoration; increase the amount of forest byproducts resources by prioritizing mechanical thinning treatments over fire as a thinning tool; and increase the maximum allowable sale quantity (ASQ) volume to 268,000 CCF per year to meet the foreseeable requirements</p>	<p>XXXX</p>	<p>Navajo County further respectfully requests that the Selected Alternative in the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan include the provisions of Alternative B as relates to the restoration of 25,000 acres per year of grasslands (primarily the Great Basin and semi-desert types).</p>	<p>Including Provisions of Alternative B</p>	

		<p>of the existing and currently developing industry in the White Mountains, (3) provisions of Alternative C - retain the suitability of 80 percent of the lands of the Apache-Sitgreaves NFs for future consideration of new motorized areas and trails, (4) provisions of Alternative C - forested ecosystems restoration and catastrophic wildfire prevention treatment types, scale, pace and prioritization, (5) provisions of Alternative C - watersheds restoration objectives, (6) provisions of Alternatives B and C - designation of management areas as follows: Community Forest Intermix: ~61,000 acres (3%); High Use Developed Recreation Area: ~17,000 acres (1%); Energy Corridor: ~2,500 acres (&lt;1%); Wild Horse Territory: ~19,000 acres (1%); Wildlife Quiet Area: ~50,000 acres (2%); Research Natural Area: ~8,000 acres (&lt;1%); Primitive Area: ~200,000 acres (10%); and existing Wilderness: ~23,000 (1%). (7) removing the proposed Research Natural Areas from suitable rangelands for the specific purpose of quantifying and improving the understanding of the rangelands resources ecosystem processes and how they relate to improved management practices, (8)</p>				
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		<p>guidelines for a rangelands resources adaptive management plan that provides clear quantitative, qualitative and effectiveness monitoring requirements, and a more balanced approach between the goal of restoration and the goal of economic production, as the need for restoration in rangelands may not carry the same clear and present benefits as restoration in forestlands, (9) alternatively include a specific plan under conventional management to reach full utilization of the available animal unit months and to result in the full economic impact of approximately 120 jobs and \$1.3 million in labor income annually, (10) the necessary analysis, and the resulting authority for the Responsible Official to simultaneously implement a restoration program designed to support the existing and currently developing industry in the White Mountains, and the contract(s) expected to result from the second analysis of the Four Forest Restoration Initiative, including a maximum allowable sale quantity (ASQ) volume of 450,000 CCF annually, (11) guidance for the upcoming implementation of the national Travel Management Rule and for</p>				
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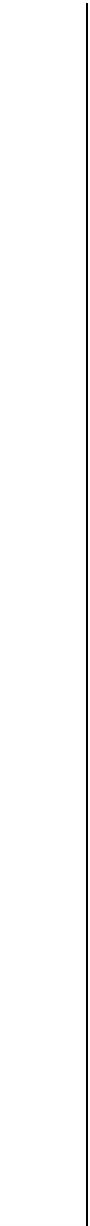
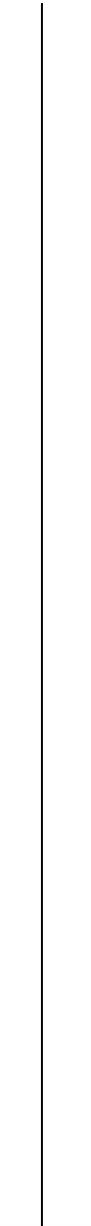
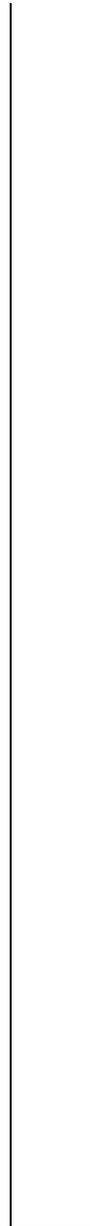
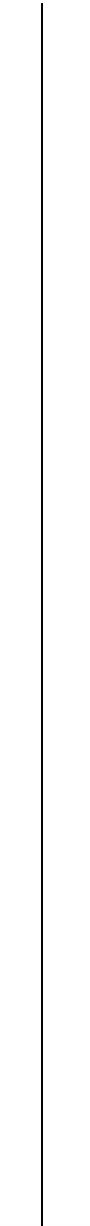
		<p>authorized cross-country travel, in order to simultaneously achieve the required preservation and conservation objectives and allow reasonable motorized access, travel and recreation for dispersed camping, big game retrieval, firewood collection and dispersed shooting as outlined in the above comments and the Navajo County Motorized Travel and Recreation Management Objectives, (12) guidelines to integrate the provisions of the Four Forest Restoration Initiative stakeholders-approved document Old Growth Protection and Large Tree Retention Strategy (OGPLTRS) to allow mechanical treatments to proceed without using 16-inch diameter caps, while retaining the social license necessary for an expeditious, non conflictual and non-litigious implementation of landscape scale restoration, (13) a comparative analysis of prioritization of the 10 priority watersheds designated under Alternatives, B, C and D, if they are different and have higher or lower priority levels as compared to each other, (14) include a revised analysis differentiating more clearly between degrading factors and the effects of degrading factors</p>				
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		<p>on watersheds physical and biological characteristics and processes that affect the hydrologic and soil functions, and between natural processes and management effects, (15) specific information on the potential location of the proposed 405,000 acres of Natural Landscape Areas under Alternative B, (16) specific information on the rationale supporting the proposed elimination of the existing 322,000 acres of Inventoried Roadless Areas (IRAs) under Alternative C, (17) the requirements for a quantitative, qualitative and effectiveness monitoring strategy, a very specific monitoring implementation plan, and a specific monitoring budget, required resources allocation and funding, to the planning and NEPA review process of all management projects, to be submitted to public review and comments in the Draft Environmental Impact Statements (DEIS), to be included in the Records of Decisions (ROD) and to be included in the Final Environmental Impact Statements (FEIS) of all management projects, in order to insure that monitoring will actually be implemented and funded, (18) the responsible officials to be bound by the</p>				
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		<p>findings of multi-party monitoring boards and to act upon the findings of a multi-party monitoring boards in a manner that appropriately addresses the issues raised by the multi-party monitoring boards, (19) a fourth phase that outlines clearly the responsibility and authority of responsible officials to implement adaptive and if necessary corrective management action during the implementation of large scale long duration specific projects as a response to the quantitative, qualitative, and effectiveness monitoring of the project, in addition to the three phases of planning (assessment, planning, and monitoring) identified in Title 36, Code of Federal Regulations, part 219 (36 CFR part219) and designed to support a framework for adaptive management, (20) guidelines to responsible officials to integrate social and economic sustainability and social and economic science into the framework of best available scientific information to inform their land management planning process and their management decision making process, (21) guidelines to responsible officials to implement substantive - even though possibly scientifically imperfect</p>				
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- management actions that move the ecosystems significantly toward the desired future conditions, when such actions are supported by social consensus, rather than spend years attempting to forcibly impose, and possibly trigger litigation of management actions that may be deemed scientifically more perfect but that do not benefit from the support of the social consensus, (22) an emphasis on executing well less than perfect projects now, over developing scientifically perfect projects that are never implemented, (23) an emphasis on allowing the public to participate meaningfully in, influence substantially, and when appropriate alter the content of the decision of responsible officials while they retain their statutory decision making authority, (24) a special forum for local government elected officials such as County Supervisors to represent the socio economic interests of the local residents in the decision making process of the Forest Service responsible officials, (25) guidelines to reviewing officers to exercise careful judgment in their resolution or rejection of objections, in relation to the true material importance of the objections – as opposed to their symbolic or



		emotional importance, and the potential effect of litigation on the implementation of the project.				
New Alt - Navajo + Proposal	Navajo County also respectfully suggests that the Selected Alternative in the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan include specific guidelines to integrate the provisions of the Four Forest Restoration Initiative stakeholders-approved document Old Growth Protection and Large Tree Retention Strategy (OGPLTRS) to allow treatments to proceed without using 16-inch diameter caps while retaining the social license necessary for an expeditious, non conflictual and non-litigious implementation of landscape scale restoration.	Suggest the selected alternative include: (1) provisions of Alternative B - up to 25,000 acres per year treated of grasslands, (2) provisions of Alternative C - to increase the number of acres logged annually to accelerate the pace of ecological restoration; increase the amount of forest byproducts resources by prioritizing mechanical thinning treatments over fire as a thinning tool; and increase the maximum allowable sale quantity (ASQ) volume to 268,000 CCF per year to meet the foreseeable requirements of the existing and currently developing industry in the White Mountains, (3) provisions of Alternative C - retain the suitability of 80 percent of the lands of the Apache-Sitgreaves NFs for future consideration of new motorized areas and trails, (4) provisions of Alternative C - forested ecosystems restoration and catastrophic wildfire prevention treatment types, scale, pace and	XXXX	Navajo County also respectfully suggests that the Selected Alternative in the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan include specific guidelines to integrate the provisions of the Four Forest Restoration Initiative stakeholders-approved document Old Growth Protection and Large Tree Retention Strategy (OGPLTRS) to allow treatments to proceed without using 16-inch diameter caps while retaining the social license necessary for an expeditious, non conflictual and non-litigious implementation of landscape scale restoration.	Large Tree Retention	

		<p>prioritization, (5) provisions of Alternative C - watersheds restoration objectives, (6) provisions of Alternatives B and C - designation of management areas as follows: Community Forest Intermix: ~61,000 acres (3%); High Use Developed Recreation Area: ~17,000 acres (1%); Energy Corridor: ~2,500 acres (&lt;1%); Wild Horse Territory: ~19,000 acres (1%); Wildlife Quiet Area: ~50,000 acres (2%); Research Natural Area: ~8,000 acres (&lt;1%); Primitive Area: ~200,000 acres (10%); and existing Wilderness: ~23,000 (1%). (7) removing the proposed Research Natural Areas from suitable rangelands for the specific purpose of quantifying and improving the understanding of the rangelands resources ecosystem processes and how they relate to improved management practices, (8) guidelines for a rangelands resources adaptive management plan that provides clear quantitative, qualitative and effectiveness monitoring requirements, and a more balanced approach between the goal of restoration and the goal of economic production, as the need for restoration in rangelands may not carry the same clear and present benefits as restoration in</p>				
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		<p>forestlands, (9) alternatively include a specific plan under conventional management to reach full utilization of the available animal unit months and to result in the full economic impact of approximately 120 jobs and \$1.3 million in labor income annually, (10) the necessary analysis, and the resulting authority for the Responsible Official to simultaneously implement a restoration program designed to support the existing and currently developing industry in the White Mountains, and the contract(s) expected to result from the second analysis of the Four Forest Restoration Initiative, including a maximum allowable sale quantity (ASQ) volume of 450,000 CCF annually, (11) guidance for the upcoming implementation of the national Travel Management Rule and for authorized cross-country travel, in order to simultaneously achieve the required preservation and conservation objectives and allow reasonable motorized access, travel and recreation for dispersed camping, big game retrieval, firewood collection and dispersed shooting as outlined in the above comments and the Navajo County Motorized Travel and Recreation</p>				
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		<p>Management Objectives, (12) guidelines to integrate the provisions of the Four Forest Restoration Initiative stakeholders-approved document Old Growth Protection and Large Tree Retention Strategy (OGPLTRS) to allow mechanical treatments to proceed without using 16-inch diameter caps, while retaining the social license necessary for an expeditious, non conflictual and non-litigious implementation of landscape scale restoration, (13) a comparative analysis of prioritization of the 10 priority watersheds designated under Alternatives, B, C and D, if they are different and have higher or lower priority levels as compared to each other, (14) include a revised analysis differentiating more clearly between degrading factors and the effects of degrading factors on watersheds physical and biological characteristics and processes that affect the hydrologic and soil functions, and between natural processes and management effects, (15) specific information on the potential location of the proposed 405,000 acres of Natural Landscape Areas under Alternative B, (16) specific information on the rationale supporting the proposed elimination of the existing</p>				
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		<p>322,000 acres of Inventoried Roadless Areas (IRAs) under Alternative C, (17) the requirements for a quantitative, qualitative and effectiveness monitoring strategy, a very specific monitoring implementation plan, and a specific monitoring budget, required resources allocation and funding, to the planning and NEPA review process of all management projects, to be submitted to public review and comments in the Draft Environmental Impact Statements (DEIS), to be included in the Records of Decisions (ROD) and to be included in the Final Environmental Impact Statements (FEIS) of all management projects, in order to insure that monitoring will actually be implemented and funded, (18) the responsible officials to be bound by the findings of multi-party monitoring boards and to act upon the findings of a multi-party monitoring boards in a manner that appropriately addresses the issues raised by the multi-party monitoring boards, (19) a fourth phase that outlines clearly the responsibility and authority of responsible officials to implement adaptive and if necessary corrective management action during the</p>				
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		<p>implementation of large scale long duration specific projects as a response to the quantitative, qualitative, and effectiveness monitoring of the project, in addition to the three phases of planning (assessment, planning, and monitoring) identified in Title 36, Code of Federal Regulations, part 219 (36 CFR part219) and designed to support a framework for adaptive management, (20) guidelines to responsible officials to integrate social and economic sustainability and social and economic science into the framework of best available scientific information to inform their land management planning process and their management decision making process, (21) guidelines to responsible officials to implement substantive - even though possibly scientifically imperfect - management actions that move the ecosystems significantly toward the desired future conditions, when such actions are supported by social consensus, rather than spend years attempting to forcibly impose, and possibly trigger litigation of management actions that may be deemed scientifically more perfect but that do not benefit from the support of the social consensus, (22) an emphasis</p>				
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<p>New Alt - Navajo + Proposal</p>	<p>Navajo County suggests that the Selected Alternative for the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan include specific guidelines for a rangelands resources adaptive management plan that</p>	<p>Suggest the selected alternative include: (1) provisions of Alternative B - up to 25,000 acres per year treated of grasslands, (2) provisions of Alternative C - to increase the number of acres logged annually to accelerate the pace of ecological restoration; increase the</p>	<p>XXXX</p>	<p>Navajo County suggests that the Selected Alternative for the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan include specific guidelines for a rangelands resources adaptive management plan that</p>	<p>Selected Alternative</p>	

	<p>provides clear quantitative, qualitative and effectiveness monitoring requirements, and a more balanced approach between the goal of restoration and the goal of economic production, as the need for restoration in rangelands may not carry the same clear and present benefits as restoration in forestlands.</p>	<p>amount of forest byproducts resources by prioritizing mechanical thinning treatments over fire as a thinning tool; and increase the maximum allowable sale quantity (ASQ) volume to 268,000 CCF per year to meet the foreseeable requirements of the existing and currently developing industry in the White Mountains, (3) provisions of Alternative C - retain the suitability of 80 percent of the lands of the Apache-Sitgreaves NFs for future consideration of new motorized areas and trails, (4) provisions of Alternative C - forested ecosystems restoration and catastrophic wildfire prevention treatment types, scale, pace and prioritization, (5) provisions of Alternative C - watersheds restoration objectives, (6) provisions of Alternatives B and C - designation of management areas as follows: Community Forest Intermix: ~61,000 acres (3%); High Use Developed Recreation Area: ~17,000 acres (1%); Energy Corridor: ~2,500 acres (&lt;1%); Wild Horse Territory: ~19,000 acres (1%); Wildlife Quiet Area: ~50,000 acres (2%); Research Natural Area: ~8,000 acres (&lt;1%); Primitive Area: ~200,000 acres (10%); and existing Wilderness: ~23,000 (1%). (7) removing the</p>		<p>provides clear quantitative, qualitative and effectiveness monitoring requirements, and a more balanced approach between the goal of restoration and the goal of economic production, as the need for restoration in rangelands may not carry the same clear and present benefits as restoration in forestlands.</p>			
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		<p>proposed Research Natural Areas from suitable rangelands for the specific purpose of quantifying and improving the understanding of the rangelands resources ecosystem processes and how they relate to improved management practices, (8) guidelines for a rangelands resources adaptive management plan that provides clear quantitative, qualitative and effectiveness monitoring requirements, and a more balanced approach between the goal of restoration and the goal of economic production, as the need for restoration in rangelands may not carry the same clear and present benefits as restoration in forestlands, (9) alternatively include a specific plan under conventional management to reach full utilization of the available animal unit months and to result in the full economic impact of approximately 120 jobs and \$1.3 million in labor income annually, (10) the necessary analysis, and the resulting authority for the Responsible Official to simultaneously implement a restoration program designed to support the existing and currently developing industry in the White Mountains, and the contract(s) expected to result</p>				
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		<p>from the second analysis of the Four Forest Restoration Initiative, including a maximum allowable sale quantity (ASQ) volume of 450,000 CCF annually, (11) guidance for the upcoming implementation of the national Travel Management Rule and for authorized cross-country travel, in order to simultaneously achieve the required preservation and conservation objectives and allow reasonable motorized access, travel and recreation for dispersed camping, big game retrieval, firewood collection and dispersed shooting as outlined in the above comments and the Navajo County Motorized Travel and Recreation Management Objectives, (12) guidelines to integrate the provisions of the Four Forest Restoration Initiative stakeholders-approved document Old Growth Protection and Large Tree Retention Strategy (OGPLTRS) to allow mechanical treatments to proceed without using 16-inch diameter caps, while retaining the social license necessary for an expeditious, non conflictual and non-litigious implementation of landscape scale restoration, (13) a comparative analysis of prioritization of the 10 priority</p>				
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		<p>watersheds designated under Alternatives, B, C and D, if they are different and have higher or lower priority levels as compared to each other, (14) include a revised analysis differentiating more clearly between degrading factors and the effects of degrading factors on watersheds physical and biological characteristics and processes that affect the hydrologic and soil functions, and between natural processes and management effects, (15) specific information on the potential location of the proposed 405,000 acres of Natural Landscape Areas under Alternative B, (16) specific information on the rationale supporting the proposed elimination of the existing 322,000 acres of Inventoried Roadless Areas (IRAs) under Alternative C, (17) the requirements for a quantitative, qualitative and effectiveness monitoring strategy, a very specific monitoring implementation plan, and a specific monitoring budget, required resources allocation and funding, to the planning and NEPA review process of all management projects, to be submitted to public review and comments in the Draft Environmental Impact Statements (DEIS), to be included in the Records of</p>				
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		<p>Decisions (ROD) and to be included in the Final Environmental Impact Statements (FEIS) of all management projects, in order to insure that monitoring will actually be implemented and funded, (18) the responsible officials to be bound by the findings of multi-party monitoring boards and to act upon the findings of a multi-party monitoring boards in a manner that appropriately addresses the issues raised by the multi-party monitoring boards, (19) a fourth phase that outlines clearly the responsibility and authority of responsible officials to implement adaptive and if necessary corrective management action during the implementation of large scale long duration specific projects as a response to the quantitative, qualitative, and effectiveness monitoring of the project, in addition to the three phases of planning (assessment, planning, and monitoring) identified in Title 36, Code of Federal Regulations, part 219 (36 CFR part219) and designed to support a framework for adaptive management, (20) guidelines to responsible officials to integrate social and economic sustainability and social and economic science into the framework of best</p>				
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		<p>available scientific information to inform their land management planning process and their management decision making process, (21) guidelines to responsible officials to implement substantive - even though possibly scientifically imperfect - management actions that move the ecosystems significantly toward the desired future conditions, when such actions are supported by social consensus, rather than spend years attempting to forcibly impose, and possibly trigger litigation of management actions that may be deemed scientifically more perfect but that do not benefit from the support of the social consensus, (22) an emphasis on executing well less than perfect projects now, over developing scientifically perfect projects that are never implemented, (23) an emphasis on allowing the public to participate meaningfully in, influence substantially, and when appropriate alter the content of the decision of responsible officials while they retain their statutory decision making authority, (24) a special forum for local government elected officials such as County Supervisors to represent the socio economic interests of the local residents in the decision</p>					
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		making process of the Forest Service responsible officials, (25) guidelines to reviewing officers to exercise careful judgment in their resolution or rejection of objections, in relation to the true material importance of the objections – as opposed to their symbolic or emotional importance, and the potential effect of litigation on the implementation of the project.				
New Alt - Navajo + Proposal	Navajo County respectfully suggests that the Selected Alternative in the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan include elements as follows Include the provisions of Alternative B as relates to the restoration treatment of up to 25,000 acres per year of grasslands (primarily the Great Basin and semi-desert types) to remove encroaching woody species. Include the provisions of Alternative B as relates to the restoration treatment of up to 25,000 acres per year of grasslands (primarily the Great Basin and semi-desert types) to remove encroaching woody species. •Include the provisions of Alternative C as relates to Forest Products in order to: -Increase the number of acres logged annually in order to accelerate the pace of	Suggest the selected alternative include: (1) provisions of Alternative B - up to 25,000 acres per year treated of grasslands, (2) provisions of Alternative C - to increase the number of acres logged annually to accelerate the pace of ecological restoration; increase the amount of forest byproducts resources by prioritizing mechanical thinning treatments over fire as a thinning tool; and increase the maximum allowable sale quantity (ASQ) volume to 268,000 CCF per year to meet the foreseeable requirements of the existing and currently developing industry in the White Mountains, (3) provisions of Alternative C - retain the suitability of 80 percent of the lands of the Apache-Sitgreaves NFs for future consideration of new motorized areas and trails, (4) provisions of Alternative C -	XXXX	Navajo County respectfully suggests that the Selected Alternative in the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan include elements as follows Include the provisions of Alternative B as relates to the restoration treatment of up to 25,000 acres per year of grasslands (primarily the Great Basin and semi-desert types) to remove encroaching woody species. Include the provisions of Alternative B as relates to the restoration treatment of up to 25,000 acres per year of grasslands (primarily the Great Basin and semi-desert types) to remove encroaching woody species. •Include the provisions of Alternative C as relates to Forest Products in order to: -Increase the number of acres logged annually in order to accelerate the pace of		Including Provisions of Alternative C

<p>ecological restoration; - Increase the amount of forest byproducts resources by prioritizing wherever possible mechanical thinning treatments over fire as a thinning tool treatments; - Increase the maximum allowable sale quantity (ASQ) volume to 268,000 CCF per year to meet the foreseeable requirements of the existing and currently developing industry in the White Mountains. •Include the provisions of current Alternative C as relates to motorized travel and recreation in order to retain the suitability of 80% of the lands of the Apache-Sitgreaves National Forests for future consideration of new motorized areas and trails. •Include the provisions of Alternative C as relates to forested ecosystems restoration and catastrophic wildfire prevention treatment types, scale, pace and prioritization. •Include the provisions of Alternative C as relates to watersheds restoration objectives. •Include the provisions of Alternatives B and C as relates to the designation of management areas as follows: Community Forest Intermix: ~61,000 acres (3%); High Use Developed Recreation Area: ~17,000 acres (1%); Energy</p>	<p>forested ecosystems restoration and catastrophic wildfire prevention treatment types, scale, pace and prioritization, (5) provisions of Alternative C - watersheds restoration objectives, (6) provisions of Alternatives B and C - designation of management areas as follows: Community Forest Intermix: ~61,000 acres (3%); High Use Developed Recreation Area: ~17,000 acres (1%); Energy Corridor: ~2,500 acres (&lt;1%); Wild Horse Territory: ~19,000 acres (1%); Wildlife Quiet Area: ~50,000 acres (2%); Research Natural Area: ~8,000 acres (&lt;1%); Primitive Area: ~200,000 acres (10%); and existing Wilderness: ~23,000 (1%). (7) removing the proposed Research Natural Areas from suitable rangelands for the specific purpose of quantifying and improving the understanding of the rangelands resources ecosystem processes and how they relate to improved management practices, (8) guidelines for a rangelands resources adaptive management plan that provides clear quantitative, qualitative and effectiveness monitoring requirements, and a more balanced approach between the goal of restoration and the goal of economic production, as the</p>	<p>ecological restoration; - Increase the amount of forest byproducts resources by prioritizing wherever possible mechanical thinning treatments over fire as a thinning tool treatments; - Increase the maximum allowable sale quantity (ASQ) volume to 268,000 CCF per year to meet the foreseeable requirements of the existing and currently developing industry in the White Mountains. •Include the provisions of current Alternative C as relates to motorized travel and recreation in order to retain the suitability of 80% of the lands of the Apache-Sitgreaves National Forests for future consideration of new motorized areas and trails. •Include the provisions of Alternative C as relates to forested ecosystems restoration and catastrophic wildfire prevention treatment types, scale, pace and prioritization. •Include the provisions of Alternative C as relates to watersheds restoration objectives. •Include the provisions of Alternatives B and C as relates to the designation of management areas as follows: Community Forest Intermix: ~61,000 acres (3%); High Use Developed Recreation Area: ~17,000 acres (1%); Energy</p>			
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<p>Corridor: ~2,500 acres (&lt;1%); Wild Horse Territory: ~19,000 acres (1%); Wildlife Quiet Area: ~50,000 acres (2%); Research Natural Area: ~8,000 acres (&lt;1%); Primitive Area: ~200,000 acres (10%); and existing Wilderness: ~23,000 (1%). In addition, Navajo County respectfully suggests that the Selected Alternative in the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan include the following:</p> <ul style="list-style-type: none"> <li>• Designate the new proposed Research Natural Areas removed from suitable rangelands for the specific purpose of quantifying and improving the understanding of the rangelands resources ecosystem processes and how they relate to improved management practices.</li> <li>• Include specific guidelines for a rangelands resources adaptive management plan that provides clear quantitative, qualitative and effectiveness monitoring requirements, and a more balanced approach between the goal of restoration and the goal of economic production, as the need for restoration in rangelands may not carry the same clear and present benefits as restoration in forestlands.</li> </ul>	<p>need for restoration in rangelands may not carry the same clear and present benefits as restoration in forestlands, (9) alternatively include a specific plan under conventional management to reach full utilization of the available animal unit months and to result in the full economic impact of approximately 120 jobs and \$1.3 million in labor income annually, (10) the necessary analysis, and the resulting authority for the Responsible Official to simultaneously implement a restoration program designed to support the existing and currently developing industry in the White Mountains, and the contract(s) expected to result from the second analysis of the Four Forest Restoration Initiative, including a maximum allowable sale quantity (ASQ) volume of 450,000 CCF annually, (11) guidance for the upcoming implementation of the national Travel Management Rule and for authorized cross-country travel, in order to simultaneously achieve the required preservation and conservation objectives and allow reasonable motorized access, travel and recreation for dispersed camping, big game retrieval, firewood collection and dispersed</p>	<p>Corridor: ~2,500 acres (&lt;1%); Wild Horse Territory: ~19,000 acres (1%); Wildlife Quiet Area: ~50,000 acres (2%); Research Natural Area: ~8,000 acres (&lt;1%); Primitive Area: ~200,000 acres (10%); and existing Wilderness: ~23,000 (1%).</p>			
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	<ul style="list-style-type: none"> <li>• Alternatively include a specific plan under conventional management to reach full utilization of the available animal unit months and to result in the full economic impact of approximately 120 jobs and \$1.3 million in labor income annually.</li> <li>• Include the necessary analysis, and the resulting authority for the Responsible Official to simultaneously implement a restoration program designed to support the existing and currently developing industry in the White Mountains, and the contract(s) expected to result from the second analysis of the Four Forest Restoration Initiative, including a maximum allowable sale quantity (ASQ) volume of 450,000 CCF annually.</li> <li>• Include guidance for the upcoming implementation of the national Travel Management Rule and for authorized cross-country travel, in order to simultaneously achieve the required preservation and conservation objectives and allow reasonable motorized access,</li> </ul> <p>travel and recreation for</p>	<p>shooting as outlined in the above comments and the Navajo County Motorized Travel and Recreation Management Objectives, (12) guidelines to integrate the provisions of the Four Forest Restoration Initiative stakeholders-approved document Old Growth Protection and Large Tree Retention Strategy (OGPLTRS) to allow mechanical treatments to proceed without using 16-inch diameter caps, while retaining the social license necessary for an expeditious, non conflictual and non-litigious implementation of landscape scale restoration, (13) a comparative analysis of prioritization of the 10 priority watersheds designated under Alternatives, B, C and D, if they are different and have higher or lower priority levels as compared to each other, (14) include a revised analysis differentiating more clearly between degrading factors and the effects of degrading factors on watersheds physical and biological characteristics and processes that affect the hydrologic and soil functions, and between natural processes and management effects, (15) specific information on the potential location of the proposed 405,000 acres of Natural Landscape Areas under</p>				
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	<p>dispersed camping, big game retrieval, firewood collection and dispersed shooting as outlined in the above comments and the Navajo County Motorized Travel and Recreation Management Objectives.</p> <ul style="list-style-type: none"> <li>• Include specific guidelines to integrate the provisions of the Four Forest Restoration Initiative stakeholders-approved document Old Growth Protection and Large Tree Retention Strategy (OGPLTRS) to allow mechanical treatments to proceed without using 16-inch diameter caps, while retaining the social license necessary for an expeditious, non conflictual and non-litigious implementation of landscape scale restoration.</li> <li>• Include a comparative analysis of prioritization of the 10 priority watersheds designated under Alternatives, B, C and D, if they are different and have higher or lower priority levels as compared to each other.</li> <li>• Include a revised analysis differentiating more clearly between degrading factors and the effects of degrading factors on watersheds physical and biological characteristics and processes that affect the hydrologic and soil functions, and between natural processes and management effects, so</li> </ul>	<p>Alternative B, (16) specific information on the rationale supporting the proposed elimination of the existing 322,000 acres of Inventoried Roadless Areas (IRAs) under Alternative C, (17) the requirements for a quantitative, qualitative and effectiveness monitoring strategy, a very specific monitoring implementation plan, and a specific monitoring budget, required resources allocation and funding, to the planning and NEPA review process of all management projects, to be submitted to public review and comments in the Draft Environmental Impact Statements (DEIS), to be included in the Records of Decisions (ROD) and to be included in the Final Environmental Impact Statements (FEIS) of all management projects, in order to insure that monitoring will actually be implemented and funded, (18) the responsible officials to be bound by the findings of multi-party monitoring boards and to act upon the findings of a multi-party monitoring boards in a manner that appropriately addresses the issues raised by the multi-party monitoring boards, (19) a fourth phase that outlines clearly the responsibility and authority of</p>										
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<p>that a proper causality analysis can improve the design of effective restoration and management actions.</p> <ul style="list-style-type: none"> <li>• Include specific information on the potential location of the proposed 405,000 acres of Natural Landscape Areas under Alternative B.</li> <li>• Include specific information on the rationale supporting the proposed elimination of the existing 322,000 acres of Inventoried Roadless Areas (IRAs) under Alternative C.</li> <li>• Include in very specific terms the requirements for a quantitative, qualitative and effectiveness monitoring strategy, a very specific monitoring implementation plan, and a specific monitoring budget, required resources allocation and funding, to the planning and NEPA review process of all management projects, to be submitted to public review and comments in the Draft Environmental Impact Statements (DEIS), to be included in the Records of Decisions (ROD) and to be included in the Final Environmental Impact Statements (FEIS) of all management projects, in order to insure that monitoring will actually be implemented and funded.</li> <li>• Include in very specific terms the requirements for the</li> </ul>	<p>responsible officials to implement adaptive and if necessary corrective management action during the implementation of large scale long duration specific projects as a response to the quantitative, qualitative, and effectiveness monitoring of the project, in addition to the three phases of planning (assessment, planning, and monitoring) identified in Title 36, Code of Federal Regulations, part 219 (36 CFR part219) and designed to support a framework for adaptive management, (20) guidelines to responsible officials to integrate social and economic sustainability and social and economic science into the framework of best available scientific information to inform their land management planning process and their management decision making process, (21) guidelines to responsible officials to implement substantive - even though possibly scientifically imperfect - management actions that move the ecosystems significantly toward the desired future conditions, when such actions are supported by social consensus, rather than spend years attempting to forcibly impose, and possibly trigger litigation of management actions that may be deemed</p>				
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<p>responsible officials to be bound by the findings of multi-party monitoring boards and to act upon the findings of a multi-party monitoring boards in a manner that appropriately addresses the issues raised by the multi-party monitoring boards.</p> <ul style="list-style-type: none"> <li>• Include in very specific terms a fourth phase that outlines clearly the responsibility and authority of responsible officials to implement adaptive and if necessary corrective management action during the implementation of large scale long duration specific projects as a response to the quantitative, qualitative, and effectiveness monitoring of the project, in addition to the three phases of planning (assessment, planning, and monitoring) identified in Title 36, Code of Federal Regulations, part 219 (36 CFR part 219) and designed to support a framework for adaptive management.</li> <li>• Include clear and unambiguous guidelines to responsible officials to integrate social and economic sustainability and social and economic science into the framework of best available scientific information to inform their land management planning process and their management decision making</li> </ul>	<p>scientifically more perfect but that do not benefit from the support of the social consensus, (22) an emphasis on executing well less than perfect projects now, over developing scientifically perfect projects that are never implemented, (23) an emphasis on allowing the public to participate meaningfully in, influence substantially, and when appropriate alter the content of the decision of responsible officials while they retain their statutory decision making authority, (24) a special forum for local government elected officials such as County Supervisors to represent the socio economic interests of the local residents in the decision making process of the Forest Service responsible officials, (25) guidelines to reviewing officers to exercise careful judgment in their resolution or rejection of objections, in relation to the true material importance of the objections – as opposed to their symbolic or emotional importance, and the potential effect of litigation on the implementation of the project.</p>									
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process.

- Include clear and unambiguous guidelines to responsible officials to implement substantive - even though possibly scientifically imperfect - management actions that move the ecosystems significantly toward the desired future conditions, when such actions are supported by social consensus, rather than spend years attempting to forcibly impose, and possibly trigger litigation of management actions that may be deemed scientifically more perfect but that do not benefit from the support of the social consensus.
- Include an emphasis on executing well less than perfect projects now, over developing scientifically perfect projects that are never implemented.
- Include an emphasis on allowing the public to participate meaningfully in, influence substantially, and when appropriate alter the content of the decision of responsible officials while they retain their statutory decision making authority.
- Include a special forum for local government elected officials such as County Supervisors to represent the socio economic interests of the local residents in the decision making process of the Forest

	<p>Service responsible officials.</p> <ul style="list-style-type: none"> <li>• Include clear and unambiguous guidelines to reviewing officers to exercise careful judgment in their resolution or rejection of objections, in relation to the true material importance of the objections – as opposed to their symbolic or emotional importance, and the potential effect of litigation on the implementation of the project.</li> </ul>						
New Alt - Biodiversity	<p>Emphasize conservation of biological diversity. At least one action alternative should emphasize conservation of biological diversity. The alternative would err on the side of ecological caution (“no-regrets strategy”) by managing national forest lands as a safe harbor and refuge for fish, wildlife and at-risk plant species, even at the expense of multiple use activities, such as livestock grazing, timber production, or motorized recreation.</p>	<p>An alternative should focus on managing forests for biological diversity and at-risk species by providing a substantial increase in protection for plant and animal species to address scientific uncertainty and controversy regarding climate change impacts. Err on the side of ecological caution (a “no-regrets strategy”) by managing the national forests as a safe harbor and refuge for fish and wildlife, even at the expense of competing multiple use activities.</p>	XXXX	<p>Emphasize conservation of biological diversity. At least one action alternative should emphasize conservation of biological diversity. The alternative would err on the side of ecological caution (“no-regrets strategy”) by managing national forest lands as a safe harbor and refuge for fish, wildlife and at-risk plant species, even at the expense of multiple use activities, such as livestock grazing, timber production, or motorized recreation.</p>		Biodiversity	<p>PC 206-1 The Forest Service should add an alternative to emphasize conservation of biological diversity and at risk species that would err on the side of ecological caution by managing national forest lands as a safe harbor and refuge for fish, wildlife and at-risk plant species, even at the expense of multiple use activities, such as livestock grazing, timber production, or motorized recreation.</p>
New Alt - Biodiversity	<p>Restore aquatic ecosystems. An ecosystem approach is warranted to stop habitat degradation, maintain habitat and ecosystems that are currently in good condition, and to aid recovery of at-risk aquatic species and their habitat. It is clear that more protective requirements, not less, are required to provide for viable populations of fish and wildlife species that</p>	<p>An alternative should focus on managing forests for biological diversity and at-risk species by providing a substantial increase in protection for plant and animal species to address scientific uncertainty and controversy regarding climate change impacts. Err on the side of ecological caution (a “no-regrets strategy”) by managing the national forests as a safe harbor and refuge for fish and</p>	XXXX				

	depend on aquatic habitats.	wildlife, even at the expense of competing multiple use activities.					
New Alt - Biodiversity	The forests need to be managed for biological diversity conservation not commercial exploitation. All proposed management plans should use caution that favors the healthy bio system/ecology such that these forests represent a safe refuge for all creatures and plants that are native and not be managed for exploitative or destructive activities. This includes limitation or complete banning of grazing, logging, or ORV use.	An alternative should focus on managing forests for biological diversity and at-risk species by providing a substantial increase in protection for plant and animal species to address scientific uncertainty and controversy regarding climate change impacts. Err on the side of ecological caution (a “no-regrets strategy”) by managing the national forests as a safe harbor and refuge for fish and wildlife, even at the expense of competing multiple use activities.	XXXX	The forests need to be managed for biological diversity conservation not commercial exploitation. All proposed management plans should use caution that favors the healthy bio system/ecology such that these forests represent a safe refuge for all creatures and plants that are native and not be managed for exploitative or destructive activities. This includes limitation or complete banning of grazing, logging, or ORV use.		Emphasize Conservation of Biological Diversity	PC 975-2 The Forests should be managed for biological diversity, at risk species, and conservation not commercial exploitation and all proposed management plans should favor the healthy biosystem/ecology in order to represent a safe refuge for all native species. This should include limitations or the complete banning of grazing, logging, and ORV use. The Forest Service should include a prohibition on new road construction and motorized trail development and a requirement to reduce route density to less than one mile per square-mile outside of designated wilderness areas, inventoried roadless areas, and wilderness study areas
New Alt - Biodiversity	An ecosystem approach is warranted to stop habitat degradation, maintain habitat and ecosystems that are currently in good condition, and to aid recovery of at-risk aquatic species and their habitat.	An alternative should focus on managing forests for biological diversity and at-risk species by providing a substantial increase in protection for plant and animal species to address scientific uncertainty and controversy regarding climate change impacts. Err on the side of ecological caution (a “no-	XXXX	An ecosystem approach is warranted to stop habitat degradation, maintain habitat and ecosystems that are currently in good condition, and to aid recovery of at-risk aquatic species and their habitat.		Ecosystem Approach for restoration and recovery of At Risk Aquatic Species	

		regrets strategy”) by managing the national forests as a safe harbor and refuge for fish and wildlife, even at the expense of competing multiple use activities.				and Habitat	
New Alt - Biodiversity	Proposals should emphasize conservation of biological diversity. At least one alternative should focus on managing forests for biological diversity and at-risk species.	An alternative should focus on managing forests for biological diversity and at-risk species by providing a substantial increase in protection for plant and animal species to address scientific uncertainty and controversy regarding climate change impacts. Err on the side of ecological caution (a “no-regrets strategy”) by managing the national forests as a safe harbor and refuge for fish and wildlife, even at the expense of competing multiple use activities.	XXXX	Proposals should emphasize conservation of biological diversity. At least one alternative should focus on managing forests for biological diversity and at-risk species.		Biodiversity	
New Alt - Biodiversity	Conserve biological diversity. At least one alternative should focus on managing forests for biological diversity and at-risk species.	An alternative should focus on managing forests for biological diversity and at-risk species by providing a substantial increase in protection for plant and animal species to address scientific uncertainty and controversy regarding climate change impacts. Err on the side of ecological caution (a “no-regrets strategy”) by managing the national forests as a safe harbor and refuge for fish and wildlife, even at the expense of competing multiple use activities.	XXXX	Conserve biological diversity. At least one alternative should focus on managing forests for biological diversity and at-risk species.		Emphasize Conservation of Biological Diversity	

New Alt - Biodiversity	The Forest Service should fully consider and compare environmental impacts of action alternatives that respond to foreseeable changes in regional climate. At a minimum, one reasonable alternative should provide a substantial increase in protection for plant and animal species on national forest lands to address scientific uncertainty and controversy regarding the magnitude of climate change impacts on water availability, net productivity, fish and wildlife habitat, and sustainability of multiple uses	An alternative should focus on managing forests for biological diversity and at-risk species by providing a substantial increase in protection for plant and animal species to address scientific uncertainty and controversy regarding climate change impacts. Err on the side of ecological caution (a “no-regrets strategy”) by managing the national forests as a safe harbor and refuge for fish and wildlife, even at the expense of competing multiple use activities.	XXXX	The Forest Service should fully consider and compare environmental impacts of action alternatives that respond to foreseeable changes in regional climate. At a minimum, one reasonable alternative should provide a substantial increase in protection for plant and animal species on national forest lands to address scientific uncertainty and controversy regarding the magnitude of climate change impacts on water availability, net productivity, fish and wildlife habitat, and sustainability of multiple uses	Environmental Impacts	
New Alt - Biodiversity	Due to uncertainties regarding impacts of climate change on biodiversity and the clear mandate of NFMA to provide for diversity, the Forest Service must consider and fully analyze an action alternative that errs on the side of ecological caution (a “no-regrets strategy”) by managing the national forests as a safe harbor and refuge for fish and wildlife, even at the expense of competing multiple use activities, such as programmed livestock grazing, timber production or motorized recreation.	An alternative should focus on managing forests for biological diversity and at-risk species by providing a substantial increase in protection for plant and animal species to address scientific uncertainty and controversy regarding climate change impacts. Err on the side of ecological caution (a “no-regrets strategy”) by managing the national forests as a safe harbor and refuge for fish and wildlife, even at the expense of competing multiple use activities.	XXXX	Due to uncertainties regarding impacts of climate change on biodiversity and the clear mandate of NFMA to provide for diversity, the Forest Service must consider and fully analyze an action alternative that errs on the side of ecological caution (a “no-regrets strategy”) by managing the national forests as a safe harbor and refuge for fish and wildlife, even at the expense of competing multiple use activities, such as programmed livestock grazing, timber production or motorized recreation.	Biodiversity	

<p>New Alt - Biodiversity</p>	<p>Alternative D, as presented in the PDEIS, is not the same as a no-regrets strategy and it does not respond to climate change because it: Deletes standards and guidelines in the current Forest Plan (USDA 1987a), as amended (USDA 1996), that provide for species viability. Alternative D would return forest management to the pre-1996 era of unlimited agency discretion, which informed the FWS biological opinion that the continued existence of Mexican spotted owl was in jeopardy and its critical habitat was likely to be destroyed or adversely modified (USDI 1996a). An alternative based on the no-regrets strategy would, at minimum, retain existing direction regarding project-level management of TES habitat, and explicitly require implementation of recovery plans. • Maintains range suitability determinations developed “in the 1980s during the first round of forest planning.” PDEIS at 451. Water and forage resources are over- allocated and overutilization by livestock is common (Evans 2012, USDA 2009). Livestock grazing is a significant threat to riparian areas and aquatic species (USDA 2008b: 59). Alternative D fails to account for synergistic effects of livestock grazing and climate change on</p>	<p>An alternative should focus on managing forests for biological diversity and at-risk species by providing a substantial increase in protection for plant and animal species to address scientific uncertainty and controversy regarding climate change impacts. Err on the side of ecological caution (a “no-regrets strategy”) by managing the national forests as a safe harbor and refuge for fish and wildlife, even at the expense of competing multiple use activities.</p>	<p>XXXX</p>	<p>Alternative D, as presented in the PDEIS, is not the same as a no-regrets strategy and it does not respond to climate change because it: Deletes standards and guidelines in the current Forest Plan (USDA 1987a), as amended (USDA 1996), that provide for species viability. Alternative D would return forest management to the pre-1996 era of unlimited agency discretion, which informed the FWS biological opinion that the continued existence of Mexican spotted owl was in jeopardy and its critical habitat was likely to be destroyed or adversely modified (USDI 1996a). An alternative based on the no-regrets strategy would, at minimum, retain existing direction regarding project-level management of TES habitat, and explicitly require implementation of recovery plans. • Maintains range suitability determinations developed “in the 1980s during the first round of forest planning.” PDEIS at 451. Water and forage resources are over- allocated and overutilization by livestock is common (Evans 2012, USDA 2009). Livestock grazing is a significant threat to riparian areas and aquatic species (USDA 2008b: 59). Alternative D fails to account for synergistic effects of livestock grazing and climate change on</p>	<p>Species Viability</p>	
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	<p>soil, water, vegetation and fire regime (Beschta et al. 2012, Brooks et al. 2004). A no-regrets alternative would account for new information about range capability and designate only small portions of the forests, if any, as suitable for livestock grazing. • Deletes standards and guidelines in the current Forest Plan (USDA 1987a) that constrain multiple-use management in riparian areas, and replaces them with “desired conditions” and “objectives” that would not constrain project-level management. Existing direction is not adequate to forestall widespread declines in riparian ecosystem health and aquatic species viability (USDA 2008b: 52, 75). A no-regrets alternative would implement the aquatic conservation strategy (“ACS”) described above to maintain and restore riparian areas and ensure aquatic species viability.</p>			<p>soil, water, vegetation and fire regime (Beschta et al. 2012, Brooks et al. 2004). A no-regrets alternative would account for new information about range capability and designate only small portions of the forests, if any, as suitable for livestock grazing. • Deletes standards and guidelines in the current Forest Plan (USDA 1987a) that constrain multiple-use management in riparian areas, and replaces them with “desired conditions” and “objectives” that would not constrain project-level management. Existing direction is not adequate to forestall widespread declines in riparian ecosystem health and aquatic species viability (USDA 2008b: 52, 75). A no-regrets alternative would implement the aquatic conservation strategy (“ACS”) described above to maintain and restore riparian areas and ensure aquatic species viability.</p>		
New Alt - Biodiversity	<p>On March 18, 2010, the Center asked the Forest Service in scoping comments to fully consider and compare impacts of an action alternative that would increase protection of forest resources, including species viability, in response to climate change. The agency has not considered such an alternative, and the range presented in the PDEIS is</p>	<p>An alternative should focus on managing forests for biological diversity and at-risk species by providing a substantial increase in protection for plant and animal species to address scientific uncertainty and controversy regarding climate change impacts. Err on the side of ecological caution (a “no-regrets strategy”) by managing the national forests as a safe</p>	XXXX	<p>On March 18, 2010, the Center asked the Forest Service in scoping comments to fully consider and compare impacts of an action alternative that would increase protection of forest resources, including species viability, in response to climate change. The agency has not considered such an alternative, and the range presented in the PDEIS is</p>		<p>Environmental Impacts</p>

	unreasonably narrow	harbor and refuge for fish and wildlife, even at the expense of competing multiple use activities.		unreasonably narrow		
New Alt - Biodiversity	An ecosystem approach is warranted to stop habitat degradation, maintain habitat and ecosystems that are currently in good condition, and to aid recovery of at-risk aquatic species and their habitat.	An alternative should focus on managing forests for biological diversity and at-risk species by providing a substantial increase in protection for plant and animal species to address scientific uncertainty and controversy regarding climate change impacts. Err on the side of ecological caution (a “no-regrets strategy”) by managing the national forests as a safe harbor and refuge for fish and wildlife, even at the expense of competing multiple use activities.	XXXX	An ecosystem approach is warranted to stop habitat degradation, maintain habitat and ecosystems that are currently in good condition, and to aid recovery of at-risk aquatic species and their habitat.		Ecosystem Approach
New Alt - Biodiversity	The Center strongly recommends that the Forest Service adopt an ecosystem approach to management of aquatic habitats in this forest plan revision. It is clear that existing standards and guidelines and best management practices, even if fully funded, implemented and monitored, are inadequate to meet statutory and regulatory requirements to provide for viable fish and wildlife populations that depend on aquatic habitats.	An alternative should focus on managing forests for biological diversity and at-risk species by providing a substantial increase in protection for plant and animal species to address scientific uncertainty and controversy regarding climate change impacts. Err on the side of ecological caution (a “no-regrets strategy”) by managing the national forests as a safe harbor and refuge for fish and wildlife, even at the expense of competing multiple use activities.	XXXX	The Center strongly recommends that the Forest Service adopt an ecosystem approach to management of aquatic habitats in this forest plan revision. It is clear that existing standards and guidelines and best management practices, even if fully funded, implemented and monitored, are inadequate to meet statutory and regulatory requirements to provide for viable fish and wildlife populations that depend on aquatic habitats.		Aquatic Habitats

New Alt - Biodiversity	And finally, I strongly support plans to restore aquatic ecosystems and encourage the recovery of at-risk aquatic species such as the Chiricahua leopard frog and the Apache trout.	An alternative should focus on managing forests for biological diversity and at-risk species by providing a substantial increase in protection for plant and animal species to address scientific uncertainty and controversy regarding climate change impacts. Err on the side of ecological caution (a “no-regrets strategy”) by managing the national forests as a safe harbor and refuge for fish and wildlife, even at the expense of competing multiple use activities.	XXXX	And finally, I strongly support plans to restore aquatic ecosystems and encourage the recovery of at-risk aquatic species such as the Chiricahua leopard frog and the Apache trout.	Ecosystem Approach for restoration and recovery of At Risk Aquatic Species and Habitat
New Alt - Biodiversity	It should consider an alternative that errs on the side of ecological caution (a “no-regrets strategy”) by managing the national forests as a safe harbor and refuge for fish and wildlife, even at the expense of competing multiple-use activities, such as programmed livestock grazing, timber production or motorized recreation.	An alternative should focus on managing forests for biological diversity and at-risk species by providing a substantial increase in protection for plant and animal species to address scientific uncertainty and controversy regarding climate change impacts. Err on the side of ecological caution (a “no-regrets strategy”) by managing the national forests as a safe harbor and refuge for fish and wildlife, even at the expense of competing multiple use activities.	XXXX	It should consider an alternative that errs on the side of ecological caution (a “no-regrets strategy”) by managing the national forests as a safe harbor and refuge for fish and wildlife, even at the expense of competing multiple-use activities, such as programmed livestock grazing, timber production or motorized recreation.	Ecological and Public Benefits
New Alt - Biodiversity	An ecosystem approach is warranted to stop habitat degradation, maintain habitat and ecosystems that are currently in good condition, and to aid recovery of at-risk aquatic species and their habitat.	An alternative should focus on managing forests for biological diversity and at-risk species by providing a substantial increase in protection for plant and animal species to address scientific uncertainty and controversy regarding climate change impacts. Err on the side of ecological caution (a “no-	XXXX	An ecosystem approach is warranted to stop habitat degradation, maintain habitat and ecosystems that are currently in good condition, and to aid recovery of at-risk aquatic species and their habitat.	Ecosystem Approach

		regrets strategy”) by managing the national forests as a safe harbor and refuge for fish and wildlife, even at the expense of competing multiple use activities.				
New Alt - Biodiversity	At a minimum, one reasonable alternative should provide a substantial increase in protection for plant and animal species on national forest lands to address scientific uncertainty and controversy regarding the magnitude of climate change impacts on water availability, net productivity, fish and wildlife habitat, and sustainability of multiple uses.	An alternative should focus on managing forests for biological diversity and at-risk species by providing a substantial increase in protection for plant and animal species to address scientific uncertainty and controversy regarding climate change impacts. Err on the side of ecological caution (a “no-regrets strategy”) by managing the national forests as a safe harbor and refuge for fish and wildlife, even at the expense of competing multiple use activities.	XXXX	At a minimum, one reasonable alternative should provide a substantial increase in protection for plant and animal species on national forest lands to address scientific uncertainty and controversy regarding the magnitude of climate change impacts on water availability, net productivity, fish and wildlife habitat, and sustainability of multiple uses.		Increased Protection
New Alt - grazing	You need to look at different ways of meeting or maximizing net public benefits as required by the NFMA, and that includes grazing schemes and different mixes of standards and guidelines. There should be at least one alternative that maximizes long-term vegetative health through a conservative strategy toward grazing that minimizes the damage livestock grazing can do and maximizes the retention of water and forage for wildlife. This alternative would have restrictive	One alternative should maximize long-term vegetative health through a conservative strategy toward grazing that minimizes the damage of livestock grazing and maximizes the retention of water and forage for wildlife.	XXXX	You need to look at different ways of meeting or maximizing net public benefits as required by the NFMA, and that includes grazing schemes and different mixes of standards and guidelines. There should be at least one alternative that maximizes long-term vegetative health through a conservative strategy toward grazing that minimizes the damage livestock grazing can do and maximizes the retention of water and forage for wildlife. This alternative would have restrictive		Range of Alternatives

	management standards and ambitious goals to finally reduce the acreage of unsatisfactory lands and improve forage and grassland habitat. The simple fact there is only one plan for the alternatives speaks volumes about whether you analyzed a “range.”			management standards and ambitious goals to finally reduce the acreage of unsatisfactory lands and improve forage and grassland habitat. The simple fact there is only one plan for the alternatives speaks volumes about whether you analyzed a “range.”		
New Alt - CBD alternative	The Forest Service should study, develop and describe a stand-alone action alternative to give the decision-maker and the public a meaningful basis for comparison of impacts that may result from the revised forest plan to Mexican spotted owl and its critical habitat. At a minimum, an alternative should: <ul style="list-style-type: none"> <li>• Implement existing standards and guidelines (USDA 1996).</li> <li>• Forbid new road construction in PAC.</li> <li>• Incorporate fuel treatment concepts to minimize risk of stand-replacing fire in PAC, as outlined below, including large tree retention, management of surface fuels and sub-canopy forest structure, and spatial orientation of treatments.</li> <li>• Apply fuel treatment modeling in Mexican spotted owl habitat conducted by Northern Arizona University Forest Ecosystem Restoration Analysis (Prather et al. 2008)</li> </ul>	A stand-alone alternative should: (1) implement existing standards and guidelines (USDA 1996), (2) forbid new road construction in protected activity centers (PAC), (3) incorporate fuel treatment concepts to minimize risk of stand-replacing fire in PAC including large tree retention, management of surface fuels and sub-canopy forest structure, and spatial orientation of treatments, and (4) apply fuel treatment modeling in Mexican spotted owl habitat conducted by Northern Arizona University Forest Ecosystem Restoration Analysis.	XXXX	The Forest Service should study, develop and describe a stand-alone action alternative to give the decision-maker and the public a meaningful basis for comparison of impacts that may result from the revised forest plan to Mexican spotted owl and its critical habitat. At a minimum, an alternative should: <ul style="list-style-type: none"> <li>• Implement existing standards and guidelines (USDA 1996).</li> <li>• Forbid new road construction in PAC.</li> <li>• Incorporate fuel treatment concepts to minimize risk of stand-replacing fire in PAC, as outlined below, including large tree retention, management of surface fuels and sub-canopy forest structure, and spatial orientation of treatments.</li> <li>• Apply fuel treatment modeling in Mexican spotted owl habitat conducted by Northern Arizona University Forest Ecosystem Restoration Analysis (Prather et al. 2008)</li> </ul>	Stand Alone Action Alternative	

New Alt - CBD alternate	The work of Prather and others (2008) is especially relevant to this analysis because it is: (1) specific to dry mixed conifer, wet mixed conifer and pine-oak vegetation types that comprise Mexican spotted owl critical habitat in the planning area; (2) consistent with the need for change (Revision Topic 1 – see PDEIS at 3-5); (3) representative of the best available science; and (4) offers a meaningful basis for comparison of the intensity of environmental impacts that may result from this plan revision.	A stand-alone alternative should: (1) implement existing standards and guidelines (USDA 1996), (2) forbid new road construction in protected activity centers (PAC)., (3) incorporate fuel treatment concepts to minimize risk of stand-replacing fire in PAC including large tree retention, management of surface fuels and sub-canopy forest structure, and spatial orientation of treatments, and (4) apply fuel treatment modeling in Mexican spotted owl habitat conducted by Northern Arizona University Forest Ecosystem Restoration Analysis.	XXXX			
New Alt - max treatments	In order to achieve the maximum accomplishments of returning the forest to a desired condition I am in favor of maximizing timber sales and volumes offered for sale, maximize the use of mechanical equipment, prescribed fire, and natural fires to accomplish the needed work. The acreage of planned fire- prescribed and natural fire use- needs to be expanded dramatically. Accomplishments averaging 100,000+ acres per year are achievable and could be increased over time as the fuel loading is reduced. This is due to less smoke generated in subsequent treatments if the fire return interval can be maintained at ten years or less.	There should be an alternative that maximizes timber sales, volumes offered for sale, the use of mechanical equipment, prescribed fire, and natural fires to accomplish the needed work. The acreage of planned fire, prescribed and natural fire use, needs to be expanded dramatically. Accomplishments averaging 100,000+ acres per year are achievable.	XXXX	In order to achieve the maximum accomplishments of returning the forest to a desired condition I am in favor of maximizing timber sales and volumes offered for sale, maximize the use of mechanical equipment, prescribed fire, and natural fires to accomplish the needed work. The acreage of planned fire- prescribed and natural fire use- needs to be expanded dramatically. Accomplishments averaging 100,000+ acres per year are achievable and could be increased over time as the fuel loading is reduced. This is due to less smoke generated in subsequent treatments if the fire return interval can be maintained at ten years or less.	Forest Products	

	There is no identified alternative that maximizes all of these factors; it would be good if there were such an alternative.			There is no identified alternative that maximizes all of these factors; it would be good if there were such an alternative.		
Forest Products - max ASQ	In order to achieve the maximum accomplishments of returning the forest to a desired condition I am in favor of maximizing timber sales and volumes offered for sale, maximize the use of mechanical equipment, prescribed fire, and natural fires to accomplish the needed work	There should be an alternative that maximizes timber sales, volumes offered for sale, the use of mechanical equipment, prescribed fire, and natural fires to accomplish the needed work. The acreage of planned fire, prescribed and natural fire use, needs to be expanded dramatically. Accomplishments averaging 100,000+ acres per year are achievable.	XXXX	In order to achieve the maximum accomplishments of returning the forest to a desired condition I am in favor of maximizing timber sales and volumes offered for sale, maximize the use of mechanical equipment, prescribed fire, and natural fires to accomplish the needed work		Maximizing Timber Sales
TES	I believe the main flaw in this document is the reliance on the outdated TES document on which to base Standards for Grasslands. The currently available TES was conducted during the wettest decade in the last 100+years. It is irresponsible to base vegetation and soil desired conditions, standards or guidelines in any way on such a survey. Doing so is denying climate influences, climate variability and climate change scenarios	The TES (terrestrial ecosystem survey) data should be based on current soil conditions. There is concern that the TES may not be achievable because it is based on soil conditions inventoried in the 1980s.	** Check out Kaibab p. 75 2nd comment	I believe the main flaw in this document is the reliance on the outdated TES document on which to base Standards for Grasslands. The currently available TES was conducted during the wettest decade in the last 100+years. It is irresponsible to base vegetation and soil desired conditions, standards or guidelines in any way on such a survey. Doing so is denying climate influences, climate variability and climate change scenarios		Reliance on Outdated TES Documentation  PC 860-1 The Forest Service should address why standards were based outdated TES data because by doing so it is denying climate influences, climate variability and climate change scenarios.

TES	Issue: The DEIS fails to use current conditions data for soils condition. Remedy: Use current condition data to rebuild TES reporting and for analysis.	The TES (terrestrial ecosystem survey) data should be based on current soil conditions. There is concern that the TES may not be achievable because it is based on soil conditions inventoried in the 1980s.	** Check out Kaibab p. 75 2nd comment	Use current condition data to rebuild TES reporting and for analysis.	Wildlife	
TES	Issue: The Plan incorrectly relies on outdated data regarding past conditions. (3rd paragraph, page 66, Proposed Plan): Remedy: Plan and implement management based on actual current conditions that will achieve the desired conditions.	The TES (terrestrial ecosystem survey) data should be based on current soil conditions. There is concern that the TES may not be achievable because it is based on soil conditions inventoried in the 1980s.	** Check out Kaibab p. 75 2nd comment	Issue: The Plan incorrectly relies on outdated data regarding past conditions. (3rd paragraph, page 66, Proposed Plan): Remedy: Plan and implement management based on actual current conditions that will achieve the desired conditions.	Outdated Information	The Forest Service should add current condition when discussing desired conditions as a baseline to compare the desired conditions to and Plan and implement management based on actual current conditions that will achieve the desired conditions. Human activity on the land should also be discussed.
TES	Pg 3 -Maintenance & Improvement of Ecosystem Health First paragraph: be more specific than "divergent from reference conditions". The 1987 plan relied heavily on TES and other data from the 80's which was one of the heaviest rainfall periods in recent history. If desired conditions are based on that data, we may be trying to attain conditions that are not natural and achievable. It might be better to use and cite an accepted , collaborative set of data and methodology based on the best of good, current science.	The TES (terrestrial ecosystem survey) data should be based on current soil conditions. There is concern that the TES may not be achievable because it is based on soil conditions inventoried in the 1980s.	** Check out Kaibab p. 75 2nd comment	Pg 3 -Maintenance & Improvement of Ecosystem Health First paragraph: be more specific than "divergent from reference conditions". The 1987 plan relied heavily on TES and other data from the 80's which was one of the heaviest rainfall periods in recent history. If desired conditions are based on that data, we may be trying to attain conditions that are not natural and achievable. It might be better to use and cite an accepted , collaborative set of data and methodology based on the best of good, current science.	Divergence from Reference Conditions	PC 2611-2 The Forest Service should be more specific in addressing "divergent from reference conditions" by using and citing an accepted , collaborative set of data and methodology based on the best of good, current science in order to attain conditions that are not natural and achievable.

TES	Standards for Grasslands Many of us did not have access to your "ecological mapping units" and so have no idea as to how it defines vegetation climax conditions for canopy and composition. That is worrisome as standards are binding and must be followed. The definition may fit what we grazers understand to be current, good range science, or they may be outdated and not in the best interest of the resource. It might be much better to reference the standards in a known and accepted, collaboratively produced publication like the Guide to Rangeland Monitoring and Assessment that your own staff participated in.	The TES (terrestrial ecosystem survey) data should be based on current soil conditions. There is concern that the TES may not be achievable because it is based on soil conditions inventoried in the 1980s.	** Check out Kaibab p. 75 2nd comment	Standards for Grasslands Many of us did not have access to your "ecological mapping units" and so have no idea as to how it defines vegetation climax conditions for canopy and composition. That is worrisome as standards are binding and must be followed. The definition may fit what we grazers understand to be current, good range science, or they may be outdated and not in the best interest of the resource. It might be much better to reference the standards in a known and accepted, collaboratively produced publication like the Guide to Rangeland Monitoring and Assessment that your own staff participated in.	Standards for Grasslands	
TES	1980's TES Data from one of the wettest decades on record, skews what may be achievable conditions in view of the plan's admission of climatic variability.	The TES (terrestrial ecosystem survey) data should be based on current soil conditions. There is concern that the TES may not be achievable because it is based on soil conditions inventoried in the 1980s.	** Check out Kaibab p. 75 2nd comment	1980's TES Data from one of the wettest decades on record, skews what may be achievable conditions in view of the plan's admission of climatic variability.	Current Conditions and Desired Conditions	
TES	Vegetation and litter is sufficient to maintain and improve water infiltration, nutrient cycling and soil stability.  Expected vegetation and litter amounts are being based on 1987 TES Data and therefore do not accurately represent what site	The TES (terrestrial ecosystem survey) data should be based on current soil conditions. There is concern that the TES may not be achievable because it is based on soil conditions inventoried in the 1980s.	** Check out Kaibab p. 75 2nd comment			

	potentials may be as described by the plan and what are the standards by which sufficiency will be determined					
TES	Page 3: we question the "current information and guidelines" basis for the Plan. The TES data is derived from work 30 years old.	The TES (terrestrial ecosystem survey) data should be based on current soil conditions. There is concern that the TES may not be achievable because it is based on soil conditions inventoried in the 1980s.	** Check out Kaibab p. 75 2nd comment	Page 3: we question the "current information and guidelines" basis for the Plan. The TES data is derived from work 30 years old.		Outdated Information
General effects of Wallow Fire	Sometimes reading the "affected environment" sections it appears that the information maybe did not reflect conditions after the big 2011 fire (?).	The affected environment should reflect conditions following the Wallow Fire.	XXXX	Sometimes reading the "affected environment" sections it appears that the information maybe did not reflect conditions after the big 2011 fire (?). There are some assumptions in the environmental document— what are the implications if those are wrong? What is "potential" vegetation compared to what is there now?		Current Conditions and Desired Conditions PC 175-16 The Forest Service should provide a clear and understandable description of the expected ecological functions of the various vegetative communities and remove conflicting program direction (fire program direction verses program direction for soil, watershed, wildlife and other resource programs) in the Proposed Plan. The plan should reflect conditions after the big 2011 fire.
General effects - human env	Issue: The DEIS fails to include the required analysis of the current and future impact or benefit on the human environment. Remedy: Disclose site specific data about the types and frequency of use on the different areas of the Forest, along with acreage	The DEIS should disclose the effects on the human environment, including impacts to social and economic values, goods, and services.	XXXX	Disclose site specific data about the types and frequency of use on the different areas of the Forest, along with acreage of actual (if any) disturbed land and impacts on wildlife. Estimates of acres of actual impacted land area should be displayed as a percent of any		Disclose Site Specific Data Showing Direct and Indirect Effects

	<p>of actual (if any) disturbed land and impacts on wildlife. Estimates of acres of actual impacted land area should be displayed as a percent of any given land area such as acres of disturbance per section etc. This data should then be used to present the current and future effect on the environment (Direct and Indirect effects) and also be used to show a clear difference between the alternatives. (See 40 CFR 1502.16)</p>			<p>given land area such as acres of disturbance per section etc. This data should then be used to present the current and future effect on the environment (Direct and Indirect effects) and also be used to show a clear difference between the alternatives. (See 40 CFR 1502.16)</p>		
General effects - human env	<p>Issue: The DEIS fails to fairly address impacts on human environment. Remedy: The DEIS should discuss need for change within the context of the human environment, not outside of it.</p>	<p>The DEIS should disclose the effects on the human environment, including impacts to social and economic values, goods, and services.</p>	XXXX	<p>Issue: The DEIS fails to fairly address impacts on human environment. Remedy: The DEIS should discuss need for change within the context of the human environment, not outside of it.</p>		<p>Impacts on Human Environment</p>
General effects - human env	<p>For each desired condition stated there must be an identifiable plan of action related to the impacts of the plan on respective forest users. What are the expected management changes and their corresponding impacts to social and economic values, goods and services?</p>	<p>The DEIS should disclose the effects on the human environment, including impacts to social and economic values, goods, and services.</p>	XXXX	<p>For each desired condition stated there must be an identifiable plan of action related to the impacts of the plan on respective forest users. What are the expected management changes and their corresponding impacts to social and economic values, goods and services?</p>		<p>Desired Conditions</p> <p>PC 2610-10 The Forest Service should address managing the forest to provide goods and services needed by the people, adding an identifiable plan of action related to the impacts on forest users for each desired condition, and a more balanced approach because the Proposed LMP overwhelmingly emphasizes ecological sustainability over economic uses and social sustainability and, private, statutory and pre-existing rights will be minimized</p>

General effects - direct eff	Issue: The DEIS erroneously provides impression that there are no direct effects: (1st paragraph, page 19, Watershed Specialist Report): Remedy: Remove language that provides any impression that the updated Forest Plan will have no direct effects on the management of the Forest.	Remove language from the DEIS that provides an impression that the revised plan will have no direct effects.	XXXX	Issue: The DEIS erroneously provides impression that there are no direct effects: (1st paragraph, page 19, Watershed Specialist Report): Remedy: Remove language that provides any impression that the updated Forest Plan will have no direct effects on the management of the Forest.		Impression of No Direct Effects	
General effects - water, aspen, grazing	As natural water sources and aspen regeneration are highlighted needs, they must be addressed thoroughly, and grazing, too, is owed a more thorough treatment.	Natural water sources, aspen regeneration, and grazing must be addressed thoroughly in the EIS.	XXXX	As natural water sources and aspen regeneration are highlighted needs, they must be addressed thoroughly, and grazing, too, is owed a more thorough treatment.		Enhancing Section Information	PC 175-19 The Forest Service should fully address grazing, natural water sources and aspen regeneration because they are highlighted needs
Effects - indicators	Issue: The DEIS fails to adequately provide definition for and justification of "indicators" of the need for change. Remedy: Discuss how and why indicators are developed in Chapter 1 in order to justify their application to the Alternatives. Review all indicators to be sure they can yield quantifiable results that can be compared.	The plan and DEIS should use criteria (indicators) that can be measured so the public can understand and relate to what is taking place on the national forest.	XXXX	Issue: The DEIS fails to adequately provide definition for and justification of "indicators" of the need for change. Remedy: Discuss how and why indicators are developed in Chapter 1 in order to justify their application to the Alternatives. Review all indicators to be sure they can yield quantifiable results that can be compared.		Indicators of the Need for Change	PC 102-2 The Forest Service should provide a definition of indicators and discuss the justification of the need for change in their application to the alternatives.
Monitoring - science based	Issue: The Plan fails to provide scientific parameters for "natural disturbance regime". (3rd paragraph, page 15, Proposed Plan): Remedy: Establish tangible science-based criteria that can be measured using proven monitoring techniques so the public can understand and relate to what is taking place	The plan and DEIS should use criteria (indicators) that can be measured so the public can understand and relate to what is taking place on the national forest.	XXXX	Issue: The Plan fails to provide scientific parameters for "natural disturbance regime". (3rd paragraph, page 15, Proposed Plan): Remedy: Establish tangible science-based criteria that can be measured using proven monitoring techniques so the public can understand and relate to what is taking place		Provide Science and Fact Based Measurable Specifics	PC 175-8 The Forest Service should establish tangible science-based criteria that can be measured using proven monitoring techniques so the public can understand and relate to what is taking place on their National Forest.

	on their National Forest.			on their National Forest.			
Effects - indicators	Issue: The Plan uses terms which are not defined and for which no measurements are provided. (mid page, page 17, Proposed Plan): Remedy: Establish tangible science-based criteria that can be measured using proven monitoring techniques so the public can understand and relate to what is taking place on their National Forest.	The plan and DEIS should use criteria (indicators) that can be measured so the public can understand and relate to what is taking place on the national forest.	XXXX	Issue: The Plan uses terms which are not defined and for which no measurements are provided. (mid page, page 17, Proposed Plan): Remedy: Establish tangible science-based criteria that can be measured using proven monitoring techniques so the public can understand and relate to what is taking place on their National Forest.	Provide Science and Fact Based Measurable Specifics	PC 175-8 The Forest Service should establish tangible science-based criteria that can be measured using proven monitoring techniques so the public can understand and relate to what is taking place on their National Forest.	
Uncertainty	There are some assumptions in the environmental document—what are the implications if those are wrong?	Explain the implications if the assumptions in the DEIS are wrong.	XXXX	Sometimes reading the “affected environment” sections it appears that the information maybe did not reflect conditions after the big 2011 fire (?). There are some assumptions in the environmental document—what are the implications if those are wrong? What is “potential” vegetation compared to what is there now?			

General effects - climate change to forest	The Forest Service must address and disclose threats to the Apache-Sitgreaves National Forests that result from scientifically recognized changes in regional climate and implications for natural resource management over the life of the revised forest plan	The Forest Service must address and disclose threats to the forests from climate change.	** Check out Kaibab p. 89 & Prescott p. 9	The Forest Service must address and disclose threats to the Apache-Sitgreaves National Forests that result from scientifically recognized changes in regional climate and implications for natural resource management over the life of the revised forest plan	Disclose Threats from Climate Change	
General effects - climate change to forest	Furthermore, in assessing and describing the affected environment, the Forest Service must consider and disclose the extent and degree to which climate change affects national forest lands and resources.	The Forest Service must address and disclose threats to the forests from climate change.	** Check out Kaibab p. 89 & Prescott p. 9	Furthermore, in assessing and describing the affected environment, the Forest Service must consider and disclose the extent and degree to which climate change affects national forest lands and resources.	Effects and Environmental Consequences of Climate Change	
General effects - climate change to forest	The Forest Service must address and disclose threats to the Apache-Sitgreaves National Forests that result from climate change.	The Forest Service must address and disclose threats to the forests from climate change.	** Check out Kaibab p. 89 & Prescott p. 9	The Forest Service must address and disclose threats to the Apache-Sitgreaves National Forests that result from climate change. Ecological restoration oriented to "reference" or "desired" conditions based on a presumed "historic range of variability" may not be appropriate or sustainable.	Disclose Threats from Climate Change	
General effects - climate change to forest	The Forest Service must compare environmental impacts of action alternatives that respond to foreseeable changes in regional climate.	The Forest Service must address and disclose threats to the forests from climate change.	** Check out Kaibab p. 89 & Prescott p. 9	The Forest Service must compare environmental impacts of action alternatives that respond to foreseeable changes in regional climate.	Climate Change	PC 207-30 The Forest Service should address and clarify "climate variability" and basing planning on the concept of return to a condition that no longer exists while admitting that future conditions will not be the same as either the present or the past. At a minimum, one reasonable alternative should provide a substantial increase in protection for plant and animal species on national

							forest lands to address scientific uncertainty and controversy regarding the magnitude of climate change impacts on water availability, net productivity, fish and wildlife habitat, and sustainability of multiple uses.
Controversy	The Forest Service is required by NEPA to disclose the degree to which effects of a revised Forest Plan on the environment "are likely to be highly controversial. 40 C.F.R. § 1508.27(b)(4). "	The Forest Service should disclose the degree to which effects of a revised Forest Plan on the environment "are likely to be highly controversial" 40 C.F.R. § 1508.27(b)(4).	XXXX				
Coordination with other Government Agencies	Issue: The DEIS fails to demonstrate intergovernmental coordination. Remedy: Discuss how Agency has fulfilled this requirement in order for the County to comply with Subsection B. of this State law's above requirements.	Explain how the Forest Service complied with requirements for public participation, tribal, and intergovernmental coordination and review (36 CFR 219.4 (b)(2), 36 CFR 219.6(k), 36 CFR 219.7,40 CFR 1502.16(c), 40 CFR 1506.2).	XXXX	Issue: The DEIS fails to demonstrate intergovernmental coordination. Remedy: Discuss how Agency has fulfilled this requirement in order for the County to comply with Subsection B. of this State law's above requirements.		Intergovernmental Coordination with State and Local Requirements	
Coordination with other Government Agencies	The FEIS should describe in the DEIS how the line officer fulfilled this requirement to coordinate with potentially effected private property owners, such as inholders and adjacent property owners, per 36 CPR 219.6(k).	Explain how the Forest Service complied with requirements for public participation, tribal, and intergovernmental coordination and review (36 CFR 219.4 (b)(2), 36 CFR 219.6(k), 36 CFR 219.7,40 CFR 1502.16(c), 40 CFR 1506.2).	XXXX	The FEIS should describe in the DEIS how the line officer fulfilled this requirement to coordinate with potentially effected private property owners, such as inholders and adjacent property owners, per 36 CPR 219.6(k).		Intergovernmental Coordination with State and Local Requirements	

<p>Coordination with other Government Agencies</p>	<p>Include an explanation as to why the Agency has not complied with 40 CFR§1506.2 in Chapter 4 and/or in the DEIS Appendix. In the event that the Agency should decide to comply with this regulation, then the Agency should document this in the DEIS.</p>	<p>Explain how the Forest Service complied with requirements for public participation, tribal, and intergovernmental coordination and review (36 CFR 219.4 (b)(2), 36 CFR 219.6(k), 36 CFR 219.7,40 CFR 1502.16(c), 40 CFR 1506.2).</p>	<p>XXXX</p>	<p>Include an explanation as to why the Agency has not complied with 40 CFR§1506.2 in Chapter 4 and/or in the DEIS Appendix. In the event that the Agency should decide to comply with this regulation, then the Agency should document this in the DEIS.</p>	<p>Intergovernmental Coordination with State and Local Requirements</p>	
<p>Coordination with other Government Agencies</p>	<p>Issue: DEIS fails to disclose the possible consistencies and inconsistencies between the proposed A-S TMP alternatives in the DEIS and State, Tribal and/or local government policies The FEIS consistency section must address related local policies, programs and activities, such as county roads and transportation plans, related County environmental planning and review process; the County Community Wildfire Prevention Plan, related law enforcement to just name some of the related county policies. . . Remedy: The Agency should address specific individual local government policy and planning, including discussion of consistency with local and state policy and planning in the Affects Analysis section</p>	<p>Explain how the Forest Service complied with requirements for public participation, tribal, and intergovernmental coordination and review (36 CFR 219.4 (b)(2), 36 CFR 219.6(k), 36 CFR 219.7,40 CFR 1502.16(c), 40 CFR 1506.2).</p>	<p>XXXX</p>	<p>Issue: DEIS fails to disclose the possible consistencies and inconsistencies between the proposed A-S TMP alternatives in the DEIS and State, Tribal and/or local government policies. Remedy: The Agency should address specific individual local government policy and planning, including discussion of consistency with local and state policy and planning in the Affects Analysis section</p>	<p>Intergovernmental Coordination with State and Local Requirements</p>	

<p>Coordination with other Government Agencies</p>	<p>Issue: The DEIS omits key information regarding compliance with required. The DEIS discusses public participation and tribal consultation (not coordination) on p. 10, however coordination with local governments or state governments is missing from the DEIS. Remedy: Include these laws, regulation and agency directives into the DEIS in the sections and appendix that addresses related laws and regulations. Additionally, comply with coordination requirements for the DEIS; specify how the Agency coordinated.</p>	<p>Explain how the Forest Service complied with requirements for public participation, tribal, and intergovernmental coordination and review (36 CFR 219.4 (b)(2), 36 CFR 219.6(k), 36 CFR 219.7,40 CFR 1502.16(c), 40 CFR 1506.2).</p>	<p>XXXX</p>	<p>Issue: The DEIS omits key information regarding compliance with required. The DEIS discusses public participation and tribal consultation (not coordination) on p. 10, however coordination with local governments or state governments is missing from the DEIS. Remedy: Include these laws, regulation and agency directives into the DEIS in the sections and appendix that addresses related laws and regulations. Additionally, comply with coordination requirements for the DEIS; specify how the Agency coordinated.</p>	<p>Intergovernmental Coordination with State and Local Requirements</p>	
<p>Coordination with other Government Agencies</p>	<p>The DEIS omits key information regarding compliance with required. The DEIS discusses public participation and tribal consultation (not coordination) on p. 10, however coordination with local governments or state governments is missing from the DEIS. ...Additionally, comply with coordination requirements for the DEIS; specify how the Agency coordinated.</p>	<p>Explain how the Forest Service complied with requirements for public participation, tribal, and intergovernmental coordination and review (36 CFR 219.4 (b)(2), 36 CFR 219.6(k), 36 CFR 219.7,40 CFR 1502.16(c), 40 CFR 1506.2).</p>	<p>XXXX</p>	<p>The DEIS omits key information regarding compliance with required. The DEIS discusses public participation and tribal consultation (not coordination) on p. 10, however coordination with local governments or state governments is missing from the DEIS. Remedy: Include these laws, regulation and agency directives into the DEIS in the sections and appendix that addresses related laws and regulations. Additionally, comply with coordination requirements for the DEIS; specify how the Agency coordinated.</p>	<p>Coordination with Local Government</p>	<p>PC 336-7 The Forest Service should include these laws, regulation and agency directives into the DEIS in the sections and appendix that addresses related laws and regulations and comply with coordination requirements for the DEIS by specifying how the Agency coordinated</p>

<p>Coordination with other Government, Agencies</p>	<p>Issue: The DEIS fails to disclose coordination, fails to demonstrate compliance with the laws and regulations related to coordination. (36 CFR 219.7, 40 CFR 1502.16(c), 1506.2.) Remedy: Agency should comply with 36 CFR 219.7 and disclose the results of their consistency review, per 219.7(c) and (40 CFR 1502.16(c), 1506.2). Review the planning and land use policies of local governments; display the results of said review in the DEIS and show how the line officer fulfilled this requirement. This should include reviewing prior Memoranda of Understanding and previous communications from local governments regarding planning, coordination and cooperation. Additionally, coordinate with local government in the implementation of monitoring; include results of said planning in the monitoring section of the DEIS.</p>	<p>Explain how the Forest Service complied with requirements for public participation, tribal, and intergovernmental coordination and review (36 CFR 219.4 (b)(2), 36 CFR 219.6(k), 36 CFR 219.7,40 CFR 1502.16(c), 40 CFR 1506.2).</p>	<p>XXXX</p>	<p>Issue: The DEIS fails to disclose coordination, fails to demonstrate compliance with the laws and regulations related to coordination. (36 CFR 219.7, 40 CFR 1502.16(c), 1506.2.) Remedy: Agency should comply with 36 CFR 219.7 and disclose the results of their consistency review, per 219.7(c) and (40 CFR 1502.16(c), 1506.2). Review the planning and land use policies of local governments; display the results of said review in the DEIS and show how the line officer fulfilled this requirement. This should include reviewing prior Memoranda of Understanding and previous communications from local governments regarding planning, coordination and cooperation. Additionally, coordinate with local government in the implementation of monitoring; include results of said planning in the monitoring section of the DEIS.</p>	<p>Coordination with Local Government</p>	<p>PC 336-2 The Forest Service should comply with 36 CFR 219.7 and disclose the results of their consistency review, per 219.7(c) and (40 CFR 1502.16(c), 1506.2) and review the planning and land use policies of local governments;</p>
<p>Coordination with other Government, Agencies</p>	<p>Issue: The DEIS fails to demonstrate intergovernmental coordination. Remedy: Discuss how Agency has fulfilled this requirement in order for the County to comply with Subsection B. of this State law's above requirements.</p>	<p>Explain how the Forest Service complied with requirements for public participation, tribal, and intergovernmental coordination and review (36 CFR 219.4 (b)(2), 36 CFR 219.6(k), 36 CFR 219.7,40 CFR 1502.16(c), 40 CFR 1506.2).</p>	<p>XXXX</p>	<p>Issue: The DEIS fails to demonstrate intergovernmental coordination. Remedy: Discuss how Agency has fulfilled this requirement in order for the County to comply with Subsection B. of this State law's above requirements.</p>	<p>Coordination with Local Government</p>	

Coordination with other Government, Agencies	Issue: The DEIS is missing important information regarding Joint Planning Requests. Remedy: Include an explanation as to why the Agency has not complied with 40 CFR§1506.2 in Chapter 4 and/or in the DEIS Appendix. In the event that the Agency should decide to comply with this regulation, then the Agency should document this in the DEIS.	Explain how the Forest Service complied with requirements for public participation, tribal, and intergovernmental coordination and review (36 CFR 219.4 (b)(2), 36 CFR 219.6(k), 36 CFR 219.7,40 CFR 1502.16(c), 40 CFR 1506.2).	XXXX	Issue: The DEIS is missing important information regarding Joint Planning Requests. Remedy: Include an explanation as to why the Agency has not complied with 40 CFR§1506.2 in Chapter 4 and/or in the DEIS Appendix. In the event that the Agency should decide to comply with this regulation, then the Agency should document this in the DEIS.	Joint Planning Requests	PC 336-8 The Forest Service should include an explanation as to why the Agency has not complied with 40 CFR§1506.2 in Chapter 4 and/or in the DEIS Appendix. In the event that the Agency should decide to comply with this regulation, then the Agency should document this in the DEIS.
Coordination with other Government, Agencies	The Agency should document coordination with the County, per 36 CFR 219.7 (1982) in order to complete the consistency requirements, per 36 CFR per 219.7 or provide discussion as to reasons for non-compliance with CFR requirements.	Explain how the Forest Service complied with requirements for public participation, tribal, and intergovernmental coordination and review (36 CFR 219.4 (b)(2), 36 CFR 219.6(k), 36 CFR 219.7,40 CFR 1502.16(c), 40 CFR 1506.2).	XXXX	The Agency should document coordination with the County, per 36 CFR 219.7 (1982) in order to complete the consistency requirements, per 36 CFR per 219.7 or provide discussion as to reasons for non-compliance with CFR requirements.	Coordination with Local Government	PC 336-3 The Forest Service should document coordination with the County, per 36 CFR 219.7 (1982) in order to complete the consistency requirements, per 36 CFR per 219.7 or provide discussion as to reasons for non-compliance with CFR requirements.
Coordination with other Government, Agencies	Navajo County posits that these statutory requirements are meant by the U.S. Congress to imply more than a perfunctory review process resulting in a check mark in a 'coordination box' and imply a sincere and proactive resolution effort to reduce and resolve potential conflicts between aspects of the Apache-Sitgreaves National Forests Land Management Plan and objectives expressed in the Navajo County plans and policies; such as, but not limited to, those relevant to motorized big game retrieval, dispersed motorized camping and the reasonable allowance	Explain how the Forest Service complied with requirements for public participation, tribal, and intergovernmental coordination and review (36 CFR 219.4 (b)(2), 36 CFR 219.6(k), 36 CFR 219.7,40 CFR 1502.16(c), 40 CFR 1506.2).	XXXX	Navajo County posits that these statutory requirements are meant by the U.S. Congress to imply more than a perfunctory review process resulting in a check mark in a 'coordination box' and imply a sincere and proactive resolution effort to reduce and resolve potential conflicts between aspects of the Apache-Sitgreaves National Forests Land Management Plan and objectives expressed in the Navajo County plans and policies; such as, but not limited to, those relevant to motorized big game retrieval, dispersed motorized camping and the reasonable allowance	Coordination with Local Government	of the Apache-Sitgreaves National Forests Land Management Plan and objectives expressed in the Navajo County plans and policies

	of motorized travel in and motorized access to the Apache-Sitgreaves National Forests, or those relevant to the unique rural economic development and employment role resting on natural resources such timber, grazing or mineral resources located within the Apache-Sitgreaves National Forests.			of motorized travel in and motorized access to the Apache-Sitgreaves National Forests, or those relevant to the unique rural economic development and employment role resting on natural resources such timber, grazing or mineral resources located within the Apache-Sitgreaves National Forests.			
Coordination with other Government Agencies	For the purpose of compliance with the statutory requirements of coordination between the Apache-Sitgreaves National Forests land management plan and Navajo County's objectives as expressed in its plans and policies (36 CFR 219.4 (b)), the Navajo County plan defined as the accumulation of the formal Navajo County planning documents AND the Navajo County public record of Board of Supervisors deliberations and decisions, is hereby entered into the Apache-Sitgreaves National Forests Land Management Plan NEPA record.	Explain how the Forest Service complied with requirements for public participation, tribal, and intergovernmental coordination and review (36 CFR 219.4 (b)(2), 36 CFR 219.6(k), 36 CFR 219.7,40 CFR 1502.16(c), 40 CFR 1506.2).	XXXX	For the purpose of compliance with the statutory requirements of coordination between the Apache-Sitgreaves National Forests land management plan and Navajo County's objectives as expressed in its plans and policies (36 CFR 219.4 (b)), the Navajo County plan defined as the accumulation of the formal Navajo County planning documents AND the Navajo County public record of Board of Supervisors deliberations and decisions, is hereby entered into the Apache-Sitgreaves National Forests Land Management Plan NEPA record.		Coordination with Local Government	
Coordination with other Government Agencies	Navajo County, therefore, expects that: i) the Responsible Official shall coordinate land management planning with Navajo County's equivalent and related planning efforts (36 CFR 219.4 (b)(1)); ii) the consistency review and coordination action shall include consideration of the objectives of Navajo County as	Explain how the Forest Service complied with requirements for public participation, tribal, and intergovernmental coordination and review (36 CFR 219.4 (b)(2), 36 CFR 219.6(k), 36 CFR 219.7,40 CFR 1502.16(c), 40 CFR 1506.2).	XXXX	Navajo County, therefore, expects that: i) the Responsible Official shall coordinate land management planning with Navajo County's equivalent and related planning efforts (36 CFR 219.4 (b)(1)); ii) the consistency review and coordination action shall include consideration of the objectives of Navajo County as		Coordination with Local Government	PC 336-6 The Forest Service shall coordinate land management planning with Navajo County's equivalent and related planning efforts (

	expressed in its plans and policies (including the formal Navajo County planning documents, the Navajo County public record of Board of Supervisors deliberations and decisions, and the Navajo County Comments on the Programmatic Draft Environmental Impact Statement For The Apache-Sitgreaves National Forests Land Management Plan); and, iii) the Responsible Official shall consider opportunities to resolve or reduce conflicts, should some arise between the Apache-Sitgreaves National Forests Land Management Plan and the Navajo County plans (36 CFR 219.4 (b)(2)).			expressed in its plans and policies (including the formal Navajo County planning documents, the Navajo County public record of Board of Supervisors deliberations and decisions, and the Navajo County Comments on the Programmatic Draft Environmental Impact Statement For The Apache-Sitgreaves National Forests Land Management Plan); and, iii) the Responsible Official shall consider opportunities to resolve or reduce conflicts, should some arise between the Apache-Sitgreaves National Forests Land Management Plan and the Navajo County plans (36 CFR 219.4 (b)(2)).		
Coordination with other Government Agencies	REQUEST FOR DISCLOSURE OF CONSISTENCY REVIEW AND COORDINATION ACTIONS Per the requirements of 36 CFR 219.4 (b)(2), 40 CFR 1502.16(c) and 40 CFR 1506.2 Navajo County hereby requests that the results of the consistency review and coordination actions between the Apache-Sitgreaves National Forests Land Management Plan and the Navajo County objectives as expressed in its plans and policies shall be displayed in the Programmatic Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan.	Explain how the Forest Service complied with requirements for public participation, tribal, and intergovernmental coordination and review (36 CFR 219.4 (b)(2), 36 CFR 219.6(k), 36 CFR 219.7,40 CFR 1502.16(c), 40 CFR 1506.2).	XXXX	REQUEST FOR DISCLOSURE OF CONSISTENCY REVIEW AND COORDINATION ACTIONS Per the requirements of 36 CFR 219.4 (b)(2), 40 CFR 1502.16(c) and 40 CFR 1506.2 Navajo County hereby requests that the results of the consistency review and coordination actions between the Apache-Sitgreaves National Forests Land Management Plan and the Navajo County objectives as expressed in its plans and policies shall be displayed in the Programmatic Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan.	Consistency Review	

<p>Coordination with other Government Agencies</p>	<p>Finally, Navajo County respectfully requests that the Responsible Official conduct: 1) An extensive and exhaustive consistency review between the Programmatic Draft Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan and the County seven sets of natural resources management objectives relevant to these comments, as follows: I. Rangelands Resources Management Objectives II. Forest Products Resources Management Objectives III. Mineral and Energy Resources Management Objectives IV. Motorized Travel and Recreation Management Objectives V. Forested Ecosystems Restoration and Catastrophic Wildfire Prevention Objectives VI. Watersheds Restoration Objectives VII. Management Areas Designation Objectives</p>	<p>Explain how the Forest Service complied with requirements for public participation, tribal, and intergovernmental coordination and review (36 CFR 219.4 (b)(2), 36 CFR 219.6(k), 36 CFR 219.7,40 CFR 1502.16(c), 40 CFR 1506.2).</p>	<p>XXXX</p>	<p>Finally, Navajo County respectfully requests that the Responsible Official conduct: 1) An extensive and exhaustive consistency review between the Programmatic Draft Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan and the County seven sets of natural resources management objectives relevant to these comments, as follows: I. Rangelands Resources Management Objectives II. Forest Products Resources Management Objectives III. Mineral and Energy Resources Management Objectives IV. Motorized Travel and Recreation Management Objectives V. Forested Ecosystems Restoration and Catastrophic Wildfire Prevention Objectives VI. Watersheds Restoration Objectives VII. Management Areas Designation Objectives</p>	<p>Consistency Review</p>	
<p>Coordination with other Government Agencies</p>	<p>A comprehensive coordination action between the Apache-Sitgreaves National Forests Land Management Plan and the Navajo County objectives, plans and policies as expressed in the County planning documents, the County Board of Supervisors public record of deliberations and decisions, and the County comments on the Programmatic Draft Environmental Impact</p>	<p>Explain how the Forest Service complied with requirements for public participation, tribal, and intergovernmental coordination and review (36 CFR 219.4 (b)(2), 36 CFR 219.6(k), 36 CFR 219.7,40 CFR 1502.16(c), 40 CFR 1506.2).</p>	<p>XXXX</p>	<p>A comprehensive coordination action between the Apache-Sitgreaves National Forests Land Management Plan and the Navajo County objectives, plans and policies as expressed in the County planning documents, the County Board of Supervisors public record of deliberations and decisions, and the County comments on the Programmatic Draft Environmental Impact</p>	<p>Coordination with Local Government</p>	<p>PC 336-6 The Forest Service shall coordinate land management planning with Navajo County's equivalent and related planning efforts (</p>

	Statement for the Apache-Sitgreaves National Forests Land Management Plan as expressed in this document.			Statement for the Apache-Sitgreaves National Forests Land Management Plan as expressed in this document.		
Cooperating Agency	Issue: The DEIS fails to mention the Agency's rejection of Apache County Cooperating Agency (CAI request). The Agency's rejection of the Cooperating Agency (CA) request should be included in the FEIS Chapter 4 and/or in the DEIS Appendix. The correspondence for both the County's request and the Agency denial should be in the project record, and are available at the County's office upon request. Agency should disclose its legal reasoning for the CA denial, including documentation of why the County's factors for CA are not sufficient for CA status to assist the A-S in the TMP NEPA analyses. In the event that the Agency should decide to provide Apache County with the same CA status that have been granted to other forest dependent counties, per 1502.9 (b), then the Agency should document this in the DEIS.	Apache County requests documentation of the Forest Service's rejection of the county's cooperating agency request.	XXXX	Issue: The DEIS fails to mention the Agency's rejection of Apache County Cooperating Agency (CAI request). The Agency's rejection of the Cooperating Agency (CA) request should be included in the FEIS Chapter 4 and/or in the DEIS Appendix. The correspondence for both the County's request and the Agency denial should be in the project record, and are available at the County's office upon request. Agency should disclose its legal reasoning for the CA denial, including documentation of why the County's factors for CA are not sufficient for CA status to assist the A-S in the TMP NEPA analyses. In the event that the Agency should decide to provide Apache County with the same CA status that have been granted to other forest dependent counties, per 1502.9 (b), then the Agency should document this in the DEIS.		Counties and Local Communities

Cooperating Agency Request	Navajo County is committed to resolve or reduce potential conflicts between the Apache-Sitgreaves National Forests Land Management Plan and the Navajo County plans and policies, and understands that such resolution must take place within the context of developing the Apache-Sitgreaves National Forests Land Management Plan's desired conditions or objectives. To this effect, it is the intent of Navajo County to avail itself of the opportunity contained in the 2012 Planning Rule that specifies that: "Where appropriate, the responsible official shall encourage States, counties, and other local governments to seek cooperating agency status in the NEPA process for development, amendment, or revision of a plan" (36 CFR 219.4 (a)(1)(iv)).	Navajo, Gila, Graham, and Greenlee Counties and Eastern Arizona Counties Organization request cooperating agency status.	XXXX	Navajo County is committed to resolve or reduce potential conflicts between the Apache-Sitgreaves National Forests Land Management Plan and the Navajo County plans and policies, and understands that such resolution must take place within the context of developing the Apache-Sitgreaves National Forests Land Management Plan's desired conditions or objectives. To this effect, it is the intent of Navajo County to avail itself of the opportunity contained in the 2012 Planning Rule that specifies that: "Where appropriate, the responsible official shall encourage States, counties, and other local governments to seek cooperating agency status in the NEPA process for development, amendment, or revision of a plan" (36 CFR 219.4 (a)(1)(iv)).	Counties and Local Communities	
AZ State Law	The following rules applicable to reducing dust from open areas, dry washes or riverbeds, roadways and streets are enclosed: Arizona Administrative Code R18-2-604 and R18-2-605 Arizona Administrative Code R18-2-804	The following rules apply to reducing dust from open areas, dry washes or riverbeds, roadways and streets: Arizona Administrative Code R18-2-604 and R18-2-605 Arizona Administrative Code R18-2-804.	XXXX	The following rules applicable to reducing dust from open areas, dry washes or riverbeds, roadways and streets are enclosed: Arizona Administrative Code R18-2-604 and R18-2-605 Arizona Administrative Code R18-2-804	Arizona Codes Applicable to Reducing Dust	PC 104-1 The Forest Service should consider that the following rules are applicable for reducing dust Arizona Administrative Code R18-2-604 and R18-2-605 and Arizona Administrative Code R18-2-804.

Sulfur dioxide maintenance plan area	The parts of your project that are located within the T03S-R28E, T03S-R29E, T03S-R30E and T04S-R30E sections are part of a sulfur dioxide (SO2) maintenance plan area. As described, it may have a de minimis impact on air quality. Disturbance of particulate matter from off highway vehicles and vehicles traveling over unpaved roads as well as smoke from fires is anticipated.	Portions of the Apache-Sitgreaves NFs are located in a sulfur dioxide (SO2) maintenance plan area.	XXXX	The parts of your project that are located within the T03S-R28E, T03S-R29E, T03S-R30E and T04S-R30E sections are part of a sulfur dioxide (SO2) maintenance plan area. As described, it may have a de minimis impact on air quality. Disturbance of particulate matter from off highway vehicles and vehicles traveling over unpaved roads as well as smoke from fires is anticipated.	Sulfur Dioxide Maintenance Plan Area	
Smoke	Page 19 "Smoke and visibility impairment from wildland fire that closely mimics what would occur naturally is generally acceptable." That statement demonstrates how deeply the view that "natural" is good and "man caused" is bad has permeated the Plan. Smoke is smoke. If it impairs one's health or view, does it make any difference whether it is "natural" or not? By this reasoning if one's house is burned down by a fire started by a careless camper that is a crime, but one started by lightning (or maybe an Indian) is OK?	The Air background statement "smoke and visibility impairment from wildland fire that closely mimics what would occur naturally is generally acceptable." should be modified because it implies that "natural" is good and "man caused" is bad. Smoke is smoke.	XXXX			
Effects of pile burning	Though the planning area has good air quality, and meets all federal ambient air quality standards, the fine particulate matter generated during wildland fire does present a human health risk. . . . We also recommend that the Forest Service analyze and include a description, in the FEIS, of the	Analyze and describe the potential for further reductions in air emissions by lessening or eliminating pile burning of residual fuels in favor of biomass energy production.	XXXX	We also recommend that the Forest Service analyze and include a description, in the FEIS, of the potential for further reductions in air emissions, in future forest treatments, by lessening or eliminating pile burning of residual fuels in favor of biomass energy production.	Analyze and Include Description of reductions in Air Emissions	PC 353-2The Forest Service analyze and include a description, in the FEIS, of the potential for further reductions in air emissions, in future forest treatments, by lessening or eliminating pile burning of residual fuels in favor of biomass energy production.

	potential for further reductions in air emissions, in future forest treatments, by lessening or eliminating pile burning of residual fuels in favor of biomass energy production.					
Soil reference conditions	Issues: The Plan contains many errors and omissions. "The current soil condition rating is unsatisfactory or impaired on more than 30 percent of the A-S NFs, compared to the historic conditions of up to 5 percent. In addition, naturally unstable geology (Datil soils, slow geologic landslides) in the Apache Highlands and Blue Geographic Areas contributes to sediment loads in downstream rivers." (p14) No basis is provided for stating that soil conditions were only 5 percent unsatisfactory or impaired in "historic conditions." The implication is that a return to historic vegetation conditions would reduce the 30% of presently "impaired" soils to 5%, but no basis for the statement is provided. No discussion of the significance of the reference to "in addition, naturally unstable" areas contributing to sediment loads is provided, nor a description of what it is in addition to. It is unclear why naturally unstable areas did not apparently contribute	Explain the basis for existing and historic soil conditions and why returning to historic vegetation conditions would reduce the amount of impaired soils.	XXXX	Issues: The Plan contains many errors and omissions. "The current soil condition rating is unsatisfactory or impaired on more than 30 percent of the A-S NFs, compared to the historic conditions of up to 5 percent. In addition, naturally unstable geology (Datil soils, slow geologic landslides) in the Apache Highlands and Blue Geographic Areas contributes to sediment loads in downstream rivers." (p14) No basis is provided for stating that soil conditions were only 5 percent unsatisfactory or impaired in "historic conditions." The implication is that a return to historic vegetation conditions would reduce the 30% of presently "impaired" soils to 5%, but no basis for the statement is provided. No discussion of the significance of the reference to "in addition, naturally unstable" areas contributing to sediment loads is provided, nor a description of what it is in addition to. It is unclear why naturally unstable areas did not apparently contribute	Soil Condition Rating	PC 2655-2 The Forest Service should address and provide that basis for historical soil condition being 5% impaired, discuss the significance of naturally unstable areas contribute to sediment loads, and why naturally unstable areas did not apparently contribute sediment in the past.

	sediment in the past.			sediment in the past.		
Soil direction and fire	[soil guidelines, coarse woody debris, fire] Issue: The Plan provides conflicting recommendations. (3rd paragraph, page 21, Proposed Plan): Remedy: Provide clear and understandable guidelines and remove/correct conflicting direction in the Proposed Plan.	Plan direction for soils is in conflict with the idea that fire will create healthy ecosystems and watersheds by consuming accumulations of coarse woody debris. Periodic fires burning across the landscape will limit the growth of vegetation and will make the accumulation of litter difficult to achieve. Remove conflicting direction. "Soils are stable within their natural capability. Vegetation and litter limit accelerated erosion (e.g., rills, gullies, root exposure, topsoil loss) and contribute to soil deposition and development" (proposed plan p. 20) "Soils provide for diverse native plant species. Vegetative ground cover is well distributed across the soil	XXXX	Issue: The Plan provides conflicting recommendations. (3rd paragraph, page 21, Proposed Plan): Remedy: Provide clear and understandable guidelines and remove/correct conflicting direction in the Proposed Plan.	Clear Direction and Guidelines	1) more specific, clear language and strategy, 2) by reformatting to streamline presentation of information in a more logical flow, omitting duplication and conflicting information, and correcting format, grammar and punctuation for purposes of clarity., 3) provide links to downloadable reference materials available on the internet (and if documents are not yet on the internet, put them there),4) add an alphabetic index of acronyms., 5) Add a comprehensive summary / discussions to just how well the first Forest Plan worked, both the good and the not-so good, 6) add a reference on the importance of litter, 7) define: "rare"; "unique";

		<p>surface to promote nutrient cycling and water infiltration." (proposed plan p. 20)  "Biological soil crusts (e.g., mosses, lichens, algae, liverworts) are present and reestablished if potential exists." (proposed plan p. 20)  "Coarse woody debris retention and/or creation should be used as needed to help retain long term soil productivity" (proposed plan p. 21).</p>				<p>"habitat" and" protection" (from what?) Page 61: Rare and unique habitats should be protected</p>
<p>Soil direction and fire</p>	<p>Issue: The Plan fails to properly assess current soils conditions. (mid page, page 20, &amp; first paragraph, page 21, Proposed Plan): Remedy: Utilize actual current conditions on the Forest as a basis for implementing programs to achieve desired future conditions.</p>	<p>Plan direction for soils is in conflict with the idea that fire will create healthy ecosystems and watersheds by consuming accumulations of coarse woody debris. Periodic fires burning across the landscape will limit the growth of vegetation and will make the accumulation of litter difficult to achieve. Remove conflicting direction. "Soils are stable within their natural capability. Vegetation and litter limit accelerated erosion (e.g., rills, gullies, root exposure, topsoil loss) and contribute to soil deposition and development" (proposed plan p. 20)  "Soils provide for diverse native plant species. Vegetative ground cover is well distributed across the soil surface to promote nutrient cycling and water infiltration." (proposed plan p. 20)  "Biological soil crusts (e.g., mosses, lichens, algae,</p>	<p>XXXX</p>	<p>Issue: The Plan fails to properly assess current soils conditions. (mid page, page 20, &amp; first paragraph, page 21, Proposed Plan): Remedy: Utilize actual current conditions on the Forest as a basis for implementing programs to achieve desired future conditions.</p>	<p>Addressing Soil Conditions</p>	

		<p>liverworts) are present and reestablished if potential exists." (proposed plan p. 20)  "Coarse woody debris retention and/or creation should be used as needed to help retain long term soil productivity" (proposed plan p. 21).</p>				
<p>Soil affected environment (wallow , etc)</p>	<p>Issue: The Plan fails to accurately address the effects of the Wallow Fire on soils conditions.(2nd paragraph, page 20, Proposed Plan):  Remedy: Evaluate the effects of the Wallow Fire on soils conditions and provide a new and accurate accounting of soil ratings for the Forest. Use the new information to re-analyze the future watershed management requirements for the Forest and to determine the environmental consequences of each of the action alternatives. Once this information is available the Forest should re-release a new watershed management direction in the Proposed Plan.</p>	<p>Evaluate the effects of the Wallow Fire on soil conditions and provide a new and accurate accounting of soil ratings for the forest. Use the new information to analyze environmental consequences and determine watershed management direction.</p>	<p>XXXX</p>	<p>Issue: The Plan fails to accurately address the effects of the Wallow Fire on soils conditions.(2nd paragraph, page 20, Proposed Plan):  Remedy: Evaluate the effects of the Wallow Fire on soils conditions and provide a new and accurate accounting of soil ratings for the Forest. Use the new information to re-analyze the future watershed management requirements for the Forest and to determine the environmental consequences of each of the action alternatives. Once this information is available the Forest should re-release a new watershed management direction in the Proposed Plan.</p>	<p>Addressing Soil Conditions</p>	

Soils / Grasslands - add litter references	Page 56, Landscape Scale DC's We are pleased to see the fourth bullet the inclusion of Litter and would ask that this very important element be; o Enforced with the notation in both Plan and EIS to FSH 2509.18 o An additional sighting be used in the final plan § Managing For Mulch, Molinar, Gualt & Holechek Rangelands 23(4) August 2001	Reference the importance of litter (organic materials on the soil surface) in all forest NEPA project documents. Include the following two references: (1) FSH 2409.18.2.05 and (2) Managing for Mulch, Molinar, Galt & Holechek; August 2001, Rangelands 23(4) page 6 recommendations for minimum residual herbage. Cite these references in the plan and EIS.	** Check out Kaibab p. 38, 4th comment	Page 56, Landscape Scale DC's We are pleased to see the fourth bullet the inclusion of Litter and would ask that this very important element be; o Enforced with the notation in both Plan and EIS to FSH 2509.18 o An additional sighting be used in the final plan § Managing For Mulch, Molinar, Gualt & Holechek Rangelands 23(4) August 2001	Importance of Including and Expanding on Litter in Plan	1750-1The Forest Service should add the notation on " inclusion of Litter" (page 56 Landscape scale DC's) to both the Plan and EIS to FSH 2509.18 and add an additional reference to be used in the final plan - Managing For Mulch, Molinar, Gualt & Holechek Rangelands 23(4) August 2001.
Soils / Grasslands - add litter references	We urge the ASNF reference the importance of litter in all its NEPA – Project documents. We ask that the two sightings noted above be noted in the Final Plan and EIS.	Reference the importance of litter (organic materials on the soil surface) in all forest NEPA project documents. Include the following two references: (1) FSH 2409.18.2.05 and (2) Managing for Mulch, Molinar, Galt & Holechek; August 2001, Rangelands 23(4) page 6 recommendations for minimum residual herbage. Cite these references in the plan and EIS.	** Check out Kaibab p. 38, 4th comment	We urge the ASNF reference the importance of litter in all its NEPA – Project documents. We ask that the two sightings noted above be noted in the Final Plan and EIS.	Forest Health	
Soil DC - clarification	p.20 Vegetative ground cover is well - distributed in comparison to what?	Explain the soil desired condition "vegetative ground cover is well distributed across the soil surface to promote nutrient cycling and water infiltration" (proposed plan p. 20). Well-distributed, in comparison to what?	XXXX	p.20 Vegetative ground cover is well - distributed in comparison to what?	Vegetative Ground Cover Distribution	

Soil effects - loss of topsoil	Loss of soil productivity caused by loss of topsoil and inhibited early-successional plant regeneration is a long-term and irretrievable adverse impact to the forest ecosystem (Beschta et al. 2004). Recovery would not occur for decades because it would take that long for the ecosystem to replenish organic matter removed by post-fire logging that otherwise would decompose <i>in situ</i> . The effect of organic matter loss on site productivity is not well understood for lack of research (McIver and Starr 2000). The Forest Service should study this matter of scientific uncertainty and disclose its significance relative to the environmental impact of the plan revision.	The effect of organic matter loss on site productivity is not well understood, therefore the Forest Service should study this matter of scientific uncertainty and disclose its significance relative to the environmental impact of plan revision.	XXXX	The Forest Service should study this matter of scientific uncertainty and disclose its significance relative to the environmental impact of the plan revision. (loss of Soil Productivity)	Soil Productivity	
Soils - effect prescribed burn	Pages 76 and 77, Burning Treatments: We would expect any prescribed fires performed by the A-S NFs would not result in high severity burns given the description of its effects to soils and vegetation provided in paragraph three (page 77). If prescribed fires are managed to meet specific prescriptions, high burn severity should not occur.	Verify that prescribed fires would not result in high severity burns as described in the effects to soils and vegetation (DEIS p. 77).	XXXX	Pages 76 and 77, Burning Treatments: We would expect any prescribed fires performed by the A-S NFs would not result in high severity burns given the description of its effects to soils and vegetation provided in paragraph three (page 77). If prescribed fires are managed to meet specific prescriptions, high burn severity should not occur.	Prescribed Fire Prescriptions	PC 905-21 The Forest Service should manage prescribed fires to meet specific prescriptions, so that any prescribed fires performed by the A-S NFs would not result in high severity burns.

Soil Standard - ground cover	Absent, there are no standards put forward for litter, bare soil or erosion rates; either current or desired.	There should be standards for litter, bare soil, and erosion rates.	** Check out Kaibab p. 38, 4th comment	Absent, there are no standards put forward for litter, bare soil or erosion rates; either current or desired.	Providing a Standard in Tons per Acre for Unacceptable Erosion Rates	PC 410-1 The Forest Service should add a standard in tons per acre specifically for unacceptable erosion rates. Those map units that do not meet these criteria would be removed from consideration to be capable of supporting herbivore by non-native species
Soil Standard - ground cover	The ASNF to provide in the next document a standard in tons per acre specifically for litter, litter being composed of all native plants that are indigenous to a specific area, not just pine or juniper needles and limbs. The amount of litter be both vertical or horizontal is to provide for; Soil shading, Top soil development, Erosion control / elimination, Moisture retention allowing for absorption into the soil & sub-straight / groundwater, Food and shelter for small wildlife, Hiding cover for fawns, antelope and deer, Seed bedding, Small plant production, Fine fuel for fire	There should be standards for litter, bare soil, and erosion rates.	** Check out Kaibab p. 38, 4th comment	The ASNF to provide in the next document a standard in tons per acre specifically for litter, litter being composed of all native plants that are indigenous to a specific area, not just pine or juniper needles and limbs. The amount of litter be both vertical or horizontal is to provide for; Soil shading, Top soil development, Erosion control / elimination, Moisture retention allowing for absorption into the soil & sub-straight / groundwater, Food and shelter for small wildlife, Hiding cover for fawns, antelope and deer, Seed bedding, Small plant production, Fine fuel for fire	Providing a Standard in Tons per Acre for Unacceptable Erosion Rates	PC 410-1 The Forest Service should add a standard in tons per acre specifically for unacceptable erosion rates. Those map units that do not meet these criteria would be removed from consideration to be capable of supporting herbivore by non-native species
Watershed affected environment (wallow)	Issue: The DEIS fails to include impact of wildfires in analysis of watershed conditions. (DEIS Chapter 3, p.65, last paragraph): Remedy: Analyze the effects of the Wallow Fire in the Watershed Condition Framework classification process and then provide a new and accurate accounting of 6th code watershed classifications for	Evaluate the effects of the Wallow Fire on watershed conditions and provide a new and accurate accounting of watershed classifications for the forest. Use the new information to analyze environmental consequences and determine watershed management direction.	XXXX	Issue: The DEIS fails to include impact of wildfires in analysis of watershed conditions. (DEIS Chapter 3, p.65, last paragraph): Remedy: Analyze the effects of the Wallow Fire in the Watershed Condition Framework classification process and then provide a new and accurate accounting of 6th code watershed classifications for	Impacts of Wildfire in Analysis of Watershed Conditions	

	<p>the Forest. This new information should then be used to re-analyze the future watershed management requirements for the Forest and to determine the environmental consequences of each of the action alternatives. Once this information is available the Forest should re-release a new watershed section of the DEIS for public consideration and comment.</p>			<p>the Forest. This new information should then be used to re-analyze the future watershed management requirements for the Forest and to determine the environmental consequences of each of the action alternatives. Once this information is available the Forest should re-release a new watershed section of the DEIS for public consideration and comment.</p>		
<p>Watershed affected environment (wallow)</p>	<p>Issue: The Proposed Plan does not address Wallow fire effects (beneficial or adverse) on watershed. (Chapter 3 Management Area Direction) Remedy: Amend watershed management guidelines to address current and potential future conditions that may result from Wallow Fire.</p>	<p>Evaluate the effects of the Wallow Fire on watershed conditions and provide a new and accurate accounting of watershed classifications for the forest. Use the new information to analyze environmental consequences and determine watershed management direction.</p>	<p>XXXX</p>	<p>Issue: The Proposed Plan does not address Wallow fire effects (beneficial or adverse) on watershed. (Chapter 3 Management Area Direction) Remedy: Amend watershed management guidelines to address current and potential future conditions that may result from Wallow Fire.</p>	<p>Wallow Fire Effects on Watershed</p>	<p>PC 455-1 The Forest Service should amend watershed management guidelines to address current and potential future conditions that may result from Wallow Fire. The Forest Service should reanalyze the current watershed status and potential watershed effects for the Forest and address fire as an activity that has and can in the future cause degradation of watershed conditions. Watershed management emphasis for the next ten to fifteen years should be directed mainly toward degraded watershed conditions due to catastrophic wildfires.</p>

Watershed affected environment (wallow)	Reanalyze the current watershed status and potential watershed effects for the Forest and address fire as an activity that has and can in the future cause degradation of watershed conditions.	Evaluate the effects of the Wallow Fire on watershed conditions and provide a new and accurate accounting of watershed classifications for the forest. Use the new information to analyze environmental consequences and determine watershed management direction.	XXXX			
Watershed affected environment (wallow)	The Forest Service should update the information based on the post-Wallow Fire data collection and revise alternatives to reflect the worsening condition of the watersheds	Evaluate the effects of the Wallow Fire on watershed conditions and provide a new and accurate accounting of watershed classifications for the forest. Use the new information to analyze environmental consequences and determine watershed management direction.	XXXX	The Forest Service should update the information based on the post-Wallow Fire data collection and revise alternatives to reflect the worsening condition of the watersheds		Updating Information to Include Post – Wallow Fire Data
Watershed affected environment edit	the County also believes that a critical social consequence of the physical and biological characteristics and processes should be added to the definition to read: “ ... that support aquatic ecosystems AND THE PRODUCTION OF WATER FOR DOWNSTREAM CONSUMPTION.”	Within the watershed affected environment section, suggest adding "and the production of water for downstream consumption" to the end of "Watershed condition is the state of the physical and biological characteristics and processes within a watershed that affect the hydrologic and soil functions that support aquatic ecosystems." (DEIS p. 63).	XXXX	the County also believes that a critical social consequence of the physical and biological characteristics and processes should be added to the definition to read: “ ... that support aquatic ecosystems AND THE PRODUCTION OF WATER FOR DOWNSTREAM CONSUMPTION.”		Missing Information and Corrections to Information
Watershed effects - degrading factors	Navajo County respectfully suggests that the Selected Alternative in the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan include a revised analysis	There is a need to make a distinction between degrading factors and the effects of degrading factors in the watershed section of the DEIS (DEIS p. 65).	XXXX	Navajo County respectfully suggests that the Selected Alternative in the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan include a revised analysis		Watershed

	differentiating more clearly between degrading factors and the effects of degrading factors on watersheds physical and biological characteristics and processes that affect the hydrologic and soil functions, and between natural processes and management effects, so that a proper causality analysis can improve the design of effective restoration and management actions.			differentiating more clearly between degrading factors and the effects of degrading factors on watersheds physical and biological characteristics and processes that affect the hydrologic and soil functions, and between natural processes and management effects, so that a proper causality analysis can improve the design of effective restoration and management actions.		
Watershed effects - degrading factors	Navajo County believes that a clear distinction must be made between degrading factors and the effects of degrading factors, and between natural processes and management effects. The Programmatic Draft Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan lists as common degrading factors: high road density, poor aquatic habitat conditions, poor fire regime conditions, poor aquatic biota conditions, impaired soil conditions (PDEIS p. 65). High road density and poor fire regime conditions may contribute to watersheds degradation, but impaired soil condition, non-functioning riparian or aquatic areas and sedimentation are not degrading factors but the effects of degrading factors. Navajo County is concerned that a proper causality analysis is required to design effective	There is a need to make a distinction between degrading factors and the effects of degrading factors in the watershed section of the DEIS (DEIS p. 65).	XXXX	Navajo County believes that a clear distinction must be made between degrading factors and the effects of degrading factors, and between natural processes and management effects. The Programmatic Draft Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan lists as common degrading factors: high road density, poor aquatic habitat conditions, poor fire regime conditions, poor aquatic biota conditions, impaired soil conditions (PDEIS p. 65). High road density and poor fire regime conditions may contribute to watersheds degradation, but impaired soil condition, non-functioning riparian or aquatic areas and sedimentation are not degrading factors but the effects of degrading factors. Navajo County is concerned that a proper causality analysis is required to design effective		Watershed Restoration

	restoration actions.			restoration actions.			
Watershed effects - sedimentation from OHV	When we look at the issues concerning this forest and also the issues surrounding OHV use on the San Francisco, we must also take in to effect the natural geological features in this area. The area surrounding the San Francisco River and the Clifton area are comprised of a great deal of Gila Conglomerate, which is by nature a sedimentary formation. This indicates that sedimentation in a natural process in this area and thus removal of OHV use on the river will have a minimal to no effect on suspended sediment in the river system	Sedimentation from natural geological features, such as Gila Conglomerate, is a natural process. This should indicate that removal of OHV use on the San Francisco River will have minimal to no effect on suspended sediment in the river system.	XXXX	When we look at the issues concerning this forest and also the issues surrounding OHV use on the San Francisco, we must also take in to effect the natural geological features in this area. The area surrounding the San Francisco River and the Clifton area are comprised of a great deal of Gila Conglomerate, which is by nature a sedimentary formation. This indicates that sedimentation in a natural process in this area and thus removal of OHV use on the river will have a minimal to no effect on suspended sediment in the river system		Natural Geologic Features	
Watershed effects - sedimentation from OHV	In fact removing OHV use from the river may also negatively affect the riparian areas that depend on this sediment for survival	Sedimentation from natural geological features, such as Gila Conglomerate, is a natural process. This should indicate that removal of OHV use on the San Francisco River will have minimal to no effect on suspended sediment in the river system.	XXXX	In fact removing OHV use from the river may also negatively affect the riparian areas that depend on this sediment for survival		Negative Affects to Riparian Areas	

Watershed effects - analysis	Issue: The DEIS fails to use scientific data as indicators. (1st & 2nd paragraph, page 12, Watershed Specialist Report & Chapter 3, 4th paragraph, page 64, DEIS): Remedy: Use time tested monitoring of ground cover, soil loss, sediment loads entering key drainages and downstream water quality as indicators of functioning watersheds. Recommended science - (Williams et al. 1997) <b>NOTE: no reference provided for citation</b>	There is concern that a watershed has to be "natural pristine" and "show little to no influence from human actions" to be considered properly functioning according to the Watershed Condition Classification Technical Guide. Instead use monitoring of ground cover, soil loss, sediment loads entering key drainages and downstream water quality as indicators of functioning watersheds.	XXXX	Issue: The DEIS fails to use scientific data as indicators. (1st & 2nd paragraph, page 12, Watershed Specialist Report & Chapter 3, 4th paragraph, page 64, DEIS): Remedy: Use time tested monitoring of ground cover, soil loss, sediment loads entering key drainages and downstream water quality as indicators of functioning watersheds.		Using Scientific Data as Indicators of Functioning Watersheds	PC 455-4 The Forest Service should use time tested monitoring of ground cover, soil loss, sediment loads entering key drainages and downstream water quality as indicators of functioning watersheds and use scientific data as indicators
Watershed priority - restoration through timber	Issue: The Plan fails to realistically address mitigation of watershed degradation due to catastrophic wildfire.(mid page 17 through to mid page 18, Proposed Plan): Remedy: Coordinate recovery of degraded watersheds due to the Wallow Fire with the production and sale of forest products. Use timber sale receipts to provide for a watershed management program to treat watersheds heavily impacted by the Wallow Fire. Use local workforce to coordinated support local communities.	<b>The DEIS should present the assessments of watershed degradation that was done through the Wallow Fire BAER (Burned Area Emergency Response) planning.</b> Coordinate the recovery of degraded watersheds with the production and sale of forest products and use timber sale receipts to provide for watershed management programs, and employ local workforce when possible.	XXXX	Issue: The Plan fails to realistically address mitigation of watershed degradation due to catastrophic wildfire.(mid page 17 through to mid page 18, Proposed Plan): Remedy: Coordinate recovery of degraded watersheds due to the Wallow Fire with the production and sale of forest products. Use timber sale receipts to provide for a watershed management program to treat watersheds heavily impacted by the Wallow Fire. Use local workforce to coordinated support local communities.		Fire	
Watershed priority - implementation	while stating the condition class of 10, 6th code watershed will be improved, gives no indication as to which watersheds are currently severely degraded and determined to be priority. Also the Proposed Plan gives no indication where these	Explain the plans for implementation and the impacts of implementation related to the objective "During the planning period, improve the condition class on at least 10 priority 6th level HUC watersheds by removing or mitigating degrading	XXXX				

	watersheds are located.	factors" (proposed plan p. 17).					
Watershed priority - implementation	p.16 improve the condition on at least 10 priority HUG watersheds. This may be an admirable goal, but what are the plans for implementation and what would be the said impacts of such implementation?	Explain the plans for implementation and the impacts of implementation related to the objective "During the planning period, improve the condition class on at least 10 priority 6th level HUC watersheds by removing or mitigating degrading factors" (proposed plan p. 17).	XXXX	p.16 improve the condition on at least 10 priority HUG watersheds. This may be an admirable goal, but what are the plans for implementation and what would be the said impacts of such implementation?		Implementation Plans and Impacts - Watersheds	PC 2651-6 the Forest Service should define the implementation plans and impact of the plans to improve the condition on at least 10 priority HUG watersheds.
Watershed priority - implementation	With regard to watershed restoration, for example (a core management objective of all national forests in the 2010 USDA strategic plan), the A-S NFs propose to improve only ten watersheds, even though more than two-thirds of the watersheds are classified as "functioning-at-risk" or "impaired."	Explain the plans for implementation and the impacts of implementation related to the objective "During the planning period, improve the condition class on at least 10 priority 6th level HUC watersheds by removing or mitigating degrading factors" (proposed plan p. 17).	XXXX	With regard to watershed restoration, for example (a core management objective of all national forests in the 2010 USDA strategic plan), the A-S NFs propose to improve only ten watersheds, even though more than two-thirds of the watersheds are classified as "functioning-at-risk" or "impaired."		Watershed Restoration	PC 455-2 The Forest Service should review the restoration efforts and clarify degrading factors because it confuses "degrading factors" with the results of degradation and unmanaged grazing, invasive species, or improper road construction may or may not contribute to degradation and departure from historic conditions is not a degrading factor unless only "historic conditions" are considered to be undegraded. The Forest Service proposes to improve only ten watersheds, even though more than two-thirds of the watersheds are classified as "functioning-at-risk" or "impaired."

Watershed priority - implementation	Navajo County agrees with the prioritization methodology used to designate watersheds, but is concerned that “the selection of these watersheds is ongoing; and, once selected, will be a major consideration for implementation of projects in some alternatives”	Explain the plans for implementation and the impacts of implementation related to the objective "During the planning period, improve the condition class on at least 10 priority 6th level HUC watersheds by removing or mitigating degrading factors" (proposed plan p. 17).	XXXX	Navajo County agrees with the prioritization methodology used to designate watersheds, but is concerned that “the selection of these watersheds is ongoing; and, once selected, will be a major consideration for implementation of projects in some alternatives”		Prioritization Methodology in Designating Watersheds	
Watershed priority - amount of restored watersheds	Navajo County believes that the watershed treatments prioritization effort must be given a higher priority and potentially larger resources so that the preservation treatments of Class 1 watersheds and the restoration treatments of Class 2 watersheds can be appropriately prioritized. Similarly, Navajo County believes that it is critical to complete expeditiously the analysis of the 50 watersheds potentially affected by the recent Wallow Fire	The number of restored watersheds should be increased in all of the action alternatives. The watershed treatment prioritization effort should be given a higher priority and larger resources.	XXXX	Navajo County believes that the watershed treatments prioritization effort must be given a higher priority and potentially larger resources so that the preservation treatments of Class 1 watersheds and the restoration treatments of Class 2 watersheds can be appropriately prioritized. Similarly, Navajo County believes that it is critical to complete expeditiously the analysis of the 50 watersheds potentially affected by the recent Wallow Fire		Prioritization of Watershed Treatments	
Watershed priority - amount of restored watersheds	The Forest Service should increase the number of restored watersheds in all of the action alternatives.	The number of restored watersheds should be increased in all of the action alternatives. The watershed treatment prioritization effort should be given a higher priority and larger resources.	XXXX	The Forest Service should increase the number of restored watersheds in all of the action alternatives.		Restored Watersheds	

watershed outcomes	Where watershed management direction is found in the Proposed Plan, it calls for following national direction for watershed management as found in the (Watershed Condition Classification Technical Guide, USDA Forest Service FS-978, July 2011, and Watershed Condition Framework, USDA Forest Service FS-977, May 2011). While it is understood the various National Forest should follow national direction, the Proposed Plan offers very little information beyond what is found in the above mentioned documents.	Inform the public of the level of management and the expected outcomes are for watershed management in the next 10 to 15 years	XXXX			
watershed outcomes	While it is understood the Proposed Plan offers broad guidance and not specific on-the-ground project decisions, the Proposed Plan should provide enough National Forest specific information so the public has a valuable understanding of expected resource related management activities and outcomes of implementing a planned level of management. It is felt that the proposed plan, while thoroughly defining the desired conditions in the terms of emotion driven opinions, does not meet the expectation of adequately informing the public of what level of management and the expected outcomes are when addressing watershed management of the	Inform the public of the level of management and the expected outcomes are for watershed management in the next 10 to 15 years	XXXX			

	Forest in the next 10 to 15 years.						
Water - ground water	I seriously doubt that any hydrologist would support this assertion [water use in the Little Colorado and Morenci aquifers have affected stream flows upstream]. This statement should be removed from the plan unless it can be proven.	Remove the statement "pumping from the Little Colorado and Morenci groundwater aquifers associated with the forests is greater than the estimate recharge, resulting in reduced water availability and affecting some streamflows" and the photo of Eagle Creek (proposed plan p. 22). If this increased demand can be documented, such documentation should be referenced.	XXXX	I seriously doubt that any hydrologist would support this assertion. This statement should be removed from the plan unless it can be proven.		Hydrologist Support	
Water - ground water	If this increased demand can be documented, such documentation should be referenced, and such documentation should establish which streams are affected and where the increased demand is being drawn from.	Remove the statement "pumping from the Little Colorado and Morenci groundwater aquifers associated with the forests is greater than the estimate recharge, resulting in reduced water availability and affecting some streamflows" and the photo of Eagle Creek (proposed plan p. 22). If this increased demand can be documented, such documentation should be referenced.	XXXX	If this increased demand can be documented, such documentation should be referenced, and such documentation should establish which streams are affected and where the increased demand is being drawn from.		Increased Demand	

<p>Water - ground water</p>	<p>Certain statements made in the Proposed LMP with respect to groundwater and surface water are without any basis in fact. For example, the statement that "pumping from the ... Morenci groundwater aquifers associated with the forests is greater than the estimated recharge, resulting in reduced water availability and affecting some streamflows" is without any basis in fact. See Proposed LMP, Page 22. We note that we are not able to find any references in the Water Report or other Related Plan Documents supporting such statement. Furthermore, adjacent to the statement is a photograph of Eagle Creek, which creates an inference in the reader that groundwater pumping is reducing the flow of Eagle Creek. Yet there is no other mention of Eagle Creek anywhere in the text. Hence, the photograph is not appropriately placed in the Proposed LMP. We recommend that the entire statement, as well as the photograph, be stricken from the Proposed LMP.</p>	<p>Remove the statement "pumping from the Little Colorado and Morenci groundwater aquifers associated with the forests is greater than the estimate recharge, resulting in reduced water availability and affecting some streamflows" and the photo of Eagle Creek (proposed plan p. 22). If this increased demand can be documented, such documentation should be referenced.</p>	<p>XXXX</p>	<p>Certain statements made in the Proposed LMP with respect to groundwater and surface water are without any basis in fact. For example, the statement that "pumping from the ... Morenci groundwater aquifers associated with the forests is greater than the estimated recharge, resulting in reduced water availability and affecting some streamflows" is without any basis in fact. See Proposed LMP, Page 22. We note that we are not able to find any references in the Water Report or other Related Plan Documents supporting such statement. Furthermore, adjacent to the statement is a photograph of Eagle Creek, which creates an inference in the reader that groundwater pumping is reducing the flow of Eagle Creek. Yet there is no other mention of Eagle Creek anywhere in the text. Hence, the photograph is not appropriately placed in the Proposed LMP. We recommend that the entire statement, as well as the photograph, be stricken from the Proposed LMP.</p>	<p>Statements on Ground Water and Surface Water</p>	<p>PC 500-4 The Forest Service should revise and/or remove statements with respect to groundwater and surface water because they are without any basis in fact, and do not provide any references in the water report or plan. Next to the statement is a photograph of Eagle Creek, which creates an inference in the reader that groundwater pumping is reducing the flow of Eagle Creek. Yet there is no other mention of Eagle Creek anywhere in the text. Hence, the photograph is not appropriately placed in the Proposed LMP.</p>
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Water - clarify DC	Issues: The Plan contains many errors and omissions. "Soil erosion above the floodplain minimally contributes to the impairment of stream function or water quality."(p 15) "Minimally" needs to be defined, as does "impairment" and stream "function."	Clarify the desired condition "Soil erosion above the floodplain minimally contributes to the impairment of stream function or water quality".	XXXX	Issues: The Plan contains many errors and omissions. "Soil erosion above the floodplain minimally contributes to the impairment of stream function or water quality."(p 15) "Minimally" needs to be defined, as does "impairment" and stream "function."	Errors and Omissions in Definitions and Terminology	
Water - scale	Page 22-23, Watershed Scale Desired Conditions; Hydrologic Unit Codes: For clarification, we suggest explaining that 4th, 5th, or 6th level HUCs are equivalent to 8 (Sub basin), 10 (watershed), or 12 digit (Sub watershed) HUC codes, respectively.	Clarify that 4th, 5th, and 6th level hydrologic unit codes (HUCS) are equivalent to 8 (sub basin), 10 (watershed), or 12 (sub watershed) digit HUC codes, respectively. Explain the rationale for separating different desired conditions in the 4th, 5th, and 6th level HUCs. The plan should identify water-resource objectives to make progress toward or maintain desired conditions.	XXXX	Page 22-23, Watershed Scale Desired Conditions; Hydrologic Unit Codes: For clarification, we suggest explaining that 4th, 5th, or 6th level HUCs are equivalent to 8 (Sub basin), 10 (watershed), or 12 digit (Sub watershed) HUC codes, respectively.	Definition of Hydrologic Unit Codes	
Water - scale	Page 23, 6th Level HUC Watershed Scale Desired Conditions: Please provide the rationale for separating different desired conditions in the 4th and 5th level HUC desired conditions from those in 6111 level HUCs. For example, please describe why functioning flood plains are only a desired condition at the 6111 level and not at the 5111 level. If available, the Plan should identify water-resource objectives to describe measureable planned results to make progress toward or to maintain desired conditions.	Clarify that 4th, 5th, and 6th level hydrologic unit codes (HUCS) are equivalent to 8 (sub basin), 10 (watershed), or 12 (sub watershed) digit HUC codes, respectively. Explain the rationale for separating different desired conditions in the 4th, 5th, and 6th level HUCs. The plan should identify water-resource objectives to make progress toward or maintain desired conditions.	XXXX	Page 23, 6th Level HUC Watershed Scale Desired Conditions: Please provide the rationale for separating different desired conditions in the 4th and 5th level HUC desired conditions from those in 6111 level HUCs. For example, please describe why functioning flood plains are only a desired condition at the 6111 level and not at the 5111 level. If available, the Plan should identify water-resource objectives to describe measureable phumed results to make progress toward or to maintain desired conditions.	Rationale for Separating Different Conditions in HUC's	PC 503-2 The Forest Service should provide the rationale for separating different desired conditions in the 4th and 5th level HUC desired conditions from those in 6111 level HUCs. If available, the Plan should identify water-resource objectives to describe measureable phumed results to make progress toward or to maintain desired conditions.

Water - flooding	Issues: The Plan contains many errors and omissions. "Flooding does not disrupt normal stream characteristics ..." (p 15) As written, this statement is ridiculous as flooding is out of human control .Major flooding will occur and will "disrupt" stream hydrology to varying degrees and periods of time. Management may mitigate such effects to some extent, but cannot prevent such "disruption."	Explain the Water Resources desired condition "Flooding does not disrupt normal stream characteristics (e.g., water transport, sediment, woody material) or alter stream dimensions (e.g., bankfull width, depth, slope, sinuosity)" (proposed plan p. 23). Concern that flooding will occur and will 'disrupt' stream hydrology. Recommend stating "Stream condition is sufficient to withstand large floods of high magnitude without flooding causing disruption of normal stream characteristics (e.g., water transport, sediment, woody material) or altering stream dimensions (e.g., bankfull width, depth, slope, sinuosity)."	XXXX	Issues: The Plan contains many errors and omissions. "Flooding does not disrupt normal stream characteristics ..." (p 15) As written, this statement is ridiculous as flooding is out of human control .Major flooding will occur and will "disrupt" stream hydrology to varying degrees and periods of time. Management may mitigate such effects to some extent, but cannot prevent such "disruption."	Flooding	
Water - flooding	Page 23, fifth bullet: To clarify the statement "Flooding does not disrupt normal stream characteristics (e.g., water transport, sediment, woody material) or alter stream dimensions (e.g., bankfull width, depth, slope, sinuosity)" we recommend stating, "Stream condition is sufficient to withstand large floods of high magnitude without flooding causing disruption of normal stream characteristics (e.g., water transport, sediment, woody material) or altering stream dimensions (e.g., bankfull width, depth, slope, sinuosity)."	Explain the Water Resources desired condition "Flooding does not disrupt normal stream characteristics (e.g., water transport, sediment, woody material) or alter stream dimensions (e.g., bankfull width, depth, slope, sinuosity)" (proposed plan p. 23). Concern that flooding will occur and will 'disrupt' stream hydrology. Recommend stating "Stream condition is sufficient to withstand large floods of high magnitude without flooding causing disruption of normal stream characteristics (e.g., water transport, sediment, woody material) or altering stream dimensions	XXXX	Page 23, fifth bullet: To clarify the statement "Flooding does not disrupt normal stream characteristics (e.g., water transport, sediment, woody material) or alter stream dimensions (e.g., bankfull width, depth, slope, sinuosity)" we recommend stating, "Stream condition is sufficient to withstand large floods of high magnitude without flooding causing disruption of normal stream characteristics (e.g., water transport, sediment, woody material) or altering stream dimensions (e.g., bankfull width, depth, slope, sinuosity)."	Flooding Disruptin g Stream Character istics	PC 503-3 The Forest Service should clarify the statement "Flooding does not disrupt normal stream characteristics (e.g., water transport, sediment, woody material) or alter stream dimensions (e.g., bankfull width, depth, slope, sinuosity)" by stating, "Stream condition is sufficient to withstand large floods of high magnitude without flooding causing disruption of normal stream characteristics (e.g., water transport, sediment, woody material) or altering stream dimensions (e.g., bankfull width, depth, slope, sinuosity)."

		(e.g., bankfull width, depth, slope, sinuosity)."					
Water - flooding	<p>P.23 Flooding does not disrupt normal stream characteristics</p> <p>Flooding is a natural disruption of in-stream flow resulting in potential stream change.</p>	<p>Explain the Water Resources desired condition "Flooding does not disrupt normal stream characteristics (e.g., water transport, sediment, woody material) or alter stream dimensions (e.g., bankfull width, depth, slope, sinuosity)" (proposed plan p. 23). Concern that flooding will occur and will 'disrupt' stream hydrology. Recommend stating "Stream condition is sufficient to withstand large floods of high magnitude without flooding causing disruption of normal stream characteristics (e.g., water transport, sediment, woody material) or altering stream dimensions (e.g., bankfull width, depth, slope, sinuosity)."</p>	XXXX				
Water - implement DC	<p>Water resources maintain the capability to respond .... Rivers are dynamic and in a constant state of change. What maintenance procedures would be implemented and what are the expected impacts?</p>	<p>Explain the maintenance procedures and impacts of implementing the Water Resources desired condition "Water resources maintain the capability to respond and adjust to disturbances without long term adverse changes" (proposed plan p.22).</p>	XXXX				

Water - explain DC	Page 23 "Vegetation and soil conditions above the floodplain contribute to downstream water quality, quantity, and aquatic habitat." That statement is true if conditions above the floodplain are desirable or not. Does it mean that desired vegetation and soil conditions contribute to desired water quality, quantity and aquatic habitat?	Clarify the Water Resources desired condition "Vegetation and soil conditions above the floodplain contribute to downstream water quality, quantity, and aquatic habitat" (proposed plan p. 23). Does it mean that desired vegetation and soil conditions contribute to desired water quality, quantity and aquatic habitat?	XXXX				
AZGFD DC Edit - Fish	Plan, 6th Level HUC Watershed Scale Desired Conditions, page 23: "Streamflow provide connectivity among fish populations and provide unobstructed routs critical for fulfilling needs of aquatic, riparian dependent, and many upland species of plants and animals <i>except as needed for native species recovery and management.</i> " Recovery of native fishes would not be possible in most locations on the A-S without the use of man-made fish barriers (in the absence of a natural emigration barrier).	Modify the Water Resources Desired Condition (proposed plan p. 23) to read "Streamflow provide connectivity among fish populations and provide unobstructed routs critical for fulfilling needs of aquatic, riparian dependent, and many upland species of plants and animals <i>except as needed for native species recovery and management.</i> " Recovery of native fishes would not be possible in most locations on the Apache-Sitgreaves NFs without the use of man-made fish barriers (in the absence of a natural emigration barrier).		Plan, 6th Level HUC Watershed Scale Desired Conditions, page 23: "Streamflow provide connectivity among fish populations and provide unobstructed routs critical for fulfilling needs of aquatic, riparian dependent, and many upland species of plants and animals <i>except as needed for native species recovery and management.</i> " Recovery of native fishes would not be possible in most locations on the A-S without the use of man-made fish barriers (in the absence of a natural emigration barrier).			
AZGFD DC Edit - Fish2	Plan, 6th Level Huc Watershed Scal Desired conditions, Page 23: "Water quality meets the needs of <i>all desirable</i> aquatic species, <i>including such as</i> the California floater, northern and Chiricahua leopard frog, and invertebrates that support fish populations."	Modify the Water Resources Desired Condition (proposed plan p.23) to read "Water quality meets the needs of <i>all desirable</i> aquatic species, <i>including such as</i> the California floater, northern and Chiricahua leopard frog, and invertebrates that support fish populations."		Plan, 6th Level Huc Watershed Scal Desired conditions, Page 23: "Water quality meets the needs of <i>all desirable</i> aquatic species, <i>including such as</i> the California floater, northern and Chiricahua leopard frog, and invertebrates that support fish populations."			

Water effects - no mgmt on water yield	Eagar requests that the Forest Service stop basing future management of the Forest on faulty ideas such as the idea that management of forest by humans has the same effect on water yield as no human management or activity.	Remove reference and statements based on the idea that no management of forest would have the same effect on water yield as management or human activity. Concern is that the DEIS states water yield impacts are the same for all alternatives (DEIS p. 367).	XXXX	Eagar requests that the Forest Service stop basing future management of the Forest on faulty ideas such as the idea that management of forest by humans has the same effect on water yield as no human management or activity.	Forest Management	PC 1254-3 The Forest Service should address the effects of designating new areas of "Wilderness" (and the other areas which restrict human activities) on the human environment to disclose the effect and impact that the "wilderness" or other restrictive land use designations can have on the environment, water yield and availability, their daily lives as well as future generations due to land use designations that restrict human activities.
Water effects - no mgmt on water yield	Remove incorrect reference and statements based on the idea that no management of forest would have the same effect on water yield as management or human activity.	Remove reference and statements based on the idea that no management of forest would have the same effect on water yield as management or human activity. Concern is that the DEIS states water yield impacts are the same for all alternatives (DEIS p. 367).	XXXX	Issue: The DEIS incorrectly states that wilderness designation will not affect the use of fire as a vegetation treatment tool. (3rd paragraph, page 367, DEIS): Remedy: Remove misleading statements implying that wilderness designation will not affect the use of fire as a vegetation treatment tool.	Wilderness Designation not Affecting Use of Fire as a Vegetation Treatment Tool	
Water effects - clarify BMP	Page 76, Mechanical Treatments: The adverse effects to water quality described in paragraphs two and three would be expected to be mitigated for by Best Management Practices (BMPs) mentioned in paragraph one, as stated in the first complete sentence on this page. We recommend adding language regarding the use of BMPs to paragraphs two and three.	In the Water Resources section of the DEIS, add language regarding the use of best management practices (BMPs) to the discussion of mechanical treatment effects on water quality (p. 76).	XXXX	Page 76, Mechanical Treatments: The adverse effects to water quality described in paragraphs two and three would be expected to be mitigated for by Best Management Practices (BMPs) mentioned in paragraph one, as stated in the first complete sentence on this page. We recommend adding language regarding the use of BMPs to paragraphs two and three.	Adding Use of BMP's Language to Adverse effects to Water Quality Description	

Water guideline - addition	Add a guideline to protect streamflow regimes, timing, and floods, as recommended in USDA 2000, Water & the Forest Service. FS-660, at <a href="http://www.fs.fed.us/publications/policy-analysis/water.pdf">http://www.fs.fed.us/publications/policy-analysis/water.pdf</a> , pages 10-11. The guideline should acknowledge the importance of intact groundcover on hydrologic regime, and suggest that grazing allotments be modified when necessary to protect streams. Proper hydrologic regimes will protect all species that rely on Apache-Sitgreaves' streams and will protect those streams from exotic invasions	Add a guideline to protect streamflow regimes, timing, and floods, as recommended in USDA 2000, Water & the Forest Service. FS-660, at <a href="http://www.fs.fed.us/publications/policy-analysis/water.pdf">http://www.fs.fed.us/publications/policy-analysis/water.pdf</a> , pages 10-11. The guideline should acknowledge the importance of intact groundcover on hydrologic regime, and suggest that grazing allotments be modified when necessary to protect streams.	XXXX	Add a guideline to protect streamflow regimes, timing, and floods, as recommended in USDA 2000, Water & the Forest Service. FS-660, at <a href="http://www.fs.fed.us/publications/policy-analysis/water.pdf">http://www.fs.fed.us/publications/policy-analysis/water.pdf</a> , pages 10-11. The guideline should acknowledge the importance of intact groundcover on hydrologic regime, and suggest that grazing allotments be modified when necessary to protect streams. Proper hydrologic regimes will protect all species that rely on Apache-Sitgreaves' streams and will protect those streams from exotic invasions	Adding Guidelines for Protection of Water Quality	PC 508-2 The Forest Service should add a guideline to protect streamflow regimes, timing, and floods, as recommended in USDA 2000, Water & the Forest Service. FS-660, at <a href="http://www.fs.fed.us/publications/policy-analysis/water.pdf">http://www.fs.fed.us/publications/policy-analysis/water.pdf</a> , pages 10-11. The guideline should acknowledge the importance of intact groundcover on hydrologic regime, and suggest that grazing allotments be modified when necessary to protect streams. Proper hydrologic regimes will protect all species that rely on Apache-Sitgreaves' streams and will protect those streams from exotic invasions
Water guideline - modify	Add to guidelines: "To protect water quality and aquatic species, and to prevent the spread of exotic plant and animal species throughout watersheds, heavy equipment and vehicles driven into a water body to accomplish work should be completely clean of plant materials and seeds, mud and sediment, and aquatic animals.	Add to guidelines: "To protect water quality and aquatic species, and to prevent the spread of exotic plant and animal species throughout watersheds, heavy equipment and vehicles driven into a water body to accomplish work should be completely clean of plant materials and seeds, mud and sediment, and aquatic animals."	XXXX	Add to guidelines: "To protect water quality and aquatic species, and to prevent the spread of exotic plant and animal species throughout watersheds, heavy equipment and vehicles driven into a water body to accomplish work should be completely clean of plant materials and seeds, mud and sediment, and aquatic animals.	Adding Guidelines for Protection of Water Quality	PC 508-3 The Forest Service should add to the guidelines "To protect water quality and aquatic species, and to prevent the spread of exotic plant and animal species throughout watersheds, heavy equipment and vehicles driven into a water body to accomplish work should be completely clean of plant materials and seeds, mud and sediment, and aquatic animals.

Water other sources	1) The Apache-Sitgreaves National Forests should recognize USDA research and recommendations regarding protecting surface water sources. The Forest Plan should include the following under "Other Sources of Information for Water Sources," as well as other relevant USDA information about surface water protection: • USDA 2011. "Forests to Faucets" interactive maps and data. At <a href="http://www.fs.fed.us/ecosystemservices/FS_Efforts/forests2faucets.shtml">http://www.fs.fed.us/ecosystemservices/FS_Efforts/forests2faucets.shtml</a> • USDA 2000. Water & the Forest Service. FS-660. At <a href="http://www.fs.fed.us/publications/policy-analysis/water.pdf">http://www.fs.fed.us/publications/policy-analysis/water.pdf</a>	Include the following, as well as other relevant USDA information about surface water protection, under "Other Sources of Information for Water Sources": (1) USDA 2011. "Forests to Faucets" interactive maps and data. At <a href="http://www.fs.fed.us/ecosystemservices/FS_Efforts/forests2faucets.shtml">http://www.fs.fed.us/ecosystemservices/FS_Efforts/forests2faucets.shtml</a> and (2) USDA 2000. Water & the Forest Service. FS-660. At <a href="http://www.fs.fed.us/publications/policy-analysis/water.pdf">http://www.fs.fed.us/publications/policy-analysis/water.pdf</a>	XXXX	1) The Apache-Sitgreaves National Forests should recognize USDA research and recommendations regarding protecting surface water sources. The Forest Plan should include the following under "Other Sources of Information for Water Sources," as well as other relevant USDA information about surface water protection: • USDA 2011. "Forests to Faucets" interactive maps and data. At <a href="http://www.fs.fed.us/ecosystemservices/FS_Efforts/forests2faucets.shtml">http://www.fs.fed.us/ecosystemservices/FS_Efforts/forests2faucets.shtml</a> • USDA 2000. Water & the Forest Service. FS-660. At <a href="http://www.fs.fed.us/publications/policy-analysis/water.pdf">http://www.fs.fed.us/publications/policy-analysis/water.pdf</a>		Other Sources of Information	PC 509-1 Forests should recognize USDA research and recommendations regarding protecting surface water sources and should include the following under "Other Sources of Information for Water Sources," as well as other relevant USDA information about surface water protection: USDA 2011. "Forests to Faucets" interactive maps and data. At <a href="http://www.fs.fed.us/ecosystemservices/FS_Efforts/forests2faucets.shtml">http://www.fs.fed.us/ecosystemservices/FS_Efforts/forests2faucets.shtml</a> • USDA 2000. Water & the Forest Service. FS-660. • USDA 2000. Water & the Forest Service. FS-660. At <a href="http://www.fs.fed.us/publications/policy-analysis/water.pdf">http://www.fs.fed.us/publications/policy-analysis/water.pdf</a>
Water - water diversions	Management should employ removal of water diverting regimes, decreasing ground water removal.	Remove water diverting regimes and reject proposals that will deplete or divert the water table or any rivers or streams.	XXXX	Management should employ removal of water diverting regimes, decreasing ground water removal.		Water Diversions	
Water - water diversions	I urge you to reject projects that will deplete or divert the water table or any rivers or streams for any purpose.	Remove water diverting regimes and reject proposals that will deplete or divert the water table or any rivers or streams.	XXXX	I urge you to reject projects that will deplete or divert the water table or any rivers or streams for any purpose.		Water Table	PC 550-1 The Forest Service should reject projects that will deplete or divert the water table or any rivers or streams for any purpose.

Water rights - none for FS	With regards to water rights: We believe that the water rights should remain with the citizens of Arizona and the state of Arizona and that they should not be given to the Forest Service or any federally funded program. [page 24, 2nd bullet]	The Forest Service should not own water rights.	XXXX	With regards to water rights: We believe that the water rights should remain with the citizens of Arizona and the state of Arizona and that they should not be given to the Forest Service or any federally funded program.	Water Rights	
Water rights - none for FS	The same rules apply for the water rights. It is not the federal government's water. It is the state's and the people's	The Forest Service should not own water rights.	XXXX	The same rules apply for the water rights. It is not the federal government's water. It is the state's and the people's	Water Rights	
Water rights - none for FS	On Page 24 subheading 2 concerning AZ water rights it state that ASNF should retain water rights of state water. I will oppose by all means any attempt of the forest service and its enviro want a bees to get control of water in the Apache Sitgreaves Forest. This is due to past history of snails being place above human consumption of water and business effects of the same. We do not need water controlled by environmental people only.	The Forest Service should not own water rights.	XXXX	On Page 24 subheading 2 concerning AZ water rights it state that ASNF should retain water rights of state water. I will oppose by all means any attempt of the forest service and its enviro want a bees to get control of water in the Apache Sitgreaves Forest. This is due to past history of snails being place above human consumption of water and business effects of the same. We do not need water controlled by environmental people only.	Retain Water Rights	

Water rights - none for FS	With the balk of these water rights being in the headwaters, as shown on the map on Page 73, it is not in the best interest of these affected mountain communities as well as all of Arizona, to turn our water rights over to a federal agency. This is in direct conflict with "public welfare". Per ADEQ the forest service does not own water rights as this paragraph claims	The Forest Service should not own water rights.	XXXX	With the balk of these water rights being in the headwaters, as shown on the map on Page 73, it is not in the best interest of these affected mountain communities as well as all of Arizona, to turn our water rights over to a federal agency. This is in direct conflict with "public welfare". Per ADEQ the forest service does not own water rights as this paragraph claims		Retain Water Rights	
Water rights - impact of instream flow	Page 22, paragraph 4, chapter 2 – states that the Forest Service wants to obtain new water rights from the State of Arizona for "instream flows" The only way these new "instream flow" rights could impact stream flows is if they were used to restrict the water use of those who already exercise their pre-existing water rights.	Explain how the Forest Service's objective to obtain water rights for instream flows (proposed plan p. 22) is not in conflict with honoring the continuing validity of private, statutory, and pre-existing rights (proposed plan p. 1).	XXXX	The only way these new "instream flow" rights could impact stream flows is if they were used to restrict the water use of those who already exercise their pre-existing water rights.		Retain Water Rights	PC 525-1 The Forest Service should not obtain water rights for "instream flows" from the State of Arizona because the water should not be controlled by the federal government or environmental groups, and it is in direct conflict with public welfare of the affected mountain communities. The only way these new "instream flow" rights could impact stream flows is if they were used to restrict the water use of those who already exercise their pre-existing water rights.
Water rights - impact of instream flow	Page 1, chapter 1, states at the bottom of the page that the plan "honors the continuing validity of private, statutory, and pre-existing rights. The above statement from page 22, paragraph 4 contradicts the statement on page 1, chapter1, and therefore should not be included in the new plan Page 22, paragraph 4, chapter 2 – states that the Forest Service	Explain how the Forest Service's objective to obtain water rights for instream flows (proposed plan p. 22) is not in conflict with honoring the continuing validity of private, statutory, and pre-existing rights (proposed plan p. 1).	XXXX	The above statement from page 22, paragraph 4 contradicts the statement on page 1, chapter1, and therefore should not be included in the new plan Page 22, paragraph 4, chapter 2 – states that the Forest Service wants to obtain new water rights from the State of Arizona for "instream flows"		Retain Water Rights	

	wants to obtain new water rights from the State of Arizona for “instream flows”					
Water - apply for instream flow	Add an objective to immediately begin the process necessary to apply for Arizona instream flows on important perennially flowing streams, and to begin the application process for new streams each year. This is especially important since water in several streams are already “totally diverted for several months of the year”	Add an objective to immediately begin the process necessary to apply for Arizona instream flows on important perennially flowing streams, and to begin the application process for new streams each year.	XXXX	Add an objective to immediately begin the process necessary to apply for Arizona instream flows on important perennially flowing streams, and to begin the application process for new streams each year. This is especially important since water in several streams are already “totally diverted for several months of the year”	Arizona Instream Flows	
Water - efficiency of withdrawal	Add a guideline to work with water rights holders and the recipients of diverted water to increase water delivery efficiency, thereby maximizing instream water flows. Add a standard that withdrawal systems should be checked to ensure maximum efficiency in water transport and end point usage.	Add a guideline to work with water rights holders and the recipients of diverted water to increase water delivery efficiency, thereby maximizing instream water flows. Add a standard that withdrawal systems should be checked to ensure maximum efficiency in water transport and end point usage.	XXXX	Add a guideline to work with water rights holders and the recipients of diverted water to increase water delivery efficiency, thereby maximizing instream water flows. Add a standard that withdrawal systems should be checked to ensure maximum efficiency in water transport and end point usage.	Working With Water Rights Holders and Recipients of Diverted Water	PC 610-2 The Forest Service should add a guideline to work with water rights holders and the recipients of diverted water to increase water delivery efficiency, thereby maximizing instream water flows, and should add a standard that withdrawal systems should be checked to ensure maximum efficiency in water transport and end point usage.

Riparian affected environment (wallow)	Page 84, Riparian Areas along Streams: The previous page states the Wallow Fire effects to the riparian areas within its borders varied from little change to severe degradation. Table 15 presents data from a 2008 Forest Service report, pre-Wallow Fire, and states that 24 percent and 68 percent of the riparian areas are in proper functioning condition or functioning-at-risk, respectively. The previous page states that the Forest staff is still evaluating the effects of the Wallow Fire on riparian areas. Please clarify whether the information in Table 15 is current or is only to be used as a guideline.	Explain whether table 15 in the DEIS is current and represents conditions following the 2011 Wallow Fire. (DEIS p. 84)	XXXX	Page 84, Riparian Areas along Streams: The previous page states the Wallow Fire effects to the riparian areas within its borders varied from little change to severe degradation. Table 15 presents data from a 2008 Forest Service report, pre-Wallow Fire, and states that 24 percent and 68 percent of the riparian areas are in proper functioning condition or functioning-at-risk, respectively. The previous page states that the Forest staff is still evaluating the effects of the Wallow Fire on riparian areas. Please clarify whether the information in Table 15 is current or is only to be used as a guideline.	Table 15 Data – Riparian Areas around Streams	
Riparian background - clarify	Please clarify this paragraph ( page 33, second paragraph) since the first part of the paragraph regarding cottonwood-willow riparian forest fire regimes appears to contradict the last part of the paragraph.	Explain whether the language in the Riparian Areas background of the proposed plan is in conflict: "All of the riparian PNVTs, except for the cottonwood-willow riparian forested PNVT, are considered departed from reference conditions" and "The wetland/cienega and cottonwood willow fire regimes are moderately departed". (proposed plan p. 33)	XXXX	Please clarify this paragraph ( page 33, second paragraph) since the first part of the paragraph regarding cottonwood-willow riparian forest fire regimes appears to contradict the last part of the paragraph.	Riparian Fire Regimes	

Riparian background - salt cedar	Pg 33 - Background for Riparian Areas – nothing is mentioned that plant density has increased tremendously since 1996 and salt cedar has begun to invade riparian areas and is not easily visible because of the density	The background for Riparian Areas (proposed plan p. 33) should mention that plant density has increased tremendously since 1996 and salt cedar has begun to invade riparian areas.	XXXX	Pg 33 - Background for Riparian Areas – nothing is mentioned that plant density has increased tremendously since 1996 and salt cedar has begun to invade riparian areas and is not easily visible because of the density		Increasing Plant Density	PC 565-6 The Forest Service should address that plant density has increased tremendously since 1996 and salt cedar has begun to invade riparian areas and is not easily visible because of the density.
Riparian DC - clarify	What exactly does "sedimentation and soil compaction do not negatively impact riparian areas" mean, how and when are they measured and how do you detect the cause?	Explain what the Riparian Areas desired condition "sedimentation and soil compaction do not negatively impact riparian areas" means, how and when it's measured, and how the cause is detected. (proposed plan p. 34)	XXXX	What exactly does "sedimentation and soil compaction do not negatively impact riparian areas" mean, how and when are they measured and how do you detect the cause?		Clarification of Sedimentation and Soil Compaction and Impact on Riparian Areas	PC 556-1 The Forest Service should define what exactly does "sedimentation and soil compaction do not negatively impact riparian areas" mean, how and when are they measured and how to detect the cause.
Riparian DC - clarify	Issues: The Plan contains many errors and omissions. "Sedimentation and compaction rarely adversely impact riparian areas." (p21) The terms, "rarely" and "adversely" need to be defined.	Explain what the Riparian Areas desired condition "sedimentation and soil compaction do not negatively impact riparian areas" means, how and when it's measured, and how the cause is detected. (proposed plan p. 34)	XXXX	Issues: The Plan contains many errors and omissions. "Sedimentation and compaction rarely adversely impact riparian areas." (p21) The terms, "rarely" and "adversely" need to be defined.		Define Wording	PC 550-2 The Forest Service should define the terms, "rarely" and "adversely" in the following statement "Sedimentation and compaction rarely adversely impact riparian areas." (p21)
Riparian DC - clarify	p.34 Sedimentation and soil compaction .... What exactly does sedimentation and soil compaction do not negatively impact riparian areas mean, and how and when are they measured and how do you detect the cause?	Explain what the Riparian Areas desired condition "sedimentation and soil compaction do not negatively impact riparian areas" means, how and when it's measured, and how the cause is detected. (proposed plan p. 34)	XXXX	p.34 Sedimentation and soil compaction .... What exactly does sedimentation and soil compaction do not negatively impact riparian areas mean, and how and when are they measured and how do you detect the cause?		Riparian Conditions	PC 2659-1 The Forest Service should clearly define what exactly does sedimentation and soil compaction do not negatively impact riparian areas, how and when are they measured, and how causes are detected.

Riparian - xeroriparian	Issues: The Plan contains many errors and omissions. "The interface between riparian areas and uplands are referred to as xeroriparian which provide important wildlife habitat and help filter sediment." (p19) The term, xeroriparian, is not defined. The term is sometimes used to refer to ephemeral drainages that support vegetation less demanding of continuous water supply than true riparian species, but the usage here seems to apply a new meaning to the term.	Explain the term xeroriparian as used in the plan.	XXXX	Issues: The Plan contains many errors and omissions. "The interface between riparian areas and uplands are referred to as xeroriparian which provide important wildlife habitat and help filter sediment." (p19) The term, xeroriparian, is not defined. The term is sometimes used to refer to ephemeral drainages that support vegetation less demanding of continuous water supply than true riparian species, but the usage here seems to apply a new meaning to the term.	Errors and Omissions in Definitions and Terminology	
Riparian - applicability of guidance	p.33. Desired conditions identify large coarse woody debris for riparian areas yet we all know that certain stretches every riparian area on the mountain are not going to meet these conditions due to their juxtaposition on the landscape.	Remove generalizations in Riparian Areas desired conditions (e.g. "stream bottoms that are predominantly composed of sand and gravel have large coarse woody debris which provides habitat and food and helps dissipate hydraulic energy"). Concern is that desired conditions may not be attainable, given specific stream characteristics (e.g., wetland-cienega PNVT may not have the capability to provide coarse woody debris). (proposed plan p. 33-34)	XXXX	p.33. Desired conditions identify large coarse woody debris for riparian areas yet we all know that certain stretches every riparian area on the mountain are not going to meet these conditions due to their juxtaposition on the landscape.	Attainable Desired Conditions	PC 551-1 The Forest Service should revise the desired conditions because many are not attainable the way they are currently written., 1)it identifies large woody debris for riparian areas and not every riparian area on the mountain are going to meet these conditions, 2) not every stretch of riparian will produce all age classes due to site limitations for willows, 3) given stream channel evolution and vegetation succession in riparian communities, several desired future conditions that might not be attainable, 4) desired condition for grasslands: "vegetation height ranges from 10-31inches, the grassland species respond to the metabolic stress in multiple ways regardless of exposure- or not-- to grazing.

Riparian - applicability of guidance	<p>Desired conditions identify large coarse woody debris for riparian areas, however obviously riparian areas throughout the A-S will not be the same; riparian areas of a 3,000 ft. desert area will not meet the same conditions as on a mountain at 10,000 ft. in a mixed conifer forest. Page 34. "Willows are reproducing with all age-classes present" is not appropriate for all riparian stretches due to site limitations for willow, as per the above paragraph.</p> <p>Remedy: Remove generalizations regarding riparian conditions.</p>	<p>Remove generalizations in Riparian Areas desired conditions (e.g. "stream bottoms that are predominantly composed of sand and gravel have large coarse woody debris which provides habitat and food and helps dissipate hydraulic energy"). Concern is that desired conditions may not be attainable, given specific stream characteristics (e.g., wetland-cienega PNVT may not have the capability to provide coarse woody debris). (proposed plan p. 33-34)</p>	XXXX	<p>Issue: The Plan erroneously assumes desired conditions for all riparian conditions are the same (Page 33 and 34). Remedy: Remove generalizations regarding riparian conditions.</p>	Riparian Conditions	
Riparian - applicability of guidance	<p>Beginning on page 33, under Desired Conditions for Riparian Areas: The Plan appears to contain several desired future conditions that might not be attainable, given stream channel evolution and vegetation succession in riparian communities. We discuss these desired future conditions in the following statements:</p>	<p>Remove generalizations in Riparian Areas desired conditions (e.g. "stream bottoms that are predominantly composed of sand and gravel have large coarse woody debris which provides habitat and food and helps dissipate hydraulic energy"). Concern is that desired conditions may not be attainable, given specific stream characteristics (e.g., wetland-cienega PNVT may not have the capability to provide coarse woody debris). (proposed plan p. 33-34)</p>	XXXX	<p>Beginning on page 33, under Desired Conditions for Riparian Areas: The Plan appears to contain several desired future conditions that might not be attainable, given stream channel evolution and vegetation succession in riparian communities. We discuss these desired future conditions in the following statements:</p>	Attainable Desired Conditions	<p>PC 551-1 The Forest Service should revise the desired conditions because many are not attainable the way they are currently written., 1)it identifies large woody debris for riparian areas and not every riparian area on the mountain are going to meet these conditions, 2) not every stretch of riparian will produce all age classes due to site limitations for willows, 3) given stream channel evolution and vegetation succession in riparian communities, several desired future conditions that might not be attainable, 4) desired condition for grasslands: "vegetation height ranges from 10-31inches, the grassland species respond to the metabolic stress in multiple</p>

							ways regardless of exposure- or not-- to grazing.
Riparian - applicability of guidance	Fourth Bullet: Not all streams with sand or gravel bottoms require coarse woody debris to dissipate hydraulic energy. Sedge-rush dominated riparian areas (wetland-cienega PNVT) with fine sediment bed substrates dissipate energy through low gradient and high sinuosity, and maintain bank stability by supporting plant species with large root masses. Therefore, this PNVT may not meet the desired conditions because woody riparian plant species that provide coarse and/or large wood are not the potential natural vegetation in these areas.	Remove generalizations in Riparian Areas desired conditions (e.g. "stream bottoms that are predominantly composed of sand and gravel have large coarse woody debris which provides habitat and food and helps dissipate hydraulic energy"). Concern is that desired conditions may not be attainable, given specific stream characteristics (e.g., wetland-cienega PNVT may not have the capability to provide coarse woody debris). (proposed plan p. 33-34)	XXXX	Fourth Bullet: Not all streams with sand or gravel bottoms require coarse woody debris to dissipate hydraulic energy. Sedge-rush dominated riparian areas (wetland-cienega PNVT) with fine sediment bed substrates dissipate energy through low gradient and high sinuosity, and maintain bank stability by supporting plant species with large root masses. Therefore, this PNVT may not meet the desired conditions because woody riparian plant species that provide coarse and/or large wood are not the potential natural vegetation in these areas.		Coarse or Large Woody Debris	
Riparian - applicability of guidance	p.34 Stream bottom.... have large coarse woody debris Woody debris is present only where the potential exists. How would this condition be achieved and sustained if the potential does not exist?	Remove generalizations in Riparian Areas desired conditions (e.g. "stream bottoms that are predominantly composed of sand and gravel have large coarse woody debris which provides habitat and food and helps dissipate hydraulic energy"). Concern is that desired conditions may not be attainable, given specific stream characteristics (e.g., wetland-cienega PNVT may not	XXXX	p.34 Stream bottom.... have large coarse woody debris Woody debris is present only where the potential exists. How would this condition be achieved and sustained if the potential does not exist?		Riparian Conditions	PC 2659-2 The Forest Service should clearly define (page 34) stream bottom Woody debris, the potential to exists, and how this condition be achieved and sustained if the potential does not exist.

		have the capability to provide coarse woody debris). (proposed plan p. 33-34)				
Riparian - applicability of guidance - willow	p.34 "Willows are reproducing with all age classes present" is not appropriate for all riparian stretches due to site limitations for willows	Modify or remove the Riparian Areas desired condition "Willows (e.g., Bebb, Geyer, Arizona) are reproducing with all age classes present" because not all sites have the potential for willows.	XXXX	p.34 "Willows are reproducing with all age classes present" is not appropriate for all riparian stretches due to site limitations for willows	Attainable Desired Conditions	PC 551-1 The Forest Service should revise the desired conditions because many are not attainable the way they are currently written., 1)it identifies large woody debris for riparian areas and not every riparian area on the mountain are going to meet these conditions, 2) not every stretch of riparian will produce all age classes due to site limitations for willows, 3) given stream channel evolution and vegetation succession in riparian communities, several desired future conditions that might not be attainable, 4) desired condition for grasslands: "vegetation height ranges from 10-31inches, the grassland species respond to the metabolic stress in multiple ways regardless of exposure- or not- to grazing.

Riparian - applicability of guidance - willow	Page 34 "Willows... are reproducing with all age classes present." Not all sites have the potential for willows.	Modify or remove the Riparian Areas desired condition "Willows (e.g., Bebb, Geyer, Arizona) are reproducing with all age classes present" because not all sites have the potential for willows.	XXXX	Page 34 "Willows... are reproducing with all age classes present." Not all sites have the potential for willows.		Attainable Riparian Desired Conditions	PC 2658-6 the Forest Service should address that not all sites have the potential for willows (and all age classes present) and that if climate change predictions are correct, the desired condition is not likely to be met.
Riparian - applicability of guidance - willow	Mid-scale desired conditions- the plan desires "willows present and are reproducing with all age classes present". The statement does not take site potential into consideration. There may be many sites where the potential for willows does not even exist. This statement should be taken out or at least have site potential incorporated into the statement.	Modify or remove the Riparian Areas desired condition "Willows (e.g., Bebb, Geyer, Arizona) are reproducing with all age classes present" because not all sites have the potential for willows.	XXXX	Mid-scale desired conditions- the plan desires "willows present and are reproducing with all age classes present". The statement does not take site potential into consideration. There may be many sites where the potential for willows does not even exist. This statement should be taken out or at least have site potential incorporated into the statement.		Site Potential for Meeting Desired Conditions	
Riparian - applicability of guidance - willow	Issues: The Plan contains many errors and omissions. "High elevation willows, such as Bebb's and Arizona, are reproducing in wet meadows." (p 21) This statement should be modified with "Where the potential and conditions exists"	Modify or remove the Riparian Areas desired condition "Willows (e.g., Bebb, Geyer, Arizona) are reproducing with all age classes present" because not all sites have the potential for willows.	XXXX	Issues: The Plan contains many errors and omissions. "High elevation willows, such as Bebb's and Arizona, are reproducing in wet meadows." (p 21) This statement should be modified with "Where the potential and conditions exists"		Willows	PC 2559-5 The Forest Service should clearly address and define the scientific basis, monitoring, and adaptive management strategies for the desired conditions by considering the capability, site potential, growing conditions, terrain, climate, and where it is feasible and practical to attain. The Forest Service should revise the desired condition by removing references to numeric measures, add "provides sufficient cover", and clarify that the desired condition are a stable floodplain and wildlife habitat.

Riparian - applicability of guidance - willow	<p>Page 34, Mid-Scaled Desired Conditions, eighth bullet reads: "Willows (e.g., Bebb, Geyer, Arizona) are reproducing with all age classes present."  Comment: The desired condition of willow species exhibiting reproduction and all age classes being present may not be attainable in all PNVTs. For example, herbaceous riparian systems would not meet this desired condition within the wetland-cienega. Natural stream channel evolution and vegetation succession in some riparian areas can transition woody communities into riparian herbaceous communities. Riparian areas that currently exhibit mature, non-reproducing willows can be replaced by stable sedge-rush dominated communities (Marming and Padgett 1995). As written these communities may not meet desired conditions.</p>	<p>Modify or remove the Riparian Areas desired condition "Willows (e.g., Bebb, Geyer, Arizona) are reproducing with all age classes present" because not all sites have the potential for willows.</p>	XXXX	<p>Page 34, Mid-Scaled Desired Conditions, eighth bullet reads: "Willows (e.g., Bebb, Geyer, Arizona) are reproducing with all age classes present."  Comment: The desired condition of willow species exhibiting reproduction and all age classes being present may not be attainable in all PNVTs. For example, herbaceous riparian systems would not meet this desired condition within the wetland-cienega. Natural stream channel evolution and vegetation succession in some riparian areas can transition woody communities into riparian herbaceous communities. Riparian areas that currently exhibit mature, non-reproducing willows can be replaced by stable sedge-rush dominated communities (Marming and Padgett 1995). As written these communities may not meet desired conditions.</p>	Site Potential for Meeting Desired Conditions	PC 553-1 The Forest Service should consider that the desired condition of willow species exhibiting reproduction and all age classes being present may not be attainable in all PNVTs.
Riparian - applicability of guidance - willow	<p>Concerning comments on page 34 and 35, in section about desired conditions for riparian areas. Many areas that are in actual or so called riparian areas do not have the capacity or ability to grow and or sustain willow species populations. The few areas in the Greens Peak area and northward that could possibly be considered as riparian have had very few willows and they</p>	<p>Modify or remove the Riparian Areas desired condition "Willows (e.g., Bebb, Geyer, Arizona) are reproducing with all age classes present" because not all sites have the potential for willows.</p>	XXXX	<p>Concerning comments on page 34 and 35, in section about desired conditions for riparian areas. Many areas that are in actual or so called riparian areas do not have the capacity or ability to grow and or sustain willow species populations. The few areas in the Greens Peak area and northward that could possibly be considered as riparian have had very few willows and they</p>	Willows	

	cannot thrive there. The desired condition should apply only to areas where it is feasible or practical			cannot thrive there. The desired condition should apply only to areas where it is feasible or practical		
Riparian - applicability of guidance - willow	pages 33 and 34 —under desired conditions-----a lot of the description for desired conditions sound good but the reality is that most sites in the relatively dry areas around Greens Peak and northward are not capable of producing those types of conditions. Those conditions are not achievable in most areas, even those that have been identified as riparian areas. Statements need to be added clarifying that those conditions are desirable for areas where it is achievable. Otherwise the standards will be applied to areas that someone might think could be a riparian area or an area that should be better if the climate and moisture patterns changed significantly. The statement that “willows are reproducing with all age classes present” is not realistic or attainable for many sites.	Modify or remove the Riparian Areas desired condition "Willows (e.g., Bebb, Geyer, Arizona) are reproducing with all age classes present" because not all sites have the potential for willows.	XXXX	pages 33 and 34 —under desired conditions-----a lot of the description for desired conditions sound good but the reality is that most sites in the relatively dry areas around Greens Peak and northward are not capable of producing those types of conditions. Those conditions are not achievable in most areas, even those that have been identified as riparian areas. Statements need to be added clarifying that those conditions are desirable for areas where it is achievable. Otherwise the standards will be applied to areas that someone might think could be a riparian area or an area that should be better if the climate and moisture patterns changed significantly. The statement that “willows are reproducing with all age classes present” is not realistic or attainable for many sites.	Conditions	

Riparian - applicability of guidance - willow	Pg 34 Desired Conditions For Riparian Areas Mid-scale conditions -2nd bullet : There may be numerous sites where there is no actual potential for willows due to soil differences, substrate, moisture conditions, etc. To be realistic, try "moving toward all age classes, according to site potential or capability."	Modify or remove the Riparian Areas desired condition "Willows (e.g., Bebb, Geyer, Arizona) are reproducing with all age classes present" because not all sites have the potential for willows.	XXXX	Pg 34 Desired Conditions For Riparian Areas Mid-scale conditions -2nd bullet : There may be numerous sites where there is no actual potential for willows due to soil differences, substrate, moisture conditions, etc. To be realistic, try "moving toward all age classes, according to site potential or capability."		Willows	PC 2559-5 The Forest Service should clearly address and define the scientific basis, monitoring, and adaptive management strategies for the desired conditions by considering the capability, site potential, growing conditions, terrain, climate, and where it is feasible and practical to attain. The Forest Service should revise the desire condition by removing references to numeric measures, add "provides sufficient cover", and clarify that the desired condition are a stable floodplain and wildlife habitat.
Riparian - applicability of guidance - willow	p.34 Willows ..... are reproducing with all age classes present.  This is not appropriate for all riparian stretches due to site limitations (e.g. soil conditions, aerobic or anaerobic, vegetation classes present, frequency of one-hundred year event, etc.)	Modify or remove the Riparian Areas desired condition "Willows (e.g., Bebb, Geyer, Arizona) are reproducing with all age classes present" because not all sites have the potential for willows.	XXXX				
Riparian - spatial extent wetlands	Page 34 "The spatial extent of wetlands is maintained." If the predictions of drier and warmer conditions due to climate change are correct, this desired condition is not likely to be met.	The Riparian Areas desired condition "The spatial extent of wetlands is maintained" (proposed plan p. 34), if the predictions of drier and warmer conditions due to climate change are correct, this desired condition is not likely to be met.	XXXX	Page 34 "The spatial extent of wetlands is maintained." If the predictions of drier and warmer conditions due to climate change are correct, this desired condition is not likely to be met.		Attainable Riparian Desired Conditions	PC 2658-6 the Forest Service should address that not all sites have the potential for willows (and all age classes present) and that if climate change predictions are correct, the desired condition is not likely to be met.

AZGFD-DC-Edit	Plan, Mid-Scale Desired Conditions for Riparian Areas, page 34: "Willows (e.g. Bebb, Geyer, Arizona) are <i>free of disease, and</i> reproducing with all age classes present." The Department believes that the A-S has failed to acknowledge the significant role that disease has played in the loss of willows across the A-S.	Modify Riparian Areas Desired Condition (proposed plan p. 34) "Willows (e.g. Bebb, Geyer, Arizona) are <i>free of disease, and</i> reproducing with all age classes present." Need to acknowledge the significant role that disease has played in the loss of willows across the Apache-Sitgreaves NFs.		Plan, Mid-Scale Desired Conditions for Riparian Areas, page 34: "Willows (e.g. Bebb, Geyer, Arizona) are <i>free of disease, and</i> reproducing with all age classes present." The Department believes that the A-S has failed to acknowledge the significant role that disease has played in the loss of willows across the A-S.			
AZGFD-DC-Edit2	Plan, Mid-Scale Desired Conditions, page 34: Within the Plan it states that treated wastewater may be used to provide wetland habitats. However the value of treated wastewater is not mentioned as a desired condition for riparian values. The Department recommends that the following desired condition be incorporated into the Plan. <i>"Wetlands created with treated wastewater from municipalities provide additional critical wildlife habitat."</i>	Add Riparian Areas Desired Condition (p. 34) <i>"Wetlands created with treated wastewater from municipalities provide additional critical wildlife habitat."</i>		Plan, Mid-Scale Desired Conditions, page 34: Within the Plan it states that treated wastewater may be used to provide wetland habitats. However the value of treated wastewater is not mentioned as a desired condition for riparian values. The Department recommends that the following desired condition be incorporated into the Plan. <i>"Wetlands created with treated wastewater from municipalities provide additional critical wildlife habitat."</i>			
Riparian - herbaceous cover and height	p. 35 in Guidelines for Riparian Areas: Why specify herbaceous cover of 55% or greater? Why not use total ground cover? What kind of cover do they mean? Canopy, foliar, basal? How, when and where will this be measured? Where did this number originate? What is the scientific basis?	Modify or remove the Riparian Areas desired condition "Floodplains and wet meadows provide sufficient herbaceous cover (55 percent or greater) and height (9 inches or longer) to trap sediment, mitigate flood energy, and provide wildlife habitat" and guideline "Wet meadows and active floodplains with riparian-obligate species should provide sufficient herbaceous cover (55 percent or greater) and height (6 to 9 inches or longer) to trap	XXXX	p. 35 in Guidelines for Riparian Areas: Why specify herbaceous cover of 55% or greater? Why not use total ground cover? What kind of cover do they mean? Canopy, foliar, basal? How, when and where will this be measured? Where did this number originate? What is the scientific basis?	Herbaceous Cover		PC 559-1 The Forest Service should clarify in the riparian guidelines why specify herbaceous cover of 55% or greater, why not use total ground cover, what kind of cover do they mean, Canopy, foliar, basal, how, when and where will this be measured, where did this number originate, and the scientific basis for the guideline.

		sediment, mitigate flood energy, stabilize banks, and provide for wildlife and plant seeds" (proposed plan p. 34-35). There are concerns that the specified amounts may not be achievable or measurable.				
Riparian - herbaceous cover and height	Similar questions for the guidelines for herbaceous height of "6-9 inches or longer." First of all this is redundant. Why not just say 6 inches or longer? But the problem with this guideline is that to apply it objectively the plan needs to state what species this applies to or is it an overall average, and again, when and how will it be measured?	Modify or remove the Riparian Areas desired condition "Floodplains and wet meadows provide sufficient herbaceous cover (55 percent or greater) and height (9 inches or longer) to trap sediment, mitigate flood energy, and provide wildlife habitat" and guideline "Wet meadows and active floodplains with riparian-obligate species should provide sufficient herbaceous cover (55 percent or greater) and height (6 to 9 inches or longer) to trap sediment, mitigate flood energy, stabilize banks, and provide for wildlife and plant seeds" (proposed plan p. 34-35). There are concerns that the specified amounts may not be achievable or measurable.	XXXX	Similar questions for the guidelines for herbaceous height of "6-9 inches or longer." First of all this is redundant. Why not just say 6 inches or longer? But the problem with this guideline is that to apply it objectively the plan needs to state what species this applies to or is it an overall average, and again, when and how will it be measured?	Herbaceous Cover	PC 559-2 The Forest Service should clarify the herbaceous height of "6-9 inches or longer, why the requirement doesn't say 6 " or longer, state what species this applies to, if it is an overall average, and when and how will it be measured.
Riparian - herbaceous cover and height	Page 34 "Floodplains and wet meadows provide sufficient herbaceous cover (55 percent or greater) and height (9 inches or longer) to trap sediment, mitigate flood energy, and provide wildlife habitat." Specific references to required herbaceous cover and height should be deleted. These are not "desired conditions" - the	Modify or remove the Riparian Areas desired condition "Floodplains and wet meadows provide sufficient herbaceous cover (55 percent or greater) and height (9 inches or longer) to trap sediment, mitigate flood energy, and provide wildlife habitat" and guideline "Wet meadows and active floodplains with riparian-	XXXX	Page 34 "Floodplains and wet meadows provide sufficient herbaceous cover (55 percent or greater) and height (9 inches or longer) to trap sediment, mitigate flood energy, and provide wildlife habitat." Specific references to required herbaceous cover and height should be deleted. These are not "desired conditions" - the	Flood Plains and Wet Meadows	PC 2559-5 The Forest Service should clearly address and define the scientific basis, monitoring, and adaptive management strategies for the desired conditions by considering the capability, site potential, growing conditions, terrain, climate, and where it is feasible and practical to attain. The Forest Service should

	desired conditions are a stable floodplain and wildlife habitat.	obligate species should provide sufficient herbaceous cover (55 percent or greater) and height (6 to 9 inches or longer) to trap sediment, mitigate flood energy, stabilize banks, and provide for wildlife and plant seeds" (proposed plan p. 34-35). There are concerns that the specified amounts may not be achievable or measurable.		desired conditions are a stable floodplain and wildlife habitat.			revise the desire condition by removing references to numeric measures, add "provides sufficient cover", and clarify that the desired condition are a stable floodplain and wildlife habitat.
Riparian - herbaceous cover and height	Guidelines for cover and height of vegetation are only tools, not objectives, and they should be employed on a site specific basis, not as blanket requirements. Not all sites may have the potential to meet the requirements, at least not in the short run. If they are used on a site specific basis, the procedures for obtaining the measurements should be specified. On a site specific basis, not as blanket requirements. Not all sites may have the potential to meet the requirements, at least not in the short run. If they are used on a site specific basis, the procedures for obtaining the measurements should be specified.	Modify or remove the Riparian Areas desired condition "Floodplains and wet meadows provide sufficient herbaceous cover (55 percent or greater) and height (9 inches or longer) to trap sediment, mitigate flood energy, and provide wildlife habitat" and guideline "Wet meadows and active floodplains with riparian-obligate species should provide sufficient herbaceous cover (55 percent or greater) and height (6 to 9 inches or longer) to trap sediment, mitigate flood energy, stabilize banks, and provide for wildlife and plant seeds" (proposed plan p. 34-35). There are concerns that the specified amounts may not be achievable or measurable.	XXXX	Guidelines for cover and height of vegetation are only tools, not objectives, and they should be employed on a site specific basis, not as blanket requirements. Not all sites may have the potential to meet the requirements, at least not in the short run. If they are used on a site specific basis, the procedures for obtaining the measurements should be specified. On a site specific basis, not as blanket requirements. Not all sites may have the potential to meet the requirements, at least not in the short run. If they are used on a site specific basis, the procedures for obtaining the measurements should be specified.		Distance / Height and Cover Guideline not Achievable in Many Areas	PC 2660-1 The Forest Service should address and clearly define the Guidelines for cover and height of vegetation on a site specific basis with the procedures for obtaining the measurements specified, not as blanket requirements because not all sites may have the potential to meet the requirements or remove them from the plan. If site specific guidelines for cover and/or height of vegetation are used, the potential for meeting such guidelines in light of heavy and continuous elk grazing must be taken into account. The numeric measures should be removed from this statement as they make it unattainable.
Riparian - herbaceous cover and height	Page 35 The same statement cited above with regard to herbaceous cover and height are repeated. In this case, the height requirement is 6-9 inches or longer - longer than what 6 inches or 9 inches? The comments above apply here also.	Modify or remove the Riparian Areas desired condition "Floodplains and wet meadows provide sufficient herbaceous cover (55 percent or greater) and height (9 inches or longer) to trap sediment, mitigate flood energy, and provide wildlife habitat" and guideline	XXXX	Page 35 The same statement cited above with regard to herbaceous cover and height are repeated. In this case, the height requirement is 6-9 inches or longer - longer than what 6 inches or 9 inches? The comments above apply here also.		Terminology and Scientific Documentation	PC 2660-1 The Forest Service should address and clearly define the Guidelines for cover and height of vegetation on a site specific basis with the procedures for obtaining the measurements specified, not as blanket requirements because not all sites may have

		"Wet meadows and active floodplains with riparian-obligate species should provide sufficient herbaceous cover (55 percent or greater) and height (6 to 9 inches or longer) to trap sediment, mitigate flood energy, stabilize banks, and provide for wildlife and plant seeds" (proposed plan p. 34-35). There are concerns that the specified amounts may not be achievable or measurable.				the potential to meet the requirements or remove them from the plan. If site specific guidelines for cover and/or height of vegetation are used, the potential for meeting such guidelines in light of heavy and continuous elk grazing must be taken into account. The numeric measures should be removed from this statement as they make it unattainable.
Riparian - herbaceous cover and height	The Statement "Wet meadows and active floodplains with riparian-obligate species should provide sufficient herbaceous cover (55% or greater) and height (6-9 inches or longer) to trap sediment, mitigate flood energy, stabilize banks, and provide for wildlife and plant needs" is not achievable in the higher elevations of the forest, most all floodplains are dominated by Blue grass. In some very wet meadows, there are sedges and other species which can attain more height, however, they are severely impacted year-long by grazing due to elk and unauthorized livestock and are again dependent upon favorable climatic activity to achieve any height at all. Attempting to manage floodplains to these guidelines will be further inhibited by the current potential of the site. The numeric measures should be removed from this	Modify or remove the Riparian Areas desired condition "Floodplains and wet meadows provide sufficient herbaceous cover (55 percent or greater) and height (9 inches or longer) to trap sediment, mitigate flood energy, and provide wildlife habitat" and guideline "Wet meadows and active floodplains with riparian-obligate species should provide sufficient herbaceous cover (55 percent or greater) and height (6 to 9 inches or longer) to trap sediment, mitigate flood energy, stabilize banks, and provide for wildlife and plant seeds" (proposed plan p. 34-35). There are concerns that the specified amounts may not be achievable or measurable.	XXXX	The Statement "Wet meadows and active floodplains with riparian-obligate species should provide sufficient herbaceous cover (55% or greater) and height (6-9 inches or longer) to trap sediment, mitigate flood energy, stabilize banks, and provide for wildlife and plant needs" is not achievable in the higher elevations of the forest, most all floodplains are dominated by Blue grass. In some very wet meadows, there are sedges and other species which can attain more height, however, they are severely impacted year-long by grazing due to elk and unauthorized livestock and are again dependent upon favorable climatic activity to achieve any height at all. Attempting to manage floodplains to these guidelines will be further inhibited by the current potential of the site. The numeric measures should be removed from this	Herbaceous Cover	

	statement as they make it unattainable.			statement as they make it unattainable.		
Riparian - herbaceous cover and height	Fine-scale desired conditions- the plan states" floodplains and wet meadows provide sufficient herbaceous cover (55% or greater) and height (9 11 or longer) to trap sediment, mitigate flood energy, and provide wildlife cover". The statement says provide sufficient cover, then proceeds to name the% cover and vegetative height. In many instance the numeric quantities are not possible to attain.	Modify or remove the Riparian Areas desired condition "Floodplains and wet meadows provide sufficient herbaceous cover (55 percent or greater) and height (9 inches or longer) to trap sediment, mitigate flood energy, and provide wildlife habitat" and guideline "Wet meadows and active floodplains with riparian-obligate species should provide sufficient herbaceous cover (55 percent or greater) and height (6 to 9 inches or longer) to trap sediment, mitigate flood energy, stabilize banks, and provide for wildlife and plant seeds" (proposed plan p. 34-35). There are concerns that the specified amounts may not be achievable or measurable.	XXXX	Fine-scale desired conditions- the plan states" floodplains and wet meadows provide sufficient herbaceous cover (55% or greater) and height (9 11 or longer) to trap sediment, mitigate flood energy, and provide wildlife cover". The statement says provide sufficient cover, then proceeds to name the% cover and vegetative height. In many instance the numeric quantities are not possible to attain.		Coarse or Large Woody Debris
Riparian - herbaceous cover and height	Issue: The Plan Guidelines for desired conditions fail to define terms and do not provide sources or scientific basis for statements. Guidelines for Riparian Areas, page 35 refers to herbaceous cover of 55% or greater and herbaceous height of "6-9 inches or longer" with no justification for these numbers.	Modify or remove the Riparian Areas desired condition "Floodplains and wet meadows provide sufficient herbaceous cover (55 percent or greater) and height (9 inches or longer) to trap sediment, mitigate flood energy, and provide wildlife habitat" and guideline "Wet meadows and active floodplains with riparian-	XXXX	Issue: The Plan Guidelines for desired conditions fail to define terms and do not provide sources or scientific basis for statements. Guidelines for Riparian Areas, page 35 refers to herbaceous cover of 55% or greater and herbaceous height of "6-9 inches or longer" with no justification for these numbers.		Terminology and Scientific Documentation

	<p>Furthermore, the type of ground cover is not specified as to whether it canopy, foliar, or basal, nor is species specified. There is no definition which provides understanding of whether the height is an overall average, or when and how it would be measured</p>	<p>obligate species should provide sufficient herbaceous cover (55 percent or greater) and height (6 to 9 inches or longer) to trap sediment, mitigate flood energy, stabilize banks, and provide for wildlife and plant seeds" (proposed plan p. 34-35). There are concerns that the specified amounts may not be achievable or measurable.</p>		<p>Furthermore, the type of ground cover is not specified as to whether it canopy, foliar, or basal, nor is species specified. There is no definition which provides understanding of whether the height is an overall average, or when and how it would be measured</p>		
Riparian - herbaceous cover and height	<p>Page 34, Fine-Scaled Desired Conditions. second bullet reads: "Floodplains and wet meadows provide sufficient herbaceous cover (55 percent or greater) and height (9 inches or longer) to trap sediment, mitigate flood energy, and provide wildlife habitat. (This statement is also mentioned as a Guideline on Page 35.)"</p> <p>Comment: To address this point, we recommend the document clarify that vegetation in these desired conditions should contain native riparian or wetland species. As currently written, a 55- percent herbaceous cover of a non-native upland species, such as Kentucky bluegrass, would meet the desired condition and meet a riparian area guideline. Also, not all riparian areas, specifically those in narrow canyons and/or with steep water surface gradients, have the potential to support the 55 percent or greater threshold of herbaceous cover because the</p>	<p>Modify or remove the Riparian Areas desired condition "Floodplains and wet meadows provide sufficient herbaceous cover (55 percent or greater) and height (9 inches or longer) to trap sediment, mitigate flood energy, and provide wildlife habitat" and guideline "Wet meadows and active floodplains with riparian-obligate species should provide sufficient herbaceous cover (55 percent or greater) and height (6 to 9 inches or longer) to trap sediment, mitigate flood energy, stabilize banks, and provide for wildlife and plant seeds" (proposed plan p. 34-35). There are concerns that the specified amounts may not be achievable or measurable.</p>	XXXX	<p>Page 34, Fine-Scaled Desired Conditions. second bullet reads: "Floodplains and wet meadows provide sufficient herbaceous cover (55 percent or greater) and height (9 inches or longer) to trap sediment, mitigate flood energy, and provide wildlife habitat. (This statement is also mentioned as a Guideline on Page 35.)"</p> <p>Comment: To address this point, we recommend the document clarify that vegetation in these desired conditions should contain native riparian or wetland species. As currently written, a 55- percent herbaceous cover of a non-native upland species, such as Kentucky bluegrass, would meet the desired condition and meet a riparian area guideline. Also, not all riparian areas, specifically those in narrow canyons and/or with steep water surface gradients, have the potential to support the 55 percent or greater threshold of herbaceous cover because the</p>		Clarification of Vegetation in DC

	stream flow energy is too high (Biggs 1996, O'Hare et al. 2010, Riis and Biggs 2010). A stable, narrow stream with a moderate water surface gradient that supports dense alder or willow that does not provide space or conditions for herbaceous vegetation might not meet this desired condition or guideline (Manning and Padgett 1995, Winward 2000).			stream flow energy is too high (Biggs 1996, O'Hare et al. 2010, Riis and Biggs 2010). A stable, narrow stream with a moderate water surface gradient that supports dense alder or willow that does not provide space or conditions for herbaceous vegetation might not meet this desired condition or guideline (Manning and Padgett 1995, Winward 2000).		
Riparian - herbaceous cover and height	Page 35, Guidelines for Riparian Areas, first bullet: A fine-scaled desired condition for riparian areas (page 34, second bullet) includes herbaceous cover heights of nine inches or longer. The first guideline calls for herbaceous heights ranging between six to nine inches. As written, this guideline would not necessarily maintain this desired condition as stated on page 34.	Modify or remove the Riparian Areas desired condition "Floodplains and wet meadows provide sufficient herbaceous cover (55 percent or greater) and height (9 inches or longer) to trap sediment, mitigate flood energy, and provide wildlife habitat" and guideline "Wet meadows and active floodplains with riparian-obligate species should provide sufficient herbaceous cover (55 percent or greater) and height (6 to 9 inches or longer) to trap sediment, mitigate flood energy, stabilize banks, and provide for wildlife and plant seeds" (proposed plan p. 34-35). There are concerns that the specified amounts may not be achievable or measurable.	XXXX	Page 35, Guidelines for Riparian Areas, first bullet: A fine-scaled desired condition for riparian areas (page 34, second bullet) includes herbaceous cover heights of nine inches or longer. The first guideline calls for herbaceous heights ranging between six to nine inches. As written, this guideline would not necessarily maintain this desired condition as stated on page 34.	Herbaceous Cover	PC 559-2 The Forest Service should clarify the herbaceous height of "6-9 inches or longer, why the requirement doesn't say 6 " or longer, state what species this applies to, if it is an overall average, and when and how will it be measured.

Riparian - herbaceous cover and height	pg 35 under guidelines for riparian areas. In many areas of our grazing allotments, Greens Peak and Cerro Trigo "sufficient herbaceous cover, 55% or greater, and height, 6 to 9 inches or longer" is not achievable due to physical limitations. The variety of soil types and lack of sufficient moisture in many months does not allow many sites to have plant production that will meet the stated desired conditions and guidelines. Those guidelines should be removed from the plan.	Modify or remove the Riparian Areas desired condition "Floodplains and wet meadows provide sufficient herbaceous cover (55 percent or greater) and height (9 inches or longer) to trap sediment, mitigate flood energy, and provide wildlife habitat" and guideline "Wet meadows and active floodplains with riparian-obligate species should provide sufficient herbaceous cover (55 percent or greater) and height (6 to 9 inches or longer) to trap sediment, mitigate flood energy, stabilize banks, and provide for wildlife and plant seeds" (proposed plan p. 34-35). There are concerns that the specified amounts may not be achievable or measurable.	XXXX	pg 35 under guidelines for riparian areas. In many areas of our grazing allotments, Greens Peak and Cerro Trigo "sufficient herbaceous cover, 55% or greater, and height, 6 to 9 inches or longer" is not achievable due to physical limitations. The variety of soil types and lack of sufficient moisture in many months does not allow many sites to have plant production that will meet the stated desired conditions and guidelines. Those guidelines should be removed from the plan.	Distance / Height and Cover Guideline not Achievable in Many Areas	
Riparian - herbaceous cover and height	page 35----Under guidelines for riparian areas.: The standard stated of 55% or greater herbaceous cover and height of 6 to 9 inches or longer is probably not achievable in many areas.	Modify or remove the Riparian Areas desired condition "Floodplains and wet meadows provide sufficient herbaceous cover (55 percent or greater) and height (9 inches or longer) to trap sediment, mitigate flood energy, and provide wildlife habitat" and guideline "Wet meadows and active floodplains with riparian-obligate species should provide sufficient herbaceous cover (55 percent or greater) and height (6 to 9 inches or longer) to trap sediment, mitigate flood energy, stabilize banks, and provide for wildlife and plant seeds" (proposed plan p. 34-35). There are concerns that	XXXX	page 35----Under guidelines for riparian areas.: The standard stated of 55% or greater herbaceous cover and height of 6 to 9 inches or longer is probably not achievable in many areas.	Distance / Height and Cover Guideline not Achievable in Many Areas	

		the specified amounts may not be achievable or measurable.				
Riparian - herbaceous cover and height	Fine Scale Conditions - 2nd bullet: Why list cover percentages and stubble height that may be unattainable? The word "sufficient" should be sufficient. Many meadows and floodplains are dominated by species which will not reach the listed heights and cover percentages, especially in drier years, and due to soil differences and terrain that influences mini ecosystems. Capability of the site must be considered.	Modify or remove the Riparian Areas desired condition "Floodplains and wet meadows provide sufficient herbaceous cover (55 percent or greater) and height (9 inches or longer) to trap sediment, mitigate flood energy, and provide wildlife habitat" and guideline "Wet meadows and active floodplains with riparian-obligate species should provide sufficient herbaceous cover (55 percent or greater) and height (6 to 9 inches or longer) to trap sediment, mitigate flood energy, stabilize banks, and provide for wildlife and plant seeds" (proposed plan p. 34-35). There are concerns that the specified amounts may not be achievable or measurable.	XXXX	Fine Scale Conditions - 2nd bullet: Why list cover percentages and stubble height that may be unattainable? The word "sufficient" should be sufficient. Many meadows and floodplains are dominated by species which will not reach the listed heights and cover percentages, especially in drier years, and due to soil differences and terrain that influences mini ecosystems. Capability of the site must be considered.	Riparian Conditions	PC 2559-5 The Forest Service should clearly address and define the scientific basis, monitoring, and adaptive management strategies for the desired conditions by considering the capability, site potential, growing conditions, terrain, climate, and where it is feasible and practical to attain. The Forest Service should revise the desired condition by removing references to numeric measures, add "provides sufficient cover", and clarify that the desired condition are a stable floodplain and wildlife habitat.
Riparian - herbaceous cover and height	Pg 35 Guidelines for Riparian Areas First bullet: Again, "sufficient herbaceous cover (55 +%) and height (6 to 9 inches or longer) is unattainable and should be taken out. The dominant species in the higher elevation floodplains is Blue grass which is naturally short. There are some taller species and sedges,	Modify or remove the Riparian Areas desired condition "Floodplains and wet meadows provide sufficient herbaceous cover (55 percent or greater) and height (9 inches or longer) to trap sediment, mitigate flood energy, and provide wildlife habitat" and guideline "Wet meadows and active floodplains with riparian-	XXXX	Pg 35 Guidelines for Riparian Areas First bullet: Again, "sufficient herbaceous cover (55 +%) and height (6 to 9 inches or longer) is unattainable and should be taken out. The dominant species in the higher elevation floodplains is Blue grass which is naturally short. There are some taller species and sedges,	Distance / Height and Cover Guideline not Achievable in Many Areas	PC 2660-1 The Forest Service should address and clearly define the Guidelines for cover and height of vegetation on a site specific basis with the procedures for obtaining the measurements specified, not as blanket requirements because not all sites may have the potential to meet the requirements or remove them

	<p>but they are heavily grazed year round by elk and unauthorized livestock (horses), and are dependent on good moisture to grow, which doesn't 't always happen. Please remove the numbers to make this statement achievable.</p>	<p>obligate species should provide sufficient herbaceous cover (55 percent or greater) and height (6 to 9 inches or longer) to trap sediment, mitigate flood energy, stabilize banks, and provide for wildlife and plant seeds" (proposed plan p. 34-35). There are concerns that the specified amounts may not be achievable or measurable.</p>		<p>but they are heavily grazed year round by elk and unauthorized livestock (horses), and are dependent on good moisture to grow, which doesn't 't always happen. Please remove the numbers to make this statement achievable.</p>		<p>from the plan. If site specific guidelines for cover and/or height of vegetation are used, the potential for meeting such guidelines in light of heavy and continuous elk grazing must be taken into account. The numeric measures should be removed from this statement as they make it unattainable.</p>
Riparian - herbaceous cover and height	<p>p.35 Guidelines for Riparian Areas Why specify herbaceous cover of 55% or greater? What kind of cover- canopy, foliar, or basal? How, when and where will this be measured? Science indicates that ground cover is most significant. What is the scientific basis for this number which is simply an entrapment to complicate user interests based on an overly optimistic estimate of site potential or growing conditions. Because of site specific differences across the landscape, the determination of allowable numeric value must reflect numeric values that are appropriate to a given site. The call for 9 inch or longer leaf length is redundant and unachievable in many riparian areas. The allowable value must be subject to refinement through monitoring and adaptive management to achieve the desired upward trending.</p>	<p>Modify or remove the Riparian Areas desired condition "Floodplains and wet meadows provide sufficient herbaceous cover (55 percent or greater) and height (9 inches or longer) to trap sediment, mitigate flood energy, and provide wildlife habitat" and guideline "Wet meadows and active floodplains with riparian-obligate species should provide sufficient herbaceous cover (55 percent or greater) and height (6 to 9 inches or longer) to trap sediment, mitigate flood energy, stabilize banks, and provide for wildlife and plant seeds" (proposed plan p. 34-35). There are concerns that the specified amounts may not be achievable or measurable.</p>	XXXX	<p>p.35 Guidelines for Riparian Areas Why specify herbaceous cover of 55% or greater? What kind of cover- canopy, foliar, or basal? How, when and where will this be measured? Science indicates that ground cover is most significant. What is the scientific basis for this number which is simply an entrapment to complicate user interests based on an overly optimistic estimate of site potential or growing conditions. Because of site specific differences across the landscape, the determination of allowable numeric value must reflect numeric values that are appropriate to a given site. The call for 9 inch or longer leaf length is redundant and unachievable in many riparian areas. The allowable value must be subject to refinement through monitoring and adaptive management to achieve the desired upward trending.</p>	Riparian Conditions	<p>PC 2559-5 The Forest Service should clearly address and define the scientific basis, monitoring, and adaptive management strategies for the desired conditions by considering the capability, site potential, growing conditions, terrain, climate, and where it is feasible and practical to attain. The Forest Service should revise the desire condition by removing references to numeric measures, add "provides sufficient cover", and clarify that the desired condition are a stable floodplain and wildlife habitat.</p>

Riparian - herbaceous cover and height	Page 35: riparian area site conditions are being required to leave "55% herbaceous cover or 6-9 inches" of residual height. While we can applaud the technical effort to derive a policy standard, it is by any definition a value judgement, and not based on science. Observable conditions even within a single District, within a single day, far exceed the ability of this standard to apply. If residual herbaceous cover is 53%, or 5 11/16 inches tall, how is this significant or critical?	Modify or remove the Riparian Areas desired condition "Floodplains and wet meadows provide sufficient herbaceous cover (55 percent or greater) and height (9 inches or longer) to trap sediment, mitigate flood energy, and provide wildlife habitat" and guideline "Wet meadows and active floodplains with riparian-obligate species should provide sufficient herbaceous cover (55 percent or greater) and height (6 to 9 inches or longer) to trap sediment, mitigate flood energy, stabilize banks, and provide for wildlife and plant seeds" (proposed plan p. 34-35). There are concerns that the specified amounts may not be achievable or measurable.	XXXX				
Riparian - geologic control feature	Third Bullet: We recommend defining "geologic control feature." Does this include the presence of a functioning flood plain for stream channel stability? Not all riparian areas that are not geologically-confined require coarse or large woody debris to dissipate hydraulic energy. The presence of adequate channel characteristics such as flood plain, channel sinuosity, width and depth ratio, and hydraulic roughness to dissipate flow energy should be emphasized here, rather than emphasizing that woody debris is present to provide riparian-dependent species habitat.	Define geologic control feature as used in the Riparian Areas desired condition "Riparian areas that do not depend on geologic control features for stability have large, coarse woody debris that provides key habitat for riparian-dependent species" (proposed plan p. 34).	XXXX	Third Bullet: We recommend defining "geologic control feature." Does this include the presence of a functioning flood plain for stream channel stability? Not all riparian areas that are not geologically-confined require coarse or large woody debris to dissipate hydraulic energy. The presence of adequate channel characteristics such as flood plain, channel sinuosity, width and depth ratio, and hydraulic roughness to dissipate flow energy should be emphasized here, rather than emphasizing that woody debris is present to provide riparian-dependent species habitat.		Coarse or Large Woody Debris	

Riparian - floodplain	Flood plains can be very wide in some drainages and should be removed from the desired conditions. A better way to describe it would be from green line to green line or something similar that defines and restricts the areas to the places where it is even possible to sustain willow populations.	Remove floodplains from Riparian Areas desired conditions. A better way to describe it would be from green line to green line or something similar that defines and restricts the areas to the places where it is possible.	XXXX	Flood plains can be very wide in some drainages and should be removed from the desired conditions. A better way to describe it would be from green line to green line or something similar that defines and restricts the areas to the places where it is even possible to sustain willow populations.		Flood Plains and Wet Meadows	
Riparian - resiliency	"The ecological condition of riparian areas is resilient to animal and human use." (p 21) It is unclear how ecological condition is defined in this context, or how the threshold is determined for "ecological condition" that distinguishes "resilient" from "non-resilient".	The DEIS discusses the ability of riparian systems to recover and improve has being affected by ongoing and new impacts (DEIS p 84, 95). This was not discussed under standards or guidelines for management activities in the proposed plan.	XXXX				
Riparian - resiliency	Page 84, Second paragraph: The DEIS discusses the resiliency of riparian systems; however, on page 95 (under Fisheries) and their ability to recover and improve has been affected, by ongoing and new impacts. This issue was not discussed under any standards or guidelines for management activities in the Proposed Plan.	The DEIS discusses the ability of riparian systems to recover and improve has being affected by ongoing and new impacts (DEIS p 84, 95). This was not discussed under standards or guidelines for management activities in the proposed plan.	XXXX	Page 84, Second paragraph: The DEIS discusses the resiliency of riparian systems; however, on page 95 (under Fisheries) and their ability to recover and improve has been affected, by ongoing and new impacts. This issue was not discussed under any standards or guidelines for management activities in the Proposed Plan.		Impacts to Recovery	
Riparian - and fire	Page 86, Forest Restoration Activities: Planned burning treatments in riparian areas are discussed under alternatives B and D. Guidelines for Riparian Areas, on page 35 of the proposed Plan, state that planned ignitions which may degrade riparian areas should be avoided. We recommend reviewing these two	Review the Riparian Areas guideline "Ground-disturbing projects (including planned ignitions) which may degrade long term riparian conditions should be avoided" (proposed plan p. 35) and the DEIS Riparian environmental consequences for Forest Restoration Activities (DEIS p. 86) to ensure there is no contradiction.	XXXX	Page 86, Forest Restoration Activities: Planned burning treatments in riparian areas are discussed under alternatives B and D. Guidelines for Riparian Areas, on page 35 of the proposed Plan, state that planned ignitions which may degrade riparian areas should be avoided. We recommend reviewing these two		Burning Treatments and Planned Ignitions in Riparian Areas	PC 2612-2 the Forest Service should address the discrepancies in the planned burning treatments in riparian areas (alternatives B and) and the guidelines (page 35) state that planned ignitions which may degrade riparian areas should be avoided, and the last paragraph which discusses the effects of prescribed fir in riparian areas.

	statements to ensure there is no contradiction			statements to ensure there is no contradiction		
Riparian - and fire2	<p>Page 87, Mechanical, first paragraph: On page 87, it reads: "Since all alternatives would have timber harvest and restoration treatment activities, there is the potential to adversely affect riparian habitats. Haul routes, skid trails, log landings, and stream crossings used to remove trees may impact riparian vegetation, soils, and stream function. In addition to erosion and sedimentation within the riparian area, these impacts can cause an effective extension of the channel network through the roads and skid trails connecting upstream disturbances to streams and can often overload the sediment filtering and storage ability of riparian areas."</p> <p>Comment: This appears to contradict the description on page 86 which reads: "In all alternatives, environmental consequences within the foreseeable future to riparian areas and wetland ecosystems resulting from management activities (timber harvesting/forest restoration)</p>	<p>Review the Riparian DEIS environmental consequences for Mechanical and Burning (p. 87) to ensure there are no contradictions.</p>	XXXX	<p>Page 87, Mechanical, first paragraph: On page 87, it reads: "Since all alternatives would have timber harvest and restoration treatment activities, there is the potential to adversely affect riparian habitats. Haul routes, skid trails, log landings, and stream crossings used to remove trees may impact riparian vegetation, soils, and stream function. In addition to erosion and sedimentation within the riparian area, these impacts can cause an effective extension of the channel network through the roads and skid trails connecting upstream disturbances to streams and can often overload the sediment filtering and storage ability of riparian areas."</p> <p>Comment: This appears to contradict the description on page 86 which reads: "In all alternatives, environmental consequences within the foreseeable future to riparian areas and wetland ecosystems resulting from management activities (timber harvesting/forest restoration)</p>	Discrepancy in Timber Harvest and Restoration Treatments in the Alternatives	PC 207-32 The Forest Service should review the discussion of timber harvest and restoration treatment. These effects appear to be more severe than the minor consequences as described on page 86.

	are expected to be minor." We recommend reviewing the discussion of timber harvest and restoration treatment. These effects appear to be more severe than the minor consequences as described on page 86.			are expected to be minor." We recommend reviewing the discussion of timber harvest and restoration treatment. These effects appear to be more severe than the minor consequences as described on page 86.		
Riparian - and fire2	Page 87, Burning: The DEIS described the adverse effects of wildfire to watersheds and riparian areas in the section on burning, and the Guidelines for Riparian Areas on page 35 of the Proposed Forest Plan state that planned ignitions in riparian areas should be avoided. In contrast, the last paragraph on this page discusses the beneficial effects of prescribed fire in riparian areas. We recommend reviewing this paragraph to ensure there is no discrepancy.	Review the Riparian DEIS environmental consequences for Mechanical and Burning (p. 87) to ensure there are no contradictions.	XXXX	Page 87, Burning: The DEIS described the adverse effects of wildfire to watersheds and riparian areas in the section on burning, and the Guidelines for Riparian Areas on page 35 of the Proposed Forest Plan state that planned ignitions in riparian areas should be avoided. In contrast, the last paragraph on this page discusses the beneficial effects of prescribed fire in riparian areas. We recommend reviewing this paragraph to ensure there is no discrepancy.	Adverse and Beneficial Effects of Wildfire to Watersheds and Riparian Areas	PC 2612-2 the Forest Service should address the discrepancies in the planned burning treatments in riparian areas (alternatives B and) and the guidelines (page 35) state that planned ignitions which may degrade riparian areas should be avoided, and the last paragraph which discusses the effects of prescribed fire in riparian areas.
Riparian - effects of elk	If site specific guidelines for cover and/or height of vegetation are used, the potential for meeting such guidelines in light of heavy and continuous elk grazing must be taken into account.	Elk grazing should be taken into account in the specific guidelines for vegetation cover and/or height.	XXXX	If site specific guidelines for cover and/or height of vegetation are used, the potential for meeting such guidelines in light of heavy and continuous elk grazing must be taken into account.	Site Specific Guidelines	PC 2660-1 The Forest Service should address and clearly define the Guidelines for cover and height of vegetation on a site specific basis with the procedures for obtaining the measurements specified, not as blanket requirements because not all sites may have the potential to meet the requirements or remove them from the plan. If site specific guidelines for cover and/or

							height of vegetation are used, the potential for meeting such guidelines in light of heavy and continuous elk grazing must be taken into account. The numeric measures should be removed from this statement as they make it unattainable.
Riparian effects of road-stream crossings	The Forest Service must account for these factors and disclose potentially significant impacts that may result from the existing road network.	Account for factors (soil loss and erosion, distance to a water body, road-stream crossings) and disclose potentially significant impacts that may result from existing road networks.	XXXX	The Forest Service must account for these factors and disclose potentially significant impacts that may result from the existing road network.		Disclose Impacts from Existing Road Network	
Riparian effects of road-stream crossings	Page 88, Motorized Routes We recommend adding additional detail on the effects of motorized routes in this section. For example, the Forest could include information on how many road crossings on perennial streams are bridged, culverted, or are low-water crossings. Each of these could be discussed in the DEIS.	Account for factors (soil loss and erosion, distance to a water body, road-stream crossings) and disclose potentially significant impacts that may result from existing road networks.	XXXX	Page 88, Motorized Routes We recommend adding additional detail on the effects of motorized routes in this section. For example, the Forest could include information on how many road crossings on perennial streams are bridged, culverted, or are low-water crossings. Each of these could be discussed in the DEIS.		Effects of Motorized Routes	PC 1110-3 The Forest Service should add additional detail on the effects of motorized routes to include information on how many road crossings on perennial streams are bridged, culverted, or are low-water crossings.
Riparian - Livestock grazing - effects of BMPs	Page 86, Environmental Consequences of the Alternatives: The best management practices, streamside management zones, and wildlife mitigation that would be implemented under timber harvesting and forest restoration could also be included for livestock grazing.	Consider best management practices, streamside management zones, and wildlife mitigation during livestock grazing implementation (DEIS p. 86).	XXXX	Page 86, Environmental Consequences of the Alternatives: The best management practices, streamside management zones, and wildlife mitigation that would be implemented under timber harvesting and forest restoration could also be included for livestock grazing.		Include in Analysis	

Riparian - general effects	Riparian areas present a significant issue for analysis because they are severely degraded on the Apache-Sitgreaves National Forests, and the Forest Service is required by NFMA to ensure viability of species that depend on aquatic habitats, including six fishes and an amphibian listed as threatened or endangered under the ESA.	Riparian areas present a significant issue for analysis because they are severely degraded and the Forest Service is required by NFMA to ensure viability of species that depend on aquatic habitats.	XXXX				
Riparian objectives	If I read it right, it appears you will have to do the "objectives" during the next 15 years. My question is, for example, does removing an average of 2 miles of "unauthorized roads and trails" each year really going to help all that much with the problem across a huge national forest?	Explain how the Riparian Areas objectives: "annually, restore 200 to 500 acres ..." and "Annually, remove an average of 2 miles of unauthorized roads or trails .." will help that much across a large national forest. (proposed plan p. 34)	XXXX	If I read it right, it appears you will have to do the "objectives" during the next 15 years. My question is, for example, does removing an average of 2 miles of "unauthorized roads and trails" each year really going to help all that much with the problem across a huge national forest?		Treatment and Restoration	
Riparian objectives	Rivers, streams, and their riparian areas are an intrinsic part of the watershed problem, yet of the 48,000 acres of riparian forest on the AS-NFs, of which some three-fourths are functioning-at-risk or worse, only 200-500 acres per year are proposed for treatment . . . it would be difficult to show any progress at all over time with such limited goals.	Explain how the Riparian Areas objectives: "annually, restore 200 to 500 acres ..." and "Annually, remove an average of 2 miles of unauthorized roads or trails .." will help that much across a large national forest. (proposed plan p. 34)	XXXX	Rivers, streams, and their riparian areas are an intrinsic part of the watershed problem, yet of the 48,000 acres of riparian forest on the AS-NFs, of which some three-fourths are functioning-at-risk or worse, only 200-500 acres per year are proposed for treatment.		Treatment and Restoration	

Riparian objectives2	<p>page 35 The 2nd paragraph is unrealistic: an annual average of 5 miles of riparian habitat? I am afraid that if that is cumulative then in a few years the FS will hunting for additional miles and imposing restrictions on areas that are not really good or potentially good riparian areas</p>	<p>Explain how the riparian objectives would be achieved and what impact would be incurred by users. Concern if objectives are not met, restrictions may be imposed in areas that could eliminate user opportunities.</p>	XXXX	<p>page 35 The 2nd paragraph is unrealistic: an annual average of 5 miles of riparian habitat? I am afraid that if that is cumulative then in a few years the FS will hunting for additional miles and imposing restrictions on areas that are not really good or potentially good riparian areas</p>			Distance / Height and Cover Guideline not Achievable in Many Areas
Riparian objectives2	<p>P.26 Annually, enhance or restore 5 to 15 miles of stream and riparian habitat .....</p> <p>The goal is dependent on funding and many other factors. If the goal is not achieved there would be serious consequences such as eliminating a given use to mitigate lack of funding. Simple translation no grazing, no recreation, etc.</p>	<p>Explain how the riparian objectives would be achieved and what impact would be incurred by users. Concern if objectives are not met, restrictions may be imposed in areas that could eliminate user opportunities.</p>	XXXX				
Riparian objectives2	<p>Objectives for Riparian Areas</p> <p>These statements obligate the A-S to meet specific goals. If the goals are not met, challenges will result in eliminating user opportunities as mitigation for the lack of funding to implement restoration opportunities. The plan does not state how the objectives would be achieved and what impact would be incurred by users.</p>	<p>Explain how the riparian objectives would be achieved and what impact would be incurred by users. Concern if objectives are not met, restrictions may be imposed in areas that could eliminate user opportunities.</p>	XXXX				

Riparian objectives3	Your DEIS admits that “the current trend is away from desired conditions in all riparian PNVTs and then discusses “objectives to treat riparian areas” but I see no such “objectives” in the plan. You admit (DEIS 78) that grazing “pressure,” as you call it, is degrading riparian areas currently.	The DEIS discusses "objectives to treat riparian areas", explain where the objectives are in the plan.	XXXX	Your DEIS admits that “the current trend is away from desired conditions in all riparian PNVTs and then discusses “objectives to treat riparian areas” but I see no such “objectives” in the plan. You admit (DEIS 78) that grazing “pressure,” as you call it, is degrading riparian areas currently.	Riparian PNVT Objectives
Riparian - road removal	In addition, it should prioritize road removal in riparian areas associated with aquatic ecosystems.	The Forest Service should prioritize road removal in riparian areas associated with aquatic ecosystems.	XXXX	In addition, it should prioritize road removal in riparian areas associated with aquatic ecosystems.	Prioritize Road Removal in Riparian Areas
AZGFD-ObjEdit	Plan, Objectives for Riparian Areas, page 34: "Within the planning period, relocated, repair, improve, or decommission a minimum of 4 miles of National Forest Systems roads or trails that add sediment to streams, damage riparian vegetation, erode streambanks, cause gullies, and/or compact floodplain soils. <i>These activities should promote adequate trail access that addresses public recreational access needs (e.g. fishing and hiking) and minimizes creation of additional unauthorized trails.</i> "	Modify the Riparian Areas Objective (proposed plan p. 34) "Within the planning period, relocated, repair, improve, or decommission a minimum of 4 miles of National Forest Systems roads or trails that add sediment to streams, damage riparian vegetation, erode streambanks, cause gullies, and/or compact floodplain soils. <i>These activities should promote adequate trail access that addresses public recreational access needs (e.g. fishing and hiking) and minimizes creation of additional unauthorized trails.</i> "		Plan, Objectives for Riparian Areas, page 34: "Within the planning period, relocated, repair, improve, or decommission a minimum of 4 miles of National Forest Systems roads or trails that add sediment to streams, damage riparian vegetation, erode streambanks, cause gullies, and/or compact floodplain soils. <i>These activities should promote adequate trail access that addresses public recreational access needs (e.g. fishing and hiking) and minimizes creation of additional unauthorized trails.</i> "	

Riparian - mgmt approach	For as little good as it will do overall and relative to the size of problems in riparian areas, might there be cheaper fixes for changing conditions for the better, like removing cows or changing the time when they are grazing there? This is just one example where it looks like you have not provided even a few additional options.	Explain whether there are cheaper fixes for changing riparian conditions for the better (e.g., removing cows, changing the time when they graze).	XXXX	For as little good as it will do overall and relative to the size of problems in riparian areas, might there be cheaper fixes for changing conditions for the better, like removing cows or changing the time when they are grazing there? This is just one example where it looks like you have not provided even a few additional options.	Additional Options and Monitoring for Changing Conditions of Riparian Areas	
Riparian - why not mgmt	All of the riparian PNVTs, except for the cottonwood-willow riparian forested PNVT, are considered departed from reference conditions. Most of this departure has occurred in response to past grazing and water diversions for agriculture. Changes in watershed conditions have resulted in altered canopy cover, including a loss of mature trees and saplings; a change in vegetation species composition, including a shift toward increasing conifer dominance; and a reduction in the amount and composition of herbaceous vegetation. In addition, riparian tree species are not successfully reproducing in many areas. Draft Plan at 33. However, it proposes no new management direction to remedy the situation.	The proposed plan acknowledges the generally degraded condition of riparian areas, explain why it proposes no new management direction to restore conditions.	XXXX	All of the riparian PNVTs, except for the cottonwood-willow riparian forested PNVT, are considered departed from reference conditions. Most of this departure has occurred in response to past grazing and water diversions for agriculture. Changes in watershed conditions have resulted in altered canopy cover, including a loss of mature trees and saplings; a change in vegetation species composition, including a shift toward increasing conifer dominance; and a reduction in the amount and composition of herbaceous vegetation. In addition, riparian tree species are not successfully reproducing in many areas. Draft Plan at 33. However, it proposes no new management direction to remedy the situation.	Management Direction on Riparian PNVT's Reference Conditions	

Riparian - why not mgmt	NFMA further requires forest plans to make special provision for the ecological integrity and function of riparian areas. 36 C.F.R. § 219.27(e) (1982). The Proposed Plan acknowledges the generally degraded condition of riparian areas in the forests, but it proposes no new management direction to restore conditions.	The proposed plan acknowledges the generally degraded condition of riparian areas, explain why it proposes no new management direction to restore conditions.	XXXX				
AZGFD-MA-Edit	Plan, Management Approaches for Riparian Areas, page 35: In the last paragraph the word "elk" should be replaced with "ungulate". In addition, the preceding paragraph should more strongly emphasize the need for landscape scale restoration treatments within the context of riparian area management.	Modify Riparian Area Management Approaches (proposed plan p. 35) In the last paragraph the word "elk" <i>should be replaced with "ungulate"</i> . In addition, the preceding paragraph should more strongly emphasize the need for landscape scale restoration treatments within the context of riparian area management.		Plan, Management Approaches for Riparian Areas, page 35: In the last paragraph the word "elk" <i>should be replaced with "ungulate"</i> . In addition, the preceding paragraph should more strongly emphasize the need for landscape scale restoration treatments within the context of riparian area management.			
Riparian - manage for PFC	Page 22, Water Resources, second paragraph: The Plan states "Many riparian areas are not in proper functioning condition." We recommend providing the reader with a framework for evaluating proper functioning condition or a threshold that Forest riparian areas must meet. There is no goal or standard in the Plan that mentions proper functioning condition as any sort of threshold or objective.	Review the role of the proper functioning condition (PFC) assessment as a standard or a guideline under Riparian Areas. Since the PFC assessment method is not intended to be used as a monitoring tool, clarify how information on changes in ground cover, species composition, bank stability, and water quality will be used.	XXXX	Page 22, Water Resources, second paragraph: The Plan states "Many riparian areas are not in proper functioning condition." We recommend providing the reader with a framework for evaluating proper functioning condition or a threshold that Forest riparian areas must meet. There is no goal or standard in the Plan that mentions proper functioning condition as any sort of threshold or objective.		Proper Functioning Condition	PC 565-7 The Forest Service should review the discrepancy between the DEIS and the Plan and add a standard with a framework for evaluating proper functioning condition or a threshold that Forest riparian areas must meet to ensure the plan is consistent with the DEIS.

Riparian - manage for PFC	<p>Page 136, Table 11. Land Management Plan Monitoring Questions The Plan states, "Are riparian areas attaining and/or moving toward proper functioning condition?"</p> <p>Comment: Please review the role of the PFC assessment as a standard or a guideline under Riparian Areas (pages 34 to 35). Since the PFC assessment method is not intended to be used as a monitoring tool, please clarify how information on changes in ground cover, species composition, bank stability, and water quality will be used.</p>	<p>Review the role of the proper functioning condition (PFC) assessment as a standard or a guideline under Riparian Areas. Since the PFC assessment method is not intended to be used as a monitoring tool, clarify how information on changes in ground cover, species composition, bank stability, and water quality will be used.</p>	XXXX	<p>Page 136, Table 11. Land Management Plan Monitoring Questions The Plan states, "Are riparian areas attaining and/or moving toward proper functioning condition?"</p> <p>Comment: Please review the role of the PFC assessment as a standard or a guideline under Riparian Areas (pages 34 to 35). Since the PFC assessment method is not intended to be used as a monitoring tool, please clarify how information on changes in ground cover, species composition, bank stability, and water quality will be used.</p>	Clarification of How Monitoring Information will be used	
Riparian - review pfc	<p>Whether and when "riparian areas can regain their equilibrium within a few years" as stated in the DEIS, depends upon many factors including the quality of the area prior to the initiation of recovery. Deeply incised streams, which have resulted from the Wallow Fire, will not reach equilibrium within a few years. This statement in the DEIS is contradicted later in the same paragraph where it states that it may take decades for systems to function properly if large wood is not available. We recommend review of this language, and the DEIS identify the concept of regaining equilibrium; whether it involves the area regaining stability or proper functioning condition.</p>	<p>Review language in the DEIS "riparian areas can regain their equilibrium within a few years" and "the riparian system make take decades to reach PFC" (DEIS p. 84) to ensure there is no contradiction. Explain the concept of regaining equilibrium, whether it involves the area regaining stability or proper functioning condition.</p>	XXXX	<p>Whether and when "riparian areas can regain their equilibrium within a few years" as stated in the DEIS, depends upon many factors including the quality of the area prior to the initiation of recovery. Deeply incised streams, which have resulted from the Wallow Fire, will not reach equilibrium within a few years. This statement in the DEIS is contradicted later in the same paragraph where it states that it may take decades for systems to function properly if large wood is not available. We recommend review of this language, and the DEIS identify the concept of regaining equilibrium; whether it involves the area regaining stability or proper functioning condition.</p>	Proper Functioning condition	<p>PC 565-7 The Forest Service should review the discrepancy between the DEIS and the Plan and add a standard with a framework for evaluating proper functioning condition or a threshold that Forest riparian areas must meet to ensure the plan is consistent with the DEIS.</p>

Riparian - PFC2	Page 82, Riparian Subheading: The DEIS states Proper Functioning Condition (PFC) has been used to determine the condition of riparian areas. However, the draft Plan does not state that PFC is used to assess riparian condition. We recommend clarifying the management standard for riparian area assessments and condition in the Plan and the DEIS.	The DEIS states the desired condition for riparian areas and wetlands is to be in proper functioning condition. Many of the important attributes and processes needed by a riparian area to function properly are generally discussed in the desired conditions but not specifically stated in the proposed plan. Review consistency between the DEIS and plan in discussing desired conditions of riparian areas and wetlands.	XXXX	Page 82, Riparian Subheading: The DEIS states Proper Functioning Condition (PFC) has been used to determine the condition of riparian areas. However, the draft Plan does not state that PFC is used to assess riparian condition. We recommend clarifying the management standard for riparian area assessments and condition in the Plan and the DEIS.	Proper Functioning Condition	PC 565-7 The Forest Service should review the discrepancy between the DEIS and the Plan and add a standard with a framework for evaluating proper functioning condition or a threshold that Forest riparian areas must meet to ensure the plan is consistent with the DEIS.
Riparian - PFC2	Page 83, last paragraph: The DEIS states the desired condition of riparian areas and wetlands is to be in proper functioning condition. Many of the important attributes and processes needed by a riparian area to function properly are generally discussed in the desired conditions but not specifically stated in the Proposed Plan. We recommend reviewing for consistency between the DEIS and Plan in discussing desired conditions of riparian areas and wetlands.	The DEIS states the desired condition for riparian areas and wetlands is to be in proper functioning condition. Many of the important attributes and processes needed by a riparian area to function properly are generally discussed in the desired conditions but not specifically stated in the proposed plan. Review consistency between the DEIS and plan in discussing desired conditions of riparian areas and wetlands.	XXXX	Page 83, last paragraph: The DEIS states the desired condition of riparian areas and wetlands is to be in proper functioning condition. Many of the important attributes and processes needed by a riparian area to function properly are generally discussed in the desired conditions but not specifically stated in the Proposed Plan. We recommend reviewing for consistency between the DEIS and Plan in discussing desired conditions of riparian areas and wetlands.	Desired Conditions of Riparian Areas and Wetlands	PC 551-4 The Forest Service should review for consistency between the DEIS and Plan in discussing desired conditions of riparian areas and wetlands because many of the important attributes and processes needed by a riparian area to function properly are generally discussed in the desired conditions but not specifically stated in the Proposed Plan.
Riparian - manage for PFC	Page 90, first paragraph: The DEIS states properly functioning wetlands are imperative in extreme drought. Therefore, could requiring riparian areas to be managed for proper functioning condition be a standard in the Forest Plan to ensure the Plan is consistent with the DEIS?	There should be a standard(s) to manage riparian areas for proper functioning condition.	XXXX	Page 90, first paragraph: The DEIS states properly functioning wetlands are imperative in extreme drought. Therefore, could requiring riparian areas to be managed for proper functioning condition be a standard in the Forest Plan to ensure the Plan is consistent with the DEIS?	Management of Riparian Areas	

Riparian - manage for PFC	Similarly, you state both in the Plan (22) and the DEIS that "many riparian areas are not in proper functioning condition." You also admit that "most streams have been altered from reference conditions, resulting in reduced quality of fish habitat." Plan at 25. Why is there no alternative that takes steps to address this? If this is a problem, why have you removed all the standards that formerly addressed the problem? Livestock provide chronic, long-term impacts to streams that should be addressed more adequately in your standards and guidelines and discussion of livestock.	There should be a standard(s) to manage riparian areas for proper functioning condition.	XXXX	Similarly, you state both in the Plan (22) and the DEIS that "many riparian areas are not in proper functioning condition." You also admit that "most streams have been altered from reference conditions, resulting in reduced quality of fish habitat." Plan at 25. Why is there no alternative that takes steps to address this? If this is a problem, why have you removed all the standards that formerly addressed the problem?	Riparian Areas	
Fisheries - affected environment (wallow, etc)	Page 102, Gila trout Please provide any updated information regarding Raspberry Creek and its watershed. In particular, information on watershed conditions after the Wallow Fire would be useful.	Update information in the Fisheries section of the DEIS including (1) watershed conditions following the 2011 Wallow Fire for Gila trout in Raspberry Creek, (2) persistence of loach minnow, and (3) persistence of spikedace.	XXXX	Page 102, Gila trout Please provide any updated information regarding Raspberry Creek and its watershed. In particular, information on watershed conditions after the Wallow Fire would be useful.	Gila trout	PC 600-1 The Forest Service should provide any updated information regarding Raspberry Creek and its watershed to include information on watershed conditions after the Wallow Fire
Fisheries - affected environment (wallow, etc)	Page 104, Loach Minnow, third paragraph Although loach minnow have not been detected recently in Eagle Creek or the Three Forks area, the Service concluded these populations likely persist, albeit at low numbers. We also recommend adding the following language: "Loach minnow were translocated in Hot Springs and Redfield	Update information in the Fisheries section of the DEIS including (1) watershed conditions following the 2011 Wallow Fire for Gila trout in Raspberry Creek, (2) persistence of loach minnow, and (3) persistence of spikedace.	XXXX	Page 104, Loach Minnow, third paragraph Although loach minnow have not been detected recently in Eagle Creek or the Three Forks area, the Service concluded these populations likely persist, albeit at low numbers. We also recommend adding the following language: "Loach minnow were translocated in Hot Springs and Redfield	Loach Minnow	PC 600-2 The Forest Service should include that although loach minnow have not been detected recently in Eagle Creek or the Three Forks area, these populations likely persist, albeit at low numbers and include "Loach minnow were trans located in Hot Springs and Redfield canyons (Cochise and Graham counties) and Fossil Creek (Gila County) in

	canyons (Cochise and Graham counties) and Fossil Creek (Gila County) in 2007; and Bonita Creek (Graham County) in 2008. Insufficient time has elapsed to determine whether these restoration projects will be successful."			canyons (Cochise and Graham counties) and Fossil Creek (Gila County) in 2007; and Bonita Creek (Graham County) in 2008. Insufficient time has elapsed to determine whether these restoration projects will be successful."		2007; and Bonita Creek (Graham County) in 2008. Insufficient time has elapsed to determine whether these restoration projects will be successful."
Fisheries - affected environment (wallow, etc)	Page 106, Spikedace, third paragraph We recommend re-writing this paragraph to read as follows: "The spikedace is native to the Gila River drainage, including the San Francisco drainage, except in the extreme headwaters. The spikedace currently persists only in the upper Verde River, Eagle Creek, and Aravaipa Creek in Arizona and portions of the Gila River in New Mexico. However, spikedace have not been collected in the Verde River or Eagle Creek in recent years. In New Mexico, the species is generally absent from the Gila River from the confluence of the West and East Forks downstream to the mouth of Turkey Creek, and occurs irregularly downstream from the mouth of the Middle Box of the Gila River to the Arizona-New Mexico state line. In addition, spikedace were translocated in Hot Springs and Redfield canyons (Cochise and Graham counties), Fossil Creek (Gila County) in 2007, Bonita Creek (Graham County) and the San Francisco River (Catron	Update information in the Fisheries section of the DEIS including (1) watershed conditions following the 2011 Wallow Fire for Gila trout in Raspberry Creek, (2) persistence of loach minnow, and (3) persistence of spikedace.	XXXX	Page 106, Spikedace, third paragraph We recommend re-writing this paragraph to read as follows: "The spikedace is native to the Gila River drainage, including the San Francisco drainage, except in the extreme headwaters. The spikedace currently persists only in the upper Verde River, Eagle Creek, and Aravaipa Creek in Arizona and portions of the Gila River in New Mexico. However, spikedace have not been collected in the Verde River or Eagle Creek in recent years. In New Mexico, the species is generally absent from the Gila River from the confluence of the West and East Forks downstream to the mouth of Turkey Creek, and occurs irregularly downstream from the mouth of the Middle Box of the Gila River to the Arizona-New Mexico state line. In addition, spikedace were translocated in Hot Springs and Redfield canyons (Cochise and Graham counties), Fossil Creek (Gila County) in 2007, Bonita Creek (Graham County) and the San Francisco River (Catron	Spikedace	PC 600-3 The Forest Service should re-write the paragraph (Page 106, Spikedace, third paragraph)

	County) in 2008. Insufficient time has elapsed to determine whether these restoration projects will be successful."			County) in 2008. Insufficient time has elapsed to determine whether these restoration projects will be successful."		
Fisheries - affected environment (wallow, etc)	Page 94, Native Fish Population, Distribution, and Habitat All of the status information presented in this section is dated prior to the Wallow Fire. We recommend ensuring that these values are updated, or a statement be added clarifying the information was collected prior to the 2011 Wallow Fire.	Update information in the Fisheries section of the DEIS including (1) watershed conditions following the 2011 Wallow Fire for Gila trout in Raspberry Creek, (2) persistence of loach minnow, and (3) persistence of spikedace.	XXXX	Page 94, Native Fish Population, Distribution, and Habitat All of the status information presented in this section is dated prior to the Wallow Fire. We recommend ensuring that these values are updated, or a statement be added clarifying the information was collected prior to the 2011 Wallow Fire.		Update Values to include Post-Wallow Fire Data
Aquatic habitat - mgmt effect on fisheries	Interesting that turbidity (muddy water) is considered "good" for Chubs, Dace and other native minnows in the Colorado River, but not in the ASNF. Contradictions to science abound throughout the DEIS.	Explain why turbidity (muddy water) is considered "good" for chubs, dace, and other native minnows in the Colorado River, but not in the Apache-Sitgreaves NFs. The emphasis on managing for more heavily consumptive riparian vegetation and less turbidity seems like a prescription for a crises for native warm water fish. References (1) Stream Fish Responses to Grazing Exclosures, Peter B. Baley and Hiram W. Lee, North American Journal of Fisheries Management (2) Pacific Salmon Restoration: Trade-offs Between Economic Efficiency and Political Acceptance, Junjie Wu, et al., Contemporary Economic Policy, January 2003,	XXXX	Interesting that turbidity (muddy water) is considered "good" for Chubs, Dace and other native minnows in the Colorado River, but not in the ASNF. Contradictions to science abound throughout the DEIS.		Contradictions to Science

		<p>(3) Native fishes, exotic mammals, and the conservation of desert springs, Astrid Kodrie-Brown and James B. Brown, Front Ecol Environ 2007, and (4) "At age 50, dam still generates love, hate", Shawn Mckinnon, The Arizona Republic.</p>				
<p>Aquatic habitat - mgmt effect on fisheries</p>	<p>I ask you what came first, the chicken or the egg? Or perhaps the BMP's in the DEIS are really designed to create perceived ecological crises in order to remove human use. The emphasis on managing for more heavily consumptive riparian vegetation and less turbidity (ie. removal of human disturbance such as cattle, roads, logging) seems like a prescription for a crises for native warm water fish, not the remedy. The warm water fish have never recovered from the sharp population declines of the last 20 years, following removal of cattle and other post aboriginal human disturbances.</p>	<p>Explain why turbidity (muddy water) is considered "good" for chubs, dace, and other native minnows in the Colorado River, but not in the Apache-Sitgreaves NFs. The emphasis on managing for more heavily consumptive riparian vegetation and less turbidity seems like a prescription for a crises for native warm water fish. References (1) Stream Fish Responses to Grazing Exclosures, Peter B. Baley and Hiram W. Lee, North American Journal of Fisheries Management (2) Pacific Salmon Restoration: Trade-offs Between Economic Efficiency and Political Acceptance, Junjie Wu, et al., Contemporary Economic Policy, January 2003, (3) Native fishes, exotic mammals, and the conservation of desert springs, Astrid Kodrie-Brown and James B. Brown, Front Ecol Environ 2007, and (4) "At age 50, dam still generates love, hate", Shawn Mckinnon, The Arizona Republic.</p>	<p>XXXX</p>	<p>I ask you what came first, the chicken or the egg? Or perhaps the BMP's in the DEIS are really designed to create perceived ecological crises in order to remove human use. The emphasis on managing for more heavily consumptive riparian vegetation and less turbidity (ie. removal of human disturbance such as cattle, roads, logging) seems like a prescription for a crises for native warm water fish, not the remedy. The warm water fish have never recovered from the sharp population declines of the last 20 years, following removal of cattle and other post aboriginal human disturbances.</p>	<p>Native Warm Water Fish Recovery</p>	<p>PC 550-3 The Forest Service should refer to the following paper:</p>

Fisheries - affected environment (reference condition)	It is not shown how the quality of fish habitat evaluated quantitatively for historic conditions. If there are data to substantiate the statement that native fish have decreased 50-75% over the past 10 years, the cause of such a decline should be disclosed as well support for the claim that aspects of fish habitat have changed that dramatically in only 10 years. Most of the alleged changes since "historic times" and the factors that allegedly caused them occurred prior to the past decade	Explain how the quality of fish habitat is evaluated for historic conditions (e.g. native fish have decreased 50-75% over the past 10 years) and explain the cause of decline.	XXXX	It is not shown how the quality of fish habitat evaluated quantitatively for historic conditions. If there are data to substantiate the statement that native fish have decreased 50-75% over the past 10 years, the cause of such a decline should be disclosed as well support for the claim that aspects of fish habitat have changed that dramatically in only 10 years. Most of the alleged changes since "historic times" and the factors that allegedly caused them occurred prior to the past decade	Historic Fish Habitat Conditions	PC 612-2 The Forest Service should show how the quality of fish habitat was evaluated quantitatively for historic conditions. If there are data to substantiate the statement that native fish have decreased, the cause of such a decline should be disclosed as well support for the claim that aspects of fish habitat have changed that dramatically in only 10 years.
Non-native fish	Although we concur that the introduction of non-native fish species has shaped the fish fauna of the forest forever, the vast majority of these adverse introductions were done decades ago and the discussion is very dismissive of the current management practices and recent research.	There is a need to recognize that not all non-native species (sportfish) are undesirable and include more discussion on current management practices and recent research.	XXXX			
Non-native fish	We believe it is appropriate for the Forest Service to reduce the rhetoric relative to native fish issues and recognize the economic importance of the highly desirable sport fishery that exists on our natural forests. It seems that to do otherwise is to fail to comply with the President's Executive Order (E. O. 12062; promulgated on June 6, 1995) wherein the President directs federal agencies to support the	There is a need to recognize that not all non-native species (sportfish) are undesirable and include more discussion on current management practices and recent research.	XXXX			

	expansion of recreational fishing. We believe that the fishery of the region, based on both native salmonids and rainbow trout is viable and consistent with the goal of native fish recovery. It is important to recognize that not all non-native species are undesirable.						
Degraded	It is unclear what the term degraded means; it would be better to be more specific.	Within the riparian and aquatic habitat sections of the DEIS, explain what the term degraded means.	XXXX				
AZGFD - BG - edit	Plan, Background for Aquatic Habitat and Species, page 25: The Department is only aware of 23 nonnative fishes that are currently found on the A-S, not 25. There have been others that were stocked many years ago, but did not establish and do not persist on the A-S today. The Department also recommends characterizing the lower elevation warm water habitat as " <b>cyprinid and catostomid (minnow and sucker families) streams</b> " instead of only cyprinid. Mineral Creek should be added to the list of streams that are totally diverted	Modify Aquatic Habitat and Species Background (proposed plan p. 25). There are only 23 nonnative fishes that are currently found on the Apache-Sitgreaves NFs, not 25. Need to characterize the lower elevation warm water habitat as " <b>cyprinid and catostomid (minnow and sucker families) stream</b> " instead of only cyprinid. Mineral Creek should be added to the list of streams that are totally diverted		Plan, Background for Aquatic Habitat and Species, page 25: The Department is only aware of 23 nonnative fishes that are currently found on the A-S, not 25. There have been others that were stocked many years ago, but did not establish and do not persist on the A-S today. The Department also recommends characterizing the lower elevation warm water habitat as " <b>cyprinid and catostomid (minnow and sucker families) streams</b> " instead of only cyprinid. Mineral Creek should be added to the list of streams that are totally diverted			

AZGFD - DC Edit	4th and 5th HUC Watershed Scale Desired Conditions, page 25, "Streamflows, habitat, and water quality support native <i>and desirable nonnative</i> aquatic and riparian-dependent species and habitat."	Modify the Aquatic Habitat and Species Desired Condition (proposed plan p. 25) "Streamflows, habitat, and water quality support native <i>and desirable nonnative</i> aquatic and riparian-dependent species and habitat."		4th and 5th HUC Watershed Scale Desired Conditions, page 25, "Streamflows, habitat, and water quality support native <i>and desirable nonnative aquatic</i> and riparian-dependent species and habitat."			
AZGFD - DC Edit2	Plan, Desired Conditions for Aquatic Habitat and Species, 6th Level HUC Watershed Scale Desired Conditions, page 25: "Habitat and ecological conditions are capable of providing for self-sustaining populations of native <i>and desirable nonnative</i> , riparian dependent plant and animal species."	Modify the Aquatic Habitat and Species Desired Condition (proposed plan p.25) "Habitat and ecological conditions are capable of providing for self-sustaining populations of native <i>and desirable nonnative</i> , riparian dependent plant and animal species."		Plan, Desired Conditions for Aquatic Habitat and Species, 6th Level HUC Watershed Scale Desired Conditions, page 25: "Habitat and ecological conditions are capable of providing for self-sustaining populations of native <i>and desirable nonnative</i> , riparian dependent plant and animal species."			
AZGFD - DC Edit3	Plan, Desired Conditions for Aquatic Habitat and Species, 6th Level HUC Watershed Scale Desired Conditions, page 26: "Desirable nonnative fish species, <i>and native fish species (ie. Apache trout, Gila trout, roundtail chub)</i> provide recreational fishing in waters where those opportunities are not in conflict with recovery of native fish species."	Modify the Aquatic Habitat and Species Desired Condition (proposed plan p. 26) "Desirable nonnative fish species, <i>and native fish species (ie. Apache trout, Gila trout, roundtail chub)</i> provide recreational fishing in waters where those opportunities are not in conflict with recovery of native fish species."		Plan, Desired Conditions for Aquatic Habitat and Species, 6th Level HUC Watershed Scale Desired Conditions, page 26: "Desirable nonnative fish species, <i>and native fish species (ie. Apache trout, Gila trout, roundtail chub)</i> provide recreational fishing in waters where those opportunities are not in conflict with recovery of native fish species."			
AZGFD- EC-Edit	DEIS, Impacts Associated with Nonnative Fish Species, pages 132-133: The wording used to describe impacts of nonnative fish on page 132 and of fish stocking on page 133 is inappropriate and disproportionate to the descriptions given to other impacts on native fish species.	The wording used to describe impacts of nonnative fish on page 132 and of fish stocking on page 133 of the DEIS is inappropriate and disproportionate to the descriptions given to other impacts on native fish species. The statement that the Department continues to		DEIS, Impacts Associated with Nonnative Fish Species, pages 132-133: The wording used to describe impacts of nonnative fish on page 132 and of fish stocking on page 133 is inappropriate and disproportionate to the descriptions given to other impacts on native fish species.			

<p>The statement that the Department continues to impact native fish throughout the A-S through stocking and management of nonnative fish is misleading and unnecessarily confrontational. The Department does not dispute that nonnative fish are a major cause of the current status of many native fishes on the A-S. However, the impact is not at the level that it used to be decades ago. There are numerous processes in place to minimize additional impacts of nonnative fishes, especially fish stocking. The Department goes through intensive consultation with the U.S. Fish and Wildlife Service on all stocking activities to determine impacts on native wildlife and to gain associated clearances for those stocking activities. In most cases, there are no impacts or it is minimal, and in those few cases where an impact to native wildlife has been identified, the Department actively mitigates those impacts. The Department therefore asks that a more pragmatic and balanced discussion of nonnative fish and fish stocking exist by replacing current narrative with language similar to that within the Livestock Grazing impacts section on page 130, which states that livestock grazing activities <u>can</u> have numerous impacts..., and that livestock also have the <u>potential</u> to introduce nonnative species.</p>	<p>impact native fish throughout the A-S through stocking and management of nonnative fish is misleading and unnecessarily confrontational. The Department does not dispute that nonnative fish are a major cause of the current status of many native fishes on the A-S. However, the impact is not at the level that it used to be decades ago. There are numerous processes in place to minimize additional impacts of nonnative fishes, especially fish stocking. The Department goes through intensive consultation with the U.S. Fish and Wildlife Service on all stocking activities to determine impacts on native wildlife and to gain associated clearances for those stocking activities. In most cases, there are no impacts or it is minimal, and in those few cases where an impact to native wildlife has been identified, the Department actively mitigates those impacts. The Department therefore asks that a more pragmatic and balanced discussion of nonnative fish and fish stocking exist by replacing current narrative with language similar to that within the Livestock Grazing impacts section on page 130, which states that livestock grazing activities <u>can</u> have numerous impacts..., and that livestock also have the <u>potential</u> to introduce nonnative species.</p>	<p>The statement that the Department continues to impact native fish throughout the A-S through stocking and management of nonnative fish is misleading and unnecessarily confrontational. The Department does not dispute that nonnative fish are a major cause of the current status of many native fishes on the A-S. However, the impact is not at the level that it used to be decades ago. There are numerous processes in place to minimize additional impacts of nonnative fishes, especially fish stocking. The Department goes through intensive consultation with the U.S. Fish and Wildlife Service on all stocking activities to determine impacts on native wildlife and to gain associated clearances for those stocking activities. In most cases, there are no impacts or it is minimal, and in those few cases where an impact to native wildlife has been identified, the Department actively mitigates those impacts. The Department therefore asks that a more pragmatic and balanced discussion of nonnative fish and fish stocking exist by replacing current narrative with language similar to that within the Livestock Grazing impacts section on page 130, which states that livestock grazing activities <u>can</u> have numerous impacts..., and that livestock also have the <u>potential</u> to introduce nonnative species.</p>			
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Aquatic habitat - objective	Objectives should include restoring a significant amount of aquatic habitat per year, or through multi-year projects. Aim to enhance or restore a third or more of the Forests' aquatic habitats during the life of the Plan	Objectives should include restore a third or more of the forest's aquatic habitats during the life of the plan.	XXXX	Objectives should include restoring a significant amount of aquatic habitat per year, or through multi-year projects. Aim to enhance or restore a third or more of the Forests' aquatic habitats during the life of the Plan	Include Restoring and enhancing a significant Number of Aquatic Habitat	PC 609-1 The Forest Service should add Objectives that include restoring a significant amount of aquatic habitat per year, or through multi-year projects and aim to enhance or restore a third or more of the Forests' aquatic habitats during the life of the Plan
Aquatic habitat - new guideline	Add a guideline to maintain or restore functioning riparian plant communities provide water filtration, shade and temperature regulation, shelter from predators, and foraging areas to protect aquatic species.	Add a guideline to maintain or restore functioning riparian plant communities provide water filtration, shade and temperature regulation, shelter from predators, and foraging areas to protect aquatic species.	** Check out Kaibab p. 39, 4th comment	Add a guideline to maintain or restore functioning riparian plant communities provide water filtration, shade and temperature regulation, shelter from predators, and foraging areas to protect aquatic species.	Maintain or Restore Functioning Riparian Plant Communities	PC 610-1 The Forest Service should add a guideline to maintain or restore functioning riparian plant communities provide water filtration, shade and temperature regulation, shelter from predators, and foraging areas to protect aquatic species.
AZGFD-GL-Edit	Plan, Guidelines for Aquatic Habitat and Species, page 26: "To prevent degradation of native species habitat and the incidental or accidental introduction of diseases or nonnative species, <i>when transferring</i> aquatic species <del>should not be transferred</del> through management activities from one 6th code watershed to another. <i>Measures should be taken to prevent the spread of non-target fish species, invasive species, parasites, or diseases.</i> " As written, this did not allow critical management actions to recover rare species such as T&E fish and candidate species. Preventing the introduction of diseases and undesirable nonnative species is important, but it should not	Modify Aquatic Habitat and Species Guideline (proposed plan p. 26) "To prevent degradation of native species habitat and the incidental or accidental introduction of diseases or nonnative species, <i>when transferring</i> aquatic species <del>should not be transferred</del> through management activities from one 6th code watershed to another. <i>Measures should be taken to prevent the spread of non-target fish species, invasive species, parasites, or diseases.</i> " As written, this does not allow critical management actions to recover rare species such as T&E fish and candidate species.		Plan, Guidelines for Aquatic Habitat and Species, page 26: "To prevent degradation of native species habitat and the incidental or accidental introduction of diseases or nonnative species, <i>when transferring</i> aquatic species <del>should not be transferred</del> through management activities from one 6th code watershed to another. <i>Measures should be taken to prevent the spread of non-target fish species, invasive species, parasites, or diseases.</i> " As written, this did not allow critical management actions to recover rare species such as T&E fish and candidate species. Preventing the introduction of diseases and undesirable nonnative species is important, but it should not		

	preclude necessary conservation actions, or even desired recreational wildlife management actions, when these actions are supported by recovery, conservation, or management plans			preclude necessary conservation actions, or even desired recreational wildlife management actions, when these actions are supported by recovery, conservation, or management plans			
AZGFD-GL-Edit2	Plan, Guidelines for Aquatic Habitat and Species, page 26: "Projects and activities should avoid damming or impounding free-flowing waters to provide streamflows needed for aquatic and riparian-dependent species, <i>except as needed for native species recovery and management, or instream structures that improve stream functionality and stability or improve aquatic habitat conditions for aquatic species.</i> "	Modify Aquatic Habitat and Species Guideline (proposed plan p. 26) "Projects and activities should avoid damming or impounding free-flowing waters to provide streamflows needed for aquatic and riparian-dependent species, <i>except as needed for native species recovery and management, or instream structures that improve stream functionality and stability or improve aquatic habitat conditions for aquatic species.</i> "		Plan, Guidelines for Aquatic Habitat and Species, page 26: "Projects and activities should avoid damming or impounding free-flowing waters to provide streamflows needed for aquatic and riparian-dependent species, <i>except as needed for native species recovery and management, or instream structures that improve stream functionality and stability or improve aquatic habitat conditions for aquatic species.</i> "			
Aquatic habitat - background - correction	Pg 25 - 2nd paragraph under Aquatic Habitat and Species Background – “ totally diverted for several months” this to us implies the stream flow is altered and to our knowledge, Eagle Creek is not diverted, unless reference is to the water going underground in sections, which is not a total diversion.	Correct the sentence in the Aquatic Habitat and Species background (proposed plan p. 25) that says Eagle Creek is "totally diverted for several months".	XXXX	Pg 25 - 2nd paragraph under Aquatic Habitat and Species Background – “ totally diverted for several months” this to us implies the stream flow is altered and to our knowledge, Eagle Creek is not diverted, unless reference is to the water going underground in sections, which is not a total diversion.		Water Diversion	PC 612-4 The Forest Service should revise Pg. 25 - 2nd paragraph under Aquatic Habitat and Species Background – “ totally diverted for several months” because it implies the stream flow is altered and Eagle Creek is not diverted, unless reference is to the water going underground in sections, which is not a total diversion.

Aquatic habitat - need for riparian recovery plan	Those aquatic systems now in good condition should be maintained and those degraded or at risk have reparative and or restorative action taken to provide a viable habitat for the populations of animals and plants dependent on them.	Aquatic systems in good condition should be maintained and those degraded or at risk should have reparative and/or restorative action taken. There is a need for recovery plans.	XXXX	Those aquatic systems now in good condition should be maintained and those degraded or at risk have reparative and or restorative action taken to provide a viable habitat for the populations of animals and plants dependent on them.		Treatment and Restoration	
Aquatic habitat - need for riparian recovery plan	Over time, aquatic ecosystems in the Southwest have vastly deteriorated as we have overused aquifers, degraded them. Recovery plans are what is needed.	Aquatic systems in good condition should be maintained and those degraded or at risk should have reparative and/or restorative action taken. There is a need for recovery plans.	XXXX	Over time, aquatic ecosystems in the Southwest have vastly deteriorated as we have overused aquifers, degraded them. Recovery plans are what is needed.		Aquatic Ecosystem	PC 500-1 The Forest Service should develop and address recovery plans because small communities (ex., Eagar, Alpine) depend on water sources located on the ASNFs.
Aquatic habitat - analyze species at risk	The Forest Service should analyze and disclose in the EIS what it knows about the existing condition of aquatic ecosystems and associated species on national forest lands, particularly at-risk fish and amphibians, as well as their food resources.	Analyze and disclose what is known about the existing condition of riparian areas, aquatic ecosystems, and associated species on the national forest, with special attention to fish and amphibian species at risk of extinction.	XXXX	The Forest Service should analyze and disclose in the EIS what it knows about the existing condition of aquatic ecosystems and associated species on national forest lands, particularly at-risk fish and amphibians, as well as their food resources.		Aquatic Ecosystem	
Aquatic habitat - analyze species at risk	Furthermore, the Forest Service should analyze and disclose what it knows about the existing condition of riparian areas, aquatic ecosystems, and associated species on the national forest, with special attention to fish and amphibian species that are at risk of extinction.	Analyze and disclose what is known about the existing condition of riparian areas, aquatic ecosystems, and associated species on the national forest, with special attention to fish and amphibian species at risk of extinction.	XXXX	Furthermore, the Forest Service should analyze and disclose what it knows about the existing condition of riparian areas, aquatic ecosystems, and associated species on the national forest, with special attention to fish and amphibian species that are at risk of extinction.		Aquatic Ecosystem	

<p>CBD aquatic conservation strategy alternative</p>	<p>Designates “key watersheds” in large drainage basins that offer the highest quality aquatic habitat, which tend to be free of dams or host large areas of upland terrestrial habitat without roads, where recovery of at-risk aquatic organisms has the greatest likelihood of success. Key watersheds are withdrawn from programmed timber harvest and increases of road density are prohibited. • Establishes “riparian reserves” as discrete land management areas on lands generally parallel to streams, in proximity to wetlands, and including high-risk landslide terrain where the emphasis is to maintain and restore aquatic habitat. • Enacts standards and guidelines for management in riparian reserves that require project-level actions to meet objectives related to physical, chemical and biological aspects of aquatic ecosystems. • Requires watershed analysis at the scale of large drainage basins to account for such factors as road density, vegetation cover and ecological processes that contribute to aquatic habitat quality. Land management in key watersheds and riparian reserves must be preceded and informed by watershed analysis. • Compels active restoration of aquatic ecosystems in compliance with</p>	<p>The Forest Service should adopt an ecosystem-scale aquatic conservation strategy for management of aquatic habitat and at-risk fisheries similar to the one adopted in the Pacific Northwest: (1) Designate “key watersheds” in large drainage basins that offer the highest quality aquatic habitat, (2) establish “riparian reserves” to maintain and restore aquatic habitat, (3) enacts standards and guidelines for management in riparian reserves that require project-level actions to meet objectives related to physical, chemical and biological aspects of aquatic ecosystems, (4) require watershed analysis at the scale of large drainage basins to account for such factors as road density, vegetation cover and ecological processes that contribute to aquatic habitat quality, (5) compel active restoration of aquatic ecosystems in compliance with standards and guidelines for riparian reserves, and (6) prohibits use of site-specific mitigation measures or planned restoration activities as a substitute for preventing degradation of existing high-quality aquatic habitat.</p>	<p>XXXX</p>	<p>Designates “key watersheds” in large drainage basins that offer the highest quality aquatic habitat, which tend to be free of dams or host large areas of upland terrestrial habitat without roads, where recovery of at-risk aquatic organisms has the greatest likelihood of success. Key watersheds are withdrawn from programmed timber harvest and increases of road density are prohibited. • Establishes “riparian reserves” as discrete land management areas on lands generally parallel to streams, in proximity to wetlands, and including high-risk landslide terrain where the emphasis is to maintain and restore aquatic habitat. • Enacts standards and guidelines for management in riparian reserves that require project-level actions to meet objectives related to physical, chemical and biological aspects of aquatic ecosystems. • Requires watershed analysis at the scale of large drainage basins to account for such factors as road density, vegetation cover and ecological processes that contribute to aquatic habitat quality. Land management in key watersheds and riparian reserves must be preceded and informed by watershed analysis. • Compels active restoration of aquatic ecosystems in compliance with</p>	<p>Watershed</p>	
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	standards and guidelines for riparian reserves. Examples of restoration activities include road density reduction, removal of developments and grazing from floodplains and wetlands. • Prohibits use of site-specific mitigation measures or planned restoration activities as a substitute for preventing degradation of existing high-quality aquatic habitat.			standards and guidelines for riparian reserves. Examples of restoration activities include road density reduction, removal of developments and grazing from floodplains and wetlands. • Prohibits use of site-specific mitigation measures or planned restoration activities as a substitute for preventing degradation of existing high-quality aquatic habitat.		
CBD aquatic conservation strategy alternative	The Center proposes adoption of an ecosystem-scale aquatic conservation strategy in the revised forest plan, as outlined above.	The Forest Service should adopt an ecosystem-scale aquatic conservation strategy for management of aquatic habitat and at-risk fisheries similar to the one adopted in the Pacific Northwest: (1) Designate “key watersheds” in large drainage basins that offer the highest quality aquatic habitat, (2) establish “riparian reserves” to maintain and restore aquatic habitat, (3) enacts standards and guidelines for management in riparian reserves that require project-level actions to meet objectives related to physical, chemical and biological aspects of aquatic ecosystems, (4) require watershed analysis at the scale of large drainage basins to account for such factors as road density, vegetation cover and ecological processes that contribute to aquatic habitat quality, (5) compel active restoration of aquatic	XXXX	The Center proposes adoption of an ecosystem-scale aquatic conservation strategy in the revised forest plan, as outlined above.		Aquatic Conservation Strategy

		<p>ecosystems in compliance with standards and guidelines for riparian reserves, and (6) prohibits use of site-specific mitigation measures or planned restoration activities as a substitute for preventing degradation of existing high-quality aquatic habitat.</p>					
<p>CBD aquatic conservation strategy alternative</p>	<p>In scoping comments dated March 8, 2010, the Center proposed a strategy to maintain and restore riparian areas and aquatic habitats, which the Forest Service appears to have ignored.</p>	<p>The Forest Service should adopt an ecosystem-scale aquatic conservation strategy for management of aquatic habitat and at-risk fisheries similar to the one adopted in the Pacific Northwest: (1) Designate “key watersheds” in large drainage basins that offer the highest quality aquatic habitat, (2) establish “riparian reserves” to maintain and restore aquatic habitat, (3) enacts standards and guidelines for management in riparian reserves that require project-level actions to meet objectives related to physical, chemical and biological aspects of aquatic ecosystems, (4) require watershed analysis at the scale of large drainage basins to account for such factors as road density, vegetation cover and ecological processes that contribute to aquatic habitat quality, (5) compel active restoration of aquatic ecosystems in compliance with standards and guidelines for riparian reserves, and (6) prohibits use of site-specific</p>	<p>XXXX</p>				

		mitigation measures or planned restoration activities as a substitute for preventing degradation of existing high-quality aquatic habitat.				
CBD aquatic conservation strategy alternative	The Center reiterates its advocacy of the ACS described above, and urges the Forest Service to consider it as part of the range of alternatives in the EIS for this plan revision and implement it regardless of the alternative chosen by the decision-maker.[18] It is the only proposal that meets NFMA requirements for management of riparian areas, and it is consistent with the need for change (Revision Topic 1 – see PDEIS at 4-5).	The Forest Service should adopt an ecosystem-scale aquatic conservation strategy for management of aquatic habitat and at-risk fisheries similar to the one adopted in the Pacific Northwest: (1) Designate “key watersheds” in large drainage basins that offer the highest quality aquatic habitat, (2) establish “riparian reserves” to maintain and restore aquatic habitat, (3) enacts standards and guidelines for management in riparian reserves that require project-level actions to meet objectives related to physical, chemical and biological aspects of aquatic ecosystems, (4) require watershed analysis at the scale of large drainage basins to account for such factors as road density, vegetation cover and ecological processes that contribute to aquatic habitat quality, (5) compel active restoration of aquatic ecosystems in compliance with standards and guidelines for riparian reserves, and (6) prohibits use of site-specific	XXXX			

		mitigation measures or planned restoration activities as a substitute for preventing degradation of existing high-quality aquatic habitat.					
CBD aquatic conservation strategy alternative	We urge the Forest Service to consider this ACS for implementation in this plan revision regardless of the alternative chosen by the decision-maker. It is the only proposal that meets NFMA requirements for management of riparian areas, and it is consistent with the need for change (Revision Topic 1).	The Forest Service should adopt an ecosystem-scale aquatic conservation strategy for management of aquatic habitat and at-risk fisheries similar to the one adopted in the Pacific Northwest: (1) Designate "key watersheds" in large drainage basins that offer the highest quality aquatic habitat, (2) establish "riparian reserves" to maintain and restore aquatic habitat, (3) enacts standards and guidelines for management in riparian reserves that require project-level actions to meet objectives related to physical, chemical and biological aspects of aquatic ecosystems, (4) require watershed analysis at the scale of large drainage basins to account for such factors as road density, vegetation cover and ecological processes that contribute to aquatic habitat quality, (5) compel active restoration of aquatic ecosystems in compliance with standards and guidelines for riparian reserves, and (6) prohibits use of site-specific	XXXX				

		mitigation measures or planned restoration activities as a substitute for preventing degradation of existing high-quality aquatic habitat.				
AZGFD-MA-Edit	Plan, Management Approaches for Aquatic Habitat and Species, page 27: "The Apache Sitgreaves NFs cooperate with the Arizona Game and Fish Department (AZGFD), the state wildlife agency with authority over wildlife management in Arizona to protect and reintroduce native aquatic species where appropriate and control or eradicate nonnative species where appropriate." The Department recommends the proceeding edits to clarify the Department's wildlife management authority, and that control or eradication of nonnative species on the A-S is not an appropriate management action in all circumstances.	Modify Aquatic Habitat and Species Management Approaches (proposed plan p. 27) "The Apache Sitgreaves NFs cooperate with the Arizona Game and Fish Department (AZGFD), <i>the state wildlife agency with authority over wildlife management in Arizona</i> to protect and reintroduce native aquatic species where appropriate and control or eradicate nonnative species <i>where appropriate.</i> " Need to clarify the Department's wildlife management authority, and that control or eradication of nonnative species on the Apache-Sitgreaves NFs is not an appropriate management action in all circumstances.		Plan, Management Approaches for Aquatic Habitat and Species, page 27: "The Apache Sitgreaves NFs cooperate with the Arizona Game and Fish Department (AZGFD), <i>the state wildlife agency with authority over wildlife management in Arizona</i> to protect and reintroduce native aquatic species where appropriate and control or eradicate nonnative species <i>where appropriate.</i> " The Department recommends the proceeding edits to clarify the Department's wildlife management authority, and that control or eradication of nonnative species on the A-S is not an appropriate management action in all circumstances.		
Reference Conditions - historic	Ecologists stress the importance of defining locally specific reference conditions to justify restoration goals and outcomes (SER 2004). Descriptions of natural variation in ecosystems derived from historical ecology and their application as reference conditions to land management are matters of controversy (e.g., Allen et al. 2002, Swetnam et al. 1999,	Explain "historic" or "reference" vegetation conditions, including whether it is possible to achieve those conditions.	<b>** See Kaibab , p. 9, 3rd comment</b>	Ecologists stress the importance of defining locally specific reference conditions to justify restoration goals and outcomes (SER 2004). Descriptions of natural variation in ecosystems derived from historical ecology and their application as reference conditions to land management are matters of controversy (e.g., Allen et al. 2002, Swetnam et al. 1999,	Aspen Regeneration	

	Williams and Baker 2012). However, it is generally accepted that understanding historical ecosystem dynamics, structures and functions can provide useful information to guide restoration efforts (SER 2004).			Williams and Baker 2012). However, it is generally accepted that understanding historical ecosystem dynamics, structures and functions can provide useful information to guide restoration efforts (SER 2004).			
Reference Conditions - historic	Explain how vegetation can return to "historic conditions" if climate change is a reality?	Explain "historic" or "reference" vegetation conditions, including whether it is possible to achieve those conditions.	** See Kaibab , p. 9, 3rd comment	Explain how vegetation can return to "historic conditions" if climate change is a reality?		Historic Conditions	
Reference Conditions - historic	Page 16 "...underlying ecological processes that sustained diversity have been altered from historic patterns... and may not support the same native species distribution and abundance." Of course ecological processes have been altered and species distribution and abundance has been altered by land use and Forest Service management (fire control). That does not mean the changes are necessarily bad or unsustainable.	Explain "historic" or "reference" vegetation conditions, including whether it is possible to achieve those conditions.	** See Kaibab , p. 9, 3rd comment	Page 16 "...underlying ecological processes that sustained diversity have been altered from historic patterns... and may not support the same native species distribution and abundance." Of course ecological processes have been altered and species distribution and abundance has been altered by land use and Forest Service management (fire control). That does not mean the changes are necessarily bad or unsustainable.		Ecosystem Diversity	PC 2651-3 The Forest Service should address that ecological processes have been altered and species distribution and abundance has been altered by land use and Forest Service management (fire control) and that does not mean the changes are necessarily bad or unsustainable.
Reference Conditions - historic	The result of the A-S Forests' attempt to base this plan on outdated or controversial scientific concepts, as described above, resulted in the goals and objectives being based on looking backward toward "historical" times when the ecosystems were all in	Explain "historic" or "reference" vegetation conditions, including whether it is possible to achieve those conditions.	** See Kaibab , p. 9, 3rd comment	The result of the A-S Forests' attempt to base this plan on outdated or controversial scientific concepts, as described above, resulted in the goals and objectives being based on looking backward toward "historical" times when the ecosystems were all in		Outdated Information	

	balance, diverse, functioning, healthy, sustainable and, presumably, happy.			balance, diverse, functioning, healthy, sustainable and, presumably, happy.			
Reference Conditions - historic	Page 16 "The intent of this plan is to guide management efforts in the restoration and/or maintenance of ecosystems. Sustainable supplies of resources... are by products of healthy, functioning ecosystems." Here again the implication is that the objective is to go back in time to historical conditions which were healthy, functioning and resilient. Outputs and values to people have been relegated to "by products."	Explain "historic" or "reference" vegetation conditions, including whether it is possible to achieve those conditions.	** See Kaibab , p. 9, 3rd comment	Page 16 "The intent of this plan is to guide management efforts in the restoration and/or maintenance of ecosystems. Sustainable supplies of resources... are by products of healthy, functioning ecosystems." Here again the implication is that the objective is to go back in time to historical conditions which were healthy, functioning and resilient. Outputs and values to people have been relegated to "by products."		Rate of Restoration	
Reference Conditions - historic	Page 27 "The desired conditions do not necessarily represent reference conditions, since it may not be possible, nor desirable, to return to that condition." That is a good statement and should be emphasized throughout the Plan. This approach is much more rational than all the emphasis on "historical range of variability", diversity, resilience, etc. that has gone before.	Explain "historic" or "reference" vegetation conditions, including whether it is possible to achieve those conditions.	** See Kaibab , p. 9, 3rd comment				

<p>Referen ce Condi tions - historic</p>	<p>My first and foremost view of the proposed plan is that it seems to want to return the forest to more "historic" conditions. The plan refers to this in many instances throughout and seems to be the reference baseline for where our forest should be now and the condition that it is currently in. There are many factors in deciding a management plan for the Forest, and I truly believe that trying to move its condition back to more "historic" condition is neither wise nor feasible. Many circumstance have happened and many factors are now present and/or are different than they were in "historic" times. The climate has changed, there are many more people now present in our geographic area that visit the forest, and many different management regimes have taken place, all of which affect our natural resources in one way or another.</p>	<p>Explain "historic" or "reference" vegetation conditions, including whether it is possible to achieve those conditions.</p>	<p>** See Kaibab , p. 9, 3rd comment</p>	<p>My first and foremost view of the proposed plan is that it seems to want to return the forest to more "historic" conditions. The plan refers to this in many instances throughout and seems to be the reference baseline for where our forest should be now and the condition that it is currently in. There are many factors in deciding a management plan for the Forest, and I truly believe that trying to move its condition back to more "historic" condition is neither wise nor feasible. Many circumstance have happened and many factors are now present and/or are different than they were in "historic" times. The climate has changed, there are many more people now present in our geographic area that visit the forest, and many different management regimes have taken place, all of which affect our natural resources in one way or another.</p>	<p>Historic Condition s</p>	
<p>Referen ce Condi tions - historic</p>	<p>Issue: The Plan erroneously uses "pre-European settlement" as a basis for desired conditions. Remedy: Change the starting point for desired conditions to a more realistic and current condition basis, as opposed to an unsubstantiated and idealistic, but probably not realistic, one.</p>	<p>Explain "historic" or "reference" vegetation conditions, including whether it is possible to achieve those conditions.</p>	<p>** See Kaibab , p. 9, 3rd comment</p>	<p>Issue: The Plan erroneously uses "pre-European settlement" as a basis for desired conditions. Remedy: Change the starting point for desired conditions to a more realistic and current condition basis, as opposed to an unsubstantiated and idealistic, but probably not realistic, one.</p>	<p>Change Starting Point for DC</p>	<p>PC 2700-1 The Forest Service should correct using "pre-European settlement" as a basis for desired conditions and change the starting point to a more realistic and current condition basis.</p>

Referen ce Condi tions - historic	"Plant community attributes are within or moving closer to reference conditions." (p19) If this is a desired condition, then "reference conditions" needs to be identified.	Explain "historic" or "reference" vegetation conditions, including whether it is possible to achieve those conditions.	** See Kaibab , p. 9, 3rd comment				
Referen ce Condi tions - historic	Remedy Reassess the description of the Agency prior to 1850 and disclose that while some data has been collected concerning fire intervals, not much is known about ecosystem and watershed health prior to the occupation of this area by European settlers.	Explain "historic" or "reference" vegetation conditions, including whether it is possible to achieve those conditions.	** See Kaibab , p. 9, 3rd comment				
Referen ce Condi tions - historic	but nowhere in this plan did I find the "so called historic conditions" numerically quantified as is necessary in today in forest monitoring plan.	Explain "historic" or "reference" vegetation conditions, including whether it is possible to achieve those conditions.	** See Kaibab , p. 9, 3rd comment	but nowhere in this plan did I find the "so called historic conditions" numerically quantified as is necessary in today in forest monitoring plan.		Historic Conditions	
Referen ce Condi tions - historic	Because the amount of information beginning about 1400 through the 1800's is voluminous, it is impossible to note every reference to historical conditions, but it is apparent that in many instances a return to those conditions would not be desirable or provide the capacity for sustained economic and ecological benefits to forest users as is noted on p. 1.	Explain "historic" or "reference" vegetation conditions, including whether it is possible to achieve those conditions.	** See Kaibab , p. 9, 3rd comment				

<p>Reference Conditions - historic</p>	<p>All the action alternatives share a common goal of 'restoration' of 'historical' conditions, which are considered the only condition which is 'sustainable,' and an approach which considers any economic production from the forest as incidental to that goal. We believe that this goal is based on questionable scientific assumptions and, in any case, does not provide due consideration for sustainable multiple uses and economic benefits from the forest."</p>	<p>Explain "historic" or "reference" vegetation conditions, including whether it is possible to achieve those conditions.</p>	<p>** See Kaibab , p. 9, 3rd comment</p>			
<p>Reference Conditions - historic</p>	<p>Ecological restoration oriented to "reference" or "desired" conditions based on a presumed "historic range of variability" may not be appropriate or sustainable.</p>	<p>Explain "historic" or "reference" vegetation conditions, including whether it is possible to achieve those conditions.</p>	<p>** See Kaibab , p. 9, 3rd comment</p>	<p>The Forest Service must address and disclose threats to the Apache-Sitgreaves National Forests that result from climate change. Ecological restoration oriented to "reference" or "desired" conditions based on a presumed "historic range of variability" may not be appropriate or sustainable.</p>	<p>Threats Resulting from Climate Change</p>	
<p>Veg - WMC and Spruce-Fir</p>	<p>The Department does not support the general representation made in the DEIS (pages 138 and 139) that, in the wet mixed conifer and spruce-fir community, there is an overrepresentation of vegetation structural states that are lacking aspen regeneration due to elk browsing. There is no question that, absent areas impacted by large fire events, aspen regeneration is lacking in these areas. This condition, however,</p>	<p>Disagree with the representation made in the DEIS (p. 138-139) that in wet mixed conifer and spruce-fir there is an overrepresentation of vegetation structural states that are lacking aspen regeneration due to elk browsing.</p>	<p>The Apache-Sitgreaves NFs used the standard (Region 3) Forest Service</p>	<p>The Department does not support the general representation made in the DEIS (pages 138 and 139) that, in the wet mixed conifer and spruce-fir community, there is an overrepresentation of vegetation structural states that are lacking aspen regeneration due to elk browsing.</p>	<p>Reference Conditions</p>	

	is likely due to numerous and interrelated factors beyond a single factor such as elk browsing. The representation of low/lacking aspen regeneration being solely attributable to a single wildlife species is unsubstantiated by data and fails to acknowledge and consider multiple factors impacting aspen regeneration.		PNVT structural vegetation states within VDDT modeling for those forest with significant elk populations.			
Ecosystem component - climate change	"Prior to the 1850s... ecosystems were considered to be resilient.... fire, disease, and climate changes were natural components of these functioning ecosystems." No doubt the ecosystems have changed since the 1850s but what evidence is there that they were resilient then but not now? How can "climate changes" be an ecosystem component? Climate is an influence on the system not an integral part of it.	Explain how climate change can be an ecosystem component as stated in the background of Overall Ecosystem Health "Prior to 1850s, the Apache-Sitgreaves NFs ecosystems were considered to be resilient. ... Fire, disease, and climatic changes were natural components of these functioning ecosystems." (proposed plan p. 15). Climate is an influence on the system not an integral part of it.	XXXX	"Prior to the 1850s... ecosystems were considered to be resilient.... fire, disease, and climate changes were natural components of these functioning ecosystems." No doubt the ecosystems have changed since the 1850s but what evidence is there that they were resilient then but not now? How can "climate changes" be an ecosystem component? Climate is an influence on the system not an integral part of it.	Ecosystem Diversity	
Resiliency DC	Page 16 "Ecological components are resilient to disturbances including human activities and climate variability." All plants and animals react to changes in weather and longer term climatic conditions - whether plant and animal species are	Clarify Overall Ecosystem Health desired conditions (1) "Ecological components are resilient to disturbances including human activities and climate variability" (proposed plan p. 16). What is the meaning of 'resilient to disturbances'? (2) "Natural	XXXX	Page 16 "Ecological components are resilient to disturbances including human activities and climate variability." All plants and animals react to changes in weather and longer term climatic conditions - whether plant and animal species are	Ecosystem Change	

	<p>resilient (i.e. recover) from such changes depends on the nature of the change and the life histories of the species. Annual plants and animals with short lives and high reproductive ability would be the most "resilient" - but maybe not the most desirable.</p>	<p>ecological processes...return to their innate role within the ecosystem" (proposed plan p. 16). Why and how can historical disturbances return to their natural role? (3) "Natural ecological processes allow for a shifting of plant communities, structure, and ages across the landscape. ... The mosaic of plant communities and the variety within the communities are resilient to disturbances" (proposed plan p. 17). What does this mean?</p>		<p>resilient (i.e. recover) from such changes depends on the nature of the change and the life histories of the species. Annual plants and animals with short lives and high reproductive ability would be the most "resilient" - but maybe not the most desirable.</p>		
Resilien cy DC	<p>Issues: The Plan contains many errors and omissions. "Landscape Scale Desired Condition" (p12) These statements are mostly questionable from an ecological and/or management standpoint. For example, "resilient to disturbances" is not defined. There is no way to know if it means that conditions will recover after "disturbance" or that they will change character and continue to function. Why (and how) can historical disturbances could "return" to their natural role, and why that should be the desired condition is not specified. It is unclear what it means that if natural disturbances will allow for shifting of plant communities..., but the "mosaic of plant communities is resilient to disturbance.</p>	<p>Clarify Overall Ecosystem Health desired conditions (1) "Ecological components are resilient to disturbances including human activities and climate variability" (proposed plan p. 16). What is the meaning of 'resilient to disturbances'? (2) "Natural ecological processes...return to their innate role within the ecosystem" (proposed plan p. 16). Why and how can historical disturbances return to their natural role? (3) "Natural ecological processes allow for a shifting of plant communities, structure, and ages across the landscape. ... The mosaic of plant communities and the variety within the communities are resilient to disturbances" (proposed plan p. 17). What does this mean?</p>	XXXX	<p>Issues: The Plan contains many errors and omissions. "Landscape Scale Desired Condition" (p12) These statements are mostly questionable from an ecological and/or management standpoint. For example, "resilient to disturbances" is not defined. There is no way to know if it means that conditions will recover after "disturbance" or that they will change character and continue to function. Why (and how) can historical disturbances could "return" to their natural role, and why that should be the desired condition is not specified. It is unclear what it means that if natural disturbances will allow for shifting of plant communities..., but the "mosaic of plant communities is resilient to disturbance.</p>	Landscape Scale (Errors and Omissions)	

Resiliency	<p>Issue: Glossary terms are incorrect, misleading or incomplete. Resiliency - the concept of resiliency is somewhat controversial, but generally means a system that has the capacity to change in response to some stress and to recover from that stress. Resilience is different from stability - which is resistance to change. These concepts seem to be somewhat confused in this document.</p>	<p>Clarify the meaning of resiliency.</p>	<p>Resilience is the ability of a social or ecological system to absorb disturbances while retaining the same basic structure and ways of functioning, the capacity for self-organization, and the capacity to adapt to stress and change</p>	<p>Issue: Glossary terms are incorrect, misleading or incomplete. Resiliency - the concept of resiliency is somewhat controversial, but generally means a system that has the capacity to change in response to some stress and to recover from that stress. Resilience is different from stability - which is resistance to change. These concepts seem to be somewhat confused in this document.</p>	<p>Errors and Omissions in Definitions and Terminology</p>	<p>PC 3600-1 The Forest Service should revise and clarify the incorrect, misleading, or incomplete glossary terms as follows: 1. Unique – the term is used repeatedly in this document with different meanings example: "unique riparian vegetation types" (p. 5) "unique species", referring to plant and animal species claimed to be found only on the A-S NF. (p.5) "unique waters", referring to designation by ASDWR to certain streams. "Communities, populations, and individual plant and animal species are uniquely adapted to and dependent on ecosystem diversity.", implying a high degree of evolutionary organization (p11). 2. Ecotone - Ecotone was a term used by Clements and other ecologists who espoused the concept that plant communities were comparable to organisms or quasi organisms with emergent properties. The transitions from one community to another were called ecotones. If one adopts the "continuum" or "individualistic" concept (e.g Gleason) plant species abundance is seen to vary in response to environmental gradients, thus "ecotones" are only zones of rapid change as opposed to more gradual change where environmental conditions are relatively</p>
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e, while resistance is the capacity of an organism or a system to withstand and the disruptive effects of an environmental agent. These terms are defined in the glossary in both the plan and EIS.

constant. Thus, the definition used in this plan (a community sharing species of adjacent communities) would apply to any plant community, and thus has no meaning. 3. Herbivory - is defined as "loss of vegetation due to consumption by another organism." It actually means the act of consumption of vegetation by an herbivore, or an animal that eats plants. 4. Livestock Grazing - is defined as "foraging by permitted livestock" which implies that foraging that is not "permitted" is not grazing. 5. Resiliency - the concept of resiliency is somewhat controversial, but generally means a system that has the capacity to change in response to some stress and to recover from that stress. Resilience is different from stability - which is resistance to change. These concepts seem to be somewhat confused in this document. 6. Scenic integrity - This definition is confusing. In one place it says high scenic integrity is the "state of naturalness" or "without disturbance created by humans." In another, it says the highest scenic integrity ratings are given to those landscapes that have little or no deviation from the landscape character valued by constituents for its aesthetic

						<p>quality, which could mean that scenic integrity is in the eye of the beholder. There is no reason to believe that the "historic condition" is the only landscape character that can be appropriately valued by "constituents".</p>
Resiliency	<p>The term "resilient" is a controversial one in ecological theory. Resilience means that vegetation (or soils, or wildlife populations, etc) will be modified by such things as wildfire, management activities (such as grazing, logging, thinning, hunting, etc) or "climatic variability," but that it will return to its historic state when the "disturbance" is removed or diminished. However, it can be argued that this concept is not realistic</p>	<p>Clarify the meaning of resiliency.</p>	<p>Resilience is the ability of a social or ecological system to absorb disturbances while retaining the same basic structure and ways of functioning, the capacity for self-organization,</p>			

		and the capacity to adapt to stress and change, while resistance is the capacity of an organism or a system to withstand the disruptive effects of an environmental agent. These terms are defined in the glossary in both			
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			the plan and EIS.			
Veg - DCs - human	Why not define "desired vegetation" as that which will provide sustainable resource outputs and values for human beings?	When the term "functioning", or "properly functioning" is used, does it not really mean that the system is desirable from the standpoint of sustaining the values people desire? Why not define desired vegetation as that which will provide sustainable resource outputs and values for human beings.	XXXX	Why not define "desired vegetation" as that which will provide sustainable resource outputs and values for human beings?	Desired Vegetation	PC 651-1 The Forest Service should clearly define "desired vegetation" as that which will provide sustainable resource outputs and values for human beings. The Forest Service should define "healthy and suitable" vegetation conditions and address if it would be more appropriate on a project by project level.
Veg - PNVT	What is "potential" vegetation compared to what is there now?	Explain potential natural vegetation type (PNVT) and, as a goal, if it meets the Forest Service mission or mandates.	XXXX	Sometimes reading the "affected environment" sections it appears that the information maybe did not reflect conditions after the big 2011 fire (?). There are some assumptions in the environmental document— what are the implications if those are wrong? What is "potential" vegetation compared to what is there now?		
Veg - PNVT	Another critical question would be if PNVT as a goal meets the Forest Service mission or mandates.	Explain potential natural vegetation type (PNVT) and, as a goal, if it meets the Forest Service mission or mandates.	XXXX	Another underlying concern would be how the deciding official could ever relate this plan to the Forest Service mission and congressional expectations. I see little direction in this plan that will assist the site-specific managers on developing and	Deciding Official	

				planning meaningful projects that could meet such a nebulous goal. Another critical question would be if PNVT as a goal meets the Forest Service mission or mandates.		
Veg - plants	In summary, your plan seems pretty heavy on dealing with trees but weak on other plant layers.	The plan seems heavy on dealing with trees but weak on other plant layers.	XXXX	In summary, your plan seems pretty heavy on dealing with trees but weak on other plant layers. And, the discussions in the environmental document in a number of cases (especially grazing) don't make the link on how the plan will get to "desired conditions" or talk about what happens until those conditions come about.		Current Conditions and Desired Conditions  PC 175-17 The Forest Service should strengthen the discussion on other plant layers, and make the link on how the plan will get to "desired conditions" or talk about what happens until those conditions come about.
Veg - future range of variability	The EIS should establish criteria for active and passive restoration of forest vegetation accounting for the "future range of variability" (Johnson and Duncan 2007) of sustainable ecological conditions that account for the foreseeable impacts of climate change (Choi et al. 2008, Millar et al. 2007).	Use a "future range of variability" that accounts for foreseeable impacts of climate change and management effects in DEIS analysis and plan desired conditions.	** Check out Kaibab , p. 6, 2nd comment & p.10	The EIS should establish criteria for active and passive restoration of forest vegetation accounting for the "future range of variability" (Johnson and Duncan 2007) of sustainable ecological conditions that account for the foreseeable impacts of climate change (Choi et al. 2008, Millar et al. 2007).		Future Range of Variability
Veg - future range of variability	A "future range of variability" that accounts for inevitable ecological change as disturbance regimes and vegetation pattern track climate and management effects is appropriate for consideration as a desired condition in this plan revision. NEPA requires the Forest Service to disclose scientific	Use a "future range of variability" that accounts for foreseeable impacts of climate change and management effects in DEIS analysis and plan desired conditions.	** Check out Kaibab , p. 6, 2nd comment & p.10	A "future range of variability" that accounts for inevitable ecological change as disturbance regimes and vegetation pattern track climate and management effects is appropriate for consideration as a desired condition in this plan revision.		Future Range of Variability

	controversy and uncertainty.					
Veg - succession	The Forest Service should apply the full body of available science to describe possible trajectories of plant community succession after fire under the management objectives described for each alternative.	The Forest Service should apply the full body of available science to describe possible trajectories of plant community succession after fire under the management objectives described for each alternative. <b>I NEED HELP PULLING OUT WHICH SCIENCE IS APPLICABLE</b>	<b>** Check out Kaibab p. 10 - Historic conditions and climate were only some of the considerations in determining the desired conditions. Natural ranges of variability are</b>	The Forest Service should apply the full body of available science to describe possible trajectories of plant community succession after fire under the management objectives described for each alternative.	Apply Available Science to Plant Succession	

			considered a "best" estimate of a resilient and functioning ecosystem because they reflect the evolutionary and historical ecology of forests.			
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Natural ranges of variability are thereby a powerful template for improving the resiliency of

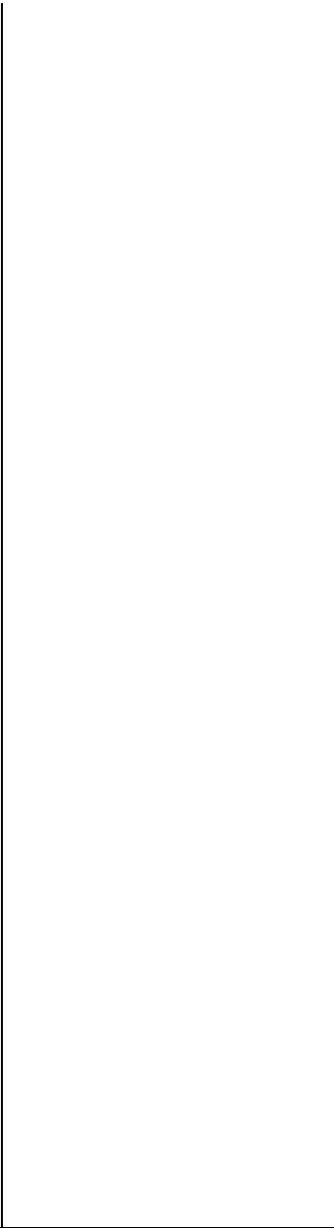
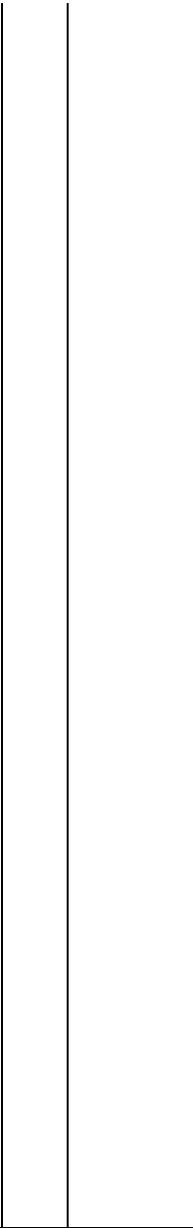
		<p>frequent-fire forests . By restoring resilience, current frequent-fire forests will be better able to adapt with changed climates and environments. Additionally, the effects of climate change are uncertain, and the historic range</p>			
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of variability is not. Desired conditions reflect both restoration and adaptation in restoring and maintaining resilience in forest ecosystems. For more information, refer to "Desired Conditions for Use in Forest Planning in the South"



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		addressed throughout the LMP; indirectly through desired conditions in the form of functional ecosystems and resilient landscapes, and directly in management approaches and the monitoring plan, where appropriate. LMP			
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			appendix A provides a more detailed explanation of the strategy the ASNFs is using to address climate change.			
Old Growth -Large Tree	A large tree retention alternative would maintain trees that are most likely to survive fire injury and supply recruitment structure that will support the recovery of old growth forest habitat in the future	There should be a large tree retention alternative.	** Check out Kaibab p. 17-21 & Prescott p.20	A large tree retention alternative would maintain trees that are most likely to survive fire injury and supply recruitment structure that will support the recovery of old growth forest habitat in the future		Large Tree Retention
Old Growth -Large Tree	A large tree retention alternative would maintain wildlife habitat in the short-term and mitigate adverse direct and indirect effects of proposed treatments.	There should be a large tree retention alternative.	** Check out Kaibab p. 17-21 & Prescott p.20	A large tree retention alternative would maintain wildlife habitat in the short-term and mitigate adverse direct and indirect effects of proposed treatments.		Large Tree Retention

Old Growth -Large Tree	Considering their scarcity, as well as the unique services they provide, large trees should be preserved whenever possible.	There should be a large tree retention alternative.	** Check out Kaibab p. 17-21 & Prescott p.20	Considering their scarcity, as well as the unique services they provide, large trees should be preserved whenever possible.	Protect, Recover, and Preserve	
Old Growth - Maximize large tree	The Center strongly encourages the Forest Service to study, develop and describe action alternatives in detail that maximize retention of existing large trees (>16-inches diameter) outside of a wildland-urban intermix ("WUI") zone that includes forest lands community infrastructure	An alternative should maximize retention of existing large trees (>16-inches diameter) outside of a wildland-urban intermix ("WUI") zone that includes forest lands located one-quarter (1/4) mile distant from established residential and other essential community infrastructure	** Check out Kaibab p. 17-21 & Prescott p.20	The Center strongly encourages the Forest Service to study, develop and describe action alternatives in detail that maximize retention of existing large trees (>16-inches diameter) outside of a wildland-urban intermix ("WUI") zone that includes forest lands community infrastructure	Large Tree Retention Strategy (OGPLTRS)	
Old Growth -large tree extract	There is no scientific basis for extracting large trees to promote fire resistance in ponderosa pine and mixed conifer forest (Allen et al. 2002, Brown et al. 2004, DellaSala et al. 2004).	There is not scientific basis for extracting large trees to promote fire resistance in ponderosa pine and mixed conifer forest.	** Check out Kaibab p. 17-21 & Prescott p.20	There is no scientific basis for extracting large trees to promote fire resistance in ponderosa pine and mixed conifer forest (Allen et al. 2002, Brown et al. 2004, DellaSala et al. 2004).	Fire Hazard	
Old Growth -large tree extract	Because large trees are the most difficult of all forest structural elements to replace, logging them constitutes an irreversible environmental impact that is scientifically controversial in regards to its efficacy in fire hazard reduction and forest restoration (Agee and Skinner 2005, Brown et al. 2004).	There is not scientific basis for extracting large trees to promote fire resistance in ponderosa pine and mixed conifer forest.	** Check out Kaibab p. 17-21 & Prescott p.20	Because large trees are the most difficult of all forest structural elements to replace, logging them constitutes an irreversible environmental impact that is scientifically controversial in regards to its efficacy in fire hazard reduction and forest restoration (Agee and Skinner 2005, Brown et al. 2004).	Fire Hazard	

<p>Old Growth - OGPLTRS alt</p>	<p>Given the enormous commitment of stakeholder time and energy to collaborative development of the Strategy [OGPLTRS], as well as its clear relevance and applicability to the planning area, it is reasonable to study, develop and describe in detail (rather than mention and dismiss) a stand-alone action alternative based on the entire Strategy as it was originally designed or, in the alternative, include it as a plan design feature common to all action alternatives.[22]</p>	<p>An alternative should be analyzed in detail based on the Old Growth Protection and Large Tree Retention Strategy (OGPLTRS) collaboratively developed by the Four Forest Restoration Initiative (4FRI) public stakeholders, which could allow the plan to proceed with a lower risk of conflict.</p>	<p>** Check out Kaibab p. 17-21 &amp; Prescott p.20</p>	<p>Given the enormous commitment of stakeholder time and energy to collaborative development of the Strategy, as well as its clear relevance and applicability to the planning area, it is reasonable to study, develop and describe in detail (rather than mention and dismiss) a stand-alone action alternative based on the entire Strategy as it was originally designed or, in the alternative, include it as a plan design feature common to all action alternatives.[22]</p>	<p>Stand Alone Action Alternative</p>	
<p>Old Growth - OGPLTRS alt</p>	<p>Navajo County believes that an intelligent implementation of the exception mechanisms identified in the Four Forest Restoration Initiative stakeholders-approved document Old Growth Protection and Large Tree Retention Strategy (OGPLTRS) can allow Alternative B to proceed without using 16-inch diameter caps.</p>	<p>An alternative should be analyzed in detail based on the Old Growth Protection and Large Tree Retention Strategy (OGPLTRS) collaboratively developed by the Four Forest Restoration Initiative (4FRI) public stakeholders, which could allow the plan to proceed with a lower risk of conflict. This should be a stand-alone action alternative based on the entire OGPLTRS as it was originally designed, or include it as a plan design feature common to all action alternatives</p>	<p>** Check out Kaibab p. 17-21 &amp; Prescott p.20</p>	<p>Navajo County believes that an intelligent implementation of the exception mechanisms identified in the Four Forest Restoration Initiative stakeholders-approved document Old Growth Protection and Large Tree Retention Strategy (OGPLTRS) can allow Alternative B to proceed without using 16-inch diameter caps.</p>	<p>Large Tree Retention Strategy (OGPLTRS)</p>	

<p>Old Growth - OGPLTRS alt</p>	<p>Navajo County believes that an intelligent implementation of the exception mechanisms identified in the Four Forest Restoration Initiative stakeholders-approved document Old Growth Protection and Large Tree Retention Strategy (OGPLTRS) can allow Alternative C to proceed without using 16-inch diameter caps.</p>	<p>An alternative should be analyzed in detail based on the Old Growth Protection and Large Tree Retention Strategy (OGPLTRS) collaboratively developed by the Four Forest Restoration Initiative (4FRI) public stakeholders, which could allow the plan to proceed with a lower risk of conflict. This should be a stand-alone action alternative based on the entire OGPLTRS as it was originally designed, or include it as a plan design feature common to all action alternatives</p>	<p>** Check out Kaibab p. 17-21 &amp; Prescott p.20</p>	<p>Navajo County believes that an intelligent implementation of the exception mechanisms identified in the Four Forest Restoration Initiative stakeholders-approved document Old Growth Protection and Large Tree Retention Strategy (OGPLTRS) can allow Alternative C to proceed without using 16-inch diameter caps.</p>	<p>Large Tree Retention Strategy (OGPLTRS)</p>	
<p>Old Growth - OGPLTRS alt</p>	<p>Given the enormous commitment of stakeholder time and energy to collaborative development of the Strategy, and its clear relevance and applicability to the planning area, it is reasonable to study, develop, and describe in detail an action alternative based on the entire Strategy as it was originally designed, or else include it as a plan feature common to all action alternatives.</p>	<p>An alternative should be analyzed in detail based on the Old Growth Protection and Large Tree Retention Strategy (OGPLTRS) collaboratively developed by the Four Forest Restoration Initiative (4FRI) public stakeholders, which could allow the plan to proceed with a lower risk of conflict. This should be a stand-alone action alternative based on the entire OGPLTRS as it was originally designed, or include it as a plan design feature common to all action alternatives</p>	<p>** Check out Kaibab p. 17-21 &amp; Prescott p.20</p>	<p>Given the enormous commitment of stakeholder time and energy to collaborative development of the Strategy, and its clear relevance and applicability to the planning area, it is reasonable to study, develop, and describe in detail an action alternative based on the entire Strategy as it was originally designed, or else include it as a plan feature common to all action alternatives.</p>	<p>Large Tree Retention Strategy (OGPLTRS)</p>	

<p>Old Growth - OGPLTRS oppose</p>	<p>Wood and Tree Products Availability – Last paragraph – do not allow outside parties (groups) to politically dictate size classes and maximum diameters to be harvested (16-inch diameter class). If silvicultural prescriptions require the eventual removal of large diameter trees (+16 inches diameter) to accomplish treatments necessary for long-term management objectives do not artificially implement politically (compromise) driven prescriptions.</p>	<p>Due to past losses, forbid the harvest of all old trees and old growth. Preserve and encourage the recovery of old growth.</p>	<p>** Check out Kaibab p. 17-21 &amp; Prescott p.20</p>	<p>Wood and Tree Products Availability – Last paragraph – do not allow outside parties (groups) to politically dictate size classes and maximum diameters to be harvested (16-inch diameter class). If silvicultural prescriptions require the eventual removal of large diameter trees (+16 inches diameter) to accomplish treatments necessary for long-term management objectives do not artificially implement politically (compromise) driven prescriptions.</p>	<p>Fuel Treatments and Timber Harvest</p>	
<p>Old Growth -Forbid harvest</p>	<p>All old growth forest should absolutely be off limits to any further logging and destruction and forest managers should promote old growth recovery.</p>	<p>Due to past losses, forbid the harvest of all old trees and old growth. Preserve and encourage the recovery of old growth.</p>	<p>** Check out Kaibab p. 17-21 &amp; Prescott p.20</p>	<p>All old growth forest should absolutely be off limits to any further logging and destruction and forest managers should promote old growth recovery.</p>	<p>Protect, Recover, and Preserve</p>	
<p>Old Growth -Forbid harvest</p>	<p>The Forest Plan should forbid harvest of old-growth trees, groups and stands, and emphasize old- growth recovery.</p>	<p>Due to past losses, forbid the harvest of all old trees and old growth. Preserve and encourage the recovery of old growth.</p>	<p>** Check out Kaibab p. 17-21 &amp; Prescott p.20</p>	<p>The Forest Plan should forbid harvest of old-growth trees, groups and stands, and emphasize old- growth recovery.</p>	<p>Protect, Recover, and Preserve</p>	<p>PC 655-1 The Forest Service should forbid old growth logging, preserve old-growth forest and encourage recovery to provide wildlife habitat, carbon storage, water filtration and flow regulation, and nutrient cycling.</p>

Old Growth -Forbid harvest	Old growth forest is a particularly precious resource that provides more carbon storage, water filtration and nutrient cycling, thus a richer habitat for other species, than any young forest can provide. Harvest of old growth trees should be forbidden.	Due to past losses, forbid the harvest of all old trees and old growth. Preserve and encourage the recovery of old growth.	** Check out Kaibab p. 17-21 & Prescott p.20	Old growth forest is a particularly precious resource that provides more carbon storage, water filtration and nutrient cycling, thus a richer habitat for other species, than any young forest can provide. Harvest of old growth trees should be forbidden. Every year we see the fires that destroy forest due in part to poor fire management. It is crucial to address this.		Protect, Recover, and Preserve	PC 655-1 The Forest Service should forbid old growth logging, preserve old-growth forest and encourage recovery to provide wildlife habitat, carbon storage, water filtration and flow regulation, and nutrient cycling.
Old Growth -Forbid harvest	Preserve old-growth forest to provide wildlife habitat, carbon storage, water filtration and flow regulation, and nutrient cycling. Past timber harvest destroyed most old-growth forest. Forbid harvest of old-growth trees and emphasize old-growth recovery.	Due to past losses, forbid the harvest of all old trees and old growth. Preserve and encourage the recovery of old growth.	** Check out Kaibab p. 17-21 & Prescott p.20	Preserve old-growth forest to provide wildlife habitat, carbon storage, water filtration and flow regulation, and nutrient cycling. Past timber harvest destroyed most old-growth forest. Forbid harvest of old-growth trees and emphasize old-growth recovery.		Protect, Recover, and Preserve	PC 655-1 The Forest Service should forbid old growth logging, preserve old-growth forest and encourage recovery to provide wildlife habitat, carbon storage, water filtration and flow regulation, and nutrient cycling.
Old Growth - Encourage recovery	Preserve old growth forest. The Forest Plan should forbid harvest of old growth trees, groups and stands and emphasize old growth recovery.	Preserve and encourage the recovery of old growth.	** Check out Kaibab p. 17-21 & Prescott p.20				
Old Growth - Encourage recovery	Since the oldest growth was logged so heavily in the past, we should encourage its recovery under the new management plan.	Preserve and encourage the recovery of old growth.	** Check out Kaibab p. 17-21 & Prescott p.20	Since the oldest growth was logged so heavily in the past, we should encourage its recovery under the new management plan.		Protect, Recover, and Preserve	PC 655-1 The Forest Service should forbid old growth logging, preserve old-growth forest and encourage recovery to provide wildlife habitat, carbon storage, water filtration and flow regulation, and nutrient cycling.

Old Growth - Encourage recovery	Preserve old-growth forest to provide wildlife habitat, carbon storage, water filtration and flow regulation, and nutrient cycling.	Preserve and encourage the recovery of old growth.	** Check out Kaibab p. 17-21 & Prescott p.20	Preserve old-growth forest to provide wildlife habitat, carbon storage, water filtration and flow regulation, and nutrient cycling.		Protect, Recover, and Preserve	PC 655-1 The Forest Service should forbid old growth logging, preserve old-growth forest and encourage recovery to provide wildlife habitat, carbon storage, water filtration and flow regulation, and nutrient cycling.
Old Growth - mgmt	Such deferral also should apply a process-centered approach to restoration in old growth ecosystems emphasizing use of naturally-adapted fire disturbance, rather than a structurally-oriented approach that presumes to replicate spatial patterns of old growth that may have existed at any given time in history (Falk et al. 1996).	The plan should include standards and guidelines that require assessment and designation of old growth habitat at site, watershed, and ecosystem scales, and allow management treatments within identified old growth only to enhance old growth characteristics, such as primary ecological functions mediated by fire. Standards and guidelines should specifically address the problem of fragmentation of old growth habitat and apply spatially-explicit analysis demonstrating that functional old growth ecosystems will be sustained over time under any chosen management alternative.	** Check out Kaibab p. 17-21 & Prescott p.20	Such deferral also should apply a process-centered approach to restoration in old growth ecosystems emphasizing use of naturally-adapted fire disturbance, rather than a structurally-oriented approach that presumes to replicate spatial patterns of old growth that may have existed at any given time in history (Falk et al. 1996).		Fire Hazard	
Old Growth - mgmt	The revised forest plan also should include standards and guidelines that require assessment and designation of old growth habitat at site, watershed, and ecosystem scales, and allow management treatments within identified old growth only to enhance old growth characteristics, such as primary ecological functions mediated by fire. Standards	The plan should include standards and guidelines that require assessment and designation of old growth habitat at site, watershed, and ecosystem scales, and allow management treatments within identified old growth only to enhance old growth characteristics, such as primary ecological functions mediated by fire. Standards and	** Check out Kaibab p. 17-21 & Prescott p.20	The revised forest plan also should include standards and guidelines that require assessment and designation of old growth habitat at site, watershed, and ecosystem scales, and allow management treatments within identified old growth only to enhance old growth characteristics, such as primary ecological functions mediated by fire. Standards		Old Growth	

	and guidelines should specifically address the problem of fragmentation of old growth habitat caused by past even-aged timber management and road construction, and apply spatially- explicit analysis demonstrating that functional old growth ecosystems will be sustained over time under any chosen management alternative.	guidelines should specifically address the problem of fragmentation of old growth habitat and apply spatially- explicit analysis demonstrating that functional old growth ecosystems will be sustained over time under any chosen management alternative.		and guidelines should specifically address the problem of fragmentation of old growth habitat caused by past even-aged timber management and road construction, and apply spatially- explicit analysis demonstrating that functional old growth ecosystems will be sustained over time under any chosen management alternative.		
Old Growth - mgmt	We recommend, consistent with the position of the Arizona and New Mexico Game and Fish Departments presented above, that the revised forest plan should contain goals and standards for maintaining and developing well-defined blocks of old growth forest in each project-level assessment area, in each Ranger District, and throughout the Apache-Sitgreaves National Forests to insure a broad spatial distribution of old growth ecosystems across the landscape.	The plan should include standards and guidelines that require assessment and designation of old growth habitat at site, watershed, and ecosystem scales, and allow management treatments within identified old growth only to enhance old growth characteristics, such as primary ecological functions mediated by fire. Standards and guidelines should specifically address the problem of fragmentation of old growth habitat and apply spatially- explicit analysis demonstrating that functional old growth ecosystems will be sustained over time under any chosen management alternative.	** Check out Kaibab p. 17-21 & Prescott p.20	We recommend, consistent with the position of the Arizona and New Mexico Game and Fish Departments presented above, that the revised forest plan should contain goals and standards for maintaining and developing well-defined blocks of old growth forest in each project-level assessment area, in each Ranger District, and throughout the Apache-Sitgreaves National Forests to insure a broad spatial distribution of old growth ecosystems across the landscape.		Maintaining and Developing blocks of Old Growth

Old Growth - mgmt	The revised forest plan also should include standards and guidelines that require assessment and designation of old growth habitat at multiple scales, and exclude old growth from timber suitability. Furthermore, standards and guidelines should specifically address the problem of fragmentation of old growth habitat caused by past even-aged timber management and road construction, and apply spatially-explicit analysis demonstrating that functional old growth ecosystems will be sustained over time under any alternative	The plan should include standards and guidelines that require assessment and designation of old growth habitat at site, watershed, and ecosystem scales, and allow management treatments within identified old growth only to enhance old growth characteristics, such as primary ecological functions mediated by fire. Standards and guidelines should specifically address the problem of fragmentation of old growth habitat and apply spatially-explicit analysis demonstrating that functional old growth ecosystems will be sustained over time under any chosen management alternative.	** Check out Kaibab p. 17-21 & Prescott p.20	The revised forest plan also should include standards and guidelines that require assessment and designation of old growth habitat at multiple scales, and exclude old growth from timber suitability. Furthermore, standards and guidelines should specifically address the problem of fragmentation of old growth habitat caused by past even-aged timber management and road construction, and apply spatially-explicit analysis demonstrating that functional old growth ecosystems will be sustained over time under any alternative	Old Growth	
Old Growth - analysis DEIS	The EIS should provide a scaled analysis of the current status and projected future structure, composition, extent and distribution of old growth forest in the planning area and compare effects of management alternatives on this basis	The EIS should provide a scaled analysis of the current status and projected future structure, composition, extent and distribution of old growth and compare effects of alternatives.	** Check out Kaibab p. 17-21 & Prescott p.20 & Prescott p. 51	The EIS should provide a scaled analysis of the current status and projected future structure, composition, extent and distribution of old growth forest in the planning area and compare effects of management alternatives on this basis	Analysis	
Old Growth - analysis DEIS	The Forest Service identified old growth forest as a significant issue in past planning for the Southwestern Region. The EIS should provide a scaled analysis of the current status and projected future structure, composition, extent and distribution of old growth	The EIS should provide a scaled analysis of the current status and projected future structure, composition, extent and distribution of old growth and compare effects of alternatives.	** Check out Kaibab p. 17-21 & Prescott p.20 &	The Forest Service identified old growth forest as a significant issue in past planning for the Southwestern Region. The EIS should provide a scaled analysis of the current status and projected future structure, composition, extent and distribution of old growth	Analysis	PC 655-3 The Forest Service should provide a scaled analysis of the current status and projected future structure, composition, extent and distribution of old growth forest in the planning area under each planning alternative.

	forest in the planning area under each planning alternative.		Prescott p. 51	forest in the planning area under each planning alternative.		
Old Growth - climate change	The most important thing forest managers can do to mitigate climate change is to protect large, old-growth and mature trees from timber harvest and associated soils from mechanical disturbance (Carey et al. 2001, Luysaert et al. 2007, Paw U et al. 2004). Preservation of what little old-growth forest remains may have a larger effect on atmospheric carbon cycles than promotion of regrowth (Schulze et al. 2000).	Preserve old growth forest to mitigate effects of climate change.	** Check out Kaibab p. 17-21 -- It is recognized that trees are not the only vegetation that absorb carbon dioxide and produce oxygen; herbaceous vegetation can serve	The most important thing forest managers can do to mitigate climate change is to protect large, old-growth and mature trees from timber harvest and associated soils from mechanical disturbance (Carey et al. 2001, Luysaert et al. 2007, Paw U et al. 2004). Preservation of what little old-growth forest remains may have a larger effect on atmospheric carbon cycles than promotion of regrowth (Schulze et al. 2000).		Protect, Recover, and Preserve



the same function. Additionally, perennial grasses sequester more carbon when they receive more light, which more than offsets the soil carbon loss that occurs when temperatures rise as a result of exposure. Commercial

		<p>harvests that result in creation of durable wood products can store carbon over long timeframes (Huang et al. 2013, Hurteau and North 2009). A more healthy forest with a balanced species composition is more resilient and health</p>			
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			y than one with an overabundance of trees			
Old Growth - climate change	<p>Mature and old growth forests are the most significant terrestrial stores of carbon. Through photosynthesis, plants capture carbon dioxide and convert it to plant matter that then feeds the base of the entire planetary food chain. When forests are degraded by timber harvest or fuel management, stored carbon is released into the atmosphere. Forest management can mitigate climate change by conserving mature and old growth forests and by increasing carbon absorption capacity through natural forest regeneration. In other words, to help our forest store more carbon and slow global warming, we need to let our forests grow.</p>	<p>Preserve old growth forest to mitigate effects of climate change.</p>	<p>** Check out Kaibab p. 17-21 -- It is recognized that trees are not the only vegetation that absorb carbon dioxide and produce oxygen; herbaceous vegetation can serve</p>	<p>Mature and old growth forests are the most significant terrestrial stores of carbon. Through photosynthesis, plants capture carbon dioxide and convert it to plant matter that then feeds the base of the entire planetary food chain. When forests are degraded by timber harvest or fuel management, stored carbon is released into the atmosphere. Forest management can mitigate climate change by conserving mature and old growth forests and by increasing carbon absorption capacity through natural forest regeneration. In other words, to help our forest store more carbon and slow global warming, we need to let our forests grow.</p>	<p>Conserving Old Growth and Mature Forests</p>	



the same function. Additionally, perennial grasses sequester more carbon when they receive more light, which more than offsets the soil carbon loss that occurs when temperatures rise as a result of exposure. Commercial

		<p>harvests that result in creation of durable wood products can store carbon over long timeframes (Huang et al. 2013, Hurteau and North 2009). A more healthy forest with a balanced species composition is more resilient and health</p>			
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			y than one with an over-abundance of trees			
Old Trees - irretreivable	Therefore, removal of large, mature or old growth trees may constitute an irretreivable commitment of resources .	Removal of large, mature or old growth trees may constitute an irretreivable commitment of resources.	** Check out Kaibab p. 17-21			
PNVT - clarity	Issue: The Plan provides unclear, confusing descriptions of expected ecological functions Desired condition statements, pages 28, 29 & 30 Proposed Plan Remedy: Provide a clear and understandable description of the expected ecological functions of by the various vegetative communities. Remove conflicting program direction (fire program direction verses program direction for soil, watershed, wildlife and other resource programs) in the Proposed Plan.	Clarify the All PNVT desired conditions and guidelines (e.g., "...reduce potential for damage to residual vegetation in order to prevent premature or excessive mortality", "landscape scale restoration projects should be designed to spread out treatments...", "restoration methods...should leave a mosaic of undisturbed areas...", fire "may be used to meet desired resource conditions...") by removing conflicting program direction (fire program direction versus program direction for soil, watershed, wildlife, and other resource programs).	XXXX	Issue: The Plan provides unclear, confusing descriptions of expected ecological functions Desired condition statements, pages 28, 29 & 30 Proposed Plan Remedy: Provide a clear and understandable description of the expected ecological functions of by the various vegetative communities. Remove conflicting program direction (fire program direction verses program direction for soil, watershed, wildlife and other resource programs) in the Proposed Plan.	Conflicting Program Direction	PC 175-16 The Forest Service should provide a clear and understandable description of the expected ecological functions of the various vegetative communities and remove conflicting program direction (fire program direction verses program direction for soil, watershed, wildlife and other resource programs) in the Proposed Plan. The plan should reflect conditions after the big 2011 fire.

PNVT - clarity	(all pnvt guidelines] Provide clear and understandable guidelines. Remove conflicting program direction in the Proposed Plan.	Clarify the All PNVT desired conditions and guidelines (e.g., "...reduce potential for damage to residual vegetation in order to prevent premature or excessive mortality", "landscape scale restoration projects should be designed to spread out treatments...", "restoration methods...should leave a mosaic of undisturbed areas...", fire "may be used to meet desired resource conditions...") by removing conflicting program direction (fire program direction versus direction for soil, watershed, wildlife, and other resource programs).	XXXX	Provide clear and understandable guidelines. Remove conflicting program direction in the Proposed Plan.	Clear Direction and Guidelines	
PNVT - climate change	Page 29 "Stand densities and species compositions are such that vegetation conditions are resilient under a variety of potential future climates." Since climate is a major factor that determines stand density and species composition, what does this mean?	Since climate change is a major factor that determines stand density and species composition, explain the meaning of the All PNVT desired condition "Stand densities and species compositions are such that vegetation conditions are resilient under a variety of potential future climates" (proposed plan p. 29).	XXXX	Page 29 "Stand densities and species compositions are such that vegetation conditions are resilient under a variety of potential future climates." Since climate is a major factor that determines stand density and species composition, what does this mean?	Effects and Environmental Consequences of Climate Change	
AZGFD-DC-Edit	Plan, Desired Conditions for All PNVTs, Landscape Scale, page 29: "Herbivory is in balance with available forage (i.e., grazing and browsing by authorized <i>and unauthorized</i> livestock, wild horses, <i>feral horses and hogs</i> , and wildlife do not exceed available forage production within established use levels)."	Modify All PNVTs Desired Condition (proposed plan p. 29) "Herbivory is in balance with available forage (i.e., grazing and browsing by authorized <i>and unauthorized</i> livestock, wild horses, <i>feral horses and hogs</i> , and wildlife do not exceed available forage production within established use levels)."		Plan, Desired Conditions for All PNVTs, Landscape Scale, page 29: "Herbivory is in balance with available forage (i.e., grazing and browsing by authorized <i>and unauthorized</i> livestock, wild <i>horses, feral horses and hogs</i> , and wildlife do not exceed available forage production within established use levels)."		

AZGFD-DC-Edit2	<p>Plan, Desired Conditions for All PNVTs, Landscape Scale, page 29: Add "<i>The A-S is free of unauthorized, feral, and trespass livestock.</i>" The Department has become increasingly concerned over the negative impacts of unauthorized, feral, and trespass livestock on wildlife habitat. Department personnel have noted significant increases in the numbers of these animals over recent years, and expects this nearly exponential growth to continue. The Department urges the A-S to include the above Desired Condition and to take prompt, substantive action to address this growing threat to ecosystem health on the A-S.</p>	<p>Add a desired condition to All PNVTs (proposed plan p. 29) "The A-S is free of unauthorized, feral, and trespass livestock." There is concern over the negative impacts of unauthorized, feral, and trespass livestock on wildlife habitat.</p>		<p>Plan, Desired Conditions for All PNVTs, Landscape Scale, page 29: Add "<i>The A-S is free of unauthorized, feral, and trespass livestock.</i>" The Department has become increasingly concerned over the negative impacts of unauthorized, feral, and trespass livestock on wildlife habitat. Department personnel have noted significant increases in the numbers of these animals over recent years, and expects this nearly exponential growth to continue. The Department urges the A-S to include the above Desired Condition and to take prompt, substantive action to address this growing threat to ecosystem health on the A-S.</p>			
AZGFD-DC-Edit3	<p>Plan, Desired Conditions for All PNVTs, Fine Scale Desired Conditions, page 30: "Herbaceous vegetation amount and structure (e.g. plant density, height, litter, seed heads) provides habitat to support <i>wildlife, including</i> prey species." Plan, page 30, All PNVTs, Fine scale.</p>	<p>Modify All PNVTs Desired Condition (proposed plan p. 30) "Herbaceous vegetation amount and structure (e.g. plant density, height, litter, seed heads) provides habitat to support <i>wildlife, including</i> prey species."</p>		<p>Plan, Desired Conditions for All PNVTs, Fine Scale Desired Conditions, page 30: "Herbaceous vegetation amount and structure (e.g. plant density, height, litter, seed heads) provides habitat to support <i>wildlife, including</i> prey species." Plan, page 30, All PNVTs, Fine scale.</p>			
PNVT - objectives	<p>The Department strongly supports Plan objectives of treating on average up to 35,000 acres of forest per year, up to 15,000 acres of woodlands per year, and up to 25,000 acres of grasslands per year. The Plan should, however more clearly stress the need and intent to focus mechanical thinning efforts on the overabundant small diameter</p>	<p>Stress the need and intent to focus mechanical thinning efforts on the overabundant small diameter trees within the forested vegetation types.</p>	XXXX	<p>The Department strongly supports Plan objectives of treating on average up to 35,000 acres of forest per year, up to 15,000 acres of woodlands per year, and up to 25,000 acres of grasslands per year. The Plan should, however more clearly stress the need and intent to focus mechanical thinning efforts on the overabundant small diameter</p>		Focus Thinning on Small Diameter Trees	<p>PC 841-2 The Forest Service should more clearly stress the need and intent to focus mechanical thinning efforts on the overabundant small diameter trees within the forested vegetation types.</p>

	trees within the forested vegetation types.			trees within the forested vegetation types.			
All forested PNV standard	Issue: The Plan's Standard for timber and fire are needlessly different. Remedy: Apply the Standard found on the bottom of page 36 to the use of fire as well as timber harvest through mechanical means.	Apply to fire the All Forested PNV standard "On lands suitable for timber production, timber harvest activities shall only be used when there is reasonable assurance of restocking within 5 years after final regeneration harvest ..." (proposed plan p. 36).	XXXX	Issue: The Plan's Standard for timber and fire are needlessly different. Remedy: Apply the Standard found on the bottom of page 36 to the use of fire as well as timber harvest through mechanical means.		Timber and Fire	PC 150-6 The Forest Service should apply the standard found on the bottom of page 36 to the use of fire as well as timber harvest through mechanical means because the standard for timber and fire are needlessly different (Last paragraph, page 36 proposed plan)
Spruce-fir - WUI	Page 48 Third bullet statement reads: "The wildland urban interface (WUI) is comprised primarily of grass/forb/shrub vegetation. Structures in the WUI are surrounded by grassy openings with very few or no trees. These conditions result in ground fires." Where is a WUI located in the Spruce-Fir component? If no conditions exist then this item should be removed from document.	Clarify the Spruce-Fir desired condition "The wildland urban interface (WUI) is comprised primarily of grass/forb/shrub vegetation. Structures in the WUI are surrounded by grassy openings with very few or no trees. These conditions result in ground fires." (proposed plan p. 48). If there are no WUIs in spruce-fir, this desired condition should be removed.	XXXX	Page 48 Third bullet statement reads: "The wildland urban interface (WUI) is comprised primarily of grass/forb/shrub vegetation. Structures in the WUI are surrounded by grassy openings with very few or no trees. These conditions result in ground fires." Where is a WUI located in the Spruce-Fir component? If no conditions exist then this item should be removed from document.		Location of WUI in Spruce-Fir Component	
Aspen - objective	Modify the Objectives to increase the targeted acreage of aspen forests in the Apache-Sitgreaves National Forests. On page 48, the Forest Service describes the current condition as 76,000 acres of "mostly" and "codominating" aspen combined; yet on page 50, the Forest Service sets an	Increase the targeted acreage of aspen forests (proposed plan p. 50).	The LMP's objective is for maintaining no less than 50,000	Modify the Objectives to increase the targeted acreage of aspen forests in the Apache-Sitgreaves National Forests. On page 48, the Forest Service describes the current condition as 76,000 acres of "mostly" and "codominating" aspen combined; yet on page 50, the Forest Service sets an		Increasing Targeted Acreage of Aspen Forest	PC 834-1 The Forest Service should modify the objectives to increase the targeted acreage of aspen forests in the Apache-Sitgreaves National Forests because the objectives should aim for increased cover of aspen habitats not 33% less than what currently exists.

	<p>Objective to maintain “at least 50,000 acres during the planning period.” Why should the Forest Service aim to maintain 33 percent less aspen than currently exists, after acknowledging the importance of aspen forests for biodiversity, and noting their decline across the West? The Objectives should aim for increased cover of aspen habitats.</p>		<p>acres of aspen on the ASNFs (which is the general historic level of aspen on the forests); it does not say that is all that will be managed for.</p>	<p>Objective to maintain “at least 50,000 acres during the planning period.” Why should the Forest Service aim to maintain 33 percent less aspen than currently exists, after acknowledging the importance of aspen forests for biodiversity, and noting their decline across the West? The Objectives should aim for increased cover of aspen habitats.</p>		
<p>Aspen - guideline water development</p>	<p>Modify the Guideline about water developments being greater than “approximately ¼ mile” from aspen stands. In reality, one-quarter mile is not very far for an ungulate to travel. Water developments should be several miles from aspen stands.</p>	<p>Modify the Aspen guideline “To preclude concentrated herbivore impacts, new surface water development should not be constructed within proximity to aspen stands (approximately ¼ mile)” (proposed plan p. 50) by increasing the distance to several miles.</p>	<p>The LMP’s objective is for maintaining no less than 50,000 acres of aspen on the ASNFs (which is the</p>	<p>Modify the Guideline about water developments being greater than “approximately ¼ mile” from aspen stands. In reality, one-quarter mile is not very far for an ungulate to travel. Water developments should be several miles from aspen stands.</p>	<p>Increase Distance from Aspen Stands for water Development</p>	<p>835-1 The Forest Service should modify the Guideline about water developments being greater than “approximately ¼ mile” from aspen stands. In reality, one-quarter mile is not very far for an ungulate to travel. Water developments should be several miles from aspen stands.</p>



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Aspen - large predator	Add a Guideline to restore large predator populations, in particular wolves, to restore healthy aspen stands. The science is clearly behind this technique	Add a guideline to restore large predator populations, in particular wolves, to restore healthy aspen stands.	Comment is outside scope of the decision to be made	Add a Guideline to restore large predator populations, in particular wolves, to restore healthy aspen stands. The science is clearly behind this technique	Adding Guideline for Restoration of Large Predator Populations	835-2 The Forest Service should add a Guideline to restore large predator populations, in particular wolves, to restore healthy aspen stands.
Aspen - large predator background	In Background for Forests: Aspen (Proposed Plan, page 49), add lack of large predators to the list of causal agents behind aspen decline. Describe ungulate browsing as a demonstrated cause of aspen decline, because experimentation has shown relief from elk browsing to lead to aspen restoration.	In the background for Forests: Aspen (Proposed Plan, page 49), add lack of large predators and ungulate browsing as causal agents behind aspen decline.	XXXX	In Background for Forests: Aspen (Proposed Plan, page 49), add lack of large predators to the list of causal agents behind aspen decline. Describe ungulate browsing as a demonstrated cause of aspen decline, because experimentation has shown relief from elk browsing to lead to aspen restoration.	Causes of Aspen Decline	
Aspen - clarify over mature	Under guidelines, it is unclear what is meant by "over mature" aspen clones. Large, old aspen should not be removed to make way for small aspen, since small aspen are harder to protect from browsing and therefore difficult to keep alive. Maintaining mature aspen will ensure that there is a live root stock in soils to create new suckers after disturbance events. Please clarify the second Guideline so that it does not suggest the removal of "over mature" aspen.	What is meant by "over mature" aspen clones in the second guideline "Restoration of aspen clones should occur where aspen is over mature or in decline to maintain a sustainable presence of this species at the landscape level" (proposed plan p.50)? Large, old aspen should not be removed to make way for small aspen, since small aspen are harder to protect from browsing and therefore difficult to keep alive. Maintaining mature aspen will ensure that there is a live root stock in soils to create new suckers after disturbance events. Please clarify this guideline so that it does not	XXXX	Under guidelines, it is unclear what is meant by "over mature" aspen clones. Large, old aspen should not be removed to make way for small aspen, since small aspen are harder to protect from browsing and therefore difficult to keep alive. Maintaining mature aspen will ensure that there is a live root stock in soils to create new suckers after disturbance events. Please clarify the second Guideline so that it does not suggest the removal of "over mature" aspen.	Over Mature" Aspen	835-3 The Forest Service should clarify what is meant by "over mature" aspen clones and clarify the second Guideline so that it does not suggest the removal of "over mature" aspen.

		suggest the removal of “over mature” aspen.				
Aspen - understanding aspen	The Department supports further research and monitoring to improve understanding of the complex relationship among aspen and other biotic and abiotic factors, and to support the development of management responses that adequately consider and address these factors over time..	There is a need for further research and monitoring to improve understanding of the complex relationship among aspen and other factors and to support development of management responses.	** Check out Kaibab p. 61, 1st comment --- The LMP's objective is for maintaining no less than 50,000 acres of aspen on the ASNFs (which is the general historic level of aspen on the forests	The Department supports further research and monitoring to improve understanding of the complex relationship among aspen and other biotic and abiotic factors, and to support the development of management responses that adequately consider and address these factors over time..	Further Research and Monitoring	PC 836-1 The Forest Service should conduct further research and monitoring to improve understanding of the complex relationship among aspen and other biotic and abiotic factors, and to support the development of management responses that adequately consider and address these factors over time.

			); it does not say that is all that will be managed for. Managing aspen on the forests is not precluded by the fact that the reason (s) for decline in aspen is unknown at this time			
Aspen - understanding aspen	If the cause of the decline is not known, then how can a plan for increasing aspen be developed.	There is a need for further research and monitoring to improve understanding of the complex relationship among aspen and other factors and to support development of management responses.	** Check out Kaibab p. 61, 1st comment --- The LMP's	If the cause of the decline is not known, then how can a plan for increasing aspen be developed.	Further Research and Monitoring	

			objective is for maintaining no less than 50,000 acres of aspen on the ASNFs (which is the general historic level of aspen on the forests); it does not say that is all that will be managed for. Managing aspen on the forests is not precluded by the			
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			fact that the reason (s) for decline in aspen is unknown at this time			
Aspen - not just herbivory	Aspen and other native deciduous trees are important components of the forest community and steps need to be taken to increase their presence on the landscape. While grazing ungulates do consume aspen and willows, any intellectually honest discussion of the issue has to reference other factors that have led to the reduced presence of deciduous trees on the forest. Many of these factors are the direct result of Forest Service practices such as fire suppression, management toward even-aged stands, and management towards pure stands of conifers. While no longer the accepted Forest Service management direction, all of these actions were previously accepted practice by the Forest Service. There are also environmental factors beyond human control such as a decade-long drought and global climate change. We	Aspen and willow recovery should be described as a forest health issue and not attributed to herbivory alone.	XXXX	Aspen and other native deciduous trees are important components of the forest community and steps need to be taken to increase their presence on the landscape. While grazing ungulates do consume aspen and willows, any intellectually honest discussion of the issue has to reference other factors that have led to the reduced presence of deciduous trees on the forest. Many of these factors are the direct result of Forest Service practices such as fire suppression, management toward even-aged stands, and management towards pure stands of conifers. While no longer the accepted Forest Service management direction, all of these actions were previously accepted practice by the Forest Service. There are also environmental factors beyond human control such as a decade-long drought and global climate change. We	Reword Discussion in Context of Forest Health Issue	PC 2662-2 The Forest Service should frame any discussion of aspen and willow recovery in the context of being a forest health issue and not attributed to herbivory alone because restoration of these species is a complex issue that will require landscape rebuilding of the vegetative communities in our forests and there are many environmental factors beyond human control impacting recovery.

	believe that any discussion of aspen recovery needs to be framed in the context of being a forest health issue and not attributed to herbivory alone.			believe that any discussion of aspen recovery needs to be framed in the context of being a forest health issue and not attributed to herbivory alone.			
Aspen - not just herbivory	Please reword all discussions relative to aspen and willow recovery in the Plan in the context of being a forest health issue and that restoration of these species is a complex issue that will require landscape rebuilding of the vegetative communities in our forests.	Aspen and willow recovery should be described as a forest health issue and not attributed to herbivory alone.	XXXX	Please reword all discussions relative to aspen and willow recovery in the Plan in the context of being a forest health issue and that restoration of these species is a complex issue that will require landscape rebuilding of the vegetative communities in our forests.		Reword Discussion in Context of Forest Health Issue	PC 2662-2 The Forest Service should frame any discussion of aspen and willow recovery in the context of being a forest health issue and not attributed to herbivory alone because restoration of these species is a complex issue that will require landscape rebuilding of the vegetative communities in our forests and there are many environmental factors beyond human control impacting recovery.
Woodlands - avoid piñon	Modify Objectives for Woodlands: All Woodland PNVTs (Proposed Plan, page 51). The sole Objective is vague: "Annually treat or maintain 5,000-15,000 acres to promote a highly diverse structure." This Objective should be clarified so that piñon pines, which grow extremely slowly, are susceptible to drought, have high cultural significance, and are essential to maintaining biodiversity, are not cut during restoration or structural treatments. Large old piñons should be especially high priorities for protection	Large old piñons should be preserved and not cut during restoration, habitat, or structural treatments. This should be reflected in the All Woodland PNVTs objectives and guidelines.	XXXX	Modify Objectives for Woodlands: All Woodland PNVTs (Proposed Plan, page 51). The sole Objective is vague: "Annually treat or maintain 5,000-15,000 acres to promote a highly diverse structure." This Objective should be clarified so that piñon pines, which grow extremely slowly, are susceptible to drought, have high cultural significance, and are essential to maintaining biodiversity, are not cut during restoration or structural treatments. Large old piñons should be especially high priorities for protection		Modify Objective to Protect Piñon Pine	PC 841-1 The Forest Service should clarify how can it be true that all of these conditions are simultaneously over represented in the following statement "There are too many medium to very large trees with open canopies... and small to medium size trees with open or closed canopies." (Proposed Plan, p. 54) The Objective should be clarified so that piñon pines, which grow extremely slowly, are susceptible to drought, have high cultural significance, and are essential to maintaining biodiversity, are not cut during restoration or structural

							treatments.
Woodlands - avoid piñon	Add a Guideline under Piñon-Juniper –Savannah and under Piñon-Juniper –Persistent Woodland to avoid cutting piñon pines during restoration, habitat improvement, or structural treatments. Large, old piñons should always be protected in order to preserve a climatically vulnerable habitat type.	Large old piñons should be preserved and not cut during restoration, habitat, or structural treatments. This should be reflected in the All Woodland PNVTs objectives and guidelines.	XXXX	Add a Guideline under Piñon-Juniper –Savannah and under Piñon-Juniper –Persistent Woodland to avoid cutting piñon pines during restoration, habitat improvement, or structural treatments. Large, old piñons should always be protected in order to preserve a climatically vulnerable habitat type.		Protection for Habitat Type	
Woodlands - guideline canopy cover	Under Guidelines for Woodlands: All Woodland PVNTs (Proposed Plan, page 51), modify the Guideline to “leave single or small groups of medium to large trees that are widely spaced with expanses of herbaceous vegetation...” The reference condition for some Madrean Pine-Oak and Piñon-Juniper woodlands (Piñon-Juniper –Persistent Woodland) is closed canopy cover (see Proposed Plan, page 52, 2nd bullet under Landscape Scale Desired Conditions and 1st bullet under Mid-Scale Desired Conditions, and page 54, 2nd bullet under Landscape Scale Desired Conditions). The need for some closed condition woodlands should be reflected	The need for some closed condition woodlands should be reflected in the All Woodland PNVNT guidelines.	XXXX	Under Guidelines for Woodlands: All Woodland PVNTs (Proposed Plan, page 51), modify the Guideline to “leave single or small groups of medium to large trees that are widely spaced with expanses of herbaceous vegetation...” The reference condition for some Madrean Pine-Oak and Piñon-Juniper woodlands (Piñon-Juniper –Persistent Woodland) is closed canopy cover (see Proposed Plan, page 52, 2nd bullet under Landscape Scale Desired Conditions and 1st bullet under Mid-Scale Desired Conditions, and page 54, 2nd bullet under Landscape Scale Desired Conditions). The need for some closed condition woodlands should be reflected		Need for Closed Condition Woodlands	PC 842-2 The Forest Service should be reflect in the All Woodland PVNTs Guidelines The need for some closed condition woodlands.

	in the All Woodland PVNTs Guidelines.			in the All Woodland PVNTs Guidelines.			
Woodlands - background clarify	Clarify the statement in Background for Woodlands: Piñon-Juniper that says, "There are too many medium to very large trees with open canopies... and small to medium size trees with open or closed canopies." (Proposed Plan, p. 54) How can it be true that all of these conditions are simultaneously overrepresented?	Clarify the statement in background for Woodlands: Piñon-Juniper, "There are too many medium to very large trees with open canopies... and small to medium size trees with open or closed canopies." (proposed plan p. 54) How can it be true that all of these conditions are simultaneously overrepresented?	XXXX	Clarify the statement in Background for Woodlands: Piñon-Juniper that says, "There are too many medium to very large trees with open canopies... and small to medium size trees with open or closed canopies." (Proposed Plan, p. 54) How can it be true that all of these conditions are simultaneously overrepresented?		Open and Closed Canopies	
Woodlands - PJ historic clarify	It is not clear if pinon-juniper (P-J) woodland refers only to those areas where pinyon juniper occurred historically.	Clarify whether pinon-juniper woodland refers only to those areas where pinon-juniper occurred historically.	XXXX				
Woodlands - PJ historic clarify	"Current conditions within the pinon-juniper woodland are slightly departed from historic conditions. There are too many medium to very large trees with closed canopies and a lack of herbaceous species and small to medium size trees with open canopy. The current fire regime is similar to historic conditions." (p 35) This statement is somewhat	Clarify whether pinon-juniper woodland refers only to those areas where pinon-juniper occurred historically.	XXXX				

	<p>misleading because it seems to imply that increase of the extent of junipers and density of juniper is a minor consideration on the A-S, when, in fact large areas have a high and often increasing density of juniper that contributes to reduction of forage for wildlife and livestock as well as contributing to increased soil erosion. We assume the statement refers to juniper stands which are considered to have been dominated by juniper since "historic times" and not to other communities that have been invaded by juniper. If so, it should be clarified.</p>					
AZGFD-DC-Edit	<p>Plan, Pinon-Juniper Savanna, Landscape scale, page 54: Scattered shrubs and a continuous herbaceous understory, including native grasses, forbs, and annuals, are present to support a natural fire regime <i>and provide for wildlife needs.</i></p>	<p>Modify Pinon-Juniper Savanna Desired Condition (proposed plan p. 54) " Scattered shrubs and a continuous herbaceous understory, including native grasses, forbs, and annuals, are present to support a natural fire regime <i>and provide for wildlife needs.</i>"</p>		<p>Plan, Pinon-Juniper Savanna, Landscape scale, page 54: Scattered shrubs and a continuous herbaceous understory, including native grasses, forbs, and annuals, are present to support a natural fire regime <i>and provide for wildlife needs.</i></p>		
AZGFD-DC-Edit2	<p>Plan, Pinon-Juniper - Persistent Woodland, Mid-scale, page 54: "Grass and forb cover is maximized, based on site capability, to protect and enrich soils <i>and provide for wildlife needs.</i></p>	<p>Modify Pinon-Juniper - Persistent Woodland Desired Condition (proposed plan p. 54) "Grass and forb cover is maximized, based on site capability, to protect and enrich soils <i>and provide for wildlife needs.</i></p>		<p>Plan, Pinon-Juniper - Persistent Woodland, Mid-scale, page 54: "Grass and forb cover is maximized, based on site capability, to protect and enrich soils <i>and provide for wildlife needs.</i></p>		

Grassland - dc	The Forest also adopt wording from the Kaibab NF Draft Plan; o "Understory composition is within the natural range of variation and contains diverse native herbaceous plant species that provide nutrition for pronghorn and other species. Depending on soil type, ground cover typically averages 50% live vegetation and 50% nonliving vegetation, with vegetation composition averaging 40 to 60 percent grass, 10 – 30 percent forbs and 5 to 15 percent shrub."	Adopt desired condition wording from the Kaibab NF draft plan "Understory composition is within the natural range of variation and contains diverse native herbaceous plant species that provide nutrition for pronghorn and other species. Depending on soil type, ground cover typically averages 50% live vegetation and 50% nonliving vegetation, with vegetation composition averaging 40 to 60 percent grass, 10 – 30 percent forbs and 5 to 15 percent shrub."	XXXX	The Forest also adopt wording from the Kaibab NF Draft Plan; o "Understory composition is within the natural range of variation and contains diverse native herbaceous plant species that provide nutrition for pronghorn and other species. Depending on soil type, ground cover typically averages 50% live vegetation and 50% nonliving vegetation, with vegetation composition averaging 40 to 60 percent grass, 10 – 30 percent forbs and 5 to 15 percent shrub."	Adopt Wording from Kiabab Draft Plan	PC 959-6 The Forest should adopt the following wording from the Kaibab NF Draft Plan for the standards for grasslands:
AZGFD-DC-Edit	Plan, Desired Conditions for Grasslands, Landscape scale, page 56: " <i>Herbaceous vegetation and</i> litter provides for and maintains the natural fire regime (fire regime I)...".	Modify Grasslands Desired Condition (proposed plan p. 56) " <i>Herbaceous vegetation and</i> litter provides for and maintains the natural fire regime (fire regime I)...".		Plan, Desired Conditions for Grasslands, Landscape scale, page 56: " <i>Herbaceous vegetation and</i> litter provides for and maintains the natural fire regime (fire regime I)...".		
Grassland - prairie dogs	Page 56 "Prairie dogs are present and support healthy grassland soil development and the diversity of other species associated with them such as the western burrowing owl." Prairie dogs will create areas that do not meet the cover and height guidelines and will have a very low similarity index (as described on Page 57). Why is the concern for adequate ground cover, height of vegetation, and soil stability emphasized elsewhere (i.e. in guidelines for	Clarify the Grasslands desired condition "Prairie dogs are present and support healthy grassland soil development and the diversity of other species associated with them such as the western burrowing owl" (proposed plan p. 56). Concern that prairie dogs will create areas that do not meet the cover and height guidelines and will have a very low similarity index (proposed plan p. 57).	XXXX	Page 56 "Prairie dogs are present and support healthy grassland soil development and the diversity of other species associated with them such as the western burrowing owl." Prairie dogs will create areas that do not meet the cover and height guidelines and will have a very low similarity index (as described on Page 57).	Prairie Dogs and Cover Height Guidelines	

	livestock grazing) but ignored in the case of prairie dogs?						
Grassland - prairie dogs	Page 57 "Mechanical restoration of grasslands should emphasize individual tree removal to limit soil disturbance." If prairie dogs support healthy grassland soil development, why would mechanical soil disturbance also not do this?	Clarify the Grasslands desired condition "Prairie dogs are present and support healthy grassland soil development and the diversity of other species associated with them such as the western burrowing owl" (proposed plan p. 56). Concern that prairie dogs will create areas that do not meet the cover and height guidelines and will have a very low similarity index (proposed plan p. 57).	XXXX				
Grassland - prairie dogs	Issues: The Plan contains many errors and omissions. "Prairie dog colonies occur in appropriate habitat and support the wide array of species associated with them." (p 66) It is not stated how "appropriate" will be determined or how many prairie dogs will be enough	Clarify the Grasslands desired condition "Prairie dogs are present and support healthy grassland soil development and the diversity of other species associated with them such as the western burrowing owl" (proposed plan p. 56). Concern that prairie dogs will create areas that do not meet the cover and height guidelines and will have a very low similarity index (proposed plan p. 57).	XXXX	Issues: The Plan contains many errors and omissions. "Prairie dog colonies occur in appropriate habitat and support the wide array of species associated with them." (p 66) It is not stated how "appropriate" will be determined or how many prairie dogs will be enough		Prairie Dogs	PC 974-8 The Forest Service should include how many prairie dogs will be enough and how "appropriate" will be determined in reference to the statement "Prairie dog colonies occur in appropriate habitat and support the wide array of species associated with them." (p 66)

Grassland - prairie dogs	This statement infers that dense grass cover is desirable or necessary, except where Gunnison's prairie dog is responsible for reduction of grass cover, where it is appropriate. The effects of inadequate ground cover on soil erosion are irrespective of cause. Thus statements such as these contradict Desired Conditions regarding sedimentation elsewhere in the plan.	Clarify the Grasslands desired condition "Prairie dogs are present and support healthy grassland soil development and the diversity of other species associated with them such as the western burrowing owl" (proposed plan p. 56). Concern that prairie dogs will create areas that do not meet the cover and height guidelines and will have a very low similarity index (proposed plan p. 57).	XXXX				
Grassland - prairie dogs	It may be true that "prairie dogs support healthy grassland soil development" in some situations but it needs to be clarified that in many cases an abundance of prairie dogs harms grassland development and often destroys existing vegetation and causes erosion problems. There are several examples of that happening in the grassland areas in Apache County to the north of the A-S. With the current language as is and without some clarification someone or group could try to make a case that prairie dogs are always good for any area. Efforts to eradicate or reduce the populations when necessary or desired would be hampered or restricted. Prairie dogs and the fleas that accompany them are gross and can be dangerous carriers of diseases.	Clarify the Grasslands desired condition "Prairie dogs are present and support healthy grassland soil development and the diversity of other species associated with them such as the western burrowing owl" (proposed plan p. 56). Concern that prairie dogs will create areas that do not meet the cover and height guidelines and will have a very low similarity index (proposed plan p. 57).	XXXX				

Grassland - prairie dogs	<p>3rd bullet: prairie dogs do not necessarily "support healthy grassland soil development". Excess populations can very easily develop and can be devastating to the range. They denude huge areas and the grasses do not make a good comeback for many years. Particularly in the forecast drier conditions, their presence could be very destructive to the productivity of our grasslands. Although they are cute critters, I do not think our forest visitors would like seeing their impact if their numbers began to mushroom. When that happened historically, it took a lot of time, manpower and money to eradicate them.</p>	<p>Clarify the Grasslands desired condition "Prairie dogs are present and support healthy grassland soil development and the diversity of other species associated with them such as the western burrowing owl" (proposed plan p. 56). Concern that prairie dogs will create areas that do not meet the cover and height guidelines and will have a very low similarity index (proposed plan p. 57).</p>	Desired condition statement was rewritten for additional clarification.			
Grassland - DC - clarify	<p>Page 56 "The extent, abundance, cover and composition of grasslands is maintained or reestablished and moving closer to reference conditions." What does "abundance" of grasslands mean?</p>	<p>Clarify the Grasslands desired condition, "The extent, abundance, cover and composition of grasslands is maintained or reestablished and moving closer to reference conditions." (proposed plan p. 56) What does "abundance" of grasslands mean?</p>	This desired condition statement was rewritten for clarification. The LMP uses this term consistent with	<p>Page 56 "The extent, abundance, cover and composition of grasslands is maintained or reestablished and moving closer to reference conditions." What does "abundance" of grasslands mean?</p>	Errors and Omissions in Definitions and Terminology	

			<p>the traditional definition, which may be found in any standard dictionary</p>			
<p>Grassland - DC - clarify</p>	<p>Issues: The Plan contains many errors and omissions. "Abundant grassy openings for prey species." (p66) "Abundant" is not defined and should be determined on a project level basis. Furthermore, some prey species may prefer dense brush or trees.</p>	<p>Clarify the Grasslands desired condition, "The extent, abundance, cover and composition of grasslands is maintained or reestablished and moving closer to reference conditions." (proposed plan p. 56) What does "abundance" of grasslands mean?</p>	<p>This desire condition was rewritten for clarification. The LMP uses this term consistent with the traditional definition, which may be</p>	<p>Issues: The Plan contains many errors and omissions. "Abundant grassy openings for prey species." (p66) "Abundant" is not defined and should be determined on a project level basis. Furthermore, some prey species may prefer dense brush or trees.</p>	<p>Grassy Openings for Prey Species</p>	<p>PC 858-1 The Forest Service should define abundant as it relates to the following statement "Abundant grassy openings for prey species." (p66) and abundance should be determined on a project level basis because some prey species may prefer dense brush or trees.</p>

			found in any standa rd diction ary				
Grassland - DC - clarify	<p>p. 56 Desired Conditions for Grasslands</p> <p>There is no question that species composition and cover in the grasslands has changed and what role has the current management plan played in that role? The lack of fire has been a major contributor as has climatic variability. The desired conditions as stated are again based on the atypical data reported in the 1987 TES Data Report. The 10-18 inch grass growth needs to be referenced and explained. Where and how will this be measured? What about sites that do not provide adequate potential and these heights are not obtainable? What exceptions are in place for natural environmental variations and disturbances such as fire or prairie dog colonization.</p>	<p>Clarify the Grasslands desired condition, "The extent, abundance, cover and composition of grasslands is maintained or reestablished and moving closer to reference conditions." (proposed plan p. 56) What does "abundance" of grasslands mean?</p>	XXXX				

<p>Grassland - DC - clarify2</p>	<p>[grassland desired conditions] issue: Landscape Desired Conditions are confusing and conflicting. (Landscape Scale Desired Conditions and Mid-Scale Desired Conditions, page 56, Proposed Plan): Remedy: Provide clear and understandable guidelines. Remove conflicting program direction in the Proposed Plan.</p>	<p>Clarify the Grassland desired conditions and guidelines by removing conflicting program direction with fire.</p>	<p>The desired condition on state ments, within and between the various scales, regarding vegetation cover and vegetation heights have been removed or combined and rewritten for additional clarification</p>	<p>issue: Landscape Desired Conditions are confusing and conflicting. (Landscape Scale Desired Conditions and Mid-Scale Desired Conditions, page 56, Proposed Plan): Remedy: Provide clear and understandable guidelines. Remove conflicting program direction in the Proposed Plan.</p>	<p>Clear Direction and Guidelines</p>	
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<p>Grassland - cover and height DC</p>	<p>p.56. Desired conditions for grassland cover is 35%, and heights of 10-31 inches. What research are these numbers based on? What kind of cover is this, canopy, foliar or basal, and how and when will it be measured? Additionally, the 10-18 inch grass growth from previous year to provide adequate hiding cover for antelope fawns needs referenced and explained. Where and how will this be measured? What happens when drought or fire, for example, make this impossible? What about sites where these heights are not obtainable?</p>	<p>Explain, modify, or remove the Grasslands desired conditions: "The extent, abundance, cover, and composition of grasslands is maintained or reestablished and moving closer to reference conditions. Ground cover is 35 percent or greater and herbaceous vegetation height ranges from 10 to 31 inches depending on grassland type." "Vegetative cover (herbaceous ground cover and litter) is between 45 and 80 percent in Great Basin grasslands, 35 to 70 percent in semi-desert grasslands, and 60 to 100 percent in montane/subalpine grasslands. These percentages may vary depending on the amount of surface rock as described in each ecological mapping unit." "Average ungrazed grass height varies by grassland PNVT and yearly weather conditions. Grass heights range from 11 to 26 inches in Great Basin grasslands, 10 to 25 inches in montane/subalpine grasslands, and 13 to 31 inches in semi-desert grasslands" "During the critical pronghorn fawning period (May through June), cool season grasses and forbs provide nutritional forage; while shrubs and standing grass growth from the previous year provide adequate hiding cover (10 to 18 inches) to protect fawns from predation." (proposed</p>	<p>Desire d conditi on state ment was re- writte n for additi onal clarific ation.</p>	<p>p.56. Desired conditions for grassland cover is 35%, and heights of 10-31 inches. What research are these numbers based on? What kind of cover is this, canopy, foliar or basal, and how and when will it be measured? Additionally, the 10-18 inch grass growth from previous year to provide adequate hiding cover for antelope fawns needs referenced and explained. Where and how will this be measured? What happens when drought or fire, for example, make this impossible? What about sites where these heights are not obtainable?</p>	<p>Attainabl e Desired Condition s</p>	<p>PC 551-2 The Forest Service should clarify the desired conditions for grassland cover (is 35%, and heights of 10-31 inches) by explaining: what research are these numbers based on,,what kind of cover is this, canopy, foliar or basal,how and when will it be measured, where and how will this be measured,What happens when drought or fire, for example, make this impossible,What about sites where these heights are not obtainable,Additionally, the 10-18 inch grass growth from previous year to provide adequate hiding cover for antelope fawns needs referenced and explained</p>
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		<p>plan p. 56-57)  There are concerns that the specified amounts may not be achievable or measurable.</p>				
<p>Grassland - cover and height DC</p>	<p>Does cover refer to basal cover or canopy cover? Is height measured on all plants (grasses, sedges, forbs, shrubs) or only on certain ones - which?, why? What time of year is height measured? How will the variability in spatial height and cover be accounted for? For which species of wildlife is the habitat requirement intended? Without answers to these questions on a site specific basis, these guidelines are arbitrary and capricious and subject to abuse.</p>	<p>Explain, modify, or remove the Grasslands desired conditions: "The extent, abundance, cover, and composition of grasslands is maintained or reestablished and moving closer to reference conditions. Ground cover is 35 percent or greater and herbaceous vegetation height ranges from 10 to 31 inches depending on grassland type." "Vegetative cover (herbaceous ground cover and litter) is between 45 and 80 percent in Great Basin grasslands, 35 to 70 percent in semi-desert grasslands, and 60 to 100 percent in montane/subalpine grasslands. These percentages may vary depending on the amount of surface rock as described in each ecological mapping unit." "Average ungrazed grass height varies by grassland PNVT and yearly weather conditions. Grass heights range from 11 to 26 inches in Great Basin grasslands, 10 to 25 inches in montane/subalpine grasslands, and 13 to 31 inches in semi-desert grasslands" "During the critical pronghorn</p>	<p>Desired condition was rewritten for additional clarification.</p>	<p>Does cover refer to basal cover or canopy cover? Is height measured on all plants (grasses, sedges, forbs, shrubs) or only on certain ones - which?, why? What time of year is height measured? How will the variability in spatial height and cover be accounted for? For which species of wildlife is the habitat requirement intended? Without answers to these questions on a site specific basis, these guidelines are arbitrary and capricious and subject to abuse.</p>	<p>Vegetation Height Range</p>	

		<p>fawning period (May through June), cool season grasses and forbs provide nutritional forage; while shrubs and standing grass growth from the previous year provide adequate hiding cover (10 to 18 inches) to protect fawns from predation." (proposed plan p. 56-57)</p> <p>There are concerns that the specified amounts may not be achievable or measurable.</p>				
Grassland - cover and height DC	<p>Page 56 "Ground cover is 35 percent of greater and herbaceous vegetation height ranges from 10-31 inches depending on grassland type." Specific references to required herbaceous cover and height should be deleted. These are not "desired conditions" - the desired conditions are a productive grassland with good soil protection and wildlife habitat....Guidelines for cover and height of vegetation are only tools, not objectives, and they should be employed on a site specific basis, not as blanket requirements. Not all sites may have the potential to meet the requirements, at least not in the short run. ...If they are used on a site specific basis, the procedures for obtaining the measurements should be specified</p>	<p>Explain, modify, or remove the Grasslands desired conditions: "The extent, abundance, cover, and composition of grasslands is maintained or reestablished and moving closer to reference conditions. Ground cover is 35 percent or greater and herbaceous vegetation height ranges from 10 to 31 inches depending on grassland type." "Vegetative cover (herbaceous ground cover and litter) is between 45 and 80 percent in Great Basin grasslands, 35 to 70 percent in semi-desert grasslands, and 60 to 100 percent in montane/subalpine grasslands. These percentages may vary depending on the amount of surface rock as described in each ecological mapping unit." "Average ungrazed grass height varies by grassland PNVT and yearly weather conditions. Grass heights range from 11 to 26 inches in Great Basin grasslands, 10 to 25</p>	Desired condition was rewritten for additional clarification.	<p>Page 56 "Ground cover is 35 percent of greater and herbaceous vegetation height ranges from 10-31 inches depending on grassland type." Specific references to required herbaceous cover and height should be deleted. These are not "desired conditions" - the desired conditions are a productive grassland with good soil protection and wildlife habitat.</p>	Specific References to Cover and Height	

		<p>inches in montane/subalpine grasslands, and 13 to 31 inches in semi-desert grasslands"</p> <p>"During the critical pronghorn fawning period (May through June), cool season grasses and forbs provide nutritional forage; while shrubs and standing grass growth from the previous year provide adequate hiding cover (10 to 18 inches) to protect fawns from predation." (proposed plan p. 56-57)</p> <p>There are concerns that the specified amounts may not be achievable or measurable.</p>				
Grassland - cover and height DC	<p>Desired conditions for grassland cover (page 56) are stated to be 35%, with heights of 10-31 inches. No research references are cited for the basis of these numbers, and no description of the kind of cover is provided (canopy, foliar or basal) or how and when the grassland cover will be measured. Additionally, the statement that 10-18 inch grass growth from previous year to provide adequate hiding cover for antelope fawns needs reference and explanation, including where and how the grass will be measured, and what happens when drought or fire, for example, make the conditions impossible. Furthermore, there may be sites that are perfectly healthy where these heights are not obtainable due</p>	<p>Explain, modify, or remove the Grasslands desired conditions: "The extent, abundance, cover, and composition of grasslands is maintained or reestablished and moving closer to reference conditions. Ground cover is 35 percent or greater and herbaceous vegetation height ranges from 10 to 31 inches depending on grassland type." "Vegetative cover (herbaceous ground cover and litter) is between 45 and 80 percent in Great Basin grasslands, 35 to 70 percent in semi-desert grasslands, and 60 to 100 percent in montane/subalpine grasslands. These percentages may vary depending on the amount of surface rock as described in each ecological mapping unit." "Average ungrazed grass height varies by grassland</p>	<p>Desired conditions for grassland cover (page 56) are stated to be 35%, with heights of 10-31 inches. No research references are cited for the basis of these numbers, and no description of the kind of cover is provided (canopy, foliar or basal) or how and when the grassland cover will be measured. Additionally, the statement that 10-18 inch grass growth from previous year to provide adequate hiding cover for antelope fawns needs reference and explanation, including where and how the grass will be measured, and what happens when drought or fire, for example, make the conditions impossible. Furthermore, there may be sites that are perfectly healthy where these heights are not obtainable due</p>		Grass Heights	

	to many factors.	<p>PNVT and yearly weather conditions. Grass heights range from 11 to 26 inches in Great Basin grasslands, 10 to 25 inches in montane/subalpine grasslands, and 13 to 31 inches in semi-desert grasslands"</p> <p>"During the critical pronghorn fawning period (May through June), cool season grasses and forbs provide nutritional forage; while shrubs and standing grass growth from the previous year provide adequate hiding cover (10 to 18 inches) to protect fawns from predation." (proposed plan p. 56-57)</p> <p>There are concerns that the specified amounts may not be achievable or measurable.</p>		to many factors.		
Grassland - cover and height DC	<p>pg 56 Desired conditions for grasslands, 2nd parag. "herbaceous vegetation height ranges from 10" to 31" In the grass land areas around and north of Greens Peak many grass varieties in those areas do not and cannot achieve those minimum desired heights. Numbers determined by someone in the FS system that are not applicable to actual site or area conditions and potential should not be arbitrarily assigned. The areas should be managed on actual production and their potential rather than ideals someone thinks should be in place.</p>	<p>Explain, modify, or remove the Grasslands desired conditions: "The extent, abundance, cover, and composition of grasslands is maintained or reestablished and moving closer to reference conditions. Ground cover is 35 percent or greater and herbaceous vegetation height ranges from 10 to 31 inches depending on grassland type." "Vegetative cover (herbaceous ground cover and litter) is between 45 and 80 percent in Great Basin grasslands, 35 to 70 percent in semi-desert grasslands, and 60 to 100 percent in montane/subalpine grasslands. These percentages may vary depending on the amount of surface rock as</p>	Desired condition statement was rewritten for additional clarification.	<p>pg 56 Desired conditions for grasslands, 2nd parag. "herbaceous vegetation height ranges from 10" to 31" In the grass land areas around and north of Greens Peak many grass varieties in those areas do not and cannot achieve those minimum desired heights. Numbers determined by someone in the FS system that are not applicable to actual site or area conditions and potential should not be arbitrarily assigned. The areas should be managed on actual production and their potential rather than ideals someone thinks should be in place.</p>	Grass Heights	

		<p>described in each ecological mapping unit."          "Average ungrazed grass height varies by grassland PNVT and yearly weather conditions. Grass heights range from 11 to 26 inches in Great Basin grasslands, 10 to 25 inches in montane/subalpine grasslands, and 13 to 31 inches in semi-desert grasslands"          "During the critical pronghorn fawning period (May through June), cool season grasses and forbs provide nutritional forage; while shrubs and standing grass growth from the previous year provide adequate hiding cover (10 to 18 inches) to protect fawns from predation." (proposed plan p. 56-57)          There are concerns that the specified amounts may not be achievable or measurable.</p>				
Grassland - cover and height DC	<p>pg. 57 The first two paragraphs have unrealistic desired grass heights. During the pronghorn fawning period (May – June) most cool season grasses and forbs have no chance to have a standing grass cover height of 10 – 18". The potential is not there in most areas north of Greens Peak. ...The desired condition of having standing grass growth from the previous year in the stated height range is unrealistic...The stated desired heights should be removed and the grasslands in those areas should be</p>	<p>Explain, modify, or remove the Grasslands desired conditions: "The extent, abundance, cover, and composition of grasslands is maintained or reestablished and moving closer to reference conditions. Ground cover is 35 percent or greater and herbaceous vegetation height ranges from 10 to 31 inches depending on grassland type."          "Vegetative cover (herbaceous ground cover and litter) is between 45 and 80 percent in Great Basin grasslands, 35 to 70 percent in semi-desert grasslands, and 60 to 100</p>	<p>Desired condition statement was rewritten for additional clarification.</p>	<p>pg. 57 The first two paragraphs have unrealistic desired grass heights. During the pronghorn fawning period (May – June) most cool season grasses and forbs have no chance to have a standing grass cover height of 10 – 18". The potential is not there in most areas north of Greens Peak.</p>	Grass Heights	

	<p>managed base on production and potential. The stated minimum heights for most grasses in those areas are not attainable in most years</p>	<p>percent in montane/subalpine grasslands. These percentages may vary depending on the amount of surface rock as described in each ecological mapping unit."          "Average ungrazed grass height varies by grassland PNVT and yearly weather conditions. Grass heights range from 11 to 26 inches in Great Basin grasslands, 10 to 25 inches in montane/subalpine grasslands, and 13 to 31 inches in semi-desert grasslands"          "During the critical pronghorn fawning period (May through June), cool season grasses and forbs provide nutritional forage; while shrubs and standing grass growth from the previous year provide adequate hiding cover (10 to 18 inches) to protect fawns from predation." (proposed plan p. 56-57)          There are concerns that the specified amounts may not be achievable or measurable.</p>				
<p>Grassland - cover and height DC</p>	<p>Pg 57 Fine Scale Conditions 2nd bullet: Pronghorn 10 to 18 inches hiding cover may be difficult to achieve in May through June, especially due to heavy elk grazing. It can be quite dry then until the rainy season starts, usually, but not always, in July. Fawns hide effectively in low spots, behind rocks and slm.1bs and stumps, so this should not be a serious concern. This can be addressed</p>	<p>Explain, modify, or remove the Grasslands desired conditions: "The extent, abundance, cover, and composition of grasslands is maintained or reestablished and moving closer to reference conditions. Ground cover is 35 percent or greater and herbaceous vegetation height ranges from 10 to 31 inches depending on grassland type."          "Vegetative cover (herbaceous ground cover and litter) is</p>	<p>Desired condition statement was rewritten for additional clarification</p>	<p>Pg 57 Fine Scale Conditions 2nd bullet: Pronghorn 10 to 18 inches hiding cover may be difficult to achieve in May through June, especially due to heavy elk grazing. It can be quite dry then until the rainy season starts, usually, but not always, in July. Fawns hide effectively in low spots, behind rocks and slm.1bs and stumps, so this should not be a serious concern. This can be addressed</p>	<p>Grass Heights</p>	<p>PC 2663-6 The Forest Service should change the second bullet statement the statement on Pg. 57 Fine Scale Conditions to say "adequate cover" rather than specifying inches. This can be addressed by saying "adequate cover" rather than specifying inches. If the pronghorn herd is thriving or increasing, that should indicate more than "adequate." However, it should also be</p>

	<p>by saying "adequate cover" rather than specifying inches. If the pronghorn herd is thriving or increasing, that should indicate more than "adequate." However, it should also be acknowledged that other factors like predation or water can affect herd numbers.</p>	<p>between 45 and 80 percent in Great Basin grasslands, 35 to 70 percent in semi-desert grasslands, and 60 to 100 percent in montane/subalpine grasslands. These percentages may vary depending on the amount of surface rock as described in each ecological mapping unit."  "Average ungrazed grass height varies by grassland PNVT and yearly weather conditions. Grass heights range from 11 to 26 inches in Great Basin grasslands, 10 to 25 inches in montane/subalpine grasslands, and 13 to 31 inches in semi-desert grasslands"  "During the critical pronghorn fawning period (May through June), cool season grasses and forbs provide nutritional forage; while shrubs and standing grass growth from the previous year provide adequate hiding cover (10 to 18 inches) to protect fawns from predation." (proposed plan p. 56-57)  There are concerns that the specified amounts may not be achievable or measurable.</p>	<p>ation.</p>	<p>by saying "adequate cover" rather than specifying inches. If the pronghorn herd is thriving or increasing, that should indicate more than "adequate." However, it should also be acknowledged that other factors like predation or water can affect herd numbers.</p>		<p>acknowledged that other factors like predation or water can affect herd numbers.</p>
<p>Grassland - cover and height DC</p>	<p>Pg 56 Desired Conditions for Grasslands 2nd bullet: Once again, I believe the phrase "according to site potential" should be inserted, rather than specific measurements that may not be achievable. Even with our grassland areas, soil type and depth can vary</p>	<p>Explain, modify, or remove the Grasslands desired conditions: "The extent, abundance, cover, and composition of grasslands is maintained or reestablished and moving closer to reference conditions. Ground cover is 35 percent or greater and herbaceous vegetation height</p>	<p>Desired condition was rewritten</p>	<p>Pg 56 Desired Conditions for Grasslands 2nd bullet: Once again, I believe the phrase "according to site potential" should be inserted, rather than specific measurements that may not be achievable. Even with our grassland areas, soil type and depth can vary</p>	<p>Grass Heights</p>	

	<p>tremendously within relatively close areas, affecting the growth of various species. Many years, favorable moisture does not occur or comes late. (The most accurate time to measure height is at the end of the growing season so recovery can be accurately determined.) It is important to follow clearly defined methodologies for range assessment that are accepted by current range science so that measuring is consistent and accurate.</p>	<p>ranges from 10 to 31 inches depending on grassland type." "Vegetative cover (herbaceous ground cover and litter) is between 45 and 80 percent in Great Basin grasslands, 35 to 70 percent in semi-desert grasslands, and 60 to 100 percent in montane/subalpine grasslands. These percentages may vary depending on the amount of surface rock as described in each ecological mapping unit." "Average ungrazed grass height varies by grassland PNVT and yearly weather conditions. Grass heights range from 11 to 26 inches in Great Basin grasslands, 10 to 25 inches in montane/subalpine grasslands, and 13 to 31 inches in semi-desert grasslands" "During the critical pronghorn fawning period (May through June), cool season grasses and forbs provide nutritional forage; while shrubs and standing grass growth from the previous year provide adequate hiding cover (10 to 18 inches) to protect fawns from predation." (proposed plan p. 56-57) There are concerns that the specified amounts may not be achievable or measurable.</p>	<p>n for additi onal clarific ation.</p>	<p>tremendously within relatively close areas, affecting the growth of various species. Many years, favorable moisture does not occur or comes late. (The most accurate time to measure height is at the end of the growing season so recovery can be accurately determined.) It is important to follow clearly defined methodologies for range assessment that are accepted by current range science so that measuring is consistent and accurate.</p>		
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<p>Grassland - cover and height DC</p>	<p>Page 56: desired condition for grasslands: "vegetation height ranges from 10-31inches": anyone looking at the grassland ranges of ASNF today can see this is silly. We are experiencing significant protracted drought; the grassland species respond to the metabolic stress in multiple ways regardless of exposure- or not-- to grazing. See comments above on scientific standards.</p>	<p>Explain, modify, or remove the Grasslands desired conditions: "The extent, abundance, cover, and composition of grasslands is maintained or reestablished and moving closer to reference conditions. Ground cover is 35 percent or greater and herbaceous vegetation height ranges from 10 to 31 inches depending on grassland type." "Vegetative cover (herbaceous ground cover and litter) is between 45 and 80 percent in Great Basin grasslands, 35 to 70 percent in semi-desert grasslands, and 60 to 100 percent in montane/subalpine grasslands. These percentages may vary depending on the amount of surface rock as described in each ecological mapping unit." "Average ungrazed grass height varies by grassland PNVT and yearly weather conditions. Grass heights range from 11 to 26 inches in Great Basin grasslands, 10 to 25 inches in montane/subalpine grasslands, and 13 to 31 inches in semi-desert grasslands" "During the critical pronghorn fawning period (May through June), cool season grasses and forbs provide nutritional forage; while shrubs and standing grass growth from the previous year provide adequate hiding cover (10 to 18 inches) to protect fawns from predation." (proposed</p>	<p>Desired condition statement was rewritten for additional clarification.</p>	<p>Page 56: desired condition for grasslands: "vegetation height ranges from 10-31inches": anyone looking at the grassland ranges of ASNF today can see this is silly. We are experiencing significant protracted drought; the grassland species respond to the metabolic stress in multiple ways regardless of exposure- or not-- to grazing. See comments above on scientific standards.</p>	<p>Vegetation Height Range</p>	
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		plan p. 56-57) There are concerns that the specified amounts may not be achievable or measurable.				
Grassland - cover and height ungrazed height	The Desired Conditions for Grasslands describes a vegetation height “from 10 to 31 inches.” (Proposed Plan, p. 56) However, the footnote explains that this will be “Measured on ungrazed plants as an indicator of vigor.” This is a biased way to measure grassland vigor. If only the ungrazed plants are measured, it will be impossible to know the true state of grassland ecosystems. The Forest Service should measure both grazed and ungrazed plants to determine the actual height distributions of grasslands.	The Forest Service should measure both grazed and ungrazed plants to determine the actual height distributions of grasslands. (proposed plan 56-57)	Desired condition statement was rewritten for additional clarification	The Desired Conditions for Grasslands describes a vegetation height “from 10 to 31 inches.” (Proposed Plan, p. 56) However, the footnote explains that this will be “Measured on ungrazed plants as an indicator of vigor.” This is a biased way to measure grassland vigor. If only the ungrazed plants are measured, it will be impossible to know the true state of grassland ecosystems. The Forest Service should measure both grazed and ungrazed plants to determine the actual height distributions of grasslands.	Vegetation Height Range	PC 855-3 The Forest Service should address the biased way to measure grassland vigor and should measure both grazed and ungrazed plants to determine the actual height distributions of grasslands.
Grassland - cover and height ungrazed height	Under Fine-Scale Desired Conditions (less than 10 acres), the “average ungrazed grass height” is again given as a metric (Proposed Plan, page 57). We reiterate that the Forest Service should record both grazed and ungrazed grass heights in order to track the true level of grassland health.	The Forest Service should measure both grazed and ungrazed plants to determine the actual height distributions of grasslands. (proposed plan 56-57)	Desired condition statement was rewritten for additional clarification	Under Fine-Scale Desired Conditions (less than 10 acres), the “average ungrazed grass height” is again given as a metric (Proposed Plan, page 57). We reiterate that the Forest Service should record both grazed and ungrazed grass heights in order to track the true level of grassland health.	Recording of Grazed and Ungrazed Grass Height	PC 858-2 The Forest Service should record both grazed and ungrazed grass heights in order to track the true level of grassland health instead of using a metric.

Grassland - cover and height	Further, herbaceous cover and height desired conditions, standards and guidelines significantly exceed those attributes ranges found in NRCS ESI documents, which are much more current than FS inventories	Herbaceous cover and height desired conditions, standards and guidelines significantly exceed those attributes ranges found in NRCS ESI documents, which are much more current than FS inventories	These are not Forest Service documents, standards, direction or policy; however, this desired condition statement was rewritten for additional clarification.	Further, herbaceous cover and height desired conditions, standards and guidelines significantly exceed those attributes ranges found in NRCS ESI documents, which are much more current than FS inventories	Exceeding Standards set in NRCS ESI Documents	PC 860-2 The Forest Service should clarify how the standard on riparian area site conditions is significant or critical when it is not based on science and, herbaceous cover and height desired conditions, standards and guidelines significantly exceed those attribute ranges found in NRCS ESI documents, which are much more current than FS inventories
Grassland - cover and height gl	p.57. Guidelines for grasslands: 45% "Vegetative ground cover" for Great Basin grasslands, 35% for semi desert grasslands and 60% of Montane grasslands are listed. What is the scientific basis for these numbers? Why is this vegetative ground cover and not total ground cover? What kind of cover, canopy, foliar, or basal? When, how and where will this be measured? And finally, these	Explain, modify, or remove the Grasslands guideline "Grasslands and openings should provide for sufficient vegetative ground cover (45 percent or greater in Great Basin grasslands, 35 percent or greater in semi-desert grasslands, and 60 percent or greater in montane/subalpine grasslands) to prevent accelerated erosion, dissipate rainfall, facilitate the natural	Desired condition statement was rewritten for additional clarification	p.57. Guidelines for grasslands: 45% "Vegetative ground cover" for Great Basin grasslands, 35% for semi desert grasslands and 60% of Montane grasslands are listed. What is the scientific basis for these numbers? Why is this vegetative ground cover and not total ground cover? What kind of cover, canopy, foliar, or basal? When, how and where will this be measured? And finally, these	Clarification and Scientific Basis for Guideline	PC 861-1 The Forest Service should explain the scientific basis for these numbers, why it is vegetative ground cover and not total ground cover, what kind of cover, canopy, foliar, or basal, and when, how and where will this be measured. The Forest Service should explain why these values exceed any estimates provided by NRCS ESI data.

	values exceed any estimates provided by NRCS ESI data. Why is that?	fire regime, and provide wildlife and insect habitat." (proposed plan p. 57). There are concerns that the specified amounts may not be achievable or measurable.	ation. In addition, these are not Forest Service documents, standards or direction.	values exceed any estimates provided by NRCS ESI data. Why is that?			
Grassland - cover and height	Guidelines for grasslands (page 57) lists 45% "Vegetative ground cover" for Great Basin grasslands, 35% for semi desert grasslands and 60% of Montaine grasslands with no accompanying description of the scientific basis for those numbers. It is not explained why this is vegetative ground cover as opposed to total ground cover, nor is the kind of cover, canopy, foliar, or basal described. When, how and where measurements will occur is not included.	Explain, modify, or remove the Grasslands guideline "Grasslands and openings should provide for sufficient vegetative ground cover (45 percent or greater in Great Basin grasslands, 35 percent or greater in semi-desert grasslands, and 60 percent or greater in montane/subalpine grasslands) to prevent accelerated erosion, dissipate rainfall, facilitate the natural fire regime, and provide wildlife and insect habitat." (proposed plan p. 57). There are concerns that the specified amounts may not be achievable or measurable.	Desired condition was rewritten for additional clarification. In addition, these are not Forest Service documents, standards or direction.	Guidelines for grasslands (page 57) lists 45% "Vegetative ground cover" for Great Basin grasslands, 35% for semi desert grasslands and 60% of Montaine grasslands with no accompanying description of the scientific basis for those numbers. It is not explained why this is vegetative ground cover as opposed to total ground cover, nor is the kind of cover, canopy, foliar, or basal described. When, how and where measurements will occur is not included.	Data on Desired Condition		

			rds or directi on			
Grassland - cover and height gl	p. 57 Guideline for Grasslands The numeric values assigned to grasslands may or may not be achievable? What is the scientific basis for these numbers? Why is this listed as 45% vegetative ground cover and not total ground cover, a more realistic depiction of the condition of the landscape. These numbers are again referenced to the 1980's exceptional and atypical TES Data Report.	Explain, modify, or remove the Grasslands guideline "Grasslands and openings should provide for sufficient vegetative ground cover (45 percent or greater in Great Basin grasslands, 35 percent or greater in semi-desert grasslands, and 60 percent or greater in montane/subalpine grasslands) to prevent accelerated erosion, dissipate rainfall, facilitate the natural fire regime, and provide wildlife and insect habitat." (proposed plan p. 57). There are concerns that the specified amounts may not be achievable or measurable.	Desired condition was rewritten for additional clarification. In addition, these are not Forest Service documents, standards or direction	p. 57 Guideline for Grasslands The numeric values assigned to grasslands may or may not be achievable? What is the scientific basis for these numbers? Why is this listed as 45% vegetative ground cover and not total ground cover, a more realistic depiction of the condition of the landscape. These numbers are again referenced to the 1980's exceptional and atypical TES Data Report.	Data on Desired Condition	

Grassland - similarity standard	As an aside, I could not help but notice that the one old-fashioned standard in the whole plan is the firm, affirmative standard that says "A moderate to high similarity to vegetation climax conditions for plant canopy cover and composition . . . shall be achieved and/or maintained." Plan at 57. This of course will require you to undertake large-scale removal of pinon and juniper to open up the canopy to grow more grass— something the ranchers want very badly. Why no similar standards for the other vegetation types? Why is this rancher-friendly standard the only one in just about the whole plan that has any teeth to it?)	Explain why other vegetation types do not have a standard like the one for Grasslands "A moderate to high similarity to vegetation climax conditions for plant canopy cover and composition as described in each ecological mapping unit shall be achieved and/or maintained" (proposed plan p. 57).	XXXX	As an aside, I could not help but notice that the one old-fashioned standard in the whole plan is the firm, affirmative standard that says "A moderate to high similarity to vegetation climax conditions for plant canopy cover and composition . . . shall be achieved and/or maintained." Plan at 57. This of course will require you to undertake large-scale removal of pinon and juniper to open up the canopy to grow more grass— something the ranchers want very badly. Why no similar standards for the other vegetation types? Why is this rancher-friendly standard the only one in just about the whole plan that has any teeth to it?)		Strengthening and Keeping Existing Standards , Objectives, and Guidelines
Grassland - similarity standard2	"In grasslands, a moderate to high similarity index to reference conditions <sup>23</sup> should be achieved." (p 119-120). This statement is meaningless unless the attribute used (e.g. cover or production) and method of calculating similarity are defined. Also, the type and source of "reference conditions" must be identified. Finally, the relevance of the similarity index to management objectives must be established, and evidence that the desired level of similarity is achievable presented.	Provide more details in the Grasslands standard "A moderate to high similarity to vegetation climax conditions for plant canopy cover and composition as described in each ecological mapping unit shall be achieved and/or maintained" (proposed plan p. 57). Concern that it points to other documents and is not the best method to convey the details of the standard.	XXXX			

Grassland - similarity standard2	Page 57, Standards for Grasslands, We request; The Forest provide more details to this very important topic, to continually point to other documents is not the best method to convey the details of the Standard.	Provide more details in the Grasslands standard "A moderate to high similarity to vegetation climax conditions for plant canopy cover and composition as described in each ecological mapping unit shall be achieved and/or maintained" (proposed plan p. 57). Concern that it points to other documents and is not the best method to convey the details of the standard.	XXXX	Page 57, Standards for Grasslands, We request; The Forest provide more details to this very important topic, to continually point to other documents is not the best method to convey the details of the Standard.		Provide and Clarify Details in Standards	
Grasslands - guidelines - remove duplicates	Similar guidelines are presented on Page 57 as objectives at different scales and as Guidelines for Grasslands. These should be removed.	Similar guidelines are presented on page 57 of the proposed plan as objectives at different scales and as guidelines for Grasslands. These should be removed.	Guideline was removed because it was covered under desired conditions.	Similar guidelines are presented on Page 57 as objectives at different scales and as Guidelines for Grasslands. These should be removed.		Duplicate and Unacceptable Guidelines	
Grassland - guideline - mechanical	Keep the Guideline, "Mechanical restoration of grasslands should emphasize individual tree removal to limit soil disturbance." (Proposed Plan, p. 57) Fire may be enough to remove excess woody vegetation, but if mechanical methods are used, they should be applied on a tree-by-tree basis and retain fragile soils.	Keep the Grasslands guideline "Mechanical restoration of grasslands should emphasize individual tree removal to limit soil disturbance" (proposed plan p. 57). Fire may be enough to remove excess woody vegetation, but if mechanical methods are used, they should be applied on a tree-by-tree basis and retain fragile soils	This guideline does not exclude the use of fire .	Keep the Guideline, "Mechanical restoration of grasslands should emphasize individual tree removal to limit soil disturbance." (Proposed Plan, p. 57) Fire may be enough to remove excess woody vegetation, but if mechanical methods are used, they should be applied on a tree-by-tree basis and retain fragile soils.		Enhance Mechanical Methods in Guideline	PC 861-2 The Forest Service should keep the guideline, "Mechanical restoration of grasslands should emphasize individual tree removal to limit soil disturbance." (Proposed Plan, p. 57). Fire may be enough to remove excess woody vegetation, but if mechanical methods are used, they should be applied on a tree-by-tree basis and retain fragile soils.

Grassland - restoration approach	Therefore, the reintroduction of fire, combined with long-term rest from livestock grazing, should be implemented to restore our grasslands to their full capacity.	The reintroduction of fire, combined with long-term rest from livestock grazing, should be implemented to restore grasslands to their full capacity.	XXXX	Therefore, the reintroduction of fire, combined with long-term rest from livestock grazing, should be implemented to restore our grasslands to their full capacity.	Implement Restoration Tools - Fire and Rest from Grazing	
Grassland - restoration w/fire concern	Page 56 Lack of fire in the grasslands, especially desert grassland and Great Basin grassland, has no doubt contributed to shrub increases over the past 100 years or so due to fire suppression and removal of fuel by grazing. However, re-establishing the historic fire frequencies described here may not be feasible or practical in some cases, and it will not necessarily reduced the shrub cover to "historic" levels. Shrub increases have benefitted habitat for some wildlife species while reducing habitat values for others.	Concern that plan desired condition to reestablish the historic fire frequencies in grasslands, especially desert grassland and Great Basin grassland, may not be feasible or practical and will not necessarily reduce the shrub cover to historic levels.	XXXX			
FIRE - CWPP	The above list of Wuis is in error by omitting the Community Wildfire Protection Plan (CWPP) WUI Areas in Greenlee County. GCCWPP was completed and signed on November 3, 2005. The "Urban Wildfire Interface Communities/Areas left out of the above highlighted Just are the communities of Eagle Creek and Blue as well as at-risk private inholdings of the GCCWPP analysis area and are	Correct the list and community-forest intermix management area showing the Community Wildlife Protection Plan WUI (wildland-urban interface) areas. Areas in Greenlee County are missing. Explain why the CWPP area's in Apache and Navajo counties are surrounded with a designation of "General Forest" and the CWPP area in Greenlee County is surrounded by a designation of "natural	XXXX	The above list of Wuis is in error by omitting the Community Wildfire Protection Plan (CWPP) WUI Areas in Greenlee County. GCCWPP was completed and signed on November 3, 2005. The "Urban Wildfire Interface Communities/Areas left out of the above highlighted Just are the communities of Eagle Creek and Blue as well as at-risk private inholdings of the GCCWPP analysis area and are	Community Wildfire Protection Plan Areas	

	located in the Alpine and Clifton Districts of the ANF. The majority of the lands surrounding the at-risk interface communities of Clifton and Morenci are located adjacent to ANF.	landscape.”		located in the Alpine and Clifton Districts of the ANF. The majority of the lands surrounding the at-risk interface communities of Clifton and Morenci are located adjacent to ANF.		
FIRE - CWPP	By presenting both erroneous and correct information about the CWPP areas in Greenlee County, the DEIS seems to have arbitrarily imposed "Natural landscape", and other restrictive managements and/or designations on top of Greenlee County's "Community Wildfire Protection Plan" designated areas (Especially evident in the "preferred" Alternative - see the variations on maps in the DEIS).	Correct the list and community-forest intermix management area showing the Community Wildlife Protection Plan WUI (wildland-urban interface) areas. Areas in Greenlee County are missing. Explain why the CWPP area's in Apache and Navajo counties are surrounded with a designation of "General Forest" and the CWPP area in Greenlee County is surrounded by a designation of "natural landscape.”	XXXX	By presenting both erroneous and correct information about the CWPP areas in Greenlee County, the DEIS seems to have arbitrarily imposed "Natural landscape", and other restrictive managements and/or designations on top of Greenlee County's "Community Wildfire Protection Plan" designated areas (Especially evident in the "preferred" Alternative - see the variations on maps in the DEIS).	Greenlee County CWPP Areas	PC 906-3 The Forest Service should review the arbitrarily imposed "Natural landscape", and other restrictive managements and/or designations on top of Greenlee County's "Community Wildfire Protection Plan" designated areas (Especially evident in the "preferred" Alternative - see the variations on maps in the DEIS) and correct the erroneous information. Management Area" maps for Alternatives B, C, and D, specific only to Greenlee County, show various designations incompatible with and unsuitable for the "at high risk of fire" protected Wildland Urban Interface areas designated by the Greenlee County CWPP and established in 2005 by the signing of the ASNF Forest Supervisor in 2005.

FIRE - CWPP	<p>"Management Area" maps for Alternatives B, C, and D, specific only to Greenlee County, show various designations incompatible with and unsuitable for the "at high risk of fire" protected Wildland Urban Interface areas designated by the Greenlee County CWPP and established in 2005 by the signing of the ASNF Forest Supervisor in 2005. • The DEIS "Management Area" maps also illustrate the correct application of "Community-Forest Intermix" (CFI) management areas on all the established CWPP areas in Apache and Navaho counties, also appropriately showing these CFI areas surrounded, by a large majority, with the appropriate, much less detrimental designation of "General Forest" management areas.</p>	<p>Correct the list and community-forest intermix management area showing the Community Wildlife Protection Plan WUI (wildland-urban interface) areas. Areas in Greenlee County are missing. Explain why the CWPP area's in Apache and Navajo counties are surrounded with a designation of "General Forest" and the CWPP area in Greenlee County is surrounded by a designation of "natural landscape."</p>	XXXX	<p>"Management Area" maps for Alternatives B, C, and D, specific only to Greenlee County, show various designations incompatible with and unsuitable for the "at high risk of fire" protected Wildland Urban Interface areas designated by the Greenlee County CWPP and established in 2005 by the signing of the ASNF Forest Supervisor in 2005. • The DEIS "Management Area" maps also illustrate the correct application of "Community-Forest Intermix" (CFI) management areas on all the established CWPP areas in Apache and Navaho counties, also appropriately showing these CFI areas surrounded, by a large majority, with the appropriate, much less detrimental designation of "General Forest" management areas.</p>	Community Wildfire Protection Plan Areas	
Fire - plan edit	<p>Issues: The Plan contains many errors and omissions. "Fire is the most important natural disturbance ..." (p17) This statement is not necessarily correct and should include reference to geologic processes and climatic fluctuations.</p>	<p>Correct the statement "Fire is the most important natural disturbance ..." (proposed plan p.17). Concern that this statement is not necessarily correct and should include reference to geologic processes and climatic fluctuations. <b>NOTE: statement is in ALL PNVT section</b></p>	XXXX	<p>Issues: The Plan contains many errors and omissions. "Fire is the most important natural disturbance ..." (p17) This statement is not necessarily correct and should include reference to geologic processes and climatic fluctuations.</p>	Reference to Geologic Processes and Climatic Fluctuations	<p>PC 905-9 The Forest Service should correct the statement "Fire is the most important natural disturbance ..." (p17)" because it should include reference to geologic processes and climatic fluctuations.</p>

Fire - baseline data	The occurrences of large fires need to be included in the data and their occurrence and impacts planned for.	The occurrences of large fires need to be included in the analysis and their occurrence and impacts planned for.	XXXX	The occurrences of large fires need to be included in the data and their occurrence and impacts planned for.	Planning for Large Fire Occurrences and Impacts	
Fire - effects	impacts, good or bad, must be evaluated as to how each alternative and vegetation strata would be impacted by a high intensity wildfire.	With the appropriate resource specialist, analyze and discuss the impacts to vegetation strata (percent mortality, value, volume) of current and potential changes of fire regime condition class (FRCC) and high intensity fire. Recommend that the impacts of a wildfire be evaluated using a rating such as the ERC (Energy Release Component) and evaluate the fire at the 90th or 95th percentile and higher of the ERC rating for the respective fuel model(s). Include a loss or benefit analysis based upon recent high intensity wildfires throughout the Southwest using comparable vegetative (1) types/classes, pre-wildfire and (2) treatments and extrapolated to the proposed alternatives.	XXXX	impacts, good or bad, must be evaluated as to how each alternative and vegetation strata would be impacted by a high intensity wildfire.	Impacts from High Intensity Fires	

Fire - effects	Wildfire impacts are basically ignored throughout the Proposed LMP and the Programmatic DEIS... This evaluation needs to be a joint analysis between the Fire Specialist and appropriate resource specialist	With the appropriate resource specialist, analyze and discuss the impacts to vegetation strata (percent mortality, value, volume) of current and potential changes of fire regime condition class (FRCC) and high intensity fire. Recommend that the impacts of a wildfire be evaluated using a rating such as the ERC (Energy Release Component) and evaluate the fire at the 90th or 95th percentile and higher of the ERC rating for the respective fuel model(s). Include a loss or benefit analysis based upon recent high intensity wildfires throughout the Southwest using comparable vegetative (1) types/classes, pre-wildfire and (2) treatments and extrapolated to the proposed alternatives.	XXXX	Wildfire impacts are basically ignored throughout the Proposed LMP and the Programmatic DEIS... This evaluation needs to be a joint analysis between the Fire Specialist and appropriate resource specialist		Potential Wildfire Impacts
Fire - effects	The Fire Specialist's Report identified the current and potential changes of the FRCC in Table 11 by alternative but nowhere the potential impacts discussed or evaluated. This evaluation needs to be a joint analysis between the Fire Specialist and appropriate resource specialist 'Example: a high intensity wildfire burning through vegetations strata XX of Alternative ZZ will result in 90% mortality of the stand. The resource specialist would convert that to a loss of value, volume use, etc. The same	With the appropriate resource specialist, analyze and discuss the impacts to vegetation strata (percent mortality, value, volume) of current and potential changes of fire regime condition class (FRCC) and high intensity fire. Recommend that the impacts of a wildfire be evaluated using a rating such as the ERC (Energy Release Component) and evaluate the fire at the 90th or 95th percentile and higher of the ERC rating for the respective fuel model(s). Include a loss or benefit	XXXX			

	wildfire in vegetation strata YY might provide a benefit resulting in a gain of value, volume, use, etc.	analysis based upon recent high intensity wildfires throughout the Southwest using comparable vegetative (1) types/classes, pre-wildfire and (2) treatments and extrapolated to the proposed alternatives.				
Fire - effects	I would recommend that the impacts of a wildfire be evaluated using a rating such as the ERC (Energy Release Component) and evaluate the fire at the 90th or 95th percentile and higher of the ERC rating for the respective fuel model(s).	With the appropriate resource specialist, analyze and discuss the impacts to vegetation strata (percent mortality, value, volume) of current and potential changes of fire regime condition class (FRCC) and high intensity fire. Recommend that the impacts of a wildfire be evaluated using a rating such as the ERC (Energy Release Component) and evaluate the fire at the 90th or 95th percentile and higher of the ERC rating for the respective fuel model(s). Include a loss or benefit analysis based upon recent high intensity wildfires throughout the Southwest using comparable vegetative (1) types/classes, pre-wildfire and (2) treatments and extrapolated to the proposed alternatives.	XXXX	I would recommend that the impacts of a wildfire be evaluated using a rating such as the ERC (Energy Release Component) and evaluate the fire at the 90th or 95th percentile and higher of the ERC rating for the respective fuel model(s).	Potential Wildfire Impacts	

Fire - effects	Such an evaluation should include a loss or benefit analysis based upon recent high intensity wildfires throughout the Southwest using comparable vegetative •types/classes, pre-wildfire • treatments and extrapolated to the proposed alternatives.	With the appropriate resource specialist, analyze and discuss the impacts to vegetation strata (percent mortality, value, volume) of current and potential changes of fire regime condition class (FRCC) and high intensity fire. Recommend that the impacts of a wildfire be evaluated using a rating such as the ERC (Energy Release Component) and evaluate the fire at the 90th or 95th percentile and higher of the ERC rating for the respective fuel model(s). Include a loss or benefit analysis based upon recent high intensity wildfires throughout the Southwest using comparable vegetative (1) types/classes, pre-wildfire and (2) treatments and extrapolated to the proposed alternatives.	XXXX	Such an evaluation should include a loss or benefit analysis based upon recent high intensity wildfires throughout the Southwest using comparable vegetative •types/classes, pre-wildfire • treatments and extrapolated to the proposed alternatives.		Impacts from High Intensity Fires
Fire - effects	Review basis for "retuning natural fire regimes" and place more emphasis on fire suppression and prevention during periods of drought and during the time of year when high and extreme fire danger occurs. Recalculate fire interval based on most recent wildfire data and current forest conditions.	With the appropriate resource specialist, analyze and discuss the impacts to vegetation strata (percent mortality, value, volume) of current and potential changes of fire regime condition class (FRCC) and high intensity fire. Recommend that the impacts of a wildfire be evaluated using a rating such as the ERC (Energy Release Component) and evaluate the fire at the 90th or 95th percentile and higher of the ERC rating for the respective fuel model(s). Include a loss or benefit	XXXX			

		analysis based upon recent high intensity wildfires throughout the Southwest using comparable vegetative (1) types/classes, pre-wildfire and (2) treatments and extrapolated to the proposed alternatives.					
Fire - effects - human	Include realistic impact of wildfire on human environment, including but not limited to smoke, air pollution, and short-term as well as cumulative socio-economic effects. Assess mechanical treatment vs. burning to reduce smoke and other negative effects.	Discuss impact of wildfire on the human environment including, but not limited to, (1) smoke, (2) air pollution, (3) socio-economic effects, (4) assess mechanical v. burning treatments on smoke and other negative effects, and (5) cost for post-fire flooding and infrastructure damage and loss of revenue from activities shut down by fires.	** Check out Kaibab p. 24, 1st comment & Prescott p. 18 2nd comment	Include realistic impact of wildfire on human environment, including but not limited to smoke, air pollution, and short-term as well as cumulative socio-economic effects. Assess mechanical treatment vs. burning to reduce smoke and other negative effects. Include post-fire long-term and cumulative effects on human environment, such as cost for post-fire flooding damage prevention and damage reconstruction of infrastructure, the huge loss of revenue from activities shut down by fires.		Include Impact of Fire and Management options	PC 903-1 The Forest Service should include the realistic impacts of wildfire on human environment to include: 1) including but not limited to smoke, air pollution short-term as well as cumulative socio-economic effects 3) assess mechanical treatment vs. burning to reduce smoke and other negative effects 4) include post-fire long-term and cumulative effects on human environment, such as cost for post-fire flooding damage prevention and damage reconstruction of infrastructure 5) the huge loss of revenue from activities shut down by fires
Fire - effects - human	All data should be reviewed to be sure it is recent enough to be placed within the framework of wildfire impact. New data should be used to re-analyze all Agency management planning, to determine cumulative impact on the human environment and should be included in determining the natural and human environmental consequences of each of the	Discuss impact of wildfire on the human environment including, but not limited to, (1) smoke, (2) air pollution, (3) socio-economic effects, (4) assess mechanical v. burning treatments on smoke and other negative effects, and (5) cost for post-fire flooding and infrastructure damage and loss of revenue from activities shut down by fires.	** Check out Kaibab p. 24, 1st comment & Prescott p. 18 2nd comment				

	action alternatives.						
Fire - effects - human	Include post-fire long-term and cumulative effects on human environment, such as cost for post-fire flooding damage prevention and damage reconstruction of infrastructure, the huge loss of revenue from activities shut down by fires.	Discuss impact of wildfire on the human environment including, but not limited to, (1) smoke, (2) air pollution, (3) socio-economic effects, (4) asses mechanical v. burning treatments on smoke and other negative effects, and (5) cost for post-fire flooding and infrastructure damage and loss of revenue from activities shut down by fires.	** Check out Kaibab p. 24, 1st comment & Prescott p. 18 2nd comment				
Fire - effects - human	Include post-fire long-term and cumulative effects on human environment, such as cost for post-fire flooding damage prevention and damage reconstruction of infrastructure, the huge loss of revenue from activities shut down by fires.	Discuss impact of wildfire on the human environment including, but not limited to, (1) smoke, (2) air pollution, (3) socio-economic effects, (4) asses mechanical v. burning treatments on smoke and other negative effects, and (5) cost for post-fire flooding and infrastructure damage and loss of revenue from activities shut down by fires.	** Check out Kaibab p. 24, 1st comment & Prescott p. 18 2nd comment				

Fire - effects - high severity	Unless I missed it, nowhere in the Draft Forest Plan or Programmatic DEIS: did anyone identify the acceptability of high intensity wildfires- impacting the various alternatives and vegetation strata. Each vegetation type is treated differently to some degree in each alternative. To rephrase the question, once the desired condition of the alternative is reached and the area is impacted by a high intensity wildfire, are those fire impacts acceptable?	Explain when a high intensity wildfire would be considered acceptable.	XXXX	Unless I missed it, nowhere in the Draft Forest Plan or Programmatic DEIS: did anyone identify the acceptability of high intensity wildfires- impacting the various alternatives and vegetation strata. Each vegetation type is treated differently to some degree in each alternative. To rephrase the question, once the desired condition of the alternative is reached and the area is impacted by a high intensity wildfire, are those fire impacts acceptable?	Impacts from High Intensity Fires	PC 902-1 The Forest Service should evaluate how each alternative and vegetation strata would be impacted by a high intensity wildfire using a rating such as the ERC (Energy Release Component) and evaluate the fire at the 90th or 95th percentile and higher of the ERC rating for the respective fuel model(s). The evaluation should include a loss or benefit analysis based upon recent high intensity wildfires throughout the Southwest using comparable vegetative •types/classes, pre-Wildfire • treatments and extrapolated to the imposed alternatives. Much -of the impacts could be obtained from BAER severity bum maps and data. Because of this, Table 2 should be expanded to include the Rodeo.-Chediski Fire.
Fire - effects - climate	The EIS must assess more than the degree of fire regime departure from a narrowly-defined historical condition (“fire regime condition class”) and disclose implications of climate change on wildland fire and management options in the future.	Assess more than the degree of fire regime departure from FRCC (fire regime condition class) and disclose implications of climate change on wildland fire and management.	**Check out Prescott p. 9, last comment	The EIS must assess more than the degree of fire regime departure from a narrowly-defined historical condition (“fire regime condition class”) and disclose implications of climate change on wildland fire and management options in the future.	Include Impact of Fire and Management options	

Fire - effects - crown	The environmental analysis should ensure professional and scientific integrity with site-specific information based on field observations (Weatherspoon and Skinner 1995).	The environmental analysis (forest structure and crown fire hazard) should ensure professional and scientific information based on field observations. To accurately assess fuel treatment effects on the likelihood of crown fire initiation and spread, it is necessary to consider: (1) surface fuel density and arrangement; (2) canopy base height; (3) local topography; and (4) weather patterns.	XXXX	The environmental analysis should ensure professional and scientific integrity with site-specific information based on field observations (Weatherspoon and Skinner 1995).		Site Specific Information	
Fire - effects - crown	To accurately assess fuel treatment effects on the likelihood of crown fire initiation and spread, it is necessary to consider: (1) surface fuel density and arrangement; (2) canopy base height; (3) local topography; and (4) weather patterns (Graham et al. 2004, Hunter et al. 2007).	The environmental analysis (forest structure and crown fire hazard) should ensure professional and scientific information based on field observations. To accurately assess fuel treatment effects on the likelihood of crown fire initiation and spread, it is necessary to consider: (1) surface fuel density and arrangement; (2) canopy base height; (3) local topography; and (4) weather patterns. .	XXXX				
Fire - effects activity-created fuels	The PDEIS discusses a range of fuel management options, but notably, it does not consider the effect of activity-created fuels on fire hazard, nor does it propose any standards or guidelines for their treatment.	Consider the effect of activity-created fuels on fire hazard. Disclose how much slash may remain on the ground after logging in different vegetation types. Look at slash fuels and treatment options on fire hazard and ecosystem resilience, particularly on steep slopes where prescribed fire may not be used due to operability constraints. Provide plan guidance for management of activity-created fuels.	XXXX	The PDEIS discusses a range of fuel management options, but notably, it does not consider the effect of activity-created fuels on fire hazard, nor does it propose any standards or guidelines for their treatment.		Activity Fuel Treatments	

Fire - effects activity-created fuels	The analysis should disclose how much slash may remain on the ground after logging is completed in different vegetation types, and take a hard look at the effectiveness of activity fuel treatments.	Consider the effect of activity-created fuels on fire hazard. Disclose how much slash may remain on the ground after logging in different vegetation types. Look at slash fuels and treatment options on fire hazard and ecosystem resilience, particularly on steep slopes where prescribed fire may not be used due to operability constraints. Provide plan guidance for management of activity-created fuels.	XXXX	The analysis should disclose how much slash may remain on the ground after logging is completed in different vegetation types, and take a hard look at the effectiveness of activity fuel treatments.		Activity Fuel Treatments	
Fire - effects activity-created fuels	The Forest Service is required to disclose potentially significant effects of the project on public health and safety, including wildland fire control efforts. It should take a hard look at the effect of slash fuels and treatment options on fire hazard and ecosystem resilience, particularly on steep slopes where prescribed fire may not be used due to operability constraints, rather than generalizing them across the national forest s.	Consider the effect of activity-created fuels on fire hazard. Disclose how much slash may remain on the ground after logging in different vegetation types. Look at slash fuels and treatment options on fire hazard and ecosystem resilience, particularly on steep slopes where prescribed fire may not be used due to operability constraints. Provide plan guidance for management of activity-created fuels.	XXXX				
Fire - effects prescribed fire	Therefore, the Forest Service should consider and disclose benefits and potential liabilities of using prescribed fire at broad spatial scales to reduce risk, provide ecosystem services, and regulate greenhouse gas emissions.	Disclose benefits and potential liabilities of using prescribed fire at broad spatial scales to reduce risk, provide ecosystem services, and regulate greenhouse gas emissions.	** Check out Kaibab, p. 24, 2nd comment	Therefore, the Forest Service should consider and disclose benefits and potential liabilities of using prescribed fire at broad spatial scales to reduce risk, provide ecosystem services, and regulate greenhouse gas emissions.		Effects of Prescribed Fire at Broad Scales	

Fire - effects prescribed fire	<p>Fire is a fundamental component of Earth's natural carbon cycle, with a functional role that pre-dates human existence. Ecosystems occurring on the Apache-Sitgreaves National Forests are adapted to the active functioning of natural fire process. In those ecosystems, fire exclusion may not yield long term reduction of greenhouse gas emissions compared to re- establishment and maintenance of a functional fire regime (AFE 2009). Prescribed burning is a risk-reduction management tool that can be used to mitigate undesirable impacts of unplanned wildfires. Carbon emissions from prescribed burning typically are much lower than those stemming from unplanned wildfires (AFE 2009). Therefore, the Forest Service should consider and disclose benefits and potential liabilities of using prescribed fire at broad spatial scales to reduce risk, provide ecosystem services, and regulate greenhouse gas emissions.</p>	<p>Disclose benefits and potential liabilities of using prescribed fire at broad spatial scales to reduce risk, provide ecosystem services, and regulate greenhouse gas emissions.</p>	<p>** Check out Kaibab, p. 24, 2nd comment</p>	<p>Fire is a fundamental component of Earth's natural carbon cycle, with a functional role that pre-dates human existence. Ecosystems occurring on the Apache-Sitgreaves National Forests are adapted to the active functioning of natural fire process. In those ecosystems, fire exclusion may not yield long term reduction of greenhouse gas emissions compared to re- establishment and maintenance of a functional fire regime (AFE 2009). Prescribed burning is a risk-reduction management tool that can be used to mitigate undesirable impacts of unplanned wildfires. Carbon emissions from prescribed burning typically are much lower than those stemming from unplanned wildfires (AFE 2009). Therefore, the Forest Service should consider and disclose benefits and potential liabilities of using prescribed fire at broad spatial scales to reduce risk, provide ecosystem services, and regulate greenhouse gas emissions.</p>		Effects of Prescribed Fire	
Fire - Correction	<p>Correct statement on p 208 that previously burned areas stop fires.</p>	<p>Correct statement on p 208 of the DEIS that says previously burned areas stop fires.</p>	<p>XXXX</p>				

Fire effects - Ignition	There is no discussion of the scientific basis of the impacts of different ignition starts on subsequent fire events, although conclusions are derived from the premise (being within the "natural disturbance regime" and outside the "natural disturbance regime"). There is no discussion of the impacts of the effects of different ignition types on priority watersheds or the implementation of watershed management activities.	There should be discussion of the effects of different ignition types on subsequent fire events and watershed management activities.	XXXX				
Fire - natural fire regime	Would it not be better to simply say that fire will be used as a tool to achieve the desired vegetation conditions on the Forests whether or not it approximates the "natural" fire regime?	Explain the need to return to natural fire regimes compared to simply using fire as a tool to achieve the desired vegetation conditions.	XXXX	Would it not be better to simply say that fire will be used as a tool to achieve the desired vegetation conditions on the Forests whether or not it approximates the "natural" fire regime?		Fire Used as Tool	PC 651-2 The Forest Service should reword the language in the plan to state that fire will be used as a tool to achieve the desired vegetation conditions on the Forests whether or not it approximates the "natural" fire regime.
Fire - natural fire regime	Page 28 " Natural fire regimes are restored." Unless it is not possible or desirable?	Explain the need to return to natural fire regimes compared to simply using fire as a tool to achieve the desired vegetation conditions.	XXXX				

Fire - natural fire regime	The idea "nature conditions" and "natural fire regimes" are superior to what has occurred over the past century on the National Forest is unproven and based upon emotions verses science.	Explain the need to return to natural fire regimes compared to simply using fire as a tool to achieve the desired vegetation conditions.	XXXX			
Fire - natural fire regime	Also there is not much research and science based data to support the theories that "natural fire regimes" "fire adapted ecosystems" and a "FRCC rating of 1" provides healthier ecosystems, less erosion, more clean water supplies for downstream users and many other conditions that make up a healthy forest.	Explain the need to return to natural fire regimes compared to simply using fire as a tool to achieve the desired vegetation conditions.	XXXX			
Fire - natural fire regime	Restore natural fire disturbance processes. Patches of severely burned forest, or snag forests, are among the rarest of all wildlife habitats in the West; they should be managed for natural recovery, not for industrial logging or other forms of economic production.	The plan should focus on safely restoring natural fire regimes and identify where natural fires are a priority.	** Check out Prescott, p. 17 3rd comment			
Fire - natural fire regime	Appropriate management will absolutely include return to the historical fire regime. This will decrease costs of fighting unplanned fires but more importantly improve public and forest health as well as restore a process that is vital to maintaining forest resiliency.	The plan should focus on safely restoring natural fire regimes and identify where natural fires are a priority.	** Check out Prescott, p. 17 3rd comment	Appropriate management will absolutely include return to the historical fire regime. This will decrease costs of fighting unplanned fires but more importantly improve public and forest health as well as restore a process that is vital to maintaining forest resiliency.	Return to Historical Fire Regimes	

Fire - natural fire regime	The plan should also focus on safely restoring natural fire regimes. The plan should identify areas where natural fires are a priority.	The plan should focus on safely restoring natural fire regimes and identify where natural fires are a priority.	** Check out Prescott, p. 17 3rd comment	The plan should also focus on safely restoring natural fire regimes. The plan should identify areas where natural fires are a priority.	Natural Fire Regimes	PC 905-4 The Forest Service should focus on safely restoring natural fire regimes and the plan should identify areas where natural fires are a priority because it is not in the best interest of the public for the Agency to concentrate its fire, vegetation, soils, wildlife, watershed and other management efforts to changing the majority of the fire regime condition classes (FRCC) ratings for the Forest to a level 1.
Fire - natural fire regime	Restore natural fire disturbance processes. Identify areas where natural fires are a priority.	The plan should focus on safely restoring natural fire regimes and identify where natural fires are a priority.	** Check out Prescott, p. 17 3rd comment	Restore natural fire disturbance processes. Identify areas where natural fires are a priority.	Natural Fire Regimes	
Fire - natural fire regime	And throughout the restoration processes, work toward safely restoring natural fire regimes wherever possible.	The plan should focus on safely restoring natural fire regimes and identify where natural fires are a priority.	** Check out Prescott, p. 17 3rd comment	And throughout the restoration processes, work toward safely restoring natural fire regimes wherever possible.	Natural Fire Regimes	PC 905-4 The Forest Service should focus on safely restoring natural fire regimes and the plan should identify areas where natural fires are a priority because it is not in the best interest of the public for the Agency to concentrate its fire, vegetation, soils, wildlife, watershed and other management efforts to changing the majority of the fire regime condition classes (FRCC) ratings for the Forest to a level 1.

Fire - natural fire regime	Restore natural fire disturbance processes. Identify areas where natural fires are a priority.	The plan should focus on safely restoring natural fire regimes and identify where natural fires are a priority.	** Check out Prescott, p. 17 3rd comment	Restore natural fire disturbance processes. Identify areas where natural fires are a priority.		Natural Fire Regimes	PC 905-4 The Forest Service should focus on safely restoring natural fire regimes and the plan should identify areas where natural fires are a priority because it is not in the best interest of the public for the Agency to concentrate its fire, vegetation, soils, wildlife, watershed and other management efforts to changing the majority of the fire regime condition classes (FRCC) ratings for the Forest to a level 1.
Fire - address it	Every year we see the fires that destroy forest due in part to poor fire management. It is crucial to address this.	There is a need to address increasing fire occurrence.	XXXX	Every year we see the fires that destroy forest due in part to poor fire management. It is crucial to address this.		Fire Management	PC 905-7 The Forest Service should address that every year we see the fires that destroy forest due in part to poor fire management. Much can be learned from looking at what is being done where population growth, homes and people encroaching into remote areas and large wildfires have been dealt with for many years. While thinned and well-manicured forest are much more resilient and resistant to fire, the Agency will never achieve a point in time that fire suppression and fuels management will not be one of its major responsibilities.

Fire - address it	Fire occurrence has remained relatively constant over time but the burned acreage is increasing on an upward trending curve which tells me that whatever has been done in the past is obviously not working and change is needed.	There is a need to address increasing fire occurrence.	XXXX	Fire occurrence has remained relatively constant over time but the burned acreage is increasing on an upward trending curve which tells me that whatever has been done in the past is obviously not working and change is needed.		Planning for Large Fire Occurrences and Impacts	
Fire - suppression	The Plan fails to provide predetermined burning conditions to establish suppression thresholds.	The plan should describe predetermined burning conditions to establish when fires should be suppressed or managed to meet resource objectives.	** Check out Kaibab , p. 25 last comment	The Plan fails to provide predetermined burning conditions to establish suppression thresholds.		Fire	
Fire - suppression	Issue: The Plan fails to provide predetermined burning conditions to establish suppression thresholds. (4th paragraph, page 31, Proposed Plan): Remedy: Establish clear fire management parameters for the use of fire as a tool to meet resource objectives.	The plan should describe predetermined burning conditions to establish when fires should be suppressed or managed to meet resource objectives.	** Check out Kaibab , p. 25 last comment	Issue: The Plan fails to provide predetermined burning conditions to establish suppression thresholds. (4th paragraph, page 31, Proposed Plan): Remedy: Establish clear fire management parameters for the use of fire as a tool to meet resource objectives.		Prescribed Fire Prescriptions	PC 905-20 The Forest Service should establish clear fire management parameters for the use of fire as a tool to meet resource objectives in order to provide predetermined burning conditions to establish suppression thresholds.
Fire - priorities	Remove emphasis on "returning natural fire regimes" and reanalyze for values and resources that are important to current and future generations in order to comply with Multiple Use - Sustained Yield Act of 1960 (MUSY) (Public Law 86-517)	De-emphasize restoration and prioritize the safety of people and property, including fire prevention, suppression activities, and reducing fuels in key locations.	** Check out Kaibab , p. 61 last comment & Prescott. P. 17 3rd comment	Remove emphasis on "returning natural fire regimes" and reanalyze for values and resources that are important to current and future generations in order to comply with Multiple Use - Sustained Yield Act of 1960 (MUSY) (Public Law 86-517)		Emphasis on Returning Natural Fire Regimes	PC 302-3 The Forest Service should remove emphasis on "returning natural fire regimes" and reanalyze for values and resources that are important to current and future generations in order to comply with Multiple Use - Sustained Yield Act of 1960 (MUSY) (Public Law 86-517)

Fire - priorities	De-emphasize "restoring fire-adapt ecosystems" and develop management alternatives that prioritize the safety of people and property. Focus on fire prevention and suppression activities and reducing fuels in key locations as opposed to "restoring fire adapted ecosystems" and "returning natural fire regimes".	De-emphasize restoration and prioritize the safety of people and property, including fire prevention, suppression activities, and reducing fuels in key locations.	** Check out Kaibab, p. 61 last comment & Prescott. P. 17 3rd comment	De-emphasize "restoring fire-adapt ecosystems" and develop management alternatives that prioritize the safety of people and property. Focus on fire prevention and suppression activities and reducing fuels in key locations as opposed to "restoring fire adapted ecosystems" and "returning natural fire regimes".	Prioritize Safety and People	
Fire - priorities	Remove emphasis on "uncharacteristic fires" and develop management alternatives that prioritize the safety of people and property. This would require an emphasis on fire prevention and suppression activities even if treatments are completed in the wildland-urban interface.	De-emphasize restoration and prioritize the safety of people and property, including fire prevention, suppression activities, and reducing fuels in key locations.	** Check out Kaibab, p. 61 last comment & Prescott. P. 17 3rd comment	Remove emphasis on "uncharacteristic fires" and develop management alternatives that prioritize the safety of people and property. This would require an emphasis on fire prevention and suppression activities even if treatments are completed in the wildland-urban interface.	Prioritize Safety and People	
Fire - priorities	Issue: The Plan incorrectly assumes protection of people, property and infrastructure is discretionary. (5th paragraph, page 31, Proposed Plan): Remedy: Reprioritize the protection of people, their property and their infrastructure as non-discretionary when suppressing wildfires.	De-emphasize restoration and prioritize the safety of people and property, including fire prevention, suppression activities, and reducing fuels in key locations.	** Check out Kaibab, p. 61 last comment & Prescott. P. 17 3rd comment	Issue: The Plan incorrectly assumes protection of people, property and infrastructure is discretionary. (5th paragraph, page 31, Proposed Plan): Remedy: Reprioritize the protection of people, their property and their infrastructure as non-discretionary when suppressing wildfires.	Protection Prioritization	PC 905-19 The Forest Service should reprioritize the protection of people, their property and their infrastructure as non-discretionary when suppressing wildfires.

Fire - priorities	Yet much of the use of prescribed fire heretofore and presumably under the proposed plan has prioritized (probably inevitably) protection of structures in the wildland/urban interface rather than the restoration of watersheds in more remote areas.	De-emphasize restoration and prioritize the safety of people and property, including fire prevention, suppression activities, and reducing fuels in key locations.	** Check out Kaibab , p. 61 last comment & Prescott. P. 17 3rd comment	Yet much of the use of prescribed fire heretofore and presumably under the proposed plan has prioritized (probably inevitably) protection of structures in the wildland/urban interface rather than the restoration of watersheds in more remote areas.	Protection Prioritization	
Fire - tactical placement of treatments	An additional approach to the strategic location of fuel treatments is to identify landscape features that are currently resistant to severe fire effects and use them as anchor points for a compartmentalized landscape fire management strategy. Such features may include natural openings, meadows, relatively open ridges, moist riparian areas, mature forest patches with shaded and cool microclimates and little or no history of past logging (Naficy et al. 2010), and areas where fuel treatments already have been completed. Those features can support the strategic use of fire for resource benefits, application of confinement and containment strategies as alternatives to full control of unplanned fires, and provide safe areas for workers to ignite prescribed fires for hazard reduction and ecological	The analysis should consider different approaches (e.g., fire resistant landscape features) for the strategic location of fuel treatments. Prioritize fuel treatments at locations where relatively little resource investment may create fire resistant conditions in the shortest amount of time.	** Check out Kaibab , p. 25 last comment	An additional approach to the strategic location of fuel treatments is to identify landscape features that are currently resistant to severe fire effects and use them as anchor points for a compartmentalized landscape fire management strategy. Such features may include natural openings, meadows, relatively open ridges, moist riparian areas, mature forest patches with shaded and cool microclimates and little or no history of past logging (Naficy et al. 2010), and areas where fuel treatments already have been completed. Those features can support the strategic use of fire for resource benefits, application of confinement and containment strategies as alternatives to full control of unplanned fires, and provide safe areas for workers to ignite prescribed fires for hazard reduction and ecological	Fuel Treatments	

	process restoration. The analysis should consider such factors.			process restoration. The analysis should consider such factors.		
Fire - tactical placement of treatments	Finally, in our view, the Forest Service should prioritize fuel treatments at locations where relatively little resource investment may create fire resistant conditions in the shortest amount of time. Targeting initial work in this way will maximize the area treated with available funds and personnel, and provide the greatest opportunity to quickly reduce fuels and restore ecosystem function at larger spatial scales. It is not clear that the Forest Service has given its own research on this point requisite consideration in the PDEIS	The analysis should consider different approaches (e.g., fire resistant landscape features) for the strategic location of fuel treatments. Prioritize fuel treatments at locations where relatively little resource investment may create fire resistant conditions in the shortest amount of time.	** Check out Kaibab, p. 25 last comment	Finally, in our view, the Forest Service should prioritize fuel treatments at locations where relatively little resource investment may create fire resistant conditions in the shortest amount of time. Targeting initial work in this way will maximize the area treated with available funds and personnel, and provide the greatest opportunity to quickly reduce fuels and restore ecosystem function at larger spatial scales. It is not clear that the Forest Service has given its own research on this point requisite consideration in the PDEIS	Fuel Treatments	
Fire - adaptive management?	Reassess Agency fire management perspective based on successful management from other areas.	The DEIS and fire specialist report fail to address critical fire suppression management variables.	XXXX	Reassess Agency fire management perspective based on successful management from other areas.	Agency Fire Management	PC 906-5 The Forest Service should reassess the Agency fire management perspective based on successful management from other areas because it fails to address critical wildfire management variables.

Fire - fire mgmt	The Forest Service should analyze these factors[see letter] and demonstrate that proposed fire management program will meet the need for change.	The Forest Service should analyze direction of fire spread and slope and demonstrate that proposed fuels treatments will meet the need for change. Fuels treatments should be oriented in concert with prevailing spatial patterns of fire spread in the project area.	XXXX	The Forest Service should analyze these factors and demonstrate that proposed fire management program will meet the need for change.	Fire Management Program	
Fire - minimize smoke	We recommend that the Forest Service implement BMPs and work with the interagency Smoke Management Group to reduce emissions from prescribed burns and wildfires to the greatest possible extent.	Prescribed fire planning should minimize the effects of smoke on public health, public nuisance, and visibility in Federal Class I Areas. Prescribed fire activities must also comply with the requirements of Title 18, Chapter 2, Article 15 of the Arizona Administrative Code entitled "Forest and Range Management Burns."	XXXX	We recommend that the Forest Service implement BMPs and work with the interagency Smoke Management Group to reduce emissions from prescribed burns and wildfires to the greatest possible extent.	Implement BMPs in Reducing Emissions from Prescribed Burns and Wildfires	
Fire - minimize smoke	PRESCRIBED FIRE ACTIVITIES Fire creates smoke that includes a complex mix of air pollutants. Prescribed fire planning should minimize the effects of smoke on public health, public nuisance, and visibility in Federal Class I Areas. Prescribed fire activities must also comply with the requirements of Title 18, Chapter 2, Article 15 of the Arizona Administrative Code entitled "Forest and Range Management Burns."	Prescribed fire planning should minimize the effects of smoke on public health, public nuisance, and visibility in Federal Class I Areas. Prescribed fire activities must also comply with the requirements of Title 18, Chapter 2, Article 15 of the Arizona Administrative Code entitled "Forest and Range Management Burns."	XXXX	PRESCRIBED FIRE ACTIVITIES Fire creates smoke that includes a complex mix of air pollutants. Prescribed fire planning should minimize the effects of smoke on public health, public nuisance, and visibility in Federal Class I Areas. Prescribed fire activities must also comply with the requirements of Title 18, Chapter 2, Article 15 of the Arizona Administrative Code entitled "Forest and Range Management Burns." For further information regarding requirements for prescribed burns, please contact the Environmental Program Specialist at (602) 771-2363.	Effects of Prescribed Fire	PC 905-6 The Forest Service should minimize the effects of smoke on public health, public nuisance, and visibility in Federal Class I Areas in prescribed fire planning. The prescribed fire activities must also comply with the requirements of Title 18, Chapter 2, Article 15 of the Arizona Administrative Code entitled "Forest and Range Management Burns."

AZGFD-BG-Edit	<p>Plan, Background for Wildlife and Rare Plants, page 59: In the last paragraph it states that "Other species have been introduced, such as Rocky Mountain elk and crayfish." The Department considers elk to be a native Arizona species. Although it is likely that Merriam's elk, which were present in Arizona prior to the Yellowstone introductions of Rocky Mountain elk had been extirpated from the state, the genetic differences, and the significance of these differences between the two populations (based on very limited samples) is uncertain at this time. Accordingly, the Department views it wholly inappropriate to present elk, a desired native species that provides significant economic and social benefits to the forest and local communities, in the same context as crayfish, which is a clearly undesirable and destructive nonnative species</p>	<p><b>Modify Wildlife and Rare Plants Background</b> (proposed plan p. 59). In the last paragraph it states that "Other species have been introduced, such as Rocky Mountain elk and crayfish." The Department considers elk to be a native Arizona species. Accordingly, the Department views it wholly inappropriate to present elk, a desired native species that provides significant economic and social benefits to the forest and local communities, in the same context as crayfish, which is a clearly undesirable and destructive nonnative species</p>	<p>Plan, Background for Wildlife and Rare Plants, page 59: In the last paragraph it states that "Other species have been introduced, such as Rocky Mountain elk and crayfish." The Department considers elk to be a native Arizona species. Although it is likely that Merriam's elk, which were present in Arizona prior to the Yellowstone introductions of Rocky Mountain elk had been extirpated from the state, the genetic differences, and the significance of these differences between the two populations (based on very limited samples) is uncertain at this time. Accordingly, the Department views it wholly inappropriate to present elk, a desired native species that provides significant economic and social benefits to the forest and local communities, in the same context as crayfish, which is a clearly undesirable and destructive nonnative species</p>			
AZGFD-BG-Edit2	<p>Plan, Background for Wildlife and Rare Plants, page 59: Although the Plan briefly discusses and makes mention of the economic importance of forest products, including timber and livestock, the significant economic contribution to the local communities and counties provided by wildlife residing on the A-S is lacking. The Department recommends that the A-S acknowledge the economic</p>	<p><b>Modify Wildlife and Rare Plants Background</b> (proposed plan p. 59). Acknowledge the economic contribution of wildlife (hunting, fishing, wildlife viewing) and provide such information within the Background for Wildlife and Rare Plants section.</p>	<p>Plan, Background for Wildlife and Rare Plants, page 59: Although the Plan briefly discusses and makes mention of the economic importance of forest products, including timber and livestock, the significant economic contribution to the local communities and counties provided by wildlife residing on the A-S is lacking. The Department recommends that the A-S acknowledge the economic</p>			

	contribution of wildlife (hunting, fishing, wildlife viewing) and provide such information within the Background for Wildlife and Rare Plants section. The Department looks forward to working with the A-S to provide additional detailed information regarding the economic benefits of wildlife.			contribution of wildlife (hunting, fishing, wildlife viewing) and provide such information within the Background for Wildlife and Rare Plants section. The Department looks forward to working with the A-S to provide additional detailed information regarding the economic benefits of wildlife.			
AZGFD-BG-Edit3	Plan, Background for Wildlife and Rare Plants, page 60: The reference to "Mexican wolf" should be changed to "Mexican gray wolf".	Modify Wildlife and Rare Plants Background (proposed plan p. 60). The reference to "Mexican wolf" should be changed to "Mexican gray wolf".		Plan, Background for Wildlife and Rare Plants, page 60: The reference to "Mexican wolf" should be changed to "Mexican gray wolf".			
Table corrections	Page 299, Table 103 Management effect compared by alternative for each of the [Management Indicator Species] MIS indicator habitats. Please review the table-rating description which does not match with the values in the table. The table uses letters for ratings, and the description below the table uses numbers.	Correct table 103 (DEIS p. 299), the rating description does not match the values in the table.	XXXX	Page 299, Table 103 Management effect compared by alternative for each of the [Management Indicator Species] MIS indicator habitats. Please review the table-rating description which does not match with the values in the table. The table uses letters for ratings, and the description below the table uses numbers.		Table Corrections	PC 980-4 The Forest Service should review the table-rating description (Page 299, Table 103) which does not match with the values in the table because the table uses letters for ratings, and the description below the table uses numbers.
Wildlife - effects - connectivity	In addition, the discussion on Habitat Connectivity and Linkages is confusing, or at least not intuitively apparent (DEIS, p. 308).	Clarify the discussion on habitat connectivity and linkages including Table 108. (DEIS p. 308).	XXXX	In addition, the discussion on Habitat Connectivity and Linkages is confusing, or at least not intuitively apparent (DEIS, p. 308).		Habitat Connectivity and Linkages	PC 974-10 The Forest Service should revise the discussion on Habitat Connectivity and Linkages because it is confusing and not easily understandable

Wildlife - effects - connectivity	While Table 108 may reflect estimated average distances between management areas, the table does not reflect connectivity between the larger, often contiguous secure habitats of Alternative D compared to the preferred alternative.	Clarify the discussion on habitat connectivity and linkages including Table 108. (DEIS p. 308).	XXXX	While Table 108 may reflect estimated average distances between management areas, the table does not reflect connectivity between the larger, often contiguous secure habitats of Alternative D compared to the preferred alternative.	Alternative D connectivity not reflected in Table
Wildlife - effects - connectivity	Our conclusion, based on greater habitat area and, hence, closer proximity of secure areas, is that Alternative D provides the greatest wildlife conservation benefits (less viability risk and most viability effectiveness), and not the preferred alternative as stated in the DEIS	Clarify the discussion on habitat connectivity and linkages including Table 108. (DEIS p. 308).	XXXX	Our conclusion, based on greater habitat area and, hence, closer proximity of secure areas, is that Alternative D provides the greatest wildlife conservation benefits (less viability risk and most viability effectiveness), and not the preferred alternative as stated in the DEIS	Greatest Wildlife Conservation Benefits Reflected in Alternative D
Wildlife - effects - closed canopy	If significant reductions of crown bulk density are necessary to meet the need for change then it is unlikely that the revised forest plan will maintain habitat for threatened and sensitive wildlife species associated with closed-canopy forest (Beier and Maschinski 2003, Keyes and O'Hara 2002, USDI 1995).	Explain whether threatened and sensitive wildlife species associated with closed-canopy forest will maintain habitat if significant reductions of crown bulk density are necessary to meet the need for change.	** Check out Kaibab, p. 44 last comment	If significant reductions of crown bulk density are necessary to meet the need for change then it is unlikely that the revised forest plan will maintain habitat for threatened and sensitive wildlife species associated with closed-canopy forest (Beier and Maschinski 2003, Keyes and O'Hara 2002, USDI 1995).	Habitat for Threatened and Endangered Species
Wildlife - MIS - NFMA	In addition, the Draft Plan and supporting analysis fail to meet NFMA requirement for estimation of effects to proposed MIS.	The plan should meet the NFMA (National Forest Management Act) requirement for estimation of effects to proposed MIS (management indicator species). Concerns include: (1) it ignored criteria prescribed by NFMA for viability determinations, including "changes in vegetation type, timber age	XXXX	In addition, the Draft Plan and supporting analysis fail to meet NFMA requirement for estimation of effects to proposed MIS.	Management Effects and Direction

		<p>classes, community composition, rotation age, and year-long suitability of habitat related to mobility of [MIS].” 36 C.F.R. § 219.19(a)(1) (1982), (2) relies on “plan decisions” as the sole basis for viability findings, and asserts that projects “would incorporate” applicable recovery plans for federally listed species, (3) recovery plans for federally listed species are not enforceable in project-level management decisions, and (4) the efficacy of proposed management direction in promoting the conservation and recovery of Mexican spotted owl is uncertain. The Forest Service is required to disclose controversy and uncertainty regarding effects to Mexican spotted owl and its critical habitat.</p>				
Wildlife - MIS - NFMA	<p>Mexican Spotted Owl Recovery Plan’ direction, including provisions for primary constituent elements of habitat.” Id. 300. However, that conclusion is arbitrary and capricious for at least four reasons: (1) It ignores criteria prescribed by NFMA for viability determinations, including “changes in vegetation type, timber age classes, community composition, rotation age, and year-long suitability of habitat related to mobility of [MIS].” 36 C.F.R. § 219.19(a)(1) (1982).</p>	<p>The plan should meet the NFMA (National Forest Management Act) requirement for estimation of effects to proposed MIS (management indicator species). Concerns include: (1) it ignored criteria prescribed by NFMA for viability determinations, including “changes in vegetation type, timber age classes, community composition, rotation age, and year-long suitability of habitat related to mobility of [MIS].” 36 C.F.R. § 219.19(a)(1) (1982), (2) relies on “plan decisions” as</p>	XXXX	<p>Mexican Spotted Owl Recovery Plan’ direction, including provisions for primary constituent elements of habitat.” Id. 300. However, that conclusion is arbitrary and capricious for at least four reasons: (1) It ignores criteria prescribed by NFMA for viability determinations, including “changes in vegetation type, timber age classes, community composition, rotation age, and year-long suitability of habitat related to mobility of [MIS].” 36 C.F.R. § 219.19(a)(1) (1982).</p>	Recovery Plan Direction	

<p>(2) It relies on “plan decisions” (i.e., desired conditions, objectives and guidelines) as the sole basis for viability findings, and asserts that projects “would incorporate” applicable recovery plans for federally listed species. The only relevant proposed guideline would not constrain project-level decisions. See Draft Plan at 60 (“Habitat management objectives and species protection measures from approved recovery plans should be applied to activities occurring within federally listed species habitat”) [emph. added]; also see id. 7 (guidelines “may be modified for a specific project”); 135 (“[T]he forest supervisor may amend the plan at any time.”).</p> <p>(3) Recovery plans for federally listed species (e.g., USDI 2012b) are not enforceable in project-level management decisions. Merely referencing them in guidelines of a revised forest plan fails to ensure viability or avoid jeopardy or destruction or adverse modification of critical habitat. See USDI (1996a: 39) (concluding jeopardy to Mexican spotted owl and adverse modification of critical habitat where forest management plans “lack the management direction to prevent the development of forest project-level activities</p>	<p>the sole basis for viability findings, and asserts that projects “would incorporate” applicable recovery plans for federally listed species, (3) recovery plans for federally listed species are not enforceable in project-level management decisions, and (4) the efficacy of proposed management direction in promoting the conservation and recovery of Mexican spotted owl is uncertain. The Forest Service is required to disclose controversy and uncertainty regarding effects to Mexican spotted owl and its critical habitat.</p>	<p>(2) It relies on “plan decisions” (i.e., desired conditions, objectives and guidelines) as the sole basis for viability findings, and asserts that projects “would incorporate” applicable recovery plans for federally listed species. The only relevant proposed guideline would not constrain project-level decisions. See Draft Plan at 60 (“Habitat management objectives and species protection measures from approved recovery plans should be applied to activities occurring within federally listed species habitat”) [emph. added]; also see id. 7 (guidelines “may be modified for a specific project”); 135 (“[T]he forest supervisor may amend the plan at any time.”).</p> <p>(3) Recovery plans for federally listed species (e.g., USDI 2012b) are not enforceable in project-level management decisions. Merely referencing them in guidelines of a revised forest plan fails to ensure viability or avoid jeopardy or destruction or adverse modification of critical habitat. See USDI (1996a: 39) (concluding jeopardy to Mexican spotted owl and adverse modification of critical habitat where forest management plans “lack the management direction to prevent the development of forest project-level activities</p>	
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that are likely to adversely affect the Mexican spotted owl,” and stating, “The definition of standards and guidelines [in the 1996 forest plan amendment] states that standards and guidelines are, ‘the bounds or constraints within which all management activities are to be carried out in achieving forest plan objectives.’); also see USDI (1996b: 29) (concluding no-jeopardy to Mexican spotted owl or adverse modification of critical habitat because Forest Service applied recovery plan recommendations as standards and guidelines in forest management plans with a Record of Decision: “Project-level actions and activities planned and implemented under these standards and guidelines, taken together, should promote the recovery of the owl.”). (4) The efficacy of proposed management direction in promoting the conservation and recovery of Mexican spotted owl is uncertain (USDI 1995, USDI 2012b). The Forest Service is required to disclose controversy and uncertainty regarding effects to Mexican spotted owl and its critical habitat.

that are likely to adversely affect the Mexican spotted owl,” and stating, “The definition of standards and guidelines [in the 1996 forest plan amendment] states that standards and guidelines are, ‘the bounds or constraints within which all management activities are to be carried out in achieving forest plan objectives.’); also see USDI (1996b: 29) (concluding no-jeopardy to Mexican spotted owl or adverse modification of critical habitat because Forest Service applied recovery plan recommendations as standards and guidelines in forest management plans with a Record of Decision: “Project-level actions and activities planned and implemented under these standards and guidelines, taken together, should promote the recovery of the owl.”). (4) The efficacy of proposed management direction in promoting the conservation and recovery of Mexican spotted owl is uncertain (USDI 1995, USDI 2012b). The Forest Service is required to disclose controversy and uncertainty regarding effects to Mexican spotted owl and its critical habitat.

Wildlife - roadless - refuge	The remote nature and remarkable elevation gradient of the Forest's roadless areas make them potentially critical as wildlife refuges from the impacts of climate change.	The remote nature and remarkable elevation gradient of roadless areas make them potentially critical as wildlife refuges from the impacts of climate change.	XXXX	The remote nature and remarkable elevation gradient of the Forest's roadless areas make them potentially critical as wildlife refuges from the impacts of climate change.	Attributes of Roadless Areas Create Habitat Refuges from Climate Change	
Forest products - Restoration - forest products/industry	wiping out forests is bad for industry and business, working together helps both	Forest products management actions should be dictated primarily by the expeditious implementation of landscape scale restoration primarily through mechanical treatments that produce products to sustain the existing forest industry and to allow natural resources-based rural economic development through new infrastructure of small diameter tree utilization at industrial scale. To ensure that this can be done most expeditiously, follow these strategies for the lifetime of the plan: (1) subordinate the focus on scientific silviculture priorities and traditional forestry methods of uneven-aged management and sustained yield of harvest volumes on a regulated non declining even-flow basis for the long term; (2) sustain the social license required for the re-introduction of appropriate scale industry logging activities at the landscape scale in a non-conflictual and non-litigious manner.		wiping out forests is bad for industry and business, working together helps both.	Forest Health	

Wildlife - roadless - refuge	The remote nature and remarkable elevation gradient of the Forest's roadless areas make them potentially critical as wildlife refuges from the impacts of climate change.	The remote nature and remarkable elevation gradient of roadless areas make them potentially critical as wildlife refuges from the impacts of climate change.	XXXX	The remote nature and remarkable elevation gradient of the Forest's roadless areas make them potentially critical as wildlife refuges from the impacts of climate change.		Roadless Areas Critical as Wildlife Refuges	
Wildlife - roadless - refuge	The remote nature and remarkable elevation gradient of the Forest's roadless areas make them potentially critical as wildlife refuges from the impacts of climate change.	The remote nature and remarkable elevation gradient of roadless areas make them potentially critical as wildlife refuges from the impacts of climate change.	XXXX	The remote nature and remarkable elevation gradient of the Forest's roadless areas make them potentially critical as wildlife refuges from the impacts of climate change.		Attributes of Roadless Areas Create Habitat Refuges from Climate Change	PC 1204-1 The Forest Service should address the remote nature and remarkable elevation gradient of the Forest's roadless areas making them potentially critical as wildlife refuges from the impacts of climate change.
Wildlife - plan - clarify	Issues: The Plan contains many errors and omissions. "Livestock conflicts with wildlife rarely occur." (p55) The terms "conflict" and "rarely" need to be defined.	Clarify the desired conditions "Livestock conflicts with wildlife rarely occur" and "Vegetation conditions support a healthy population of Montezuma Quail in suitable habitat."	XXXX	Issues: The Plan contains many errors and omissions. "Livestock conflicts with wildlife rarely occur." (p55) The terms "conflict" and "rarely" need to be defined.		Errors and Omissions in Definitions and Terminology	
Wildlife - plan - clarify	Issues: The Plan contains many errors and omissions. "Vegetation conditions support a healthy population of Montezuma Quail in suitable habitat." (p66) Define "healthy" and "suitable".	Clarify the desired conditions "Livestock conflicts with wildlife rarely occur" and "Vegetation conditions support a healthy population of Montezuma Quail in suitable habitat."	XXXX	Issues: The Plan contains many errors and omissions. "Vegetation conditions support a healthy population of Montezuma Quail in suitable habitat." (p66) Define "healthy" and "suitable". More appropriate on a project by project level.		Errors and Omissions in Definitions and Terminology	

Beaver dams	Page 35 "Large human constructed dams may be altered or removed to restore...wetland functionality." But apparently beaver dams are considered a benefit to functionality? (see page 33).	Explain why beaver dams are considered a benefit to riparian area functionality ("Beavers occupy capable stream reaches and help promote the function and stability of riparian areas" p. 33) while the Riparian Areas management approach states that "Large human constructed dams may be altered or removed to restore ....wetland functionality" (proposed plan p. 35).	XXXX				
Wildlife - browsing	Establish standards for ungulate browsing of aspen/willow/cottonwood. Both cattle and elk (without predators to move them around) browse on these trees. (Research from the Tushar Collaboration on browsing standards which results from a settlement provides methods and monitoring approaches.) <sup>48</sup> Browsing standards should inform stocking on allotments, closures, and retirement of allotments. a. Establishment of ungrazed "reference" areas in a diversity of ecological types and soil types to use as baseline of what an area's potential really is. B. Study and monitor areas for attainment of standards.	Establish standards for ungulate browsing of aspen, willow, and cottonwood. These standards should (1) inform stocking on allotments, closures, and retirement of allotments and (2) establish ungrazed "reference" areas in a diversity of ecological and soil types to use as baseline of an area's potential. Study and monitor areas for attainment of standards.	XXXX	Establish standards for ungulate browsing of aspen/willow/cottonwood. Both cattle and elk (without predators to move them around) browse on these trees. (Research from the Tushar Collaboration on browsing standards which results from a settlement provides methods and monitoring approaches.) <sup>48</sup> Browsing standards should inform stocking on allotments, closures, and retirement of allotments. a. Establishment of ungrazed "reference" areas in a diversity of ecological types and soil types to use as baseline of what an area's potential really is. B. Study and monitor areas for attainment of standards.		Add Standards	PC 959-5 The Forest Service should establish standards for ungulate browsing of aspen/willow/cottonwood. Browsing standards should inform stocking on allotments, closures, and retirement of allotments.

Wildlife - rare habitat - clarify	Page 61: Rare and unique habitats should be protected: define: "rare"; "unique"; "habitat" and "protection" (from what?)	Clarify the Wildlife guideline "Rare, unique habitats (e.g., talus slopes, cliffs, canyon slopes, caves, fens, bogs, sinkholes) should be protected" (proposed plan p. 61). Define 'rare', 'unique', 'habitat', and 'protection' (from what?).	XXXX	Page 61: Rare and unique habitats should be protected: define: "rare"; "unique"; "habitat" and "protection" (from what?)		Errors and Omissions in Definitions and Terminology	
Wildlife -add guidance - rare plants	Add a Standard to inspect project areas for rare plants before project implementation, and modify project plans appropriately to protect rare plants.	Add a standard to inspect project areas for rare plants before project implementation, and modify project plans appropriately to protect rare plants.	** Check out Kaibab p. 59- 60	Add a Standard to inspect project areas for rare plants before project implementation, and modify project plans appropriately to protect rare plants.		Add Standards	PC 959-4 The Forest Service should add a standard to inspect project areas for rare plants before project implementation, and modify project plans appropriately to protect rare plants
Wildlife -add guidance - rare plants	Add guideline to inspect areas proposed for restoration treatments and prescribed fire for rare plants, and adjust treatments appropriately to protect rare plants.	Add a standard to inspect project areas for rare plants before project implementation, and modify project plans appropriately to protect rare plants.	** Check out Kaibab p. 59- 60	Add guideline to inspect areas proposed for restoration treatments and prescribed fire for rare plants, and adjust treatments appropriately to protect rare plants.		Guidelines to Survey and Inspect for Rare Plants	PC 960-5 The Forest Service should add a guideline to inspect areas proposed for restoration treatments and prescribed fire for rare plants, and adjust treatments appropriately to protect rare plants
Wildlife -add guidance - rare plants2	Add guideline to survey grazing allotments for rare plants, and modify pastures appropriately	Add a guideline to survey grazing allotments for rare plants and modify pastures appropriately	** Check out Kaibab p. 59- 60	Add guideline to survey grazing allotments for rare plants, and modify pastures appropriately		Guidelines to Survey and Inspect for Rare Plants	PC 960-4 The Forest Service should include a guideline to require surveys on grazing allotments for rare plants, and modify pastures appropriately.

AZGFD-GL-Edit	Plan, Guidelines for Wildlife and Rare Plants, page 60: Add <i>"Right-of-way fencing where pronghorn antelope may be present should be placed and constructed in a manner that considers maximizing fence and road permeability for pronghorn antelope while addressing public safety concerns."</i>	Add a Guideline to Wildlife and Rare Plants (proposed plan p. 60) <i>"Right-of-way fencing where pronghorn antelope may be present should be placed and constructed in a manner that considers maximizing fence and road permeability for pronghorn antelope while addressing public safety concerns."</i>	Plan, Guidelines for Wildlife and Rare Plants, page 60: Add <i>"Right-of-way fencing where pronghorn antelope may be present should be placed and constructed in a manner that considers maximizing fence and road permeability for pronghorn antelope while addressing public safety concerns."</i>			
AZGFD-GL-Edit2	Plan, Guidelines for Wildlife and Rare Plants, page 61: "Prairie dog controls should not be authorized except when consistent with approved State of Arizona Gunnison's prairie dog conservation strategies, <i>or as authorized by the Arizona Game and Fish Commission.</i> " It should be clear that this guideline does not apply to hunting activities as authorized by the Arizona Game and Fish Commission.	Modify Wildlife and Rare Plants Guideline (proposed plan p. 61) "Prairie dog controls should not be authorized except when consistent with approved State of Arizona Gunnison's prairie dog conservation strategies, <i>or as authorized by the Arizona Game and Fish Commission.</i> "	Plan, Guidelines for Wildlife and Rare Plants, page 61: "Prairie dog controls should not be authorized except when consistent with approved State of Arizona Gunnison's prairie dog conservation strategies, <i>or as authorized by the Arizona Game and Fish Commission.</i> " It should be clear that this guideline does not apply to hunting activities as authorized by the Arizona Game and Fish Commission.			
AZGFD-GL-Edit3	Plan, Guidelines for Wildlife and Rare Plants, page 61: "The needs of localized species (e.g. New Mexico meadow jumping mouse, Bebb willow, White Mountain paintbrush) should be considered and provided for during project activities to ensure their limited or specialized habitats are not lost <i>or degraded.</i>	Modify Wildlife and Rare Plants Guideline (proposed plan p. 61) "The needs of localized species (e.g. New Mexico meadow jumping mouse, Bebb willow, White Mountain paintbrush) should be considered and provided for during project activities to ensure their limited or specialized habitats are not lost <i>or degraded.</i>	Plan, Guidelines for Wildlife and Rare Plants, page 61: "The needs of localized species (e.g. New Mexico meadow jumping mouse, Bebb willow, White Mountain paintbrush) should be considered and provided for during project activities to ensure their limited or specialized habitats are not lost <i>or degraded.</i>			

Wildlife - MIS - eco based mgmt	Management Indicator Species; Goshawk We are pleased and thankful the ASNF decided to keep the Northern Goshawk as a MIS. It is our hope the ecosystem / prey based model for management of the Goshawk will be expanded to the other MIS on the Forest. We ask that an ecological based management be put in place immediately on the current and historical areas used / need by [northern goshawk].	Ecological based management should be put in place immediately on the current and historical areas used or needed by northern goshawk and antelope.	XXXX	Management Indicator Species; Goshawk We are pleased and thankful the ASNF decided to keep the Northern Goshawk as a MIS. It is our hope the ecosystem / prey based model for management of the Goshawk will be expanded to the other MIS on the Forest. We ask that an ecological based management be put in place immediately on the current and historical areas used / need by antelope.		Management Effects and Direction	PC 980-5 The Forest Service should adopt an ecological based management for all the grassland types to be put in place immediately on the current and historical areas used / need by antelope and expand on the analysis and discussion of antelope populations. (MIS)
Wildlife - MIS - eco based mgmt	Management Indicator Species; Antelope Thankfully the Forest decided to keep the Antelope as a MIS. It is our hope that the ASNF will institute an accelerated ecological based management for all the grassland types on the Forest to be put in place immediately on the current and historical areas used / need by antelope.	Ecological based management should be put in place immediately on the current and historical areas used or needed by northern goshawk and antelope.	XXXX	Management Indicator Species; Antelope Thankfully the Forest decided to keep the Antelope as a MIS. It is our hope that the ASNF will institute an accelerated ecological based management for all the grassland types on the Forest to be put in place immediately on the current and historical areas used / need by antelope.		Management Effects and Direction	PC 980-5 The Forest Service should adopt an ecological based management for all the grassland types to be put in place immediately on the current and historical areas used / need by antelope and expand on the analysis and discussion of antelope populations. (MIS)
Wildlife - MIS - antelope	Review of the ASNF Management Indicator Species information is a very generic analysis and discussion which makes the bland summary "antelope populations appear to be stable."	The management indicator species information is a very generic analysis and discussion which makes the bland summary "antelope populations appear to be stable."	XXXX	Review of the ASNF Management Indicator Species information is a very generic analysis and discussion which makes the bland summary "antelope populations appear to be stable."		Information Clarification	PC 980-5 The Forest Service should adopt an ecological based management for all the grassland types to be put in place immediately on the current and historical areas used / need by antelope and expand on the analysis and discussion of antelope populations. (MIS)

Wildlife - rare plant - mgmt app	Seed and plant collections, greenhouse collections, and replanting should be considered when there is a chance of increasing rare plant species viability through these procedures.	Seed and plant collections, greenhouse collections, and replanting should be considered when there is a chance of increasing rare plant species viability through these procedures.	XXXX	Seed and plant collections, greenhouse collections, and replanting should be considered when there is a chance of increasing rare plant species viability through these procedures.		Viability of Rare Plant Species	
Wildlife - habitat security	Maintain and improve habitat security by protecting whole areas rather than individual road or route closures. a. Enforce wildlife and plants closure areas. b. Regularly monitor closure areas to ensure fences are in place to ensure violations are not occurring. C. Regularly check road signs for closure areas (e.g. the closure on the south side of White Mountain Acres is clearly being used regularly and this is an area frequented by the new Elk Horn Pack.)	Maintain and improve habitat security by protecting whole areas rather than individual road or route closures. (1) Enforce wildlife and plants closure areas. (2) Regularly monitor closure areas to ensure fences are in place to ensure violations are not occurring. (3) Regularly check road signs for closure areas.	XXXX	Maintain and improve habitat security by protecting whole areas rather than individual road or route closures. a. Enforce wildlife and plants closure areas. b. Regularly monitor closure areas to ensure fences are in place to ensure violations are not occurring. C. Regularly check road signs for closure areas (e.g. the closure on the south side of White Mountain Acres is clearly being used regularly and this is an area frequented by the new Elk Horn Pack.)		Maintain and Improve Habitat Security by Protectin g Whole Areas	b. Study and monitor areas for attainment of standards.
AZGFD-MA-Edit	Plan, Management Approaches for Wildlife and Rare Plants, page 62: Reference is made to the Arizona Wildlife and Fisheries Comprehensive Plan. This is an outdated plan. A more appropriate reference would be the State Wildlife Action Plan as well as the Wildlife 20/20 Arizona Game and Fish Department's Strategic Plan.	Modify Wildlife and Rare Plants Management Approaches (proposed plan p. 62). Reference is made to the Arizona Wildlife and Fisheries Comprehensive Plan. This is an outdated plan. A more appropriate reference would be the State Wildlife Action Plan as well as the Wildlife 20/20 Arizona Game and Fish Department's Strategic Plan.		Plan, Management Approaches for Wildlife and Rare Plants, page 62: Reference is made to the Arizona Wildlife and Fisheries Comprehensive Plan. This is an outdated plan. A more appropriate reference would be the State Wildlife Action Plan as well as the Wildlife 20/20 Arizona Game and Fish Department's Strategic Plan.			

AZGFD-MA-Edit2	<p>Plan, Management Approaches for Wildlife and Rare Plants, page 63: Promoting healthy population of predators while, reducing livestock conflicts with wildlife is discussed. It should be noted that predator control may also be required to reduce conflict and meet management objectives for wildlife prey species such as pronghorn, especially where degraded habitat conditions or other factors influence the natural predator prey relationship.</p>	<p>Modify Wildlife and Rare Plants Management Approaches (proposed plan p. 63). Promoting healthy population of predators while, reducing livestock conflicts with wildlife is discussed. It should be noted that predator control may also be required to reduce conflict and meet management objectives for wildlife prey species such as pronghorn, especially where degraded habitat conditions or other factors influence the natural predator prey relationship.</p>		<p>Plan, Management Approaches for Wildlife and Rare Plants, page 63: Promoting healthy population of predators while, reducing livestock conflicts with wildlife is discussed. It should be noted that predator control may also be required to reduce conflict and meet management objectives for wildlife prey species such as pronghorn, especially where degraded habitat conditions or other factors influence the natural predator prey relationship.</p>		
Wildlife - MSO habitat needs	<p>Pages 39 through 46, Desired Conditions for Ponderosa Pine, Dry-Mixed Conifer, and Wet Mixed Conifer: The PNVTs describe specific desired conditions for several species including Northern goshawk, Abert's squirrel, or Merriam's shrew. However, none of the desired conditions, whether at landscape, mid-, or fine-scale specifically address Mexican spotted owl habitat needs, and it is unclear how the desired conditions for these three PNVTs would provide for Mexican spotted owl nesting/roosting habitat. We recommend discussing the desired conditions, standards, and guidelines favorable for Mexican spotted owl as specifically identified in the DEIS on page 269 in the Plan.</p>	<p>Within the plan, clarify how the desired conditions for ponderosa pine, dry-mixed conifer, and wet-mixed conifer provide for Mexican spotted owl nesting/roosting habitat. Recommend discussing the desired conditions, standards, and guidelines favorable for Mexican spotted owl as identified in the DEIS (p. 269)</p>	XXXX	<p>Pages 39 through 46, Desired Conditions for Ponderosa Pine, Dry-Mixed Conifer, and Wet Mixed Conifer: The PNVTs describe specific desired conditions for several species including Northern goshawk, Abert's squirrel, or Merriam's shrew. However, none of the desired conditions, whether at landscape, mid-, or fine-scale specifically address Mexican spotted owl habitat needs, and it is unclear how the desired conditions for these three PNVTs would provide for Mexican spotted owl nesting/roosting habitat. We recommend discussing the desired conditions, standards, and guidelines favorable for Mexican spotted owl as specifically identified in the DEIS on page 269 in the Plan.</p>	PNVT's	<p>PC 964-1 The Forest Service should discuss the desired conditions, standards, and guidelines favorable for Mexican spotted owl as specifically identified in the DEIS on page 269 in the Plan.</p>

Wildlife - MSO Recovery Plan	Page 60 and 61, Guidelines for Wildlife and Rare Plants: The DEIS acknowledges management of Mexican spotted owl habitat in pine-oak and mixed conifer forests as described in the Recovery Plan. We recommend including more specific direction within the Plan for the Forest Service to continue to work with the FWS toward Mexican spotted owl recovery, including opportunities to incorporate conservation measures pursuant to 7(a)(1) of the Endangered Species Act. Therefore, within the Plan, we recommend including such language under the "Standards and Guidelines" for Wildlife as well as within desired condition objectives.	Include desired conditions, standards, and guidelines for the Forest Service to continue to work with the USFWS toward Mexican spotted owl recovery, including opportunities to incorporate conservation measures pursuant to 7(a)(1) of the Endangered Species Act.	** Check out Kaibab p. 55-57 & Prescott p. 66 1st comment	Page 60 and 61, Guidelines for Wildlife and Rare Plants: The DEIS acknowledges management of Mexican spotted owl habitat in pine-oak and mixed conifer forests as described in the Recovery Plan. We recommend including more specific direction within the Plan for the Forest Service to continue to work with the FWS toward Mexican spotted owl recovery, including opportunities to incorporate conservation measures pursuant to 7(a)(1) of the Endangered Species Act. Therefore, within the Plan, we recommend including such language under the "Standards and Guidelines" for Wildlife as well as within desired condition objectives.	Specific Direction on Mexican Spotted Owl	PC 960-2 The Forest Service should include under desired conditions, guidelines and standards, more specific direction for wildlife within the Plan to continue to work with the FWS toward Mexican spotted owl recovery, including opportunities to incorporate conservation measures pursuant to 7(a)(1) of the Endangered Species Act.
Wildlife - MSO Recovery Plan	Page 41, Guidelines for Forest: Ponderosa Pine: The Mexican spotted owl Recovery Plan recognizes the importance of high canopy cover for •nesting and roosting habitat. We recommend including guidelines for canopy cover and openings that provide habitat conditions for Mexican spotted owls under this bullet.	Add guidelines under Ponderosa Pine (proposed plan p. 41) for canopy cover and openings that provide habitat conditions consistent with the Mexican spotted owl Recovery Plan.	** Check out Kaibab p. 55-57 & Prescott p. 66 1st comment	Page 41, Guidelines for Forest: Ponderosa Pine: The Mexican spotted owl Recovery Plan recognizes the importance of high canopy cover for •nesting and roosting habitat. We recommend including guidelines for canopy cover and openings that provide habitat conditions for Mexican spotted owls under this bullet.	Guidelines for Canopy Cover and Openings	PC 964-3 The Forest Service should include guidelines for canopy cover and openings that provide habitat conditions for Mexican spotted owls.

Wildlife - MSO Recovery Plan2	Page 40, Landscape Scale Desired Conditions (10,000 acres or greater), second and third bullets: The Mexican spotted owl Recovery Plan (Service 2012) does not discuss specific amounts or densities of snags, coarse woody debris, or logs needed as important habitat components; but rather recommends retaining as many as possible without affecting human-safety, forest restoration, and/or owl habitat-enhancement goals. We recommend reviewing the desired conditions for snags, coarse woody debris, and downed log availability to match those in the Mexican spotted owl Recovery Plan, where practicable (see 2012 Mexican Spotted Owl Recovery Plan Table C.2).	The Mexican spotted owl Recovery Plan does not discuss specific amounts or densities of snags, coarse woody debris, etc. but rather recommends retaining as much of these components as possible without affecting human safety, forest restoration and owl habitat so review the desired conditions for these components to match the owl recovery plan.	** Check out Kaibab p. 55-57 & Prescott p. 66 1st comment	Page 40, Landscape Scale Desired Conditions (10,000 acres or greater), second and third bullets: The Mexican spotted owl Recovery Plan (Service 2012) does not discuss specific amounts or densities of snags, coarse woody debris, or logs needed as important habitat components; but rather recommends retaining as many as possible without affecting human-safety, forest restoration, and/or owl habitat-enhancement goals. We recommend reviewing the desired conditions for snags, coarse woody debris, and downed log availability to match those in the Mexican spotted owl Recovery Plan, where practicable (see 2012 Mexican Spotted Owl Recovery Plan Table C.2).	Landscape Scale Desired Conditions Specifics	PC 964-4 The Forest Service should review the desired conditions for snags, coarse woody debris, and downed log availability to match those in the Mexican spotted owl Recovery Plan, where practicable (see 2012 Mexican Spotted Owl Recovery Plan Table C.2).
Wildlife - MSO Recovery Plan3	The Plan acknowledges management of Mexican spotted owl habitat in ponderosa pine (pine oak) and mixed conifer forests, as referenced in the 2012 Mexican Spotted Owl Recovery Plan First Revision-(Recovery Plan) (Service 2012). However, we recommend including more specific guidelines for management and protection of Mexican spotted owls and other listed species on the Apache-Sitgreaves NF, under the "Guidelines for Forest: All Forested PNVTs" and "Guidelines for Wildlife and	Include more specific guidelines for management and protection of Mexican spotted owls and other listed species on the Apache-Sitgreaves NF, under the Guidelines for Forest: All Forested PNVTs and Guidelines for Wildlife and Rare Plants sections, in order to incorporate section 7(a)(I) recovery responsibilities. .	** Check out Kaibab p. 55-57 & Prescott p. 66 1st comment	The Plan acknowledges management of Mexican spotted owl habitat in ponderosa pine (pine oak) and mixed conifer forests, as referenced in the 2012 Mexican Spotted Owl Recovery Plan First Revision-(Recovery Plan) (Service 2012). However, we recommend including more specific guidelines for management and protection of Mexican spotted owls and other listed species on the Apache-Sitgreaves NF, under the "Guidelines for Forest: All Forested PNVTs" and "Guidelines for Wildlife and	PNVT's	PC 964-2 The Forest Service should include more specific guidelines for management and protection of Mexican spotted owls under the "Guidelines for Forest: All Forested PNVTs" and "Guidelines for Wildlife and Rare Plants", in order to incorporate section 7(a)(I) recovery responsibilities.

	Rare Plants", in order to incorporate section 7(a)(I) recovery responsibilities. The U.S. Fish and Wildlife Service (Service) will continue to work with the A-S NFs on the management approach to both ponderosa pine (pine-oak) and mixed conifer forest to more specifically identify objectives for the Mexican spotted owl within the proposed Plan and to meet recovery objectives for this species on the A-S NFs.			Rare Plants", in order to incorporate section 7(a)(I) recovery responsibilities. The U.S. Fish and Wildlife Service (Service) will continue to work with the A-S NFs on the management approach to both ponderosa pine (pine-oak) and mixed conifer forest to more specifically identify objectives for the Mexican spotted owl within the proposed Plan and to meet recovery objectives for this species on the A-S NFs.		
Wildlife - MSO - effects - table	Page 247, Table 74 Indicator habitat for PNVTs for MSO The third column refers to remaining currently suitable northern goshawk habitat. This should be MSO habitat. Since 33 percent of the indicator habitats (dry and wet mixed conifer) experienced total canopy loss, we would recommend the other PNVTs identified as Mexican spotted owl habitat be included MSO Habitat Indicator PNVTs.	Correct the third column in table 74 (DEIS p. 247) that refers to remaining currently suitable northern goshawk habitat. This should be Mexican spotted owl habitat.	** Check out Kaibab p. 55-57 & Prescott p. 66 1st comment	Page 247, Table 74 Indicator habitat for PNVTs for MSO The third column refers to remaining currently suitable northern goshawk habitat. This should be MSO habitat. Since 33 percent of the indicator habitats (dry and wet mixed conifer) experienced total canopy loss, we would recommend the other PNVTs identified as Mexican spotted owl habitat be included MSO Habitat Indicator PNVTs.	Table Corrections	
Wildlife - MSO current habitat	The Forest Service fails to disclose the method it used to estimate the availability of Mexican spotted owl critical habitat or changes to habitat that resulted from the 2011 Wallow fire.	Disclose the method used to estimate the availability of Mexican spotted owl critical habitat or changes to habitat that resulted from the 2011 Wallow Fire.	** Check out Kaibab p. 55-57 & Prescott p. 66 1st comment	The Forest Service fails to disclose the method it used to estimate the availability of Mexican spotted owl critical habitat or changes to habitat that resulted from the 2011 Wallow fire.	Methodology for estimate of MSO Habitat	

Wildlife - MSO cumulative	The Forest Service completely fails in the PDEIS to consider foreseeable cumulative effects to Mexican spotted owl viability and recovery resulting from post-fire management activities that it has authorized in critical habitat.	Consider foreseeable cumulative effects to Mexican spotted owl viability and recovery resulting from post-fire management activities authorized in critical habitat.	** Check out Kaibab p. 55-57 & Prescott p. 66 1st comment	The Forest Service completely fails in the PDEIS to consider foreseeable cumulative effects to Mexican spotted owl viability and recovery resulting from post-fire management activities that it has authorized in critical habitat.		Post Fire Activities in critical MSO Habitat	
Mexican wolf - reintroduction	you must include the release of Mexican Wolves to their historic homes here to allow inherent checks and balances to be reestablished as well!	Include the reintroduction of Mexican wolves to their historic homes.	XXXX	you must include the release of Mexican Wolves to their historic homes here to allow inherent checks and balances to be reestablished as well!		Wildlife	
Mexican wolf - reintroduction	Wolf reintroduction is the most effective way to keep elk populations moving around and bring about restoration of aspen and riparian forests. Labor intensive forest restoration programs should complement predator introduction programs to ensure healthy forests into the future. The Forest Service should promote both restoration projects and wolf recovery.	Include the reintroduction of Mexican wolves to their historic homes.	XXXX	Wolf reintroduction is the most effective way to keep elk populations moving around and bring about restoration of aspen and riparian forests. Labor intensive forest restoration programs should complement predator introduction programs to ensure healthy forests into the future. The Forest Service should promote both restoration projects and wolf recovery.		Increase Viability with Recovery Plans	PC 968-1 The Forest Service should promote both wolf recovery and restoration projects and should complement predator introduction programs to ensure healthy forests into the future because wolf reintroduction is the most effective way to keep elk populations moving around and bring about restoration of aspen and riparian forests. Management plans and implementation should give high priority to the increasing viability of the Mexican grey wolf population and establish clear, binding standards for the protection of habitat. .

Mexican wolf - conflict s other mgmt	The plan also fails to discuss two of the most important areas of concern that intersect with grazing: the Mexican wolf, and wildfire. The chief threats to the Mexican wolf all come back to livestock, as ranchers are the most vocal opponents to wolves and ranching operations completely drive the Fish and Wildlife Service's policy toward wolves.	The plan and implementation should give priority to the viability of the Mexican grey wolf population including (1) minimizing human interference by motorized vehicles (including snowmobiles), (2) issuing temporary motorized closures near wolf denning and rendezvous sites, (3) minimizing conflicts with domestic livestock, and (4) allowing non-use of allotments.	XXXX	The chief threats to the Mexican wolf all come back to livestock, as ranchers are the most vocal opponents to wolves and ranching operations completely drive the Fish and Wildlife Service's policy toward wolves.	Wolf Compatible Livestock Management	PC 968-2 The Forest Service should address that the chief threat to the Mexican wolf is livestock and ranchers which are the most vocal opponents.
Mexican wolf - conflict s other mgmt	It is critical that management plans and implementation for this region give high priority to the increasing viability of the Mexican grey wolf population; this includes minimizing human interference by motorized vehicles (including snowmobiles) and conflicts with domestic livestock.	The plan and implementation should give priority to the viability of the Mexican grey wolf population including (1) minimizing human interference by motorized vehicles (including snowmobiles), (2) issuing temporary motorized closures near wolf denning and rendezvous sites, (3) minimizing conflicts with domestic livestock, and (4) allowing non-use of allotments.	XXXX	It is critical that management plans and implementation for this region give high priority to the increasing viability of the Mexican grey wolf population; this includes minimizing human interference by motorized vehicles (including snowmobiles) and conflicts with domestic livestock.	Viability of Mexican grey wolf	
Mexican wolf - conflict s other mgmt	The Forest Service should issue temporary motorized closures near wolf denning and rendezvous sites. The FS currently allows non-use for rancher convenience and issues such as drought. The same should be done for wolves.	The plan and implementation should give priority to the viability of the Mexican grey wolf population including (1) minimizing human interference by motorized vehicles (including snowmobiles), (2) issuing temporary motorized closures near wolf denning and rendezvous sites, (3) minimizing conflicts with domestic livestock, and (4) allowing non-use of allotments.	XXXX	The Forest Service should issue temporary motorized closures near wolf denning and rendezvous sites. The FS currently allows non-use for rancher convenience and issues such as drought. The same should be done for wolves.	Issue Temporary Motorized Closures near Wolf Denning and Rendezvous Sites	

Mexican wolf - recovery plan	Ensure recovery of threatened and endangered species. The Forest Plan must implement formal recovery plans rather than merely reference them, and establish clear, binding standards to ensure the recovery of the Mexican wolf. The 1982 Mexican Wolf Recovery Plan requires establishment of two viable populations in the wild. The Fish and Wildlife Service has designated the Apache National Forest as part of the Blue Range Wolf Recovery Area to establish the first such population, but current Forest Service management is often at odds with recovery.	Implement formal recovery plans and establish clear, binding standards to ensure the recovery of the Mexican wolf.	XXXX	Ensure recovery of threatened and endangered species. The Forest Plan must implement formal recovery plans rather than merely reference them, and establish clear, binding standards to ensure the recovery of the Mexican wolf. The 1982 Mexican Wolf Recovery Plan requires establishment of two viable populations in the wild. The Fish and Wildlife Service has designated the Apache National Forest as part of the Blue Range Wolf Recovery Area to establish the first such population, but current Forest Service management is often at odds with recovery.	Increase Viability with Recovery Plans	PC 968-1 The Forest Service should promote both wolf recovery and restoration projects and should complement predator introduction programs to ensure healthy forests into the future because wolf reintroduction is the most effective way to keep elk populations moving around and bring about restoration of aspen and riparian forests. Management plans and implementation should give high priority to the increasing viability of the Mexican grey wolf population and establish clear, binding standards for the protection of habitat. .
Mexican wolf - suggested direction - grazing	There are no standards or guidelines specific to wolf, such as cow carcass removal or treatment, range riders during calving season, etc., which would help to avoid predator-livestock conflicts. Please require responsible livestock management along with wolf recovery. A. The Forest Service should specifically require all permittees to remove or render inedible or unpalatable all livestock carcasses before wolves have the opportunity to scavenge on them. B. The Forest Service should require all permittees to practice responsible livestock management practices, e.g., range riders, guard dogs.	Add standards or guidelines specific to Mexican wolves: (1) require all permittees to remove or render inedible or unpalatable all livestock carcasses before wolves have the opportunity to scavenge them and (2) require all permittees to practice responsible livestock management practices, e.g., range riders, guard dogs.	XXXX	There are no standards or guidelines specific to wolf, such as cow carcass removal or treatment, range riders during calving season, etc., which would help to avoid predator-livestock conflicts. Please require responsible livestock management along with wolf recovery. A. The Forest Service should specifically require all permittees to remove or render inedible or unpalatable all livestock carcasses before wolves have the opportunity to scavenge on them. B. The Forest Service should require all permittees to practice responsible livestock management practices, e.g., range riders, guard dogs.	Add Standards	

<p>Mexican wolf - suggested direction - grazing conflict</p>	<p>3. The Forest Plan should require wolf-compatible livestock management in wolf use areas. Livestock grazing is widespread and often damaging use of National Forest lands in the Southwest. In order to support Mexican wolf reintroduction and recovery, the Proposed Plan should enable the Forest Service to decrease livestock grazing in areas of high conflict, or when necessary to mitigate conflicts. a. Ensure sufficient prey availability to reduce livestock conflicts. i. In areas where habitat is at risk reduce/eliminate grazing to ensure adequate prey for the wolves. (Each AUM cow on the landscape reduces forage for 2 elk or 7 deer or 11 pronghorn). ii. Reassess the stocking rates on every allotment, ensuring a proper allocation of forage for non-livestock herbivores. Current forage is affected by drought, climate change, changing species grazing and browsing, and invasive species. Reassessment of proper forage is critical to protect habitat for wolf prey. iii. Changes in species composition affects forage availability by changing the relative palatability of plants in any given pasture. The Forest Service should reevaluate carrying capacity based on current conditions before issuing any new permits</p>	<p>Require wolf-compatible livestock management in wolf use areas and enable the Forest Service to decrease livestock grazing in areas of high conflict, or when necessary to mitigate conflicts: (1) ensure sufficient prey availability to reduce livestock conflicts, (2) include plans for voluntary grazing retirements, and (3) include voluntary grazing non-use to protect denning and rendezvous sites, and (4) ensure a proper allocation of forage for non-livestock herbivores.</p>	<p>XXXX</p>	<p>3. The Forest Plan should require wolf-compatible livestock management in wolf use areas. Livestock grazing is widespread and often damaging use of National Forest lands in the Southwest. In order to support Mexican wolf reintroduction and recovery, the Proposed Plan should enable the Forest Service to decrease livestock grazing in areas of high conflict, or when necessary to mitigate conflicts. a. Ensure sufficient prey availability to reduce livestock conflicts. i. In areas where habitat is at risk reduce/eliminate grazing to ensure adequate prey for the wolves. (Each AUM cow on the landscape reduces forage for 2 elk or 7 deer or 11 pronghorn). ii. Reassess the stocking rates on every allotment, ensuring a proper allocation of forage for non-livestock herbivores. Current forage is affected by drought, climate change, changing species grazing and browsing, and invasive species. Reassessment of proper forage is critical to protect habitat for wolf prey. iii. Changes in species composition affects forage availability by changing the relative palatability of plants in any given pasture. The Forest Service should reevaluate carrying capacity based on current conditions before issuing any new permits</p>	<p>Wolf Compatible Livestock Management</p>
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	for livestock grazing on the forest. b. Include plans for voluntary grazing retirements. C. Include voluntary grazing non-use to protect denning and rendezvous sites.			for livestock grazing on the forest. b. Include plans for voluntary grazing retirements. C. Include voluntary grazing non-use to protect denning and rendezvous sites.			
Mexican wolf - suggested direction - roads	Limit/restrict roads and routes in sensitive wolf habitat. A. Implement “abuse it and lose it” policies regarding roads and routes. If users are not able to restrict their use to the designated road and route/closures then closures will be increased/moved to locations where they can physically be enforced. B. Roads and routes should not be designated and/or should be closed where take of an endangered species may occur. When illegal killings occur, nearby roads and routes should be closed. C. Roads and routes should not be designated in ESA-designated critical habitat for threatened or endangered species unless it can be shown definitively that the species and its habitat are not harmed. D. Set levels of acceptable disturbance that are compatible with maintaining species viability or recovery. E. Close roads and routes in areas that are near denning sites or know pack territory f. Locate roads and routes as far as possible from	Limit or restrict roads and routes in sensitive wolf habitat (e.g., close roads around denning sites and pack territories, locate roads in forested areas and bounded by natural features, reassess roads and routes after the Wallow Fire).	XXXX	Limit/restrict roads and routes in sensitive wolf habitat. A. Implement “abuse it and lose it” policies regarding roads and routes. If users are not able to restrict their use to the designated road and route/closures then closures will be increased/moved to locations where they can physically be enforced. B. Roads and routes should not be designated and/or should be closed where take of an endangered species may occur. When illegal killings occur, nearby roads and routes should be closed. C. Roads and routes should not be designated in ESA-designated critical habitat for threatened or endangered species unless it can be shown definitively that the species and its habitat are not harmed. D. Set levels of acceptable disturbance that are compatible with maintaining species viability or recovery. E. Close roads and routes in areas that are near denning sites or know pack territory f. Locate roads and routes as far as possible from	Limit /restrict Roads and Routes in Sensitive Wolf Habitat	a. Establishment of ungrazed “reference” areas in a diversity of ecological types and soil types to use as baseline of what an area’s potential really is.	

	<p>natural caves or other natural denning sites. G. Locate roads and routes in discrete, specified areas bounded by natural features (topography and vegetative cover) to provide visual and acoustic barriers and to ensure that secure habitat is maintained for wildlife. H. Locate roads and routes in forest cover and not in open country. Long sight lines in open country make the visual effects of machines more pronounced. Reassess roads and routes after the Wallow Fire. i. Prohibit cross-country travel and dispersed camping in or near Mexican grey wolf denning and rendezvous areas. J. Maintain large unfragmented, undisturbed blocks of forestland where no roads or routes are designated.</p>			<p>natural caves or other natural denning sites. G. Locate roads and routes in discrete, specified areas bounded by natural features (topography and vegetative cover) to provide visual and acoustic barriers and to ensure that secure habitat is maintained for wildlife. H. Locate roads and routes in forest cover and not in open country. Long sight lines in open country make the visual effects of machines more pronounced. Reassess roads and routes after the Wallow Fire. i. Prohibit cross-country travel and dispersed camping in or near Mexican grey wolf denning and rendezvous areas. J. Maintain large unfragmented, undisturbed blocks of forestland where no roads or routes are designated.</p>		
<p>Mexican wolf - wilderness</p>	<p>Wilderness designation is an important means of protecting wolf habitat in Arizona and New Mexico.</p>	<p>Wilderness designation is an important means of protecting wolf habitat in Arizona and New Mexico.</p>	<p>XXXX</p>	<p>If we are to have wolves recover in Utah, we need strong populations of wolves in neighboring states such as Arizona and New Mexico so they can migrate back to Utah. Wilderness designation is an important means of protecting wolf habitat in Arizona and New Mexico.</p>	<p>Protect Wolf Habitat</p>	<p>PC 968-1 The Forest Service should promote both wolf recovery and restoration projects and should complement predator introduction programs to ensure healthy forests into the future because wolf reintroduction is the most effective way to keep elk populations moving around and bring about restoration of aspen and riparian forests. Management plans and implementation should give high priority to the increasing viability of the Mexican grey</p>

							wolf population and establish clear, binding standards for the protection of habitat. .
Wildlife - effects missing S&Gs	The Draft Plan proposes no standards for management of northern goshawk habitat, and notably, it omits any requirement to survey for goshawks prior to habitat disturbance, monitor populations, or retain structural attributes of ponderosa pine forest (e.g., canopy cover) essential to nesting and fledging behaviors of the sensitive species	The proposed plan has no standards for management of northern goshawk habitat, and omits any requirement to survey for goshawks prior to habitat disturbance, monitor populations, or retain structural attributes of ponderosa pine forest (e.g., canopy cover) essential to nesting and fledging behaviors of the sensitive species	** Check out Kaibab p. 27 last comment & p. 51 2nd comment	The Draft Plan proposes no standards for management of northern goshawk habitat, and notably, it omits any requirement to survey for goshawks prior to habitat disturbance, monitor populations, or retain structural attributes of ponderosa pine forest (e.g., canopy cover) essential to nesting and fledging behaviors of the sensitive species		Viability Analysis and Surveying	
Wildlife - effects missing S&Gs	The Forest Service is required by NFMA and NEPA to address changes in management direction affecting northern goshawk habitat and potential effects to the environment.	The proposed plan has no standards for management of northern goshawk habitat, and omits any requirement to survey for goshawks prior to habitat disturbance, monitor populations, or retain structural attributes of ponderosa pine forest (e.g., canopy cover) essential to nesting and fledging behaviors of the sensitive species	** Check out Kaibab p. 27 last comment & p. 51 2nd comment				

Wildlife - effects missing S&Gs	It also omits standards and guidelines that require survey of suitable habitat and retention of habitat attributes essential to viability of northern goshawk and 14 vertebrate prey species.	The proposed plan has no standards for management of northern goshawk habitat, and omits any requirement to survey for goshawks prior to habitat disturbance, monitor populations, or retain structural attributes of ponderosa pine forest (e.g., canopy cover) essential to nesting and fledging behaviors of the sensitive species	** Check out Kaibab p. 27 last comment & p. 51 2nd comment	It also omits standards and guidelines that require survey of suitable habitat and retention of habitat attributes essential to viability of northern goshawk and 14 vertebrate prey species.	Viability Analysis and Surveying	
Wildlife - antelope DC	Page 57, Fine-Scale Desired Conditions. Both of the statements made sound great and are very important for antelope and a vast improvement from the current management of these systems. However we do not know how practical they are or how the Forest will achieve them given the current management of domestic livestock and uncontrolled herbivore by elk. . . . As such for the Forest to be successful in providing the natural potential hiding cover for antelope fawns it must remove or at the very least greatly restrict herbivore by domestic livestock and work with the Game Department to either encourage elk to use other areas during the winter or reduce their population to where they are less of a negative factor.	Remove or greatly restrict herbivore use by domestic livestock and work with the AZGFD to manage elk use or decrease populations. Concern how the Grasslands fine-scale desired conditions can be achieved given the current management of domestic livestock and uncontrolled herbivory by elk (proposed plan p. 57).	XXXX	Page 57, Fine-Scale Desired Conditions. Both of the statements made sound great and are very important for antelope and a vast improvement from the current management of these systems. However we do not know how practical they are or how the Forest will achieve them given the current management of domestic livestock and uncontrolled herbivore by elk. As such for the Forest to be successful in providing the natural potential hiding cover for antelope fawns it must remove or at the very least greatly restrict herbivore by domestic livestock and work with the Game Department to either encourage elk to use other areas during the winter or reduce their population to where they are less of a negative factor.	Restricting Herbivore in Potential Hiding Cover for Antelope	PC 858-3 The Forest Service should revise the desired conditions to include either encouraging elk to use other areas during the winter or reducing their population to where they are less of a negative factor and explain they will be achieved because of the current management of domestic livestock and uncontrolled herbivore by elk.

Wildlife - antelope and fence	Page 58, Guidelines speaks to “pronghorn antelope fence and other crossings ....” The Forest must provide the specifics for these barriers.	Provide specifications for pronghorn antelope fence and other crossings (proposed plan p. 48).	XXXX	Page 58, Guidelines speaks to “pronghorn antelope fence and other crossings ....” The Forest must provide the specifics for these barriers.	Guideline Specifics on Pronghorn Antelope Fence	“Understory composition is within the natural range of variation and contains diverse native herbaceous plant species that provide nutrition for pronghorn and other species. Depending on soil type, ground cover typically averages 50% live vegetation and 50% nonliving vegetation, with vegetation composition averaging 40 to 60 percent grass, 10 – 30 percent forbs and 5 to 15 percent shrub.”
Wildlife - antelope and fence	Given the importance of antelope movement and the fact that fences are an impediment to easy movement of antelope, the Forest must provide the specifications / standards for fence modification and / or replacement it’s hard to understand why the Forest will on one hand move all responsibility for wildlife to the Game and Fish Department when there are at least two Supreme Court decisions which clearly put the responsibility for wildlife on the FS, and when the Game Department says that bottom wire should be at 20 inches from the ground, all of a sudden the FS knows better and sets the standard at 18 inches. We ask that someone within the FS could please explain why	Provide specifications for pronghorn antelope fence and other crossings (proposed plan p. 48).	XXXX	Given the importance of antelope movement and the fact that fences are an impediment to easy movement of antelope, the Forest must provide the specifications / standards for fence modification and / or replacement it’s hard to understand why the Forest will on one hand move all responsibility for wildlife to the Game and Fish Department when there are at least two Supreme Court decisions which clearly put the responsibility for wildlife on the FS, and when the Game Department says that bottom wire should be at 20 inches from the ground, all of a sudden the FS knows better and sets the standard at 18 inches. We ask that someone within the FS could please explain why	Fence Standards	PC 971-1 The Forest Service should address that fences are a major issue for antelope movement and include the number of miles of fence that are in current and historic antelope habitat that need to be modified and add fence standards which will be implemented by the Forest for fence construction or modification and/or replacement. The Forest Service should explain the discrepancy in the bottom wire distance from the ground between the AZ Game and Fish requirement of 20” and the FS requirement of 18”.

Wildlife - antelope and fence problem	<p>Fences are a major issue for antelope movement. Two items here, First, the reader has no idea at all how many miles of fence are in current and historic antelope habitat that need to be modified. Please provide the public some factual or lacking that an estimate to the magnitude of the issue. We were unable to find any reference to the fence standards which will be implemented by the Forest for fence construction or modification, other than the bottom wire is to be smooth and installed at 18 inches from the ground.</p>	<p>Describe how many miles of fence are in current and historic antelope habitat that need to be modified to prevent habitat fragmentation.</p>	<p>** Check out Kaibab p. 51 1st comment</p>	<p>Fences are a major issue for antelope movement. Two items here, First, the reader has no idea at all how many miles of fence are in current and historic antelope habitat that need to be modified. Please provide the public some factual or lacking that an estimate to the magnitude of the issue. We were unable to find any reference to the fence standards which will be implemented by the Forest for fence construction or modification, other than the bottom wire is to be smooth and installed at 18 inches from the ground.</p>	Fence Standards	<p>PC 971-1 The Forest Service should address that fences are a major issue for antelope movement and include the number of miles of fence that are in current and historic antelope habitat that need to be modified and add fence standards which will be implemented by the Forest for fence construction or modification and/or replacement. The Forest Service should explain the discrepancy in the bottom wire distance from the ground between the AZ Game and Fish requirement of 20" and the FS requirement of 18".</p>
Wildlife - antelope considerations	<p>Key elements to pronghorn management come from Pronghorn Ecology and Management", Bart O'Gara and Jim Yoakum, University of Colorado Press, 2004 – A Wildlife Management Institute Book. Two macro points that should be considered with any project that could effect antelope. § Isolated small pronghorn populations become increasingly vulnerable to extirpation as numbers decrease. Genetic consequences are commonly considered, but stochastic events like predation, disease, and climatic events have a greater likelihood of causing extirpations. § " ,,, predators taking 100</p>	<p>Any project that could affect antelope should consider: (1) isolated small pronghorn populations become increasingly vulnerable to extirpation as numbers decrease. Genetic consequences are commonly considered, but stochastic events like predation, disease, and climatic events have a greater likelihood of causing extirpations, and (2) "predators taking 100 fawns from a population in a valley were 1,000 fawns are borne probably is biologically insignificant, but their taking 100 fawns in the same valley when only 150 fawns are born is significant." . Reference: Pronghorn Ecology and Management, Bart O'Gara and</p>	<p>** Check out Prescott - antelope comments p. 67-28</p>			

	fawns from a population in a valley were 1,000 fawns are borne probably is biologically insignificant, but their taking 100 fawns in the same valley when only 150 fawns are born is significant.”	Jim Yoakum, University of Colorado Press, 2004.					
Wildlife - needs and non-native	There are other elements to pronghorn and grassland recover that must be addressed in detail by the ASNF in this new forest plan. We did not find any details to how the Forest will implement and practically function management that will provide for the needs of antelope of hiding cover and high quality food resources and at the same time resolving the very real conflict of also providing forage for non-native species ?	Explain how the plan provides for the needs of antelope (hiding cover and food resources) while also providing forage for non-native species.	** Check out Kaibab p. 74 comment 4				
Wildlife - antelope DC	With the continued long term decline in antelope populations combined with the “just at” or more often below ZPG fawns per 100 does the ASNF must make every effort to provide the best antelope habitat possible on the lands under its administration no matter how large or small. There must be a DFC that speaks to achieving at least 40 fawns per 100 does as a goal to meet in an effort to expand the existing populations of antelope to much higher levels.	There should be a desired condition that has a goal of at least 40 fawns per 100 does to expand the existing populations of antelope.	**Check out Kaibab , p. 5, 5th comment				

Wildlife - maximum achievable	<p>"In grasslands, maximum achievable cover height should be present in pastures with known antelope fawning areas each spring/summer. " (p 119)</p> <p>This statement effectively removes any known antelope fawning area from all livestock grazing without any evidence that properly managed grazing influences antelope fawning success. If other than only anecdotal evidence exists, then data should be provided.</p>	<p>"In grasslands, maximum achievable cover height should be present in pastures with known antelope fawning areas each spring/summer. " (p 119)</p> <p>This statement effectively removes any known antelope fawning area from all livestock grazing without any evidence that properly managed grazing influences antelope fawning success. If other than only anecdotal evidence exists, then data should be provided.</p>	XXXX				
AZGFD-EIS-Edit	<p>DEIS, Pronghorn Antelope, page 249: "Semi-desert grasslands which on the Mogollon Rim is isolated by topography and dense woodlands, supports limited numbers of pronghorn, and is not currently managed for the species by the AZGFD." This is not correct. Although pronghorn numbers may be limited, this area is currently managed for pronghorn. In fact, the Department has worked with the A-S and NGOS to fund habitat improvement projects in the semi-desert grasslands with pronghorn as one of the focus species for the work.</p>	<p>Correct the DEIS at page 249: "Semi-desert grasslands which on the forests occurs below the Mogollon Rim is isolated by topography and dense woodlands, supports limited numbers of pronghorn, and is not currently managed for the species by the AZGFD." Although pronghorn numbers may be limited, this area is currently managed for pronghorn.</p>		<p>DEIS, Pronghorn Antelope, page 249: "Semi-desert grasslands which on the forests occurs below the Mogollon Rim is isolated by topography and dense woodlands, supports limited numbers of pronghorn, and is not currently managed for the species by the AZGFD." This is not correct. Although pronghorn numbers may be limited, this area is currently managed for pronghorn. In fact, the Department has worked with the A-S and NGOS to fund habitat improvement projects in the semi-desert grasslands with pronghorn as one of the focus species for the work.</p>			

Wildlife - provide connectivity	These large, contiguous tracts of land are critical for the wildlife and allow the visitor to enjoy this wonderful landscape in solitude and quiet recreation, which is so difficult to find these days.	Provide for high quality habitat and the maintenance of wildlife connectivity to preserve species viability.	** Check out Kaibab p. 48 last comment	These large, contiguous tracts of land are critical for the wildlife and allow the visitor to enjoy this wonderful landscape in solitude and quiet recreation, which is so difficult to find these days.	Protect Wildlife Habitat	PC 974-1 The Forest Service should protect the wildlife and habitat from threats from poaching, pollution, cars, and deforestation and implement a recovery plan in order to ensure the ecological value and integrity, restoration, and recovery of the forest for future generations. The Forest Service should keep the contiguous tracts of land that are critical for the wildlife and allow the visitor to enjoy this wonderful landscape in solitude and quiet recreation.
Wildlife - provide connectivity	The majority of the Apache-Sitgreaves roadless areas are contiguous, adjacent, or in close proximity to the Blue Range Primitive Area, giving these wildland tremendous ecological value particularly for roaming large mammals and predators including mule and whitetail deer, elk, bears, mountain lions, and wolves.	Provide for high quality habitat and the maintenance of wildlife connectivity to preserve species viability.	** Check out Kaibab p. 48 last comment	The majority of the Apache-Sitgreaves roadless areas are contiguous, adjacent, or in close proximity to the Blue Range Primitive Area, giving these wildland tremendous ecological value particularly for roaming large mammals and predators including mule and whitetail deer, elk, bears, mountain lions, and wolves.	Ecological Value	
Wildlife - provide connectivity	It is therefore essential that the next forest plan not only adequately address current wildlife habitat and recreational needs, but also provide for the high quality habitat and the maintenance of wildlife connectivity both within and across the A-S that will be essential for sustaining healthy populations of wildlife within a more fragmented Arizona landscape.	Provide for high quality habitat and the maintenance of wildlife connectivity to preserve species viability.	** Check out Kaibab p. 48 last comment	It is therefore essential that the next forest plan not only adequately address current wildlife habitat and recreational needs, but also provide for the high quality habitat and the maintenance of wildlife connectivity both within and across the A-S that will be essential for sustaining healthy populations of wildlife within a more fragmented Arizona landscape.	Sustaining Healthy Populations of Wildlife	

Wildlife - provide connectivity	We are concerned, however, that the Preferred Alternative's reduced protection of wildlife conservation values of the Apache portion of the Forests IRAs, the Blue Range Primitive Area, and limited amount of designated wilderness; as well as the Sitgreaves' issues discussed above, impede the commendable goal of safe passage among habitat areas to preserve species viability (DEIS, p. 254).	Provide for high quality habitat and the maintenance of wildlife connectivity to preserve species viability.	** Check out Kaibab p. 48 last comment	We are concerned, however, that the Preferred Alternative's reduced protection of wildlife conservation values of the Apache portion of the Forests IRAs, the Blue Range Primitive Area, and limited amount of designated wilderness; as well as the Sitgreaves' issues discussed above, impede the commendable goal of safe passage among habitat areas to preserve species viability (DEIS, p. 254).	Protection of Wildlife Conservation Values	PC 990-4 The Forest Service should address the reduced protection of wildlife conservation values of the Forests IRAs, the Blue Range Primitive Area, and limited amount of designated wilderness may impede the goal of safe passage among habitat areas to preserve species viability
Wildlife - provide connectivity	It is imperative the ASNf set forward a set of DFC's that specifically address the needs of antelope and deer, AND at the same time the proper wording which will have the effect to make sure these DFC's are used in the AMP process.	Provide for high quality habitat and the maintenance of wildlife connectivity to preserve species viability.	XXXX	It is imperative the ASNf set forward a set of DFC's that specifically address the needs of antelope and deer, AND at the same time the proper wording which will have the effect to make sure these DFC's are used in the AMP process.	Addressing Needs of Antelope and Deer and Use in AMP Process	PC 952-2 The Forest Service should set forward a set of DFC's that specifically address the needs of antelope and deer and include proper wording which will make sure these DFC's are used in the AMP process.
Wildlife - corridors	Protect Wildlife Corridors a. Limiting roads in some areas of the Apache-Sitgreaves National Forests, such as the Little Creek, Paddy Creek, and along the Mogollon Rim would help protect movement between the lower elevations of the forest and the high country b. Wildlife linkages should have a road density of no more than 0.25 mile/square mile, limited developed sites, no logging (except for restoration treatments), no vehicle or mountain bike use off of designated roads and trails, and no new road construction. C. These corridors are used by	Protect wildlife corridors: (1) limit roads in some areas such as Little Creek, Paddy Creek, and along the Mogollon Rim, (2) wildlife linkages should have a road density of no more than 0.25 mile/square mile, limited developed sites, no logging (except restoration treatments), no vehicle or mountain bike use off of designated roads and trails, and no new road construction, and (3) roads and routes that threaten or significantly impair wildlife movement through critical corridors should be closed.	** Check out Prescott p. 28	Protect Wildlife Corridors a. Limiting roads in some areas of the Apache-Sitgreaves National Forests, such as the Little Creek, Paddy Creek, and along the Mogollon Rim would help protect movement between the lower elevations of the forest and the high country b. Wildlife linkages should have a road density of no more than 0.25 mile/square mile, limited developed sites, no logging (except for restoration treatments), no vehicle or mountain bike use off of designated roads and trails, and no new road construction. C. These corridors are used by	Wildlife Corridors	PC 974-11 The Forest Service should protect wildlife corridors by:a. Limiting roads in some areas of the Apache-Sitgreaves National Forests, such as the Little Creek, Paddy Creek, and along the Mogollon Rim would help protect movement between the lower elevations of the forest and the high country b. Wildlife linkages should have a road density of no more than 0.25 mile/square mile, limited developed sites, no logging (except for restoration treatments), no vehicle or mountain bike use off of designated roads and trails,

	many species critical to the health of the forest. Roads and routes that threaten or significantly impair wildlife movement through critical corridors within the Apache-Sitgreaves National Forests should be closed. A healthy prey base is vital to a thriving Mexican wolf population.			many species critical to the health of the forest. Roads and routes that threaten or significantly impair wildlife movement through critical corridors within the Apache-Sitgreaves National Forests should be closed. A healthy prey base is vital to a thriving Mexican wolf population.			and no new road construction. c. These corridors are used by many species critical to the health of the forest. Roads and routes that threaten or significantly impair wildlife movement through critical corridors within the Apache-Sitgreaves National Forests should be closed. A healthy prey base is vital to a thriving Mexican wolf population.
Wildlife - corridors - no	We do NOT need any wildlife corridors	We do not need any wildlife corridors.	XXXX	We do NOT need any wildlife corridors		Wildlife Corridors	PC 974-3 The Forest Service should not add any wildlife corridors.
Wildlife - recovery plans	Ensure recovery of threatened and endangered species. The Forest Plan must implement formal recovery plans rather than merely reference them, and establish clear, binding standards to ensure the recovery of each at-risk plant and animal species that may occur on the Forest.	Implement species recovery plans to ensure recovery of threatened and endangered species and establish standards to ensure the recovery of each at-risk plant and animal species that may occur on the forest.	XXXX	Ensure recovery of threatened and endangered species. The Forest Plan must implement formal recovery plans rather than merely reference them, and establish clear, binding standards to ensure the recovery of each at-risk plant and animal species that may occur on the Forest.		Binding Standards	PC 959-1 The Forest Plan must implement formal recovery plans rather than merely reference them, and establish clear, binding standards to ensure the recovery of each at-risk plant and animal species that may occur on the Forest.
Wildlife - recovery plans	The biome in question is habitat for many threatened and endangered species. I want to see strong, binding recovery plans for every plant and animal species that is at risk. In a time when we see a high rate of species loss planet-wide, we cannot afford to be anything but stringent shepherds of plants and	Implement species recovery plans to ensure recovery of threatened and endangered species and establish standards to ensure the recovery of each at-risk plant and animal species that may occur on the forest.	XXXX	The biome in question is habitat for many threatened and endangered species. I want to see strong, binding recovery plans for every plant and animal species that is at risk. In a time when we see a high rate of species loss planet-wide, we cannot afford to be anything but stringent shepherds of plants and		Habitat for Threatened and Endangered Species	PC 950-1 The Forest Service should revise the plan to include strong, binding recovery plans and protection for every plant and animal species that is at risk because the loss on one effects innumerable others.

	animals who need our protection. No plant or animal exists in a vacuum, the loss of one effects innumerable others.			animals who need our protection. No plant or animal exists in a vacuum, the loss of one effects innumerable others.			
Wildlife - recovery plans	Implement recovery plans to ensure recovery of threatened and endangered species.	Implement species recovery plans to ensure recovery of threatened and endangered species and establish standards to ensure the recovery of each at-risk plant and animal species that may occur on the forest.	XXXX	Implement recovery plans to ensure recovery of threatened and endangered species.		Implement Threatened and Endangered Recovery Plans	
Wildlife - recovery plans	We must implement recovery plans to ensure recovery of threatened and endangered species. These endangered species as well as plants and other wildlife need our protection.	Implement species recovery plans to ensure recovery of threatened and endangered species and establish standards to ensure the recovery of each at-risk plant and animal species that may occur on the forest.	XXXX	We must implement recovery plans to ensure recovery of threatened and endangered species. These endangered species as well as plants and other wildlife need our protection.		Protect Wildlife Habitat	PC 974-1 The Forest Service should protect the wildlife and habitat from threats from poaching, pollution, cars, and deforestation and implement a recovery plan in order to ensure the ecological value and integrity, restoration, and recovery of the forest for future generations. The Forest Service should keep the contiguous tracts of land that are critical for the wildlife and allow the visitor to enjoy this wonderful landscape in solitude and quiet recreation.

Wildlife - predators	Please, let's use our heads and science before destroying the habitat - which means all the methods outlined above....including predators (wolves & mtn. lions) to maintain the BALANCE.	Provide the greatest possible safe habitat for predators (e.g., Mexican wolves, mountain lions).	XXXX	Please, let's use our heads and science before destroying the habitat - which means all the methods outlined above....including predators (wolves & mtn. lions) to maintain the BALANCE.	Protect Wildlife Habitat	
Wildlife - predators	[revisions in the management plan for Apache-Sitgreaves National Forest should be aimed primarily at accomplishing and safeguarding the greatest possible safe habitat for the restoration of Mexican wolves and for other native species of wildlife.] no Federal predator control by the disgustingly misnamed "Wildlife Services	Provide the greatest possible safe habitat for predators (e.g., Mexican wolves, mountain lions).	XXXX	no Federal predator control by the disgustingly misnamed "Wildlife Services	Wildlife	
Wildlife -former species	to ensure the ecological integrity, restoration, and habitat friendliness of Apache Sitgreaves National Forest for Mexican wolves, and eventually grizzlies, jaguars and all other native species which formally lived in the region	Provide habitat for Mexican wolves, and eventually grizzlies, jaguars and all other native species which formally lived in the region.	** Check out Kaibab p. 50 last comment	to ensure the ecological integrity, restoration, and habitat friendliness of Apache Sitgreaves National Forest for Mexican wolves, and eventually grizzlies, jaguars and all other native species which formally lived in the region	Emphasize Conservation of Biological Diversity	
Elk	Concern that the plan says elk is a non-native species. Clarify the taxonomic status of what is purported to be Merriam's elk.	As is often the case, the issue of status of elk as being a non-native species is raised in this document. The existence of the Merriam's subspecies is not well established in credible science. It is indisputable that Cervus elaphus or the American elk existed in the area now known as the Apache-Sitgreaves NFs. It is important to understand that	XXXX			

		the taxonomic status of what is purported to be Merriam's elk is in question.					
fragmentation vs. food/cover	It is unclear why fragmentation of habitat would be the major issue for wildlife as opposed to cover and food (forage), or if fragmentation of habitat is actually an issue of "ecological restoration?"	Clarify why fragmentation of habitat would be the major issue for wildlife as opposed to cover and food (forage).	XXXX				
Diversity - biodiversity - clarify	What is the definition of diversity for this plan?	Explain the plan's definition of diversity and how it will be measured to evaluate progress. Explain the evidence that diversity has changed on the Apache-Sitgreaves NFs.	XXXX	What is the definition of diversity for this plan?		Definition of Diversity	PC 975-4 The Forest Service should define diversity, explain how will diversity be measured to evaluate progress toward objectives, and provide evidence that diversity as defined has changed. The Forest Service should define the "Species diversity needs" in order to be integrated into the plan.
Diversity - biodiversity - clarify	How will diversity be measured to evaluate progress toward objectives using the definition above?	Explain the plan's definition of diversity and how it will be measured to evaluate progress. Explain the evidence that diversity has changed on the Apache-Sitgreaves NFs.	XXXX	How will diversity be measured to evaluate progress toward objectives using the definition above?		<i>Measuring Diversity</i>	PC 975-4 The Forest Service should define diversity, explain how will diversity be measured to evaluate progress toward objectives, and provide evidence that diversity as defined has changed. The Forest Service should define the "Species diversity needs" in order to be integrated into the plan.

Diversity - biodiversity - clarify	What evidence exists that diversity (as defined in #1) has changed	Explain the plan's definition of diversity and how it will be measured to evaluate progress. Explain the evidence that diversity has changed on the Apache-Sitgreaves NFs.	XXXX	What evidence exists that diversity (as defined in #1) has changed		Change in Diversity	PC 975-4 The Forest Service should define diversity, explain how will diversity be measured to evaluate progress toward objectives, and provide evidence that diversity as defined has changed. The Forest Service should define the "Species diversity needs" in order to be integrated into the plan.
Diversity - biodiversity - clarify	"Ecosystem diversity is the primary means by which this plan contributes to the maintenance and improvement of ecosystem health." Using an undefined term as a basis for achieving an objective based on an erroneous concept of an ecosystem is not a good basis for a plan (see General Comments).	Explain the plan's definition of diversity and how it will be measured to evaluate progress. Explain the evidence that diversity has changed on the Apache-Sitgreaves NFs.	XXXX	"Ecosystem diversity is the primary means by which this plan contributes to the maintenance and improvement of ecosystem health." Using an undefined term as a basis for achieving an objective based on an erroneous concept of an ecosystem is not a good basis for a plan (see General Comments).		Ecosystem Diversity	
Diversity - biodiversity - clarify	Diversity is repeatedly mentioned in Chapter 1 and all through the plan as a major goal/objective of the Plan. (The National Forest Management Act (NFMA) requires the Forest Service to consider "natural diversity" in their land management). Yet, the term is not defined anywhere, as if the definition were self-evident.	Explain the plan's definition of diversity and how it will be measured to evaluate progress. Explain the evidence that diversity has changed on the Apache-Sitgreaves NFs.	XXXX	Diversity is repeatedly mentioned in Chapter 1 and all through the plan as a major goal/objective of the Plan. (The National Forest Management Act (NFMA) requires the Forest Service to consider "natural diversity" in their land management). Yet, the term is not defined anywhere, as if the definition were self-evident.		Errors and Omissions in Definitions and Terminology	
Diversity - biodiversity - clarify	The statement quoted above illustrates several fundamental features that underlay a considerable part of this plan which we believe are flawed, scientifically questionable, or incorrect. "Ecosystem diversity" is not defined, but is equated with "distribution,	Explain the plan's definition of diversity and how it will be measured to evaluate progress. Explain the evidence that diversity has changed on the Apache-Sitgreaves NFs.	XXXX	The statement quoted above illustrates several fundamental features that underlay a considerable part of this plan which we believe are flawed, scientifically questionable, or incorrect. "Ecosystem diversity" is not defined, but is equated with "distribution,		Errors and Omissions in Definitions and Terminology	

	diversity, and complexity" of landscapes, and these latter terms are also not defined.			diversity, and complexity" of landscapes, and these latter terms are also not defined.			
Diversity - biodiversity - clarify	The second paragraph also states that "species diversity needs" are integrated into all aspects of the plan. Without defining species diversity needs, the concept cannot be integrated into the plan. The statement indicates that "social and economic needs" are also integrated into the desired conditions for the plan "whenever possible," however it is not clear when it would not be possible, since the mission is to "serve people" and thus social and economic needs should always be integrated into desired conditions.	Explain the plan's definition of diversity and how it will be measured to evaluate progress. Explain the evidence that diversity has changed on the Apache-Sitgreaves NFs.	XXXX				
MIS concept	What is the scientific basis for the use of MIS?	Explain the scientific basis and purpose for management indicator species (MIS).	XXXX	What is the scientific basis for the use of MIS?		Information Clarification	PC 980-1 The Forest Service should clarify the scientific basis for the use of MIS.

MIS concept	If MIS is intended to be single indicator of management effects on the entire ecosystem, then it is a flawed concept and should be abandoned.	Explain the scientific basis and purpose for management indicator species (MIS).	XXXX	If MIS is intended to be single indicator of management effects on the entire ecosystem, then it is a flawed concept and should be abandoned.		Management Effects and Direction	
MIS concept	"Mexican spotted owl and northern goshawk are management indicator species (MIS) of forest density and structure." Is the implication here that if populations of these species are maintained or increased, the forest density and structure will be ideal for meeting all other goals? If that is what is meant, the basis for that assumption should be presented. If is not what is meant, then why are they called MIS?	Explain the scientific basis and purpose for management indicator species (MIS).	XXXX	"Mexican spotted owl and northern goshawk are management indicator species (MIS) of forest density and structure." Is the implication here that if populations of these species are maintained or increased, the forest density and structure will be ideal for meeting all other goals? If that is what is meant, the basis for that assumption should be presented. If is not what is meant, then why are they called MIS?		Information Clarification	PC 980-8 The Forest Service should clarify the statement (Page 38) " Mexican spotted owl and northern goshawk are management indicator species(MIS) of forest density and structure." The Forest Service should address why they are called MIS, and if the intent was to assume that populations of these species are maintained or increased, the forest density and structure will be ideal for meeting all other goals.
Missing MIS	The Draft Plan's identification of management indicator species ("MIS") is highly controversial because it: (1) fails to capture the range of PNVT that host TES species whose viability is of planning concern; and (2) significantly changes course from the current Forest Plan (USDA 1987a), which designates 17 MIS that better represent of the range of habitats found on the forests.	The plan's identification of management indicator species (MIS) is controversial because it (1) fails to capture the range of PNVT that host TES species whose viability is of planning concern; and (2) significantly changes course from the 1987 plan which designates 17 MIS that better represent the range of habitats found on the forests.	** Check out Kaibab, p. 42-43 & Prescott p. 61 last comment	The Draft Plan's identification of management indicator species ("MIS") is highly controversial because it: (1) fails to capture the range of PNVT that host TES species whose viability is of planning concern; and (2) significantly changes course from the current Forest Plan (USDA 1987a), which designates 17 MIS that better represent of the range of habitats found on the forests.		List of MIS	

Missing MIS	The proposed MIS are not reasonably likely to indicate management effects to species viability in any other PNVT, including spruce-fir, Madrean pine-oak, piñon-juniper, semi-desert grassland, interior chaparral and riparian communities that comprise approximately 45 percent of the forests. See PDEIS at 135-36 (Tables 22-23).	The plan's identification of management indicator species (MIS) is controversial because it (1) fails to capture the range of PNVT that host TES species whose viability is of planning concern; and (2) significantly changes course from the 1987 plan which designates 17 MIS that better represent the range of habitats found on the forests.	** Check out Kaibab , p. 42-43 & Prescott p. 61 last comment	The proposed MIS are not reasonably likely to indicate management effects to species viability in any other PNVT, including spruce-fir, Madrean pine-oak, piñon-juniper, semi-desert grassland, interior chaparral and riparian communities that comprise approximately 45 percent of the forests. See PDEIS at 135-36 (Tables 22-23).		Management Effects and Direction	
Missing MIS	We also find it disappointing, surprising, and depressing that although natural water is a purpose and need for this project, no management indicator species was selected to reflect the health of this important and rare resource on the Apache-Sitgreaves NF. Why not?	The plan's identification of management indicator species (MIS) is controversial because it (1) fails to capture the range of PNVT that host TES species whose viability is of planning concern; and (2) significantly changes course from the 1987 plan which designates 17 MIS that better represent the range of habitats found on the forests.	** Check out Kaibab , p. 42-43 & Prescott p. 61 last comment	We also find it disappointing, surprising, and depressing that although natural water is a purpose and need for this project, no management indicator species was selected to reflect the health of this important and rare resource on the Apache-Sitgreaves NF. Why not?		List of MIS	PC 980-9 The Forest Service should address why no riparian or aquatic species MIS was selected although natural water is a purpose and need for this project and designate MIS for riparian areas to ensure that management effects are monitored and irretrievable commitments are not made. The Forest Service should implement standards and guidelines to maintain and restore aquatic and riparian habitats on national forest lands with an ecosystem approach.
Missing MIS	The former plan had a long list of MIS and you have narrowed this list to three, none of which are riparian or aquatic species.	The plan's identification of management indicator species (MIS) is controversial because it (1) fails to capture the range of PNVT that host TES species whose viability is of planning concern; and (2) significantly changes course from the 1987 plan which designates 17 MIS that better represent the range of habitats found on the forests.	** Check out Kaibab , p. 42-43 & Prescott p. 61 last comment	The former plan had a long list of MIS and you have narrowed this list to three, none of which are riparian or aquatic species.		List of MIS	PC 980-9 The Forest Service should address why no riparian or aquatic species MIS was selected although natural water is a purpose and need for this project and designate MIS for riparian areas to ensure that management effects are monitored and irretrievable commitments are not made. The Forest Service should implement standards and guidelines to maintain and

						restore aquatic and riparian habitats on national forest lands with an ecosystem approach.
Missing MIS	<p>Identification of management indicator species (“MIS”) in the Proposed Plan is controversial because it: (1) fails to capture the range of habitats that host species of viability concern; and (2) changes course from the current Forest Plan, which designates 17 MIS that better represent the range of habitats found on the forests. The Proposed Plan identifies only three MIS: Mexican spotted owl, northern goshawk and pronghorn antelope. Together, those species are assumed to indicate management effects on other species associated with dry mixed conifer, wet mixed conifer, ponderosa pine, Great Basin grassland and montane-subalpine grassland PNVT, which comprise just 1.16 million acres (~55 percent) of the approximately 2.1 million-acre planning area</p>	<p>The plan's identification of management indicator species (MIS) is controversial because it (1) fails to capture the range of PNVT that host TES species whose viability is of planning concern; and (2) significantly changes course from the 1987 plan which designates 17 MIS that better represent the range of habitats found on the forests.</p>	<p><b>** Check out Kaibab , p. 42-43 &amp; Prescott p. 61 last comment</b></p>	<p>Identification of management indicator species (“MIS”) in the Proposed Plan is controversial because it: (1) fails to capture the range of habitats that host species of viability concern; and (2) changes course from the current Forest Plan, which designates 17 MIS that better represent the range of habitats found on the forests. The Proposed Plan identifies only three MIS: Mexican spotted owl, northern goshawk and pronghorn antelope. Together, those species are assumed to indicate management effects on other species associated with dry mixed conifer, wet mixed conifer, ponderosa pine, Great Basin grassland and montane-subalpine grassland PNVT, which comprise just 1.16 million acres (~55 percent) of the approximately 2.1 million-acre planning area</p>	List of MIS	<p>PC 980-6 The Forest Service should review the Identification of management indicator species (“MIS”) in the controversial Proposed Plan because it fails to capture the range of habitats that host species of viability concern; and it changes course from the current Forest plan. The proposed MIS cannot indicate management effects to species viability in any other PNVT, including spruce-fir, Madrean pine-oak, piñon-juniper, semi-desert grassland, interior chaparral and riparian communities that comprise approximately 45 percent of the forest.</p>

Missing MIS	The proposed MIS cannot indicate management effects to species viability in any other PNVT, including spruce-fir, Madrean pine-oak, piñon-juniper, semi-desert grassland, interior chaparral and riparian communities that comprise approximately 45 percent of the forests	The plan's identification of management indicator species (MIS) is controversial because it (1) fails to capture the range of PNVT that host TES species whose viability is of planning concern; and (2) significantly changes course from the 1987 plan which designates 17 MIS that better represent the range of habitats found on the forests.	** Check out Kaibab, p. 42-43 & Prescott p. 61 last comment	The proposed MIS cannot indicate management effects to species viability in any other PNVT, including spruce-fir, Madrean pine-oak, piñon-juniper, semi-desert grassland, interior chaparral and riparian communities that comprise approximately 45 percent of the forests	Management Effects and Direction	PC 980-6 The Forest Service should review the Identification of management indicator species ("MIS") in the controversial Proposed Plan because it fails to capture the range of habitats that host species of viability concern; and it changes course from the current Forest plan. The proposed MIS cannot indicate management effects to species viability in any other PNVT, including spruce-fir, Madrean pine-oak, piñon-juniper, semi-desert grassland, interior chaparral and riparian communities that comprise approximately 45 percent of the forest.
Missing MIS	The Proposed Plan changes the management direction in the current Forest Plan by omitting from the MIS designation pygmy nuthatch (old growth ponderosa pine), red squirrel (old growth spruce-fir and mixed conifer), Abert's squirrel (mid-mature ponderosa pine), hairy woodpecker (primary cavity excavator in mid-mature aspen, mixed conifer, ponderosa pine and riparian), plain titmouse (late seral piñon-juniper), cinnamon teal (wetlands), and other species including yellow-breasted chat, Lincoln's sparrow, Lucy's warbler, turkey and mule deer. There is no explanation for this omission	The plan's identification of management indicator species (MIS) is controversial because it (1) fails to capture the range of PNVT that host TES species whose viability is of planning concern; and (2) significantly changes course from the 1987 plan which designates 17 MIS that better represent the range of habitats found on the forests.	** Check out Kaibab, p. 42-43 & Prescott p. 61 last comment	The Proposed Plan changes the management direction in the current Forest Plan by omitting from the MIS designation pygmy nuthatch (old growth ponderosa pine), red squirrel (old growth spruce-fir and mixed conifer), Abert's squirrel (mid-mature ponderosa pine), hairy woodpecker (primary cavity excavator in mid-mature aspen, mixed conifer, ponderosa pine and riparian), plain titmouse (late seral piñon-juniper), cinnamon teal (wetlands), and other species including yellow-breasted chat, Lincoln's sparrow, Lucy's warbler, turkey and mule deer. There is no explanation for this omission	List of MIS	PC 980-11 The Forest Service should address why the Proposed Plan changes the management direction in the current Forest Plan by omitting from the MIS designation pygmy nuthatch (old growth ponderosa pine), red squirrel (old growth spruce-fir and mixed conifer), Abert's squirrel (mid-mature ponderosa pine), hairy woodpecker (primary cavity excavator in mid-mature aspen, mixed conifer, ponderosa pine and riparian), plain titmouse (late seral piñon-juniper), cinnamon teal (wetlands), and other species including yellow-breasted chat, Lincoln's sparrow, Lucy's warbler, turkey and mule deer

Missing MIS	The Forest Service should survey for suites of species and perform community analyses to detect trends in ecosystems. Modern statistical techniques are capable of evaluating ecosystem health and changes with a high level of sensitivity. For example, community analyses of aquatic or terrestrial macroarthropods, native fish species, or common plants can be used to detect changes in ecosystem condition	The plan's identification of management indicator species (MIS) is controversial because it (1) fails to capture the range of PNVT that host TES species whose viability is of planning concern; and (2) significantly changes course from the 1987 plan which designates 17 MIS that better represent the range of habitats found on the forests.	** Check out Kaibab , p. 42-43 & Prescott p. 61 last comment	The Forest Service should survey for suites of species and perform community analyses to detect trends in ecosystems. Modern statistical techniques are capable of evaluating ecosystem health and changes with a high level of sensitivity. For example, community analyses of aquatic or terrestrial macroarthropods, native fish species, or common plants can be used to detect changes in ecosystem condition	List of MIS	PC 980-13 The Forest Service should survey for suites of species and perform community analyses to detect trends in ecosystems because NFMA requires the Forest Service to monitor MIS population and habitat trends and modern statistical techniques are capable of evaluating ecosystem health and changes with a high level of sensitivity
Aspen EI	And why was aspen not also selected? It would be a simple matter to do so and would go so far toward lending badly-needed credibility toward this plan.	Explain why aspen was not selected as an ecological indicator (EI).	** Check out Kaibab , p. 42-43 & Prescott p. 61 last comment	And why was aspen not also selected? It would be a simple matter to do so and would go so far toward lending badly-needed credibility toward this plan.	Aspen not Selected as Indicator	PC 962-1 The Forest Service should address why aspen was not also selected because it would be a simple matter to do so and would go so far toward lending badly-needed credibility toward this plan.
Aquatic and Riparian	The failure of the Draft Plan to designate MIS for riparian habitat is inexplicable.	Designate management indicator species (MIS) to evaluate the health of aquatic and riparian systems.	** Check out Kaibab , p. 42-43 & Prescott p. 61 last comment	The failure of the Draft Plan to designate MIS for riparian habitat is inexplicable.	List of MIS	

Aquatic and Riparian	Native fishes and amphibians are ideal candidates for designation as MIS under the revised forest plan due to the potential ubiquity of aquatic habitat disturbances resulting from planned management activities, yet the Draft Plan unreasonably declines to so designate them. More, as noted above, it changes course from the current Forest Plan by omitting hairy woodpecker, cinnamon teal and aquatic macroinvertebrates from the MIS designation as riparian associates, and it does so without explanation.	Designate management indicator species (MIS) to evaluate the health of aquatic and riparian systems.	** Check out Kaibab, p. 42-43 & Prescott p. 61 last comment			
Aquatic and Riparian	Instead, the Proposed Plan does not include designation of any MIS for riparian areas, which make up less than 3 percent (3%) of the forests' acreage, but feature their most productive and diverse ecosystems. Fish, wildlife, and many plant species depend on riparian areas for their existence. According to the draft analysis, riparian vegetation and soil condition trends are "away" from desired conditions, 68 percent (68%) of riparian areas along streams are "functioning at-risk," and eight percent (8%) are "nonfunctioning." Degraded riparian systems may take decades to reach properly functioning conditions. As a result, aquatic species are in trouble. It is prudent to	Designate management indicator species (MIS) to evaluate the health of aquatic and riparian systems.	** Check out Kaibab, p. 42-43 & Prescott p. 61 last comment	Instead, the Proposed Plan does not include designation of any MIS for riparian areas, which make up less than 3 percent (3%) of the forests' acreage, but feature their most productive and diverse ecosystems. Fish, wildlife, and many plant species depend on riparian areas for their existence. According to the draft analysis, riparian vegetation and soil condition trends are "away" from desired conditions, 68 percent (68%) of riparian areas along streams are "functioning at-risk," and eight percent (8%) are "nonfunctioning." Degraded riparian systems may take decades to reach properly functioning conditions. As a result, aquatic species are in trouble. It is prudent to	Designate MIS for Riparian Areas	

	designate MIS for riparian areas to ensure that management effects are monitored and irretreivable commitments are not made.			designate MIS for riparian areas to ensure that management effects are monitored and irretreivable commitments are not made.			
Aquatic and Riparian	Native fishes and amphibians are ideal candidates for designation as MIS due to the potential ubiquity of aquatic habitat disturbances resulting from planned management activities.	Designate management indicator species (MIS) to evaluate the health of aquatic and riparian systems.	** Check out Kaibab , p. 42-43 & Prescott p. 61 last comment	Native fishes and amphibians are ideal candidates for designation as MIS due to the potential ubiquity of aquatic habitat disturbances resulting from planned management activities.		List of MIS	
Aquatic and Riparian	Add a suite of Management Indicator Species (MIS) to evaluate health of aquatic and riparian systems. For example, community analyses of aquatic or terrestrial macroarthropods, native fish species, or common plants can be used to detect changes in ecosystem condition <sup>32,33,34</sup> . Without this type of monitoring, it is not clear how the Forest Service plans to evaluate ecosystem health along its waterways	Designate management indicator species (MIS) to evaluate the health of aquatic and riparian systems.	** Check out Kaibab , p. 42-43 & Prescott p. 61 last comment	Add a suite of Management Indicator Species (MIS) to evaluate health of aquatic and riparian systems. For example, community analyses of aquatic or terrestrial macroarthropods, native fish species, or common plants can be used to detect changes in ecosystem condition <sup>32,33,34</sup> . Without this type of monitoring, it is not clear how the Forest Service plans to evaluate ecosystem health along its waterways		List of MIS	

<p>Include wetland/cienega PNVT in Riparian EI</p>	<p>Page 232, Habitat Ecological Indicators (EI), Riparian EI The wetland/cienega riparian area PNVT is not included as a riparian EI. Since numerous Forest Planning Species with some viability risk are associated with this PNVT (Table 66), we recommend including the wetland/cienega PNVT as a Riparian EI not only for its value to the species listed in Table 66, but for its importance in providing stable aquatic habitats.</p>	<p>Include the wetland/cienega PNVT as a riparian ecological indicator (EI).</p>	<p>** Check out Kaibab, p. 42-43 &amp; Prescott p. 61 last comment</p>	<p>Page 232, Habitat Ecological Indicators (EI), Riparian EI The wetland/cienega riparian area PNVT is not included as a riparian EI. Since numerous Forest Planning Species with some viability risk are associated with this PNVT (Table 66), we recommend including the wetland/cienega PNVT as a Riparian EI not only for its value to the species listed in Table 66, but for its importance in providing stable aquatic habitats.</p>	<p>Including Wetland/Cienega</p>	<p>PC 963-1 The Forest Service should include the wetland/cienega PNVT as a Riparian EI not only for its value to the species listed in Table 66, but for its importance in providing stable aquatic habitats.</p>
<p>MIS - and monitoring data</p>	<p>Finally, NFMA implementing regulations obligate the Forest Service to monitor population and habitat trends of MIS. See 36 C.F.R. § 219.19(a)(6). The agency admits failure to monitor threatened Mexican spotted owl and sensitive northern goshawk populations. See PDEIS at 247 (“Population figures for MSO on the planning unit are not available.”); 248 (“Population figures for [northern goshawk] on the planning unit are not available.”). Therefore, any estimate of management effect to the viability those MIS is arbitrary and capricious. Monitoring failures cast doubt on conclusions in the PDEIS that the Draft Plan will maintain viable populations of proposed MIS.</p>	<p>The agency admits failure to monitor threatened Mexican spotted owl and sensitive northern goshawk populations. Therefore, any estimate of management effect to the viability those MIS is arbitrary and capricious. Monitoring failures cast doubt on conclusions in the DEIS that the plan will maintain viable populations of proposed MIS.</p>	<p>** Check out Kaibab p. 42 2nd comment</p>			

Viability - edits	Page 227, Table 66, PNVT Coarse and Fine Filters On page 109, the DEIS states that coarse filter plan decisions would provide viability for low risk species and that fine filter plan decisions are for species at some viability risk. However, it does not appear that Mexican spotted owls are considered species with viability risk in any of the four forest PNVTs. We recommend including fine filter habitat elements to reduce viability risk for Mexican spotted owls.	Include fine filter habitat elements to reduce viability risk for Mexican spotted owls. Include Mexican spotted owl as an associated forest plan species for riparian forests and Madrean pine-oak woodland PNVTs. (DEIS p. 227, 240).	XXXX	Page 227, Table 66, PNVT Coarse and Fine Filters On page 109, the DEIS states that coarse filter plan decisions would provide viability for low risk species and that fine filter plan decisions are for species at some viability risk. However, it does not appear that Mexican spotted owls are considered species with viability risk in any of the four forest PNVTs. We recommend including fine filter habitat elements to reduce viability risk for Mexican spotted owls.	PNVT	PC 990-9 The Forest Service should include fine filter habitat elements to reduce viability risk for Mexican spotted owls because table on page 227 states that fine filter plan decisions are for species at some viability risk.
Viability - edits	Page 228, Table 66 (continued), Riparian PNVTs We recommend including Mexican spotted owl as Associated Forest Planning Species for riparian forests. The Mexican spotted owl Recovery Plan recognizes riparian forests located outside of established protected activity centers as Recovery Habitat (Service 2012). These riparian habitats are used by owls for foraging, roosting, daily movements, dispersal, and potentially for nesting. Riparian Recovery Habitat is considered key habitat for owl recovery. Other riparian habitats may not be regularly used by owls but serve as important linkages between Recovery Habitats or as non-breeding-season habitats.	Include fine filter habitat elements to reduce viability risk for Mexican spotted owls. Include Mexican spotted owl as an associated forest plan species for riparian forests and Madrean pine-oak woodland PNVTs. (DEIS p. 227, 240).	XXXX	Page 228, Table 66 (continued), Riparian PNVTs We recommend including Mexican spotted owl as Associated Forest Planning Species for riparian forests. The Mexican spotted owl Recovery Plan recognizes riparian forests located outside of established protected activity centers as Recovery Habitat (Service 2012). These riparian habitats are used by owls for foraging, roosting, daily movements, dispersal, and potentially for nesting. Riparian Recovery Habitat is considered key habitat for owl recovery. Other riparian habitats may not be regularly used by owls but serve as important linkages between Recovery Habitats or as non-breeding-season habitats.	PNVT's	PC 964-5 The Forest Service should include Mexican spotted owl as Associated Forest Planning Species for riparian forests because Riparian Recovery Habitat is considered key habitat for owl recovery and other riparian habitats may not be regularly used by owls but serve as important linkages between Recovery Habitats or as non-breeding-season habitats.

Viability - edits	Page 240, Mexican spotted owl: Threatened with Critical Habitat The DEIS mentions three forested riparian and the Madrean pine-oak woodland PNVTs (Table 72) provide habitat for Mexican spotted owls. However, Table 66 does not include the Mexican spotted owl as Forest Planning Species in either of these two PNVTs. For consistency, we recommend including Mexican spotted owls in these additional PNVTs in Table 66; or provide the rationale for omitting them.	Include fine filter habitat elements to reduce viability risk for Mexican spotted owls. Include Mexican spotted owl as an associated forest plan species for riparian forests and Madrean pine-oak woodland PNVTs. (DEIS p. 227, 240).	XXXX	Page 240, Mexican spotted owl: Threatened with Critical Habitat The DEIS mentions three forested riparian and the Madrean pine-oak woodland PNVTs (Table 72) provide habitat for Mexican spotted owls. However, Table 66 does not include the Mexican spotted owl as Forest Planning Species in either of these two PNVTs. For consistency, we recommend including Mexican spotted owls in these additional PNVTs in Table 66; or provide the rationale for omitting them.	PNVT's	PC 964-6 In order to be consistent the Forest Service should include Mexican spotted owls in these additional PNVTs in Table 66; or provide the rationale for omitting them because they are mention in the PNVT table 72 on page 240.
Viability - ensure viability	In effect, the agency admits that the Draft Plan will not, by itself, ensure viability of any wildlife species, but it holds out hope that foresters "should not contribute to the trend toward Federal listing" of sensitive species, and "should" apply "measures from approved recovery plans" for federally listed species. Draft Plan at 60 [emph. added].	The plan should offer a different approach to ensure species viability that is both more protective of existing habitat and more pro-active in restoration of reference ecological condition.	** Check out Kaibab p. 41 3rd comment	In effect, the agency admits that the Draft Plan will not, by itself, ensure viability of any wildlife species, but it holds out hope that foresters "should not contribute to the trend toward Federal listing" of sensitive species, and "should" apply "measures from approved recovery plans" for federally listed species. Draft Plan at 60 [emph. added].	Applying Measures from Approved Recovery Plans	
Viability - ensure viability	The revised forest plan must offer a different approach to ensure species viability that does not rely solely upon project-level management that, at best, fails to move habitat of at-risk species toward desired conditions, and at worst, degrades habitat.	The plan should offer a different approach to ensure species viability that is both more protective of existing habitat and more pro-active in restoration of reference ecological condition.	** Check out Kaibab p. 41 3rd comment	The revised forest plan must offer a different approach to ensure species viability that does not rely solely upon project-level management that, at best, fails to move habitat of at-risk species toward desired conditions, and at worst, degrades habitat.	Management Direction	

Viability - ensure viability	Under the current Forest Plan, the U.S. Fish and Wildlife Service has listed many species as threatened or endangered. The draft analysis discloses severe habitat degradation resulting from past and ongoing human uses of the forests. The revised plan must offer a different approach to ensure species viability that is both more protective of existing habitat and more proactive in restoration of reference ecological functions. Unfortunately, the Forest Service acknowledges in the draft analysis that the proposed guidelines may not be adequate to ensure species viability, and that additional measures may be needed, but it contains no direction requiring adoption of such measures.	The plan should offer a different approach to ensure species viability that is both more protective of existing habitat and more pro-active in restoration of reference ecological condition.	** Check out Kaibab p. 41 3rd comment	Under the current Forest Plan, the U.S. Fish and Wildlife Service has listed many species as threatened or endangered. The draft analysis discloses severe habitat degradation resulting from past and ongoing human uses of the forests. The revised plan must offer a different approach to ensure species viability that is both more protective of existing habitat and more proactive in restoration of reference ecological functions. Unfortunately, the Forest Service acknowledges in the draft analysis that the proposed guidelines may not be adequate to ensure species viability, and that additional measures may be needed, but it contains no direction requiring adoption of such measures.	Standards and Guidelines	PC 990-8 The Forest Service should revise the proposed guidelines to adequately ensure species viability, and add additional measures with direction requiring adoption of such measures.
Viability - difference from 1987 plan	Where the Draft Plan would apply a different management approach to species viability than the current plan (USDA 1987a), as amended (USDA 1996), the Forest Service must provide a reasoned explanation for the change of course and compare impacts to the environment	Explain why the proposed plan's management approach to species viability is different than the 1987 plan and compare the impacts to the environment.	XXXX	Where the Draft Plan would apply a different management approach to species viability than the current plan (USDA 1987a), as amended (USDA 1996), the Forest Service must provide a reasoned explanation for the change of course and compare impacts to the environment	Management Direction	

Viability - habitat proxy	To be useful and meaningful, the analysis of the environmental consequences of alternatives should explicitly apply the viability requirement, specify a minimum number of reproductive individuals for each species of planning concern, and demonstrate that the spatial distribution of habitat is adequate to maintain populations.	The species viability analysis does not meet NFMA (National Forest Management Act) requirements because it does not use a reliable and accurate habitat-proxy. To meet the species viability requirement: (1) avoid grouping TES species with more common or less specialized animals in the viability analysis, (2) identify a minimum number of individuals comprising viable populations, and (3) demonstrate spatially that adequate habitat exists for each species of planning concern.	** Check out Kaibab p. 42 2nd comment	To be useful and meaningful, the analysis of the environmental consequences of alternatives should explicitly apply the viability requirement, specify a minimum number of reproductive individuals for each species of planning concern, and demonstrate that the spatial distribution of habitat is adequate to maintain populations.	Viability Requirements	
Viability - habitat proxy	The analysis does not explicitly consider the minimum number of reproductive individuals for species of planning concern, nor does it demonstrate that the spatial distribution of habitat is adequate to maintain viable populations.	The species viability analysis does not meet NFMA (National Forest Management Act) requirements because it does not use a reliable and accurate habitat-proxy. To meet the species viability requirement: (1) avoid grouping TES species with more common or less specialized animals in the viability analysis, (2) identify a minimum number of individuals comprising viable populations, and (3) demonstrate spatially that adequate habitat exists for each species of planning concern.	** Check out Kaibab p. 42 2nd comment	The analysis does not explicitly consider the minimum number of reproductive individuals for species of planning concern, nor does it demonstrate that the spatial distribution of habitat is adequate to maintain viable populations.	Viability Requirements	

Viability - habitat proxy	The revised forest plan must apply the species viability requirement as a starting point to develop mandatory protections for fish and wildlife populations on the national forests.	The species viability analysis does not meet NFMA (National Forest Management Act) requirements because it does not use a reliable and accurate habitat-proxy. To meet the species viability requirement: (1) avoid grouping TES species with more common or less specialized animals in the viability analysis, (2) identify a minimum number of individuals comprising viable populations, and (3) demonstrate spatially that adequate habitat exists for each species of planning concern.	** Check out Kaibab p. 42 2nd comment			
Viability - habitat proxy	The Proposed Plan's shift from requiring the Forest Service to manage for viable populations to a guideline that management activities "should" not contribute toward federal listing is a significant downgrade from what the statute requires	The species viability analysis does not meet NFMA (National Forest Management Act) requirements because it does not use a reliable and accurate habitat-proxy. To meet the species viability requirement: (1) avoid grouping TES species with more common or less specialized animals in the viability analysis, (2) identify a minimum number of individuals comprising viable populations, and (3) demonstrate spatially that adequate habitat exists for each species of planning concern.	** Check out Kaibab p. 42 2nd comment	The Proposed Plan's shift from requiring the Forest Service to manage for viable populations to a guideline that management activities "should" not contribute toward federal listing is a significant downgrade from what the statute requires	Viability Requirements	PC 990-8 The Forest Service should revise the proposed guidelines to adequately ensure species viability, and add additional measures with direction requiring adoption of such measures.

Viability - habitat proxy	The revised forest plan must apply the species viability requirement of the National Forest Management Act ("NFMA") as a starting point to develop mandatory protections for fish and wildlife populations on the national forests.	The species viability analysis does not meet NFMA (National Forest Management Act) requirements because it does not use a reliable and accurate habitat-proxy. To meet the species viability requirement: (1) avoid grouping TES species with more common or less specialized animals in the viability analysis, (2) identify a minimum number of individuals comprising viable populations, and (3) demonstrate spatially that adequate habitat exists for each species of planning concern.	** Check out Kaibab p. 42 2nd comment	The revised forest plan must apply the species viability requirement of the National Forest Management Act ("NFMA") as a starting point to develop mandatory protections for fish and wildlife populations on the national forests.	Viability Requirements	PC 990-13 The revised forest plan must apply the species viability requirement of the National Forest Management Act ("NFMA") as a starting point to develop mandatory protections for fish and wildlife populations on the national forests
Viability - habitat proxy	To be useful and meaningful, the analysis of the environmental consequences of alternatives should explicitly apply the viability requirement, specify a minimum number of reproductive individuals for each species of planning concern, and demonstrate that the spatial distribution of habitat is adequate to maintain populations.	The species viability analysis does not meet NFMA (National Forest Management Act) requirements because it does not use a reliable and accurate habitat-proxy. To meet the species viability requirement: (1) avoid grouping TES species with more common or less specialized animals in the viability analysis, (2) identify a minimum number of individuals comprising viable populations, and (3) demonstrate spatially that adequate habitat exists for each species of planning concern.	** Check out Kaibab p. 42 2nd comment	To be useful and meaningful, the analysis of the environmental consequences of alternatives should explicitly apply the viability requirement, specify a minimum number of reproductive individuals for each species of planning concern, and demonstrate that the spatial distribution of habitat is adequate to maintain populations.	Viability Requirements	PC 990-11 The Forest Service should revise the analysis of the environmental consequences of alternatives in order to be useful and meaningful, and should explicitly apply the viability requirement, specify a minimum number of reproductive individuals for each species of planning concern, and demonstrate that the spatial distribution of habitat is adequate to maintain populations.

Viability - habitat proxy	The draft analysis does not consider the minimum number of reproductive individuals for species of planning concern, nor does it demonstrate that the spatial distribution of habitat is adequate to maintain viable populations. It merely equates “viability effectiveness” with “movement toward desired ecological conditions” for each potential natural vegetation type (“PNVT”). That approach will not ensure species viability because the Forest Service has a poor track record for improving habitat for threatened, endangered, and sensitive species.	The species viability analysis does not meet NFMA (National Forest Management Act) requirements because it does not use a reliable and accurate habitat-proxy. To meet the species viability requirement: (1) avoid grouping TES species with more common or less specialized animals in the viability analysis, (2) identify a minimum number of individuals comprising viable populations, and (3) demonstrate spatially that adequate habitat exists for each species of planning concern.	** Check out Kaibab p. 42 2nd comment	The draft analysis does not consider the minimum number of reproductive individuals for species of planning concern, nor does it demonstrate that the spatial distribution of habitat is adequate to maintain viable populations. It merely equates “viability effectiveness” with “movement toward desired ecological conditions” for each potential natural vegetation type (“PNVT”). That approach will not ensure species viability because the Forest Service has a poor track record for improving habitat for threatened, endangered, and sensitive species.	Viability Requirements	PC 990-10 The Forest Service should address the draft analysis not considering the minimum number of reproductive individuals for species of planning concern, nor does it demonstrate that the spatial distribution of habitat is adequate to maintain viable populations. The approach that equates “viability effectiveness” with “movement toward desired ecological conditions” for each potential natural vegetation type (“PNVT”) will not ensure species viability because the Forest Service has a poor track record for improving habitat for threatened, endangered, and sensitive species
Viability - habitat proxy	In particular, the Draft Plan considers only the overall amount of habitat, defined broadly as acres within each PNVT, as a surrogate for analysis of populations of sensitive species whose viability is of admitted planning concern	The species viability analysis does not meet NFMA (National Forest Management Act) requirements because it does not use a reliable and accurate habitat-proxy. To meet the species viability requirement: (1) avoid grouping TES species with more common or less specialized animals in the viability analysis, (2) identify a minimum number of individuals comprising viable populations, and (3) demonstrate spatially that adequate habitat exists for each species of planning concern.	** Check out Kaibab p. 44, 2nd comment	In particular, the Draft Plan considers only the overall amount of habitat, defined broadly as acres within each PNVT, as a surrogate for analysis of populations of sensitive species whose viability is of admitted planning concern	PNVT	

Viability - habitat proxy	By assuming full occupancy of sensitive species in each PNVT, the Forest Service overestimates the effectiveness of its habitat-based approach to maintaining viability.	The species viability analysis does not meet NFMA (National Forest Management Act) requirements because it does not use a reliable and accurate habitat-proxy. To meet the species viability requirement: (1) avoid grouping TES species with more common or less specialized animals in the viability analysis, (2) identify a minimum number of individuals comprising viable populations, and (3) demonstrate spatially that adequate habitat exists for each species of planning concern.	** Check out Kaibab p. 44, 2nd comment	By assuming full occupancy of sensitive species in each PNVT, the Forest Service overestimates the effectiveness of its habitat-based approach to maintaining viability.	PNVT	
Viability - habitat proxy	Not all acres of each PNVT are likely to be occupied by sensitive species whose actual distribution and habitat use is likely to be more limiting than assumed by the analysis.	The species viability analysis does not meet NFMA (National Forest Management Act) requirements because it does not use a reliable and accurate habitat-proxy. To meet the species viability requirement: (1) avoid grouping TES species with more common or less specialized animals in the viability analysis, (2) identify a minimum number of individuals comprising viable populations, and (3) demonstrate spatially that adequate habitat exists for each species of planning concern.	** Check out Kaibab p. 44, 2nd comment	Not all acres of each PNVT are likely to be occupied by sensitive species whose actual distribution and habitat use is likely to be more limiting than assumed by the analysis.	PNVT	

Viability - habitat proxy	The Forest Service fails in the PDEIS to meet standards for a reliable and accurate habitat-proxy analysis of species viability. This shortcoming renders Forest Service conclusions that the alternatives will not lead to federal listing of sensitive species arbitrary and capricious. See PDEIS at 279-93 (viability conclusions).	The species viability analysis does not meet NFMA (National Forest Management Act) requirements because it does not use a reliable and accurate habitat-proxy. To meet the species viability requirement: (1) avoid grouping TES species with more common or less specialized animals in the viability analysis, (2) identify a minimum number of individuals comprising viable populations, and (3) demonstrate spatially that adequate habitat exists for each species of planning concern.	** Check out Kaibab p. 44, 2nd comment	The Forest Service fails in the PDEIS to meet standards for a reliable and accurate habitat-proxy analysis of species viability. This shortcoming renders Forest Service conclusions that the alternatives will not lead to federal listing of sensitive species arbitrary and capricious. See PDEIS at 279-93 (viability conclusions).		Habitat Proxy	
Viability - habitat proxy	Failure to establish a reliable and accurate habitat-proxy also taints agency conclusions regarding viability of threatened and endangered species.	The species viability analysis does not meet NFMA (National Forest Management Act) requirements because it does not use a reliable and accurate habitat-proxy. To meet the species viability requirement: (1) avoid grouping TES species with more common or less specialized animals in the viability analysis, (2) identify a minimum number of individuals comprising viable populations, and (3) demonstrate spatially that adequate habitat exists for each species of planning concern.	** Check out Kaibab p. 44, 2nd comment	Failure to establish a reliable and accurate habitat-proxy also taints agency conclusions regarding viability of threatened and endangered species.		Habitat Proxy	

Viability - habitat proxy	The analysis also falls short of meeting NFMA requirements in its use of habitat as a proxy for the viability of endangered southwestern willow flycatcher.	The species viability analysis does not meet NFMA (National Forest Management Act) requirements because it does not use a reliable and accurate habitat-proxy. To meet the species viability requirement: (1) avoid grouping TES species with more common or less specialized animals in the viability analysis, (2) identify a minimum number of individuals comprising viable populations, and (3) demonstrate spatially that adequate habitat exists for each species of planning concern.	** Check out Kaibab p. 44, 2nd comment	The analysis also falls short of meeting NFMA requirements in its use of habitat as a proxy for the viability of endangered southwestern willow flycatcher.	Habitat Proxy	
Viability - habitat proxy	There is no basis in the PDEIS to equate the entire montane willow riparian forest PNVF with the “occupied or potentially occupied” range of this endangered species for the purpose of assessing viability.	The species viability analysis does not meet NFMA (National Forest Management Act) requirements because it does not use a reliable and accurate habitat-proxy. To meet the species viability requirement: (1) avoid grouping TES species with more common or less specialized animals in the viability analysis, (2) identify a minimum number of individuals comprising viable populations, and (3) demonstrate spatially that adequate habitat exists for each species of planning concern.	** Check out Kaibab p. 44, 2nd comment	There is no basis in the PDEIS to equate the entire montane willow riparian forest PNVF with the “occupied or potentially occupied” range of this endangered species for the purpose of assessing viability.	PNVF	

Viability - habitat proxy	Reliance on aspiration statements of desired conditions for the PNVT types as a proxy for species viability is subject to significant uncertainty, and NEPA requires disclosure.	The species viability analysis does not meet NFMA (National Forest Management Act) requirements because it does not use a reliable and accurate habitat-proxy. To meet the species viability requirement: (1) avoid grouping TES species with more common or less specialized animals in the viability analysis, (2) identify a minimum number of individuals comprising viable populations, and (3) demonstrate spatially that adequate habitat exists for each species of planning concern.	** Check out Kaibab p. 44, 2nd comment	Reliance on aspiration statements of desired conditions for the PNVT types as a proxy for species viability is subject to significant uncertainty, and NEPA requires disclosure.	PNVT	
Viability - habitat proxy	The analysis must supply the public with ability to independently determine that use of the PNVT types described in the PDEIS and Draft Plan are reliable and accurate proxies for species viability, as required by NFMA.	The species viability analysis does not meet NFMA (National Forest Management Act) requirements because it does not use a reliable and accurate habitat-proxy. To meet the species viability requirement: (1) avoid grouping TES species with more common or less specialized animals in the viability analysis, (2) identify a minimum number of individuals comprising viable populations, and (3) demonstrate spatially that adequate habitat exists for each species of planning concern.	** Check out Kaibab p. 44, 2nd comment	The analysis must supply the public with ability to independently determine that use of the PNVT types described in the PDEIS and Draft Plan are reliable and accurate proxies for species viability, as required by NFMA.	PNVT	

Viability - habitat proxy	<p>However, deferral to ESA consultation procedures fails to meet the Forest Service's independent obligation under NFMA to ensure species viability. See 36 C.F.R. § 219.19. To meet that requirement, the Center recommends that the Forest Service avoid grouping TES species with more common or less specialized animals in the viability analysis, identify a minimum number of individuals comprising viable populations, and demonstrate spatially that adequate habitat exists for each species of planning concern.</p>	<p>The species viability analysis does not meet NFMA (National Forest Management Act) requirements because it does not use a reliable and accurate habitat-proxy. To meet the species viability requirement: (1) avoid grouping TES species with more common or less specialized animals in the viability analysis, (2) identify a minimum number of individuals comprising viable populations, and (3) demonstrate spatially that adequate habitat exists for each species of planning concern.</p>	<p>** Check out Kaibab p. 44, 2nd comment</p>			
Viability - habitat proxy	<p>Desired Conditions for Wildlife Species' (p 42) It seems incredible that a Plan which purports to be heavily oriented toward wildlife would contain only two sentences describing the desired conditions for wildlife. The fact is that desired conditions for wildlife depend heavily on the species being considered and often the desired for two different species are contradictory. Failure to consider the specific needs of different species or species groups supports the underlying assumption that if "historic conditions" were restored optimum conditions for wildlife would result</p>	<p>The species viability analysis does not meet NFMA (National Forest Management Act) requirements because it does not use a reliable and accurate habitat-proxy. To meet the species viability requirement: (1) avoid grouping TES species with more common or less specialized animals in the viability analysis, (2) identify a minimum number of individuals comprising viable populations, and (3) demonstrate spatially that adequate habitat exists for each species of planning concern.</p>	<p>** Check out Kaibab p. 44, 2nd comment</p>			

Viability - habitat proxy	However, the PDEIS does not consider, nor the Draft Plan provide for, the viability of snag-dependent species, in contrast to the current Forest Plan (USDA 1987a). There is no explanation for this omission.	The species viability analysis does not meet NFMA (National Forest Management Act) requirements because it does not use a reliable and accurate habitat-proxy. To meet the species viability requirement: (1) avoid grouping TES species with more common or less specialized animals in the viability analysis, (2) identify a minimum number of individuals comprising viable populations, and (3) demonstrate spatially that adequate habitat exists for each species of planning concern.	XXXX	However, the PDEIS does not consider, nor the Draft Plan provide for, the viability of snag-dependent species, in contrast to the current Forest Plan (USDA 1987a). There is no explanation for this omission.	List of MIS	
Viability - flycatcher data	the FWS actually designated critical habitat in the Lower Colorado Management Unit and the San Francisco Management Unit in a final rule that pre-dated the notice of availability of the PDEIS by six weeks. See 78 Fed. Reg. 344-534 (Jan. 3, 2013) (final rule). The PDEIS does not account for current information and fails to ensure professional integrity.	The EIS should account for southwestern willow flycatcher designated critical habitat as identified in the final USFWS rule (See 78 Fed. Reg. 344-534 (Jan. 3, 2013) (final rule)).	XXXX			
Increase treatment of stream miles	Similarly with regard to invasive species, of more than 1,000 miles of streams on the forests, only two miles per year are proposed for treatment . . . it would be difficult to show any progress at all over time with such limited goals.	Treat more than the planned Invasive Species objective "Annually, control or eradicate invasive species (e.g., tamarisk, bullfrogs) on at least 2 stream miles" (proposed plan p. 64)	XXXX	Similarly with regard to invasive species, of more than 1,000 miles of streams on the forests, only two miles per year are proposed for treatment	Treating more than 2 miles per Year	

Increase treatment of stream miles	There are over 1,000 miles of streams on the Forests <sup>24</sup> . The Forest Service should aim to treat far more than 2 miles per year for invasive species	Treat more than the planned Invasive Species objective "Annually, control or eradicate invasive species (e.g., tamarisk, bullfrogs) on at least 2 stream miles" (proposed plan p. 64)	XXXX	There are over 1,000 miles of streams on the Forests <sup>24</sup> . The Forest Service should aim to treat far more than 2 miles per year for invasive species		Treating more than 2 miles per Year	PC 1007-1 The Forest Service should plan to repeat eradication treatments annually for at least 5 years and should aim to treat far more than 2 miles per year for invasive species. There are over 1,000 miles of streams on the forest because eradication will rarely be achieved in a single year, especially if only small areas are treated.
AZGFD-Obj-Edit	Plan, Objectives for Invasive Species, page 64: Eradication of cowbirds is included as an objective in this section. Please note that such actions need to be coordinated with the Department and appropriate permitting obtained.	Eradication of cowbirds is included as an objective in this Invasive Species section (proposed plan p. 64). Please note that such actions need to be coordinated with the Department and appropriate permitting obtained.		Plan, Objectives for Invasive Species, page 64: Eradication of cowbirds is included as an objective in this section. Please note that such actions need to be coordinated with the Department and appropriate permitting obtained.			
Prioritize treatments	Insert a guideline: Treatments should be prioritized to minimize effort and maximize results. For example, treat from upstream to downstream, uphill to downhill, upwind to downwind. Treat small and outlier infestations first to prevent new infestations from taking hold. Use prioritization software to identify which species pose the highest risk to ecosystem function, can be controlled most effectively, or will need ongoing or larger treatments.	Add a guideline for Invasive Species: "Treatments should be prioritized to minimize effort and maximize results."	The Forest Service does not disagree with this comment; however, these are project level decisions	Insert a guideline: Treatments should be prioritized to minimize effort and maximize results. For example, treat from upstream to downstream, uphill to downhill, upwind to downwind. Treat small and outlier infestations first to prevent new infestations from taking hold. Use prioritization software to identify which species pose the highest risk to ecosystem function, can be controlled most effectively, or will need ongoing or larger treatments.		Prioritizing and Repeating Eradication Treatments	PC 1009-1 The Forest Service should add the following guidelines:1) Require weed and seed free hay 2) Require that motorized equipment used in projects should be cleaned of all mud and plant propagules before entering a project area, and workers should be instructed on how to identify invasive species and avoid spreading them3) Treatments should be prioritized to minimize effort and maximize results by treating small and outlier infestations first to prevent new infestations from taking hold, and by using prioritization software to identify which species pose the highest risk to ecosystem

							function, can be controlled most effectively, or will need ongoing or larger treatments.
Minimize spread of invasive plants	Insert a guideline: Motorized equipment used in projects should be cleaned of all mud and plant propagules before entering a project area, and workers should be instructed on how to identify invasive species and avoid spreading them (i.e. clean mud and seeds off of shoes and socks, avoid walking through invasive plant patches, don't throw plants that have gone to seed into streams or washes).	Add a guideline for Invasive Species: "Motorized equipment used in projects should be cleaned of all mud and plant propagules before entering a project area, and workers should be instructed on how to identify invasive species and avoid spreading them (i.e. clean mud and seeds off of shoes and socks, avoid walking through invasive plant patches, don't throw plants that have gone to seed into streams or washes)."	The LMP discusses implementation of preventive measures (e.g., pre- and post-work equipment sanitation, requiring certified weed-free seed and hay) continues through	Insert a guideline: Motorized equipment used in projects should be cleaned of all mud and plant propagules before entering a project area, and workers should be instructed on how to identify invasive species and avoid spreading them (i.e. clean mud and seeds off of shoes and socks, avoid walking through invasive plant patches, don't throw plants that have gone to seed into streams or washes).		Require Cleaning Mud and Plant Propagules from Motorized Equipment	PC 1009-1 The Forest Service should add the following guidelines:1) Require weed and seed free hay 2) Require that motorized equipment used in projects should be cleaned of all mud and plant propagules before entering a project area, and workers should be instructed on how to identify invasive species and avoid spreading them3) Treatments should be prioritized to minimize effort and maximize results by treating small and outlier infestations first to prevent new infestations from taking hold, and by using prioritization software to identify which species pose the highest risk to ecosystem function, can be controlled most effectively, or will need ongoing or larger treatments.

		<p>h permit ting, contra cting, and other forest admini strativ e proces ses. The forests contin ue to utilize vehicl e wash statio ns to preve nt spread of noxiou s weeds , nonna tive invasiv e plants, insects , and diseas e patho gens</p>			
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			under the Management Approaches for Invasive Species section			
Require weed free hay/feed	Insert a guideline to require weed and seed free hay and feed.	Add a guideline to require weed and seed free hay and feed.	The LMP discusses implementation of preventative measures (e.g., pre- and post-work equipment sanitation, requiring certified weed-free seed	Insert a guideline to require weed and seed free hay and feed.		Require Weed and Seed Free Hay and Feed  PC 1009-1 The Forest Service should add the following guidelines:1) Require weed and seed free hay 2) Require that motorized equipment used in projects should be cleaned of all mud and plant propagules before entering a project area, and workers should be instructed on how to identify invasive species and avoid spreading them3) Treatments should be prioritized to minimize effort and maximize results by treating small and outlier infestations first to prevent new infestations from taking hold, and by using prioritization software to identify which species pose the highest risk to ecosystem function, can be controlled most effectively, or will need ongoing or larger treatments.

		<p>and hay) continues through permitting, contracting, and other forest administrative processes. The forests continue to utilize vehicle wash stations to prevent spread of noxious weeds, nonnative invasive plants, insects</p>			
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			, and disease pathogens under the Management Approaches for Invasive Species section			
AZGFD-GLj-Edit	<p>Plan, Guidelines for Invasive Species, page 64: "Projects and activities, <i>except as needed for wildlife conservation and management projects (i.e. native species recovery and management, and sportfish stocking)</i>, should not transfer water between drainages or between unconnected water bodies within the same drainage to avoid spreading disease and aquatic invasive species. <i>For projects and activities where water transfers will occur, measures should be taken to prevent the spread of non-target fish species, invasive species, parasites, or diseases.</i>"</p>	<p>Modify Invasive Species Guideline (proposed plan p. 64) "Projects and activities, <i>except as needed for wildlife conservation and management projects (i.e. native species recovery and management, and sportfish stocking)</i>, should not transfer water between drainages or between unconnected water bodies within the same drainage to avoid spreading disease and aquatic invasive species. <i>For projects and activities where water transfers will occur, measures should be taken to prevent the spread of non-target fish species, invasive species, parasites, or diseases.</i>"</p>		<p>Plan, Guidelines for Invasive Species, page 64: "Projects and activities, <i>except as needed for wildlife conservation and management projects (i.e. native species recovery and management, and sportfish stocking)</i>, should not transfer water between drainages or between unconnected water bodies within the same drainage to avoid spreading disease and aquatic invasive species. <i>For projects and activities where water transfers will occur, measures should be taken to prevent the spread of non-target fish species, invasive species, parasites, or diseases.</i>"</p>		

Native v. nonnative	Wouldn't it be better to cut out all the nit picking and assumptions about native vs nonnative and desirable and undesirable plant and animals species and just state the objective is to encourage species which contribute to the goals of the plan and to control or eliminate (where feasible) those that don't, regardless of whether they are native or not?	The objective should be to encourage species which contribute to the goals of the plan and to control or eliminate (where feasible) those that don't regardless of whether they are native or not.	XXXX	Wouldn't it be better to cut out all the nit picking and assumptions about native vs nonnative and desirable and undesirable plant and animals species and just state the objective is to encourage species which contribute to the goals of the plan and to control or eliminate (where feasible) those that don't, regardless of whether they are native or not?	Animal and Plant Species	
Multiple treatments needed	Eradication will rarely be achieved in a single year, especially if only small areas are treated. Seeds and propagules will be deposited from adjacent patches of land, and some plants will resprout. Invasive animals will migrate back into open habitats. The Forests should plan to repeat eradication treatments annually for at least 5 years.	The forests should plan to repeat invasive species eradication treatments annually for at least five years.	XXXX	Eradication will rarely be achieved in a single year, especially if only small areas are treated. Seeds and propagules will be deposited from adjacent patches of land, and some plants will resprout. Invasive animals will migrate back into open habitats. The Forests should plan to repeat eradication treatments annually for at least 5 years.	Prioritizing and Repeating Eradication Treatments	
Invasives - juniper salt cedar	2. Juniper and Salt Cedar are popping up – need to be gotten rid of	Juniper and salt cedar need to be eliminated.	** Check out Kaibab p. 32, last comment -- LMP acknowledges and directs removal of both juniper	2. Juniper and Salt Cedar are popping up – need to be gotten rid of	Juniper and Salt Cedar	PC 1015-2 The Forest Service should get rid of the Juniper and Salt Cedar that is popping up in the forest.

			r and salt cedar				
Invasives - other info	Add to "Other Sources of Information for Invasive Species" (Proposed Plan, p. 65): Aquatic Nuisance Species Task Force. 2011. State of Arizona Aquatic Invasive Species Management Plan. At <a href="http://anstaskforce.gov/State%20Plans/AZ/AISMPlan.pdf">http://anstaskforce.gov/State%20Plans/AZ/AISMPlan.pdf</a>	Add to Other Sources of Information for Invasive Species (proposed plan p.65): Aquatic Nuisance Species Task Force. 2011. State of Arizona Aquatic Invasive Species Management Plan. At <a href="http://anstaskforce.gov/State%20Plans/AZ/AISMPlan.pdf">http://anstaskforce.gov/State%20Plans/AZ/AISMPlan.pdf</a>	XXXX	Add to "Other Sources of Information for Invasive Species" (Proposed Plan, p. 65): Aquatic Nuisance Species Task Force. 2011. State of Arizona Aquatic Invasive Species Management Plan. At <a href="http://anstaskforce.gov/State%20Plans/AZ/AISMPlan.pdf">http://anstaskforce.gov/State%20Plans/AZ/AISMPlan.pdf</a>		Add Reference	2) Require that motorized equipment used in projects should be cleaned of all mud and plant propagules before entering a project area, and workers should be instructed on how to identify invasive species and avoid spreading them
Wild horses - terminology	Page 29 Fifth bullet statement: if there are no wild horses present on the ASNFs there is no reason to discuss herbivory being grazed by wild horses. Remove reference to wild horses.	Clarify the term wild horses. Concern that wild horses associated with the Heber Wild Horse Territory may be confused with unauthorized horses.	XXXX	Page 29 Fifth bullet statement: if there are no wild horses present on the ASNFs there is no reason to discuss herbivory being grazed by wild horses. Remove reference to wild horses.		Wild Horses	
Wild horses - terminology	References to wild horses and wild horse territory should be eliminated if no horses are present on ASNFs or it should be made clear to the reader no wild horses or burros are present on the forests.	Clarify the term wild horses. Concern that wild horses associated with the Heber Wild Horse Territory may be confused with unauthorized horses.	XXXX	References to wild horses and wild horse territory should be eliminated if no horses are present on ASNFs or it should be made clear to the reader no wild horses or burros are present on the forests.		Remove Wild Horse Territory	

Wild horses - terminology	If there are no wild horses or burros on the ASNFs this statement is irrelevant and misleading. Statement should be removed along with reference to wild horses in statement two down from this one	Clarify the term wild horses. Concern that wild horses associated with the Heber Wild Horse Territory may be confused with unauthorized horses.	XXXX	If there are no wild horses or burros on the ASNFs this statement is irrelevant and misleading. Statement should be removed along with reference to wild horses in statement two down from this one	Managing For Horses	
Wild horses - terminology	Heber Wild Horse Territory – As stated previously, if no wild horses are found on the ASNFs then maintaining a territory and managing for a nonexistent herd is wasteful and misleading.	Clarify the term wild horses. Concern that wild horses associated with the Heber Wild Horse Territory may be confused with unauthorized horses.	XXXX	Heber Wild Horse Territory – As stated previously, if no wild horses are found on the ASNFs then maintaining a territory and managing for a nonexistent herd is wasteful and misleading.	Remove Wild Horse Territory	
Wild horses - terminology	Forage, browse, and cover needs of wildlife, authorized livestock and wild horses should be managed in balance with available forage." This guidelines names wild horses without specifically naming the Heber Wild Horses. Wild horses should not be mentioned without exclusively naming the Heber Wild Horses or Territory as this creates confusion with unauthorized horses grazing on our forest.	Clarify the term wild horses. Concern that wild horses associated with the Heber Wild Horse Territory may be confused with unauthorized horses.	XXXX	Forage, browse, and cover needs of wildlife, authorized livestock and wild horses should be managed in balance with available forage." This guidelines names wild horses without specifically naming the Heber Wild Horses. Wild horses should not be mentioned without exclusively naming the Heber Wild Horses or Territory as this creates confusion with unauthorized horses grazing on our forest.	Wild Horses	
Wild horses - terminology	It needs to be clarified that wild horses refers only to those horses in the Heber area now classified as wild horses, and that any other horses in all other areas are not wild horses.	Clarify the term wild horses. Concern that wild horses associated with the Heber Wild Horse Territory may be confused with unauthorized horses.	XXXX	It needs to be clarified that wild horses refers only to those horses in the Heber area now classified as wild horses, and that any other horses in all other areas are not wild horses.	Wording and Terminology of Wild Horses and Heber Herd	

Wild horses - terminology	The term wild horses should be removed from that section unless it is specifically stated that only the wild horses in the Heber herd are included.	Clarify the term wild horses. Concern that wild horses associated with the Heber Wild Horse Territory may be confused with unauthorized horses.	XXXX	The term wild horses should be removed from that section unless it is specifically stated that only the wild horses in the Heber herd are included.	Wording and Terminology of Wild Horses and Heber Herd	
Wild horses - terminology	Guidelines- 7th bullet: Horses This statement names wild horses without specifically naming the Heber Wild Horse Territory. This creates confusion with the unauthorized, excess horses grazing on our forest. Wild horses should not be mentioned in this document without identifying them as Heber Wild Horses. Perhaps a statement should added here that to prevent resource damage , all stray, abandoned or unauthorized livestock, including but not limited to cattle, horses, sheep, etc. will be removed..	Clarify the term wild horses. Concern that wild horses associated with the Heber Wild Horse Territory may be confused with unauthorized horses.	XXXX	Guidelines- 7th bullet: Horses This statement names wild horses without specifically naming the Heber Wild Horse Territory. This creates confusion with the unauthorized, excess horses grazing on our forest. Wild horses should not be mentioned in this document without identifying them as Heber Wild Horses. Perhaps a statement should added here that to prevent resource damage , all stray, abandoned or unauthorized livestock, including but not limited to cattle, horses, sheep, etc. will be removed..	Clarify Terminology as Heber Wild Horses and Add Statement to Prevent Resource Damage.	PC 2712-1 The Forest Service should the 7th bullet guidelines to specifically name the Heber Wild Horse Territory to prevent confusion, and add a statement “to prevent resource damage , all stray, abandoned or unauthorized livestock, including but not limited to cattle, horses, sheep, etc. will be removed
Wild horses - mgmt plan	Further, although the Forest Plan references the Heber Wild Horse Territory Management Plan it seems essential that it is made clear in the Forest Plan that the Forest Service will keep wild horses in this herd unit, in balance with the existing forage base with consideration given for the needs of all wildlife. We are aware that this herd has increased substantially in recent years and will comment	Complete the herd management plan for the Heber Wild Horse Territory with full public review as required by NEPA (National Environmental Policy Act).	XXXX	Further, although the Forest Plan references the Heber Wild Horse Territory Management Plan it seems essential that it is made clear in the Forest Plan that the Forest Service will keep wild horses in this herd unit, in balance with the existing forage base with consideration given for the needs of all wildlife. We are aware that this herd has increased substantially in recent years and will comment	Herd Management Plan	PC 2714-4 The Forest Service should clarify in the forest plan that the wild horses in the Heber Wild Horse territory will be kept in balance with the existing forage base with consideration for the needs of all wildlife and that unchecked expansion of this herd is neither legal or in the best interest of forest health or effective wildlife management.

	<p>further on the herd management plan when it is developed but it is essential that the Forest Service recognize their legal mandate to keep this herd in balance with the needs of other forest goals and consistent with applicable laws. Unchecked expansion of this herd is neither legal or in the best interest of forest health or effective wildlife management.</p>			<p>further on the herd management plan when it is developed but it is essential that the Forest Service recognize their legal mandate to keep this herd in balance with the needs of other forest goals and consistent with applicable laws. Unchecked expansion of this herd is neither legal or in the best interest of forest health or effective wildlife management.</p>		
<p>Wild horses - mgmt plan</p>	<p>It is also important to recognize with on-going population increases that the wild horses have had recently that some horses are being pushed into areas outside of the existing herd unit boundaries and are causing unacceptable resource damage. We urge completion of the herd management plan in the immediate future with full public review as required by the National Environmental Policy Act. Anything else can only lead to litigation.</p>	<p>Complete the herd management plan for the Heber Wild Horse Territory with full public review as required by NEPA (National Environmental Policy Act).</p>	<p>XXXX</p>	<p>It is also important to recognize with on-going population increases that the wild horses have had recently that some horses are being pushed into areas outside of the existing herd unit boundaries and are causing unacceptable resource damage. We urge completion of the herd management plan in the immediate future with full public review as required by the National Environmental Policy Act. Anything else can only lead to litigation.</p>	<p>Herd Management Plan</p>	<p>PC 2714-7 The Forest Service should immediately complete the NEPA required herd management planned with full public review and should recognize the ongoing population increases and that wild horses are being pushed outside of the existing herd unit boundaries causing unacceptable resource damage.</p>
<p>Wild horses - impacts</p>	<p>There is reference to the Heber Wild Horse Territory Management Plan and other references to wild horses on the forest. This is an area of great concern to us from several standpoints. First and foremost is the presence of a herd of at least 100 horses in the Black River drainage. There seemingly is no reference to the presence of this herd of habitat-destructing invasive</p>	<p>Recognize the impact of unauthorized horses in the Black River drainage, including their destruction of habitat.</p>	<p>XXXX</p>	<p>There is reference to the Heber Wild Horse Territory Management Plan and other references to wild horses on the forest. This is an area of great concern to us from several standpoints. First and foremost is the presence of a herd of at least 100 horses in the Black River drainage. There seemingly is no reference to the presence of this herd of habitat-destructing invasive</p>	<p>Herd in Black River Drainage</p>	<p>PC 2714-5 The Forest Service should revise the plan to include reference to the herd of 100 horses in Black River Drainage because there is no legal standing for the herd and it has no relationship with the Herber herd.</p>

	<p>animals. Clearly, there is no relationship between the Black River and the Heber herd and hence, no legal standing for this herd. If you need more information on this issue, please contact the Pinetop Regional Office of the Arizona Game and Fish Department. We also have members that are familiar with the issue and willing to show Forest Service staff where the horse are and the damage they have done.</p>			<p>animals. Clearly, there is no relationship between the Black River and the Heber herd and hence, no legal standing for this herd. If you need more information on this issue, please contact the Pinetop Regional Office of the Arizona Game and Fish Department. We also have members that are familiar with the issue and willing to show Forest Service staff where the horse are and the damage they have done.</p>		
Wild horses - forage allocation	<p>The statement "Forage, browse and cover needs of wildlife, authorized livestock, and wild horses should be managed in balance with available forage" needs to be changed.</p>	<p>Horses, other than wild horses, should not be included when determining the needs and management of livestock and wildlife. Concern with guideline" 'forage, browse and cover needs of wildlife, authorized livestock, and wild horses should be managed in balance with available forage" (proposed plan p. 96)</p>	XXXX	<p>The statement "Forage, browse and cover needs of wildlife, authorized livestock, and wild horses should be managed in balance with available forage" needs to be changed.</p>		<p>Wording and Terminology of Wild Horses and Heber Herd</p>
Wild horses - forage allocation	<p>Also, that any horses other than wild horses cannot and should not be included when determining the needs and management of livestock and wildlife.</p>	<p>Horses, other than wild horses, should not be included when determining the needs and management of livestock and wildlife. Concern with guideline" 'forage, browse and cover needs of wildlife, authorized livestock, and wild horses should be managed in balance with available forage" (proposed plan p. 96)</p>	XXXX	<p>Also, that any horses other than wild horses cannot and should not be included when determining the needs and management of livestock and wildlife.</p>		<p>Wording and Terminology of Wild Horses and Heber Herd</p>

Wild horses - forage allocation	p. 95 Livestock grazing ..... use by wild horses, wildlife do not exceed available forage production .... The use of forage by livestock is closely monitored and managed unlike the use of the other foraging animals. Horses outside the Heber Reserve are feral or excess horses with not allotted forage value.	Horses, other than wild horses, should not be included when determining the needs and management of livestock and wildlife. Concern with guideline" 'forage, browse and cover needs of wildlife, authorized livestock, and wild horses should be managed in balance with available forage" (proposed plan p. 96)	XXXX	p. 95 Livestock grazing ..... use by wild horses, wildlife do not exceed available forage production .... The use of forage by livestock is closely monitored and managed unlike the use of the other foraging animals. Horses outside the Heber Reserve are feral or excess horses with not allotted forage value.	Heber Horse Territory	
Wild horses - use level	p.29 wild horses ... There is no established use level for wild horses except on the Heber Reserve, so what does that mean?	Explain why there is not established use level for wild horses except for the Heber Wild Horse Territory.	XXXX	p.29 wild horses ... There is no established use level for wild horses except on the Heber Reserve, so what does that mean?	Wild Horses	
Wild horses - territory	Wild Horse Territory – If no wild horses currently inhabit the wild horse territory then this area should be dropped as a management area. The Wild Free Roaming Horse and Burro Act of 1971 (Public Law 92-195) reads: "Sec. 10. Nothing in this Act shall be construed to authorize the Secretary to relocate wild free-roaming horses or burros to areas of the public lands where they do not presently exist." If there are no wild horses and none can be relocated then there is no need to continue identifying this area as a wild horse territory.	If no wild horses currently inhabit the wild horse territory, this area should be dropped as a management area.	XXXX	Wild Horse Territory – If no wild horses currently inhabit the wild horse territory then this area should be dropped as a management area. The Wild Free Roaming Horse and Burro Act of 1971 (Public Law 92-195) reads: "Sec. 10. Nothing in this Act shall be construed to authorize the Secretary to relocate wild free-roaming horses or burros to areas of the public lands where they do not presently exist." If there are no wild horses and none can be relocated then there is no need to continue identifying this area as a wild horse territory.	Remove Wild Horse Territory	PC 2714-2 The Forest Service should review the Wild Free Roaming Horse and Burro Act of 1971 that states that no wild horses can be relocated to areas where they do not exist and if there are no wild horses on the ASNF, there is no reason to continue to identify and manage this area as a wild horse territory. (page 111, 128, 450, 461))

Wild horses - territory	Special Uses Suitability, Table 2. - Management Area: Wild Horse Territory should be removed for same reason as identified previously in Chapter 3, Page 111	If no wild horses currently inhabit the wild horse territory, this area should be dropped as a management area.	XXXX	Special Uses Suitability, Table 2. - Management Area: Wild Horse Territory should be removed for same reason as identified previously in Chapter 3, Page 111		Remove Wild Horse Territory	PC 2714-2 The Forest Service should review the Wild Free Roaming Horse and Burro Act of 1971 that states that no wild horses can be relocated to areas where they do not exist and if there are no wild horses on the ASNF, there is no reason to continue to identify and manage this area as a wild horse territory. (page 111, 128, 450, 461))
Wild Horse Terr - abolish	The Heber Wild Horse Territory should be abolished.	The Heber Wild Horse Territory should be abolished.	the Heber Wild Horse Territory was established consistent with the Wild Free-Roaming Horses and Burros Act of 1971 (Public Law 92-195), as amended. According	The Heber Wild Horse Territory should be abolished.		Heber Horse Territory	

		to the Act, "all wild free-roaming horses and burros are hereby declared to be under the jurisdiction of the Secretary for the purpose of management and protection in accordance with the provisions of this Act; the Secretary is			
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			and preservation ...". The authority for abolishing the Heber Wild Horse Territory is outside the scope of this decision.			
AZGFD-DC-Edit	Plan, Desired Conditions for Wild Horse Territory, page 111: "Grazing is in balance with available forage (i.e., grazing and browsing by authorized <i>and unauthorized</i> livestock, wild horses, <i>feral horses and hogs</i> , and wildlife do not exceed the available forage production within established use levels)."	Modify Wild Horse Territory Desired Condition (proposed plan p. 111) "Grazing is in balance with available forage (i.e., grazing and browsing by authorized <i>and unauthorized</i> livestock, wild horses, <i>feral horses and hogs</i> , and wildlife do not exceed the available forage production within established use levels)."		Plan, Desired Conditions for Wild Horse Territory, page 111: "Grazing is in balance with available forage (i.e., grazing and browsing by authorized <i>and unauthorized</i> livestock, wild horses, <i>feral horses and hogs</i> , and wildlife do not exceed the available forage production within established use levels)."		
Recreation data	Overall Recreation Opportunities – There should be a discussion identifying the uses practiced by the local residents and the importance of the Forests to the local population and economy. The discussion fixates on the importance of the Forests to urban users and fails to	In Overall Recreation Opportunities affected environment (DEIS p. 316), there should be a discussion identifying the uses practiced by the local residents and the importance of the forests to the local population and economy.	XXXX	Overall Recreation Opportunities – There should be a discussion identifying the uses practiced by the local residents and the importance of the Forests to the local population and economy. The discussion fixates on the importance of the Forests to urban users and fails to	Importance of Local Users	

	highlight their importance to those who live year round in (surrounded by) or near the ASNFs.			highlight their importance to those who live year round in (surrounded by) or near the ASNFs.			
AZGFD-BG-Edit	Plan, Background for Overall Recreational Opportunities, page 68: Add boating to the list of primary recreational activities. Kayaking and canoeing are becoming very popular activities on some lakes such as Fool Hollow, Bear Canyon, and Woods Canyon, in addition to some motorized boating recreation.	Modify Overall Recreational Opportunities Background (proposed plan p. 68). Add boating to the list of primary recreational activities. Kayaking and canoeing are becoming very popular activities on some lakes such as Fool Hollow, Bear Canyon, and Woods Canyon, in addition to some motorized boating recreation.		Plan, Background for Overall Recreational Opportunities, page 68: Add boating to the list of primary recreational activities. Kayaking and canoeing are becoming very popular activities on some lakes such as Fool Hollow, Bear Canyon, and Woods Canyon, in addition to some motorized boating recreation.			
AZGFD-BG-Edit2	Plan, Background for Developed Recreation, page 72: In addition to the A-S and State Parks, Fool Hollow Lake Recreation Area is operated through a partnership with the Arizona Game and Fish Department and the City of Show Low.	Modify Developed Recreation Background (proposed plan p. 72). In addition to the Apache-Sitgreaves NFs and State Parks, Fool Hollow Lake Recreation Area is operated through a partnership with the Arizona Game and Fish Department and the City of Show Low.		Plan, Background for Developed Recreation, page 72: In addition to the A-S and State Parks, Fool Hollow Lake Recreation Area is operated through a partnership with the Arizona Game and Fish Department and the City of Show Low.			
Dispersed camping	Dispersed camping is a historical use and should be part of the future on the forest.	Dispersed camping should be part of the future of the forest.	XXXX	Dispersed camping is a historical use and should be part of the future on the forest.		Historical Use	

Dispersed camping	Specifically: Leave dispersed camping alone	Dispersed camping should be part of the future of the forest.	XXXX	Specifically: Leave dispersed camping alone		Dispersed Camping left alone	PC 1062-1 The Forest Service should address that dispersed camping is a historical use and should be part of the future on the forest and significantly increase the number/area of Dispersed Camping along with authorized locations without the serious restrictions on limiting camping to 30 ft. off the road.
Use of ROS	The majority of the proposed designations is Semi-Primitive Motorized (SPM). Motorized use is generally permitted.	Concern that there may be conflicts between ROS (recreation opportunity spectrum) classification and access (motorized and non-motorized) to State Trust Land. For example, NFS land adjacent to State Land is classified as Semi-Primitive Motorized (SPM), however access and motorized use through State Trust land is allowed only on designated routes permitted by the Arizona State Land Department.	XXXX	The majority of the proposed designations is Semi-Primitive Motorized (SPM). Motorized use is generally permitted.		Semi Private Motorized Use	
Use of ROS	The last designation shown that impacts State Trust land is Semi-Primitive Non-Motorized (SPNM). In this designation motorized use is generally not permitted.	Concern that there may be conflicts between ROS (recreation opportunity spectrum) classification and access (motorized and non-motorized) to State Trust Land. For example, NFS land adjacent to State Land is classified as Semi-Primitive Motorized (SPM), however access and motorized use through State Trust land is allowed only on designated routes permitted by the Arizona State Land Department.	XXXX	The last designation shown that impacts State Trust land is Semi-Primitive Non-Motorized (SPNM). In this designation motorized use is generally not permitted.		State Land Trust	

Use of ROS	In the proposed designation Semi-Primitive Motorized (SPM), motorized use is generally permitted.	Concern that there may be conflicts between ROS (recreation opportunity spectrum) classification and access (motorized and non-motorized) to State Trust Land. For example, NFS land adjacent to State Land is classified as Semi-Primitive Motorized (SPM), however access and motorized use through State Trust land is allowed only on designated routes permitted by the Arizona State Land Department.	XXXX	In the proposed designation Semi-Primitive Motorized (SPM), motorized use is generally permitted.		Semi Private Motorized Use	
Use of ROS	Another designation shown that impacts State Trust land is Roded Natural (RN). Conventional motorized use is provided for in this designation. Although this designation is shown around various types of roads and utility corridors, the swath of the designation on either side of these is quite extensive.	Concern that there may be conflicts between ROS (recreation opportunity spectrum) classification and access (motorized and non-motorized) to State Trust Land. For example, NFS land adjacent to State Land is classified as Semi-Primitive Motorized (SPM), however access and motorized use through State Trust land is allowed only on designated routes permitted by the Arizona State Land Department.	XXXX	Another designation shown that impacts State Trust land is Roded Natural (RN). Conventional motorized use is provided for in this designation. Although this designation is shown around various types of roads and utility corridors, the swath of the designation on either side of these is quite extensive.		State Land Trust	
Use of volunteers	Suggest changing last sentence in second paragraph to read: Private ventures, partnerships and volunteers may be used to help provide recreation opportunities to forest visitors. Volunteers are an integral component in managing the National Forests and more effort should be placed on encouraging volunteerism	More effort should be placed on encouraging volunteerism.	XXXX	Suggest changing last sentence in second paragraph to read: Private ventures, partnerships and volunteers may be used to help provide recreation opportunities to forest visitors. Volunteers are an integral component in managing the National Forests and more effort should be placed on encouraging volunteerism		Volunteers	PC 1061-1 The Forest Service should change the last sentence in second paragraph on Page 69 to read: Private ventures, partnerships and volunteers may be used to help provide recreation opportunities to forest visitors. Volunteers are an integral component in managing the National Forests and more effort should be placed on

							encouraging volunteerism.
Use of volunteers	Need to address coordination with volunteers to accomplish maintenance and management of facilities.	More effort should be placed on encouraging volunteerism.	XXXX	Need to address coordination with volunteers to accomplish maintenance and management of facilities.		Maintenance and Management of Facilities	
Recreation development	No recreation development is specifically outlined in any alternative.	Describe the recreation development planned in each alternative.	XXXX	No recreation development is specifically outlined in any alternative.		Alternatives	
developed camping	[Project level work] Developed campgrounds are much too small, roads are too narrow with very sharp turns and the spacing between camping sites is so small you are almost sharing a table with the adjoining camp. Developed campgrounds are very difficult for trailers or large motor homes to access- easily because of the narrow roads and small parking areas. Make the developed campgrounds more spacious with larger	Make the developed campgrounds more spacious with larger parking places for trailers, motor homes, and tow vehicles. Provide more space between camping sites.	** Check out Prescott p. 44 2nd comment				

	parking places for trailers., motor homes and tow vehicles. Provide more space between camping sites.						
Recreation data	Recreation Demand No data is provided for the kinds of recreation for which demand is stated to be increasing; such data would necessarily be a factor in deciding what kind of facilities to plan for.	Recreation demand data should be used to inform decisions on recreation. The forests should ensure the next National Visitor Use Monitoring survey has a sufficient response rate to be meaningful.	** Check out Prescott p. 42	Recreation Demand No data is provided for the kinds of recreation for which demand is stated to be increasing; such data would necessarily be a factor in deciding what kind of facilities to plan for.		Provide Data for Increased Recreation Demand	PC 1075-3 The Forest Service should provide data for the kinds of recreation with increasing demands because the data would be a necessary factor in deciding what kind of facilities and opportunities to plan. The Forest Service should include the importance of monitoring in determining forest use.
Recreation data	The Apache-Sitgreaves National Forests should take this monitoring much more seriously and be sure that the next survey has a sufficiently response rate to be meaningful in determining forest use.	Recreation demand data should be used to inform decisions on recreation. The forests should ensure the next National Visitor Use Monitoring survey has a sufficient response rate to be meaningful.	** Check out Prescott p. 42	The Apache-Sitgreaves National Forests should take this monitoring much more seriously and be sure that the next survey has a sufficiently response rate to be meaningful in determining forest use.		Monitoring	
Recreation data	These data should drive decisions on recreation with heavy emphasis on quiet recreation opportunities.	Recreation demand data should be used to inform decisions on recreation. The forests should ensure the next National Visitor Use Monitoring survey has a sufficient response rate to be meaningful.	** Check out Prescott p. 42	These data should drive decisions on recreation with heavy emphasis on quiet recreation opportunities.		Quiet Recreation Opportunities	

Recreation data	Off-highway travel is an extremely low percentage of the cited main activities. Alternatives should reflect this in their recommendations for road closures, reassessment of roads after the Wallow Fire, and identification of suitable ORV trails.	Recreation demand data should be used to inform decisions on recreation. The forests should ensure the next National Visitor Use Monitoring survey has a sufficient response rate to be meaningful.	** Check out Prescott p. 42	Off-highway travel is an extremely low percentage of the cited main activities. Alternatives should reflect this in their recommendations for road closures, reassessment of roads after the Wallow Fire, and identification of suitable ORV trails.		Off Highway Use	
Recreation for historic uses	This represents a significant change from the current management of the Forest. We request that the Forest Service amend the Proposed Plan in a manner that returns to a more traditional, balanced approach regarding managed, recreational use of the Forest.	The plan should meet the people's desires for recreation as they have historically enjoyed it.	XXXX	This represents a significant change from the current management of the Forest. We request that the Forest Service amend the Proposed Plan in a manner that returns to a more traditional, balanced approach regarding managed, recreational use of the Forest.		Balanced Approach for Recreational Use	PC 105-2 The Forest Service should manage the national forests with permanent strong protections from logging of timber, mining, hunting, petroleum drilling, and non-passive recreation for wildlife, flora and fauna, endangered species, insects, wildflowers, and old growth habitat.
Recreation for historic uses	I'm concerned about the future of recreation in the ASNF. I feel the trend for the ASNF is to eliminate the current recreation uses and or severely curtail them. The Plan MUST reflect the need to meet the people's desires for recreation as they have historically enjoyed it.	The plan should meet the people's desires for recreation as they have historically enjoyed it.	XXXX	I'm concerned about the future of recreation in the ASNF. I feel the trend for the ASNF is to eliminate the current recreation uses and or severely curtail them. The Plan MUST reflect the need to meet the people's desires for recreation as they have historically enjoyed it.		Maintain Recreation Historical Use	
Target range	Shooting Sports are not a right, it is a marketing plan by manufacturers to get public tax money used to find, staff, build, maintain etc...shooting ranges. This is not hunting and should not be considered a passive use of public land.	Shooting sports, including shooting ranges, should not be considered a use on public land.	** Check out Prescott p. 46	Shooting Sports are not a right, it is a marketing plan by manufacturers to get public tax money used to find, staff, build, maintain etc...shooting ranges. This is not hunting and should not be considered a passive use of public land.		Shooting Sports	

Target range	No Tax Payer money for shooting ranges, shooting sports, etc... passive and limited hunting by safe hunters and maybe even by lottery to minimize the disturbance and chances for accidental injury and death are needed to ensure a pleasurable visit by everyone is needed.	Shooting sports, including shooting ranges, should not be considered a use on public land.	** Check out Prescott p. 46	No Tax Payer money for shooting ranges, shooting sports, etc... passive and limited hunting by safe hunters and maybe even by lottery to minimize the disturbance and chances for accidental injury and death are needed to ensure a pleasurable visit by everyone is needed.	Shooting Sports	
Wildlife-related recreation	Recreation is a big part of their economy. Protecting the habitat will keep the tourists coming. And, the animals were there first.	Wildlife-based recreation is important to the economy. There is a need to protect wildlife habitat.	XXXX	Recreation is a big part of their economy. Protecting the habitat will keep the tourists coming. And, the animals were there first.	Economic Value to Tourism	1) more specific, clear language and strategy, 2) by reformatting to streamline presentation of information in a more logical flow, omitting duplication and conflicting information, and correcting format, grammar and punctuation for purposes of clarity., 3) provide links to downloadable reference materials available on the internet (and if documents are not yet on the internet, put them there).,4) add an alphabetic index of acronyms., 5) Add a comprehensive summary / discussions to just how well the first Forest Plan worked, both the good and the not-so good, 6) add a reference on the importance of litter, 7) define: "rare"; "unique"; "habitat" and "protection" (from what?) Page 61: Rare and unique habitats should be protected

Wildlife-related recreation	Our wildlife is important to our economy too as millions of people visit national parks and camping spots and thus supporting the people who cater to such tourism	Wildlife-based recreation is important to the economy. There is a need to protect wildlife habitat.	XXXX	Our wildlife is important to our economy too as millions of people visit national parks and camping spots and thus supporting the people who cater to such tourism	Economic Value to Tourism	PC 1076-2 The Forest Service should address and define the importance to the economy of wildlife viewing and camping and the economic support it gives to those catering to tourism.
More OHV trails	What about OHV trails? There are only a few and far in between.	Consider development of more multi-use single track and OHV trails.	XXXX	What about OHV trails? There are only a few and far in between.	More Riding Opportunities	
More OHV trails	It would be great if there were more summer time riding opportunities in this state. Please consider the development of more multi-use single track trail systems.	Consider development of more multi-use single track and OHV trails.	XXXX	It would be great if there were more summer time riding opportunities in this state. Please consider the development of more multi-use single track trail systems.	More Riding Opportunities	PC 1080-4 The Forest Service should include more summer time riding opportunities in this state by the development of more multi-use single track trail systems.
OHV opportunities	This is one of the few opportunities we have here for OHV recreation and removing this area would have a negative effect on both the economy here and also on any community relations that have been built here over the last few years.	Do not eliminate opportunities to use OHVs (off-highway vehicles) or ATVs (all terrain vehicles) on the forest.	XXXX	This is one of the few opportunities we have here for OHV recreation and removing this area would have a negative effect on both the economy here and also on any community relations that have been built here over the last few years.	Opportunities	PC 1073-1 The Forest Service should add more OHV trails because they are few and far in between and removing OHV opportunities would have a negative effect on tourism, the local economy and any community relations that have been built here over the last few years. The Forest Service should recognize the importance of OHV recreation and that it is disproportionately important to the economy of rural counties.

OHV opportunities	Our family often vacations by taking All Terrain Vehicle (ATV) trips to various locations. It is how our family spends time together, and allows all of us to visit remote places otherwise inaccessible to us. Please don't take this family opportunity away from us.	Do not eliminate opportunities to use OHVs (off-highway vehicles) or ATVs (all terrain vehicles) on the forest.	XXXX	My husband and I are raising our granddaughter. Our family often vacations by taking All Terrain Vehicle (ATV) trips to various locations. It is how our family spends time together, and allows all of us to visit remote places otherwise inaccessible to us. Please don't take this family opportunity away from us.	More Riding Opportunities	PC 1080-1 the Forest Service should not restrict opportunities for motorized access and motorized travel to lakes, remote places, collecting firewood, and should not close areas for administrative use during hunting season.
OHV opportunities	This plan actually show's why people have very little respect for the USFS. Over the past two years, the OHV users here have busted butt to get this t=river cleaned up and kept clean and it is showing right now. And we get run off the river in return. Guess we will have to sue to be taken seriously	Do not eliminate opportunities to use OHVs (off-highway vehicles) or ATVs (all terrain vehicles) on the forest.		This plan actually show's why people have very little respect for the USFS. Over the past two years, the OHV users here have busted butt to get this river cleaned up and kept clean and it is showing right now. And we get run off the river in return. Guess we will have to sue to be taken seriously.	Off Highway Use	
effects - OHV	If you have not seen the destruction and death caused by off road vehicles then you should. The exhaust pollution is three times greater than from the car you drive. There is no repairing it and the noise pollution that scares wildlife is inexcusable.	Consider the impact from OHVs (off-highway vehicles) including: loss of meadows and traditional campsites, exhaust and noise pollution, soil loss causes (loss of vegetation, wildlife habitat, overall long-term forest productivity, biological diversity, etc.).	XXXX	If you have not seen the destruction and death caused by off road vehicles then you should. The exhaust pollution is three times greater than from the car you drive. There is no repairing it and the noise pollution that scares wildlife is inexcusable.	Destruction of Habitat and Noise pollution from OHV Use	PC 1073-6 The Forest Service should address the OHV issues of death and destruction, irreparable exhaust, and noise pollution that scares wildlife
effects - OHV	The majority of this soil loss is from OHV use. Increasing overland OHV trails, using riparian zones as OHV routes, etc. Any management strategy that allows increased OHV use will be detrimental to the overall forest health. Any professional land manager can see very clearly the destruction already happening and project the possible increased loss of	Consider the impact from OHVs (off-highway vehicles) including: loss of meadows and traditional campsites, exhaust and noise pollution, soil loss causes (loss of vegetation, wildlife habitat, overall long-term forest productivity, biological diversity, etc.).	XXXX	Any management strategy that allows increased OHV use will be detrimental to the overall forest health. Any professional land manager can see very clearly the destruction already happening and project the possible increased loss of soil and associated negative effects by increased OHV use. If all the OHV users were truly responsible (stay on the roads)	OHV Use	

	soil and associated negative effects by increased OHV use. If all the OHV users were truly responsible (stay on the roads) then perhaps this would not be such an issue, but current OHV use shows that "irresponsible" users are on the increase, that cannot be denied. The proof is obvious to any professional land manager, hydrologist, soil scientist, forester, etc.			then perhaps this would not be such an issue, but current OHV use shows that "irresponsible" users are on the increase, that cannot be denied. The proof is obvious to any professional land manager, hydrologist, soil scientist, forester, etc.		
effects - OHV		Consider the impact from OHVs (off-highway vehicles) including: loss of meadows and traditional campsites, exhaust and noise pollution, soil loss causes (loss of vegetation, wildlife habitat, overall long-term forest productivity, biological diversity, etc.).	XXXX	the loss of forest attributes has been steadily increasing, from loss of meadows and traditional campsites that have been destroyed by OHV use to all the ecological spin-offs that soil loss causes (loss of vegetation, wildlife habitat, overall long-term forest productivity, biological diversity, etc.)		OHV Use
San Francisco River OHV	We would like to bring those strategies and options here to provide both a healthy river system while maintaining the OHV trail at the San Francisco River	Maintain the OHV trail system along the San Francisco River.	XXXX	We would like to bring those strategies and options here to provide both a healthy river system while maintaining the OHV trail at the San Francisco River		Travel Management
San Francisco River OHV	Also under the NEPA, the economic impact must also be taken into effect. Due to the limited OHV opportunities here, closure of the San Francisco River to OHV's would have a negative effect on both the local economy and on the quality of the human environment as this area is in	Maintain the OHV trail system along the San Francisco River.	XXXX	Also under the NEPA, the economic impact must also be taken into effect. Due to the limited OHV opportunities here, closure of the San Francisco River to OHV's would have a negative effect on both the local economy and on the quality of the human environment as this area is in		Economic Impacts

	common use by man.			common use by man.			
Sources of citations ORV	<p>DEIS, p. 333). This statement appears to support the development of more routes for ORVs. This bias is not supported by the usage data. Farther, the source53 used to justify this position can be called into question. The advisory group for this publication is heavily biased toward ORV use and includes a special group that specifically represents the ORV community. No similar group of conservation organizations that support quiet recreation is included.</p> <p>Recommendation: The Forest Service should more carefully consider the sources it cites to support development of more ORV routes. Those that have the bias as noted above do not represent the interests of the majority of forest users.</p>	<p>The forest planning process used information that was publically available. Because no additional sources were identified, the Apache-Sitgreaves NFs are unable to update the Other Sources of Information.</p>	XXXX				

AZGFD-BG-Edit	Plan, Background for Motorized Opportunities, page 73: The final sentence in this paragraph states "These roads and trails are also needed for forest management." It is unclear if the A-S is also considering unauthorized roads (user-created) as being needed for forest management. The Department recommends clarification.	Clarify Motorized Opportunities Background (proposed plan p. 73). The final sentence in this paragraph states "These roads and trails are also needed for forest management." It is unclear if the Apache-Sitgreaves NFs is also considering unauthorized roads (user-created) as being needed for forest management.		Plan, Background for Motorized Opportunities, page 73: The final sentence in this paragraph states "These roads and trails are also needed for forest management." It is unclear if the A-S is also considering unauthorized roads (user-created) as being needed for forest management. The Department recommends clarification.			
AZGFD-DC-Edit	Plan, Desired Conditions for Motorized Opportunities, page 73: " <i>Open NFS roads and</i> motorized trails are easily identified on the ground (e.g., well marked, <i>and marked open unless closed</i> ).	Modify Motorized Opportunities Desired Condition (proposed plan p. 73) " <i>Open NFS roads and</i> motorized trails are easily identified on the ground (e.g., well marked, <i>and marked open unless closed</i> ).		Plan, Desired Conditions for Motorized Opportunities, page 73: " <i>Open NFS roads and</i> motorized trails are easily identified on the ground (e.g., well marked, <i>and marked open unless closed</i> ).			
AZGFD-ST-Edit	Plan, Standards for Motorized Opportunities, page 74: "Motorized vehicle travel shall be managed to occur only on the designated system of NFS roads and motorized trails and designated motorized areas." It should be made clear in this standard that there will be authorized exemptions, including motorized big game retrieval	Clarify Motorized Opportunities Standards (proposed plan p. 74) "Motorized vehicle travel shall be managed to occur only on the designated system of NFS roads and motorized trails and designated motorized areas." It should be made clear that there will be authorized exemptions, including motorized big game retrieval		Plan, Standards for Motorized Opportunities, page 74: "Motorized vehicle travel shall be managed to occur only on the designated system of NFS roads and motorized trails and designated motorized areas." It should be made clear in this standard that there will be authorized exemptions, including motorized big game retrieval			
AZGFD-ST-Edit2	Plan, Standards for Motorized Opportunities, page 74: "Unless specifically authorized, motorized cross-country travel shall be managed to occur only in designated motorized areas." It should be made clear in this standard, that motorized big game retrieval is included in the activities that are	Clarify Motorized Opportunities Standard (proposed plan p. 74) "Unless specifically authorized, motorized cross-country travel shall be managed to occur only in designated motorized areas." It should be made clear that motorized big game retrieval is included in the activities that		Plan, Standards for Motorized Opportunities, page 74: "Unless specifically authorized, motorized cross-country travel shall be managed to occur only in designated motorized areas." It should be made clear in this standard, that motorized big game retrieval is included in the activities that are			

	specifically authorized.	are specifically authorized.		specifically authorized.			
AZGFD-MA-Edit	Plan, Management Approaches for Motorized Opportunities, page76: "The Apache Sitgreaves NFs coordinate with Federal Highways Administration, <i>Arizona Game and Fish Department</i> , and ADOT to facilitate transportation needs, planned improvements, and transportation conditions. Apache-Sitgreaves NFs work with ADOT <i>and Arizona Game and Fish Department</i> to alleviate concerns with scenic resources; maintenance activities; use of herbicides; use of deicing agents; and creation of turnouts, parking lots, and wildlife crossings."	Modify Motorized Opportunities Management Approaches (proposed plan p.76) "The Apache Sitgreaves NFs coordinate with Federal Highways Administration, <i>Arizona Game and Fish Department</i> , and ADOT to facilitate transportation needs, planned improvements, and transportation conditions. Apache-Sitgreaves NFs work with ADOT <i>and Arizona Game and Fish Department</i> to alleviate concerns with scenic resources; maintenance activities; use of herbicides; use of deicing agents; and creation of turnouts, parking lots, and wildlife crossings."		Plan, Management Approaches for Motorized Opportunities, page76: "The Apache Sitgreaves NFs coordinate with Federal Highways Administration, <i>Arizona Game and Fish Department</i> , and ADOT to facilitate transportation needs, planned improvements, and transportation conditions. Apache-Sitgreaves NFs work with ADOT <i>and Arizona Game and Fish Department</i> to alleviate concerns with scenic resources; maintenance activities; use of herbicides; use of deicing agents; and creation of turnouts, parking lots, and wildlife crossings."			
Use of decommissioned roads	There are targets within Alternative B that set specific goals for decommissioning of roads, particularly those in riparian corridors. While this is a progressive step in habitat recovery, it essential that these existing pathways be set aside and used as hiking trails after decommissioning. By precluding vehicle travel and facilitating walk- in access, those who enjoy vehicle-free areas of the forest would be	Use decommissioned roads as hiking trails.	XXXX	There are targets within Alternative B that set specific goals for decommissioning of roads, particularly those in riparian corridors. While this is a progressive step in habitat recovery, it essential that these existing pathways be set aside and used as hiking trails after decommissioning. By precluding vehicle travel and facilitating walk- in access, those who enjoy vehicle-free areas of the forest would be		Travel Management	

	well served, yet resource protection provided			well served, yet resource protection provided		
XC ski opportunities	Non-motorized Opportunities – maintenance and management of cross-country ski facilities needs to be addressed.	Address maintenance and management of cross-country ski facilities. Add an objective to accomplish this.	XXXX	Non-motorized Opportunities – maintenance and management of cross-country ski facilities needs to be addressed.		Maintenance and Management of Facilities
XC ski opportunities	Within the planning period, work with other partners to rehabilitate cross-country ski area facilities to maintain and/or increase opportunities	Address maintenance and management of cross-country ski facilities. Add an objective to accomplish this.	XXXX	Within the planning period, work with other partners to rehabilitate cross-country ski area facilities to maintain and/or increase opportunities		Work with Partners/ Volunteers to rehabilitate and maintain dispersed facilities and increase Opportunities and
XC ski opportunities	Within the planning period work with volunteers to maintain and increase non-motorized dispersed recreation opportunities, including cross-country ski trails.	Address maintenance and management of cross-country ski facilities. Add an objective to accomplish this.	XXXX	Within the planning period work with volunteers to maintain and increase non-motorized dispersed recreation opportunities, including cross-country ski trails.		Work with Partners/ Volunteers to rehabilitate and maintain dispersed facilities

						and increase Opportunities and	
Motorized routes inventory	7. Chapter 3, page 332 under affected environment – Motorized routes it states an inventory had not been completed, but it is estimated that there are hundreds of mile of unauthorized routes. This statement is false. As a group of forest users CMLUA spent over 2 years cataloging many of these routes for the forest service.	Correct the Motorized Routes affected environment statement "An inventory has not been completed, but it is estimated that there are hundreds of miles of unauthorized routes" (DEIS p. 332). CMLUA (Citizens for Multiple Land Use and Access) spent over 2 years cataloging many of these routes for the Forest Service.	XXXX	7. Chapter 3, page 332 under affected environment – Motorized routes it states an inventory had not been completed, but it is estimated that there are hundreds of mile of unauthorized routes. This statement is false. As a group of forest users CMLUA spent over 2 years cataloging many of these routes for the forest service.		Inventory	PC 1120-3 The Forest Service should correct the statement in Chapter 3, page 332 under affected environment – Motorized routes it states an inventory had not been completed, but it is estimated that there are hundreds of mile of unauthorized routes because the statement is false.
Infrastructure - decommission roads into sensitive areas	The remaining roads should be decommissioned or significantly reduced to limit incursion by motorized travel into sensitive areas.	Remaining roads should be decommissioned or significantly reduced to limit incursion by motorized travel into sensitive areas.	** Check out Kaibab , p. 68 2nd comment	The remaining roads should be decommissioned or significantly reduced to limit incursion by motorized travel into sensitive areas.		Motorized Travel into Sensitive Areas	PC 1105-1 The Forest Service should decommission or significantly reduce remaining roads to limit incursion by motorized travel into sensitive areas.
Too many roads/ close roads /no new roads	As much as we all like roads, there are some places that don't need them. I'll probably never visit this park, but it should be available for the wildlife and those adventurous types, not the looters and polluters who're only interested in lining their pockets at Mother	Prohibit new road and motorized trail development. There are too many roads.					

	Nature's expense.						
Too many roads/ close roads /no new roads	New road construction and trail development for motorized travel absolutely prohibited!	Prohibit new road and motorized trail development. There are too many roads.	**Check out Prescott p. 8, 1st comment	New road construction and trail development for motorized travel absolutely prohibited!		Prohibit New Road and Trail Construction	
Too many roads/ close roads /no new roads	I urge you also to prevent any road building	Prohibit new road and motorized trail development. There are too many roads.	**Check out Prescott p. 8, 1st comment	I urge you also to prevent any road building		Prevent Road Development	PC 1110-4 The Forest Service should close many current roads and prevent any road building and motorized trail development in order to protect wilderness and natural forest ecosystems from further noise and pollution, and because of the cost of maintenance. Post-fire logging and road building should not be allowed more than 0.25 mile from existing roads.
Too many roads/ close roads /no new roads	It must consider a prohibition on new road construction and motorized trail development, and a requirement to reduce road density to less than two miles per square mile outside of designated wilderness areas, inventoried roadless areas and wilderness study areas.	Prohibit new road and motorized trail development. There are too many roads.	**Check out Prescott p. 8, 1st comment	It must consider a prohibition on new road construction and motorized trail development, and a requirement to reduce road density to less than two miles per square mile outside of designated wilderness areas, inventoried roadless areas and wilderness study areas.		Prohibit New Road and Trail Construction	

Too many roads/ close roads /no new roads	Consider a prohibition on new road construction and motorized trail development and a requirement to reduce route density to less than one mile per square-mile outside of designated wilderness areas, inventoried roadless areas, and wilderness study areas.	Prohibit new road and motorized trail development. There are too many roads.	**Check out Prescott p. 8, 1st comment	Consider a prohibition on new road construction and motorized trail development and a requirement to reduce route density to less than one mile per square-mile outside of designated wilderness areas, inventoried roadless areas, and wilderness study areas.	Prohibit New Road and Trail Construction	
Too many roads/ close roads /no new roads	If the road don't exist, stop building more	Prohibit new road and motorized trail development. There are too many roads.	**Check out Prescott p. 8, 1st comment	If the road don't exist, stop building more	Prevent Road Development	PC 1110-4 The Forest Service should close many current roads and prevent any road building and motorized trail development in order to protect wilderness and natural forest ecosystems from further noise and pollution, and because of the cost of maintenance. Post-fire logging and road building should not be allowed more than 0.25 mile from existing roads.
Too many roads/ close roads /no new roads	In the end of all things, the public doesn't need roads going to nowhere for the benefit of logging and shipping companies.	Prohibit new road and motorized trail development. There are too many roads.	**Check out Prescott p. 8, 1st comment	In the end of all things, the public doesn't need roads going to nowhere for the benefit of logging and shipping companies.	Prevent Road Development	PC 1110-4 The Forest Service should close many current roads and prevent any road building and motorized trail development in order to protect wilderness and natural forest ecosystems from further noise and pollution, and because of the cost of maintenance. Post-fire logging and road building should not be allowed more than 0.25 mile from existing roads.

Too many roads/ close roads /no new roads	You cannot allow forests to be destroyed just for road development. This will force several animals to move. If enough forests are destroyed, then many animals will become homeless.	Prohibit new road and motorized trail development. There are too many roads.	<b>**Check out Prescott p. 8, 1st comment</b>	You cannot allow forests to be destroyed just for road development. This will force several animals to move. If enough forests are destroyed, then many animals will become homeless.	Damage to Forest	PC 1552-1 The Forest Service should not allow the destruction of the forests for road development because it will impact habitat.
Too many roads/ close roads /no new roads	Please protect our irreplaceable forest lands from the destruction of roads and all the things that follow from making roads through forests.	Prohibit new road and motorized trail development. There are too many roads.	<b>**Check out Prescott p. 8, 1st comment</b>	Please protect our irreplaceable forest lands from the destruction of roads and all the things that follow from making roads through forests.	Protection	
Too many roads/ close roads /no new roads	[revisions in the management plan for Apache-Sitgreaves National Forest should be aimed primarily at accomplishing and safeguarding the greatest possible safe habitat for the restoration of Mexican wolves and for other native species of wildlife.] minimal roads--- No New Roads and Closure of Many Existing Roads	Prohibit new road and motorized trail development. There are too many roads.	<b>**Check out Prescott p. 8, 1st comment</b>	minimal roads--- No New Roads and Closure of Many Existing Roads	Prevent Road Development	
Too many roads/ close roads /no new roads	Kindly consider prohibiting new road construction and motorized trail development	Prohibit new road and motorized trail development. There are too many roads.	<b>**Check out Prescott p. 8, 1st comment</b>	Kindly consider prohibiting new road construction and motorized trail development	Prohibit New Road and Trail Construction	

Too many roads/ close roads /no new roads	Kindly consider prohibiting new road construction and motorized trail development and a requirement to reduce route density to less than one mile per square-mile outside of designated wilderness areas, inventoried roadless areas, and wilderness study areas.	Prohibit new road and motorized trail development. There are too many roads.	**Check out Prescott p. 8, 1st comment	Kindly consider prohibiting new road construction and motorized trail development and a requirement to reduce route density to less than one mile per square-mile outside of designated wilderness areas, inventoried roadless areas, and wilderness study areas.		Route Density	PC 1110-4 The Forest Service should close many current roads and prevent any road building and motorized trail development in order to protect wilderness and natural forest ecosystems from further noise and pollution, and because of the cost of maintenance. Post-fire logging and road building should not be allowed more than 0.25 mile from existing roads.
Too many roads/ close roads /no new roads	already too many roads	Prohibit new road and motorized trail development. There are too many roads.	**Check out Prescott p. 8, 1st comment	already too many roads		Prevent Road Development	
Too many roads/ close roads /no new roads	Further, the government cannot maintain the roads that taxpayers have built previously for mining and logging interests. If you can't maintain the roads we've already built, surely we cannot afford to build more free roads for companies who take everything and give nothing.	Prohibit new road and motorized trail development. There are too many roads.	**Check out Prescott p. 8, 1st comment	Further, the government cannot maintain the roads that taxpayers have built previously for mining and logging interests. If you can't maintain the roads we've already built, surely we cannot afford to build more free roads for companies who take everything and give nothing.		Prevent Road Development	
Don't close roads	Don't close the roads to us that care because of a few that don't.	Do not close roads.	**Check out Prescott p. 8, 1st comment	Don't close the roads to us that care because of a few that don't.		Leave Roads Open	PC 1105-3 The Forest Service should not close roads.

Don't close roads	Reading the Proposed Plan & DEIS for Apache Sitgreaves National Forest we find many restrictions and limitations especially for the public access with road closures and limitations for road maintenance. The Plan should encourage the public to enjoy their forest rather than prevent them from using it	Do not close roads.	**Check out Prescott p. 8, 1st comment	Reading the Proposed Plan & DEIS for Apache Sitgreaves National Forest we find many restrictions and limitations especially for the public access with road closures and limitations for road maintenance. The Plan should encourage the public to enjoy their forest rather than prevent them from using it	Prevent Road Development	PC 1110-5 The Forest Service should not restrict and limit public access with road closures and limitations for road maintenance. The Plan should encourage the public to enjoy their forest rather than prevent them from using it.
Don't close roads	Closing forests or roads can be a hazard for firefighters, recreational users, and anybody in any kind of a need to get from point A to point B for any reason.	Do not close roads.	**Check out Prescott p. 8, 1st comment	Closing forests or roads can be a hazard for firefighters, recreational users, and anybody in any kind of a need to get from point A to point B for any reason.	Road Hazard	PC 1110-1 The Forest Service should address the safety issue that closing forests or roads can be a hazard for firefighters and recreational users
Don't close roads	I strongly oppose closure and limit put into effect for such unscientific and unreasonable concerns. It's nothing more than recreation and resource use limits. Please leave our roads open.	Do not close roads.	**Check out Prescott p. 8, 1st comment	I strongly oppose closure and limit put into effect for such unscientific and unreasonable concerns. It's nothing more than recreation and resource use limits. Please leave our roads open.	Leave Roads Open	
Give level 3-5 roads maintenance preference	Maintenance and access preference should be given to level 3-5 level roads and level 2 roads closed when financial limits restrict the amount of maintenance that can be performed. Fewer, higher maintenance level roads is preferable to many maintenance level 2 roads that are only available to a minority of forest users.	Prioritize maintenance and access for level 3-5 roads (suitable for passenger cars) and close level 2 roads (high clearance vehicles) when financial limits restrict the amount of maintenance that can be performed.	XXXX	Maintenance and access preference should be given to level 3-5 level roads and level 2 roads closed when financial limits restrict the amount of maintenance that can be performed. Fewer, higher maintenance level roads is preferable to many maintenance level 2 roads that are only available to a minority of forest users.	Road Maintenance	PC 1110-7 The Forest Service should not add any new level 2 roads and large portions of the forest should not be considered suitable for additional road development unless level 3-5 roads are required. Maintenance and access preference should be given to level 3-5 level roads and level 2 roads closed when financial limits restrict the amount of maintenance that

							can be performed
No new level 2 roads, only 3-5	No new level 2 roads should be considered in any of the alternatives and large portions of the forest should not be considered suitable for additional road development unless level 3-5 roads are required.	No new level 2 roads should be considered and large portions of the forest should not be considered suitable for additional road development unless level 3-5 roads are required.	XXXX	No new level 2 roads should be considered in any of the alternatives and large portions of the forest should not be considered suitable for additional road development unless level 3-5 roads are required.		Prevent Road Development	PC 1110-7 The Forest Service should not add any new level 2 roads and large portions of the forest should not be considered suitable for additional road development unless level 3-5 roads are required. Maintenance and access preference should be given to level 3-5 level roads and level 2 roads closed when financial limits restrict the amount of maintenance that can be performed
Road density	It must specifically consider a prohibition on new road construction and motorized trail development, and a requirement to reduce road density to less than two miles per square mile outside of designated Wilderness Areas, Inventoried Roadless Areas and wilderness study areas to provide for habitat security and restoration of degraded ecosystems.	Add a standard for road density of 2.0 mile/square mile or less.	** Check out Kaibab p. 39 & Prescott p. 8, 1st comment	It must specifically consider a prohibition on new road construction and motorized trail development, and a requirement to reduce road density to less than two miles per square mile outside of designated Wilderness Areas, Inventoried Roadless Areas and wilderness study areas to provide for habitat security and restoration of degraded ecosystems.		Prohibit New Road and Trail Construction	

Road density	In addition, the Forest Service should consider and analyze an alternative in the EIS that prohibits new road construction and requires road density reduction in each fifth-field watershed to less than two miles per square mile.	Add a standard for road density of 2.0 mile/square mile or less.	** Check out Kaibab p. 39 & Prescott p. 8, 1st comment	In addition, the Forest Service should consider and analyze an alternative in the EIS that prohibits new road construction and requires road density reduction in each fifth-field watershed to less than two miles per square mile.	Roads	
Road density	reduce route density to less than one mile per square-mile outside of designated wilderness areas, inventoried roadless areas, and wilderness study areas.	Add a standard for road density of 2.0 mile/square mile or less.	** Check out Kaibab p. 39 & Prescott p. 8, 1st comment	reduce route density to less than one mile per square-mile outside of designated wilderness areas, inventoried roadless areas, and wilderness study areas.	Reducing Route Density	
Road density	we again reiterate our support for route density standard of 1.0 mile/square mile (a standard supported by a large and influential number of scientists <sup>7</sup> ), for the protection of threatened, endangered, and sensitive species	Add a standard for road density of 2.0 mile/square mile or less.	** Check out Kaibab p. 39 & Prescott p. 8, 1st comment	we again reiterate our support for route density standard of 1.0 mile/square mile (a standard supported by a large and influential number of scientists <sup>7</sup> ), for the protection of threatened, endangered, and sensitive species	Route Density	
Post-fire roads/logging	The plan should enact standards prohibiting commercial timber harvest and road construction in recently burned forests for purposes other than public safety. Under no circumstances should post-fire logging or road building be allowed more than one-	The plan should enact standards prohibiting commercial timber harvest and road construction in recently burned forests more than one-quarter (1/4) mile from existing system roads.	XXXX	The plan should enact standards prohibiting commercial timber harvest and road construction in recently burned forests for purposes other than public safety. Under no circumstances should post-fire logging or road building be allowed more than one-	Post-Fire Logging and Road Building	PC 905-3 The Forest Service should enact standards prohibiting commercial timber harvest and road construction in recently burned forests for purposes other than public safety. Under no circumstances should post-fire logging or road building be allowed more than

	quarter (1/4) mile from existing system roads.			quarter (1/4) mile from existing system roads.			one-quarter (1/4) mile from existing system roads.
Post-fire roads/ logging	No road building at all in burned out areas which are extremely susceptible to mechanical disturbance and subsequent erosion.	The plan should enact standards prohibiting commercial timber harvest and road construction in recently burned forests more than one-quarter (1/4) mile from existing system roads.	XXXX	No road building at all in burned out areas which are extremely susceptible to mechanical disturbance and subsequent erosion.		Prohibit New Road and Trail Construction	
Post-fire roads/ logging	Post-fire logging and road building should not be allowed more than one-quarter (1/4) mile from existing roads.	The plan should enact standards prohibiting commercial timber harvest and road construction in recently burned forests more than one-quarter (1/4) mile from existing system roads.	XXXX	Post-fire logging and road building should not be allowed more than one-quarter (1/4) mile from existing roads.		Post-Fire Logging and Road Building	
Post-fire roads/ logging	Post-fire logging and road building should not be allowed more than 0.25 mile from existing roads.	The plan should enact standards prohibiting commercial timber harvest and road construction in recently burned forests more than one-quarter (1/4) mile from existing system roads.	XXXX	Post-fire logging and road building should not be allowed more than 0.25 mile from existing roads.		Post Fire Logging and Road Development	

Post-fire roads/logging	Post-fire logging and road building should not be allowed more than 0.25 mile from existing roads.	The plan should enact standards prohibiting commercial timber harvest and road construction in recently burned forests more than one-quarter (1/4) mile from existing system roads.	XXXX	Post-fire logging and road building should not be allowed more than 0.25 mile from existing roads.		Post Fire Logging and Road Development	PC 1110-4 The Forest Service should close many current roads and prevent any road building and motorized trail development in order to protect wilderness and natural forest ecosystems from further noise and pollution, and because of the cost of maintenance. Post-fire logging and road building should not be allowed more than 0.25 mile from existing roads.
Closure of level 2 roads	However, while doing this why have many historically open roads been closed? I'm referring to class #2 (maybe #3).	Explain why historically open roads have been closed.	XXXX	However, while doing this why have many historically open roads been closed? I'm referring to class #2 (maybe #3).		Travel Management	
Allow motorized XC travel	The fact that over 65% of the motorized recreational activities involved some level of dispersed access to the lands is relevant to the implementation of the upcoming Travel Management Rule as it illustrates the need to maintain some level of authorized cross-country travel for reasonably dispersed activities.	Motorized cross-country travel should be allowed.	XXXX	The fact that over 65% of the motorized recreational activities involved some level of dispersed access to the lands is relevant to the implementation of the upcoming Travel Management Rule as it illustrates the need to maintain some level of authorized cross-country travel for reasonably dispersed activities.		Travel Management Plan	

<p>Allow motorized XC travel</p>	<p>Enclosed are signature sheets signed by 390+ individuals that oppose the proposed closure of all motorized cross country travel. This action is not acceptable as it would have devastating effects on dispersed camping, hunting and all other recreation activities in the forest. Motorized cross-country travel should be included in the proposed alternative to allow access to existing dispersed camp sites and to retrieve big game animals. The impacts of this proposal are not well thought out. If hunters are not able access down game quickly the meat might spoil. Also concentrating hunters and campers in designated camp areas would take away from the enjoyment of the outdoors and may cause conflicts. There would be many other impacts to the surrounding communities that aren't considered either. I have spoken to a lot of people and none of them support the closure of any roads or trails. They feel that the forest roads should be managed as they have been in the past.</p>	<p>Motorized cross-country travel should be allowed.</p>	<p>XXXX</p>	<p>Enclosed are signature sheets signed by 390+ individuals that oppose the proposed closure of all motorized cross country travel. This action is not acceptable as it would have devastating effects on dispersed camping, hunting and all other recreation activities in the forest. Motorized cross-country travel should be included in the proposed alternative to allow access to existing dispersed camp sites and to retrieve big game animals. The impacts of this proposal are not well thought out. If hunters are not able access down game quickly the meat might spoil. Also concentrating hunters and campers in designated camp areas would take away from the enjoyment of the outdoors and may cause conflicts. There would be many other impacts to the surrounding communities that aren't considered either. I have spoken to a lot of people and none of them support the closure of any roads or trails. They feel that the forest roads should be managed as they have been in the past.</p>	<p>Motorized Cross Country travel</p>	
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Allow motorized XC travel	In Chapter 2, page 28, section 8 Motorized Cross-Country; It states "the action alternatives limit motorized travel to a system of NFS roads and trails. They do not allow motorized cross country travel....."  This action is not acceptable.	Motorized cross-country travel should be allowed.	XXXX				
Allow motorized XC travel	It would have devastating effects on dispersed camping, hunting and all other recreation activities in the forest. Motorized cross country travel should be included in the proposed alternative to allow access to existing camp sites and to retrieve big game, as stated in Travel Management Rule (73 FR 74689) section 212.51 (b) Motor vehicle use for dispersed camping or big game retrieval.	Motorized cross-country travel should be allowed.	XXXX				
Allow motorized XC travel	Leave Cross country Travel alone	Motorized cross-country travel should be allowed.	XXXX	Leave Cross country Travel alone		Motorized Cross Country Travel	
Restrict motorized XC travel	. . . and forbid off road vehicle usage	Motorized cross-country travel should not be allowed.	XXXX	and forbid off road vehicle usage		Prohibit Motorized Cross Country and Off Road Use	

Restrict motorized XC travel	The Department recognizes the negative impacts on wildlife and wildlife habitat from unrestricted cross-country motorized travel, and therefore supports the proposed prohibition of motorized cross-country travel, except where authorized.	Motorized cross-country travel should not be allowed.	XXXX	The Department recognizes the negative impacts on wildlife and wildlife habitat from unrestricted cross-country motorized travel, and therefore supports the proposed prohibition of motorized cross-country travel, except where authorized.	Prohibit Motorized Cross Country and Off Road Use	
Restrict motorized XC travel	I understand the increasing pressure on the forest by OHV users, but the forest cannot be sacrificed so that users can have unlimited access to the forest	Motorized cross-country travel should not be allowed.	XXXX	I understand the increasing pressure on the forest by OHV users, but the forest cannot be sacrificed so that users can have unlimited access to the forest	Restrict Motorized Use	
Motorized big game retrieval	The Department looks forward to continued coordination with the A-S on the Travel Management Plan. A critical component of which will be the continued availability of the variety of outdoor activities currently found on the A-S, including motorized big game retrieval.	Allow motorized cross-country travel for big game retrieval; allow motorized cross-country travel for big game retrieval on at least 95 percent of the hunting areas in each district.	XXXX	The Department looks forward to continued coordination with the A-S on the Travel Management Plan. A critical component of which will be the continued availability of the variety of outdoor activities currently found on the A-S, including motorized big game retrieval.	Big Game Retrieval	
Motorized big game retrieval	Plan, Motorized Use Suitability, page 131: The footnote for table 8 describes exemptions per the Travel Management Rule. The Department requests the allowances for motorized big game retrieval be included within this footnote.	Allow motorized cross-country travel for big game retrieval; allow motorized cross-country travel for big game retrieval on at least 95 percent of the hunting areas in each district.		Plan, Motorized Use Suitability, page 131: The footnote for table 8 describes exemptions per the Travel Management Rule. The Department requests the allowances for motorized big game retrieval be included within this footnote.		

Motorized big game retrieval	In that TMR is mentioned frequently in the Plan, we feel it appropriate that the Forest Plan address the issue of Motorized Big Game Retrieval and dispersed camping. Hunter dispersal is both an important wildlife management tool for harvesting big game away from travel corridors but is dependent on the ability of hunters to retrieve harvest game. While the specifics of both dispersed camping and MBGR await the final TMR rule, these are such important issues for forest users that it should be addressed in broad terms in the Plan itself.	Allow motorized cross-country travel for big game retrieval; allow motorized cross-country travel for big game retrieval on at least 95 percent of the hunting areas in each district.	XXXX	In that TMR is mentioned frequently in the Plan, we feel it appropriate that the Forest Plan address the issue of Motorized Big Game Retrieval and dispersed camping. Hunter dispersal is both an important wildlife management tool for harvesting big game away from travel corridors but is dependent on the ability of hunters to retrieve harvest game. While the specifics of both dispersed camping and MBGR await the final TMR rule, these are such important issues for forest users that it should be addressed in broad terms in the Plan itself.	Big Game Retrieval	PC 1120-4 The Forest Service should address the issue of Motorized Big Game Retrieval and dispersed camping in the plan because of the important wildlife management tool for harvesting big game, the importance of the issue to forest users in accommodating custom and culture of residents and visitors, and the restrictions to dispersed camping. The Forest Service should conduct an analysis of land coverage resulting from the combined values of corridor width and road network density be performed.
Motorized big game retrieval	Leave Game retrieval alone	Allow motorized cross-country travel for big game retrieval; allow motorized cross-country travel for big game retrieval on at least 95 percent of the hunting areas in each district.	XXXX	Leave Game retrieval alone	Big Game Retrieval	PC 1120-4 The Forest Service should address the issue of Motorized Big Game Retrieval and dispersed camping in the plan because of the important wildlife management tool for harvesting big game, the importance of the issue to forest users in accommodating custom and culture of residents and visitors, and the restrictions to dispersed camping. The Forest Service should conduct an analysis of land coverage resulting from the combined values of corridor width and road network density be performed.

Motorized big game retrieval	<p>The travel management plans generally limit the species of big game allowed for motorized big game retrieval to elk, bear and deer only. Navajo County believes that the limitation of motorized big game retrieval to only a few species is arbitrary and does not meet the intent of the motorized big game retrieval exemption mechanism. Specifically, other big game species such as, but not limited to, sheep, antelopes, mountain lions, javelina, etc. may in the present and/or in the future be hunted within the confine of the Arizona national forests and should qualify for motorized big game retrieval.</p>	<p>Allow motorized cross-country travel for big game retrieval; allow motorized cross-country travel for big game retrieval on at least 95 percent of the hunting areas in each district.</p>	XXXX	<p>The travel management plans generally limit the species of big game allowed for motorized big game retrieval to elk, bear and deer only. Navajo County believes that the limitation of motorized big game retrieval to only a few species is arbitrary and does not meet the intent of the motorized big game retrieval exemption mechanism. Specifically, other big game species such as, but not limited to, sheep, antelopes, mountain lions, javelina, etc. may in the present and/or in the future be hunted within the confine of the Arizona national forests and should qualify for motorized big game retrieval.</p>	Travel Management	
Motorized big game retrieval	<p>The travel management plans generally limit motorized big game retrieval to a one mile corridor off either side of allowable roads. Navajo County believes that corridor width is only one of two criteria that must be considered in order to meet the intent of the motorized big game retrieval exemption mechanism. Specifically, the intent of the exemption mechanism is not to define corridor width, but land coverage, therefore the intent can only be met and the analysis can only be completed if the density of the allowed road network is taken into consideration. For example,</p>	<p>Allow motorized cross-country travel for big game retrieval; allow motorized cross-country travel for big game retrieval on at least 95 percent of the hunting areas in each district.</p>	XXXX	<p>The travel management plans generally limit motorized big game retrieval to a one mile corridor off either side of allowable roads. Navajo County believes that corridor width is only one of two criteria that must be considered in order to meet the intent of the motorized big game retrieval exemption mechanism. Specifically, the intent of the exemption mechanism is not to define corridor width, but land coverage, therefore the intent can only be met and the analysis can only be completed if the density of the allowed road network is taken into consideration. For example,</p>	Travel Management	

	<p>road networks such as the ones present in the Williams or Tusayan districts of the Kaibab National Forest allow for a one mile corridor off either side of allowable roads to cover the vast majority of the acreage of the districts and therefore do not in effect limit unduly the ability of hunters to retrieve big game with motorized vehicles. Simply said, if roads exist every two miles, a one mile corridor on each side of each road makes a one mile corridor rule viable. If roads only exist every 10 miles, the same one mile corridor becomes unviable. Therefore, the width of the corridor off either side of allowable roads allowed for motorized big game retrieval should not be constant from one forest to the next</p>			<p>road networks such as the ones present in the Williams or Tusayan districts of the Kaibab National Forest allow for a one mile corridor off either side of allowable roads to cover the vast majority of the acreage of the districts and therefore do not in effect limit unduly the ability of hunters to retrieve big game with motorized vehicles. Simply said, if roads exist every two miles, a one mile corridor on each side of each road makes a one mile corridor rule viable. If roads only exist every 10 miles, the same one mile corridor becomes unviable. Therefore, the width of the corridor off either side of allowable roads allowed for motorized big game retrieval should not be constant from one forest to the next</p>		
Motorized big game retrieval	<p>Navajo County therefore requests that an analysis of land coverage resulting from the combined values of corridor width AND road network density be performed, and that if necessary districts featuring a lower density of roads be managed with either no corridor, or wider corridors as required in order to allow motorized big game retrieval to happen on at least 95% of the hunting areas in each districts.</p>	<p>Allow motorized cross-country travel for big game retrieval; allow motorized cross-country travel for big game retrieval on at least 95 percent of the hunting areas in each district.</p>	XXXX	<p>Navajo County therefore requests that an analysis of land coverage resulting from the combined values of corridor width AND road network density be performed, and that if necessary districts featuring a lower density of roads be managed with either no corridor, or wider corridors as required in order to allow motorized big game retrieval to happen on at least 95% of the hunting areas in each districts.</p>		Travel Management

Dispersed camping	[Project level work] The number/area of Dispersed Camping along with authorized locations needs to be significantly increased. The TMP has serious restrictions on camping limiting camping to 150 ft. of the road which I now hear is 30 feet. Where did this come from? Camping so close to roads becomes a safety issue.	Do not restrict dispersed camping to a 300 foot corridor off either side of a designated road or trail.	XXXX				
Dispersed camping	The travel management plans generally limit dispersed camping to a 300 feet corridor off either side of the edge of designated roads or trails. Navajo County believes that the limitation to a 300 feet corridor off either side of the edge of designated roads or trails is inadequate because it restricts access to numerous camping sites in the Arizona national forests that have become deeply ingrained in the custom and culture of the residents of and visitors to the White Mountains.	Do not restrict dispersed camping to a 300 foot corridor off either side of a designated road or trail.	XXXX	The travel management plans generally limit dispersed camping to a 300 feet corridor off either side of the edge of designated roads or trails. Navajo County believes that the limitation to a 300 feet corridor off either side of the edge of designated roads or trails is inadequate because it restricts access to numerous camping sites in the Arizona national forests that have become deeply ingrained in the custom and culture of the residents of and visitors to the White Mountains.		Travel Management	
Dispersed camping	Navajo County therefore believes that the implementation of the Travel Management Rule would fail to meet the requirements to reasonably accommodate the culture and custom of the residents of and visitors to Navajo County if such historically popular motorized camping sites were artificially outlawed due to their inaccessibility in a new travel	Do not restrict dispersed camping to a 300 foot corridor off either side of a designated road or trail.	XXXX	Navajo County therefore believes that the implementation of the Travel Management Rule would fail to meet the requirements to reasonably accommodate the culture and custom of the residents of and visitors to Navajo County if such historically popular motorized camping sites were artificially outlawed due to their inaccessibility in a new travel		Travel Management	

	management plan.			management plan.			
Dispersed camping	Additionally, Navajo County believes that the 300 feet distance must be managed with flexibility so that the authorized dispersed and safe motorized camping allows the parking of motorized vehicles and/or trailers at the distance from the closest legally open road or trail necessary for the dispersed camping site defined as a 300 feet radius around the motorized vehicle or trailer to be safe from traffic, to not be directly exposed to dust or projections caused by traffic and to be distant from adjacent dispersed camping site by at least 300 feet if such is the desire of the camper(s).	Do not restrict dispersed camping to a 300 foot corridor off either side of a designated road or trail.	XXXX	Additionally, Navajo County believes that the 300 feet distance must be managed with flexibility so that the authorized dispersed and safe motorized camping allows the parking of motorized vehicles and/or trailers at the distance from the closest legally open road or trail necessary for the dispersed camping site defined as a 300 feet radius around the motorized vehicle or trailer to be safe from traffic, to not be directly exposed to dust or projections caused by traffic and to be distant from adjacent dispersed camping site by at least 300 feet if such is the desire of the camper(s).		Travel Management	
Firewood cutting	Firewood gathered in the Arizona national forests is an important and necessary energy resource to many residents of rural counties. Navajo County therefore recommends that motorized access be allowed for the purpose of firewood gathering in areas specifically designated for motorized firewood gathering, or that the authorized motorized	Allow motorized cross-country travel for firewood gathering in areas specifically designated for motorized firewood gathering, or that the authorized motorized collection of firewood consist of the minimum number of trips each way, as defined based on the transport capacity of the vehicle and the trailer, from the downed tree to the closest legally open road	XXXX	Firewood gathered in the Arizona national forests is an important and necessary energy resource to many residents of rural counties. Navajo County therefore recommends that motorized access be allowed for the purpose of firewood gathering in areas specifically designated for motorized firewood gathering, or that the authorized motorized		Forest Products	

	collection of firewood consist of the minimum number of trips each way, as defined based on the transport capacity of the vehicle and the trailer, from the downed tree to the closest legally open road or trail in the authorized firewood collection area, by the most direct route compatible with safety and the preservation of other values such as riparian areas, archeological sites, etc.	or trail in the authorized firewood collection area, by the most direct route compatible with safety and the preservation of other values such as riparian areas, archeological sites, etc.		collection of firewood consist of the minimum number of trips each way, as defined based on the transport capacity of the vehicle and the trailer, from the downed tree to the closest legally open road or trail in the authorized firewood collection area, by the most direct route compatible with safety and the preservation of other values such as riparian areas, archeological sites, etc.		
dispersed shooting	Therefore, Navajo County believes that for safety reasons dispersed shooting should be included in the provisions of authorized cross-country travel with the following restrictions: the authorized motorized dispersed recreational shooting consists of one trip each way from the natural or artificial obvious terrain feature used as a backstop, such as pit, berth or terrain feature similar in their functionality as relates to safe dispersed shooting, to the closest legally open road or trail, not more than one mile away, by the most direct route compatible with safety and the preservation of other values such as riparian areas, archeological sites, etc.	Allow motorized cross-country travel for dispersed shooting.	XXXX	Therefore, Navajo County believes that for safety reasons dispersed shooting should be included in the provisions of authorized cross-country travel with the following restrictions: the authorized motorized dispersed recreational shooting consists of one trip each way from the natural or artificial obvious terrain feature used as a backstop, such as pit, berth or terrain feature similar in their functionality as relates to safe dispersed shooting, to the closest legally open road or trail, not more than one mile away, by the most direct route compatible with safety and the preservation of other values such as riparian areas, archeological sites, etc.	Shooting Sports	

Snowmobiles	Motorized Cross-Country Travel – How will snowmobiles be managed? They are motorized vehicles? There needs to be something that addresses over-the-snow vehicles and any restrictions.	Address OSV (over snow vehicle) travel in the plan. Do not exclude snowmobiles from the motorized cross-country travel ban. Apply Executive Order 11644, as amended by Executive Order 11989, minimization criteria to route and area designations.	XXXX	Motorized Cross-Country Travel – How will snowmobiles be managed? They are motorized vehicles? There needs to be something that addresses over-the-snow vehicles and any restrictions.	Motorized Cross-Country travel	
Snowmobiles	We also find the exception for snowmobiles unwarranted.	Address OSV (over snow vehicle) travel in the plan. Do not exclude snowmobiles from the motorized cross-country travel ban. Apply Executive Order 11644, as amended by Executive Order 11989, minimization criteria to route and area designations.	XXXX	We also find the exception for snowmobiles unwarranted.	Off Highway Use	Roads and routes that threaten or significantly impair wildlife movement through critical corridors within the Apache-Sitgreaves National Forests should be closed. A healthy prey base is vital to a thriving Mexican wolf population.
Snowmobiles	As a result of the WWA decision, and the subsequent change in OSV regulations, the A-S will, within the next few years, be forced to deal with OSV designations. To address OSV use now, during this planning process, would save the A-S time and resources in the long run, and put the forest at the forefront of winter recreation management. Furthermore, not addressing OSV use during forest planning, and failing to show how the ORV Executive Order minimization criteria has been applied to route and area designations, puts the A-S in a position that is vulnerable to successful legal challenge (See Wildland CPR v. USFS, Case No. CV 10-104-M-DWM (D. Mont. 2012).)	Address OSV (over snow vehicle) travel in the plan. Do not exclude snowmobiles from the motorized cross-country travel ban. Apply Executive Order 11644, as amended by Executive Order 11989, minimization criteria to route and area designations.	XXXX	As a result of the WWA decision, and the subsequent change in OSV regulations, the A-S will, within the next few years, be forced to deal with OSV designations. To address OSV use now, during this planning process, would save the A-S time and resources in the long run, and put the forest at the forefront of winter recreation management. Furthermore, not addressing OSV use during forest planning, and failing to show how the ORV Executive Order minimization criteria has been applied to route and area designations, puts the A-S in a position that is vulnerable to successful legal challenge (See Wildland CPR v. USFS, Case No. CV 10-104-M-DWM (D. Mont. 2012).)	Travel Management	

Snowmobiles	Do not exclude snowmobiles for the cross-country travel ban.	Address OSV (over snow vehicle) travel in the plan. Do not exclude snowmobiles from the motorized cross-country travel ban. Apply Executive Order 11644, as amended by Executive Order 11989, minimization criteria to route and area designations.	XXXX	Do not exclude snowmobiles for the cross-country travel ban.		Travel Management	
TMR in LMP	Delete this section of the DEIS and remove all TMP references.	Do not include travel management rule-related direction in the plan.	XXXX	Delete this section of the DEIS and remove all TMP references.		Travel Management Plan	PC 1120-1 The Forest Service should Delete the section of the DEIS (DEIS Chapter 3, Affected Environment, Motorized Routes, p. 332, last paragraph) and remove all TMP references. "Travel ways in this category are awaiting management evaluation as to whether or not to include them as part of transportation system or to decommission" is an example of how travel management rule has been slipped into this land management plan.
TMR in LMP	It further states these unauthorized routes include unplanned, abandoned travel ways; user created routes; and roads that were once under permit or other authorization and were not decommissioned upon termination of the authorization. Travel ways in this category are awaiting management evaluation as to whether or not to include them as part of transportation system or to decommission. This statement is the bases for a travel management rule. It is clear that the travel	Do not include travel management rule-related direction in the plan.	XXXX	It further states these unauthorized routes include unplanned, abandoned travel ways; user created routes; and roads that were once under permit or other authorization and were not decommissioned upon termination of the authorization. Travel ways in this category are awaiting management evaluation as to whether or not to include them as part of transportation system or to decommission. This statement is the bases for a travel management rule. It is clear that the travel		Travel Management Plan	PC 1120-1 The Forest Service should Delete the section of the DEIS (DEIS Chapter 3, Affected Environment, Motorized Routes, p. 332, last paragraph) and remove all TMP references. "Travel ways in this category are awaiting management evaluation as to whether or not to include them as part of transportation system or to decommission" is an example of how travel management rule has been slipped into this land management plan.

	management rule has been slipped into this land management plan			management rule has been slipped into this land management plan		
TMR implementation guidance needed	Authorized cross-country travel Navajo County believes that the Programmatic Draft Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan misses an opportunity to identify the criteria to be used by the Responsible Official for the upcoming implementation of the national Travel Management Rule, and for the upcoming decision making process regarding the authorization of cross-country travel.	Include guidance for the implementation of the travel management rule.	XXXX	Authorized cross-country travel Navajo County believes that the Programmatic Draft Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan misses an opportunity to identify the criteria to be used by the Responsible Official for the upcoming implementation of the national Travel Management Rule, and for the upcoming decision making process regarding the authorization of cross-country travel.		Travel Management
TMR implementation guidance needed	Navajo County respectfully requests that the current Alternative B in the Programmatic Draft Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan be rejected as relates to motorized travel and recreation No guidance is included for the upcoming implementation of the National Travel Management Rule and for authorized cross-country travel.	Include guidance for the implementation of the travel management rule.	XXXX	Navajo County respectfully requests that the current Alternative B in the Programmatic Draft Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan be rejected as relates to motorized travel and recreation No guidance is included for the upcoming implementation of the National Travel Management Rule and for authorized cross-country travel.		Travel Management

<p>TMR implementation guidance needed</p>	<p>Navajo County therefore respectfully requests that the Selected Alternative for the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan at a minimum: 1) Include the provisions of current Alternative C as relates to motorized travel and recreation in order to retain suitability of 80% of the lands of Apache-Sitgreaves National Forests for future consideration of new motorized areas and trails. 2) Include guidance for the upcoming implementation of the national Travel Management Rule and for authorized cross-country travel, in order to simultaneously achieve the required preservation and conservation objectives AND allow reasonable motorized access, travel and recreation for dispersed camping, big game retrieval, firewood collection, dispersed shooting as outlined in the above comments and the Navajo County Motorized Travel and Recreation Management Objectives.</p>	<p>Include guidance for the implementation of the travel management rule.</p>	<p>XXXX</p>	<p>Navajo County therefore respectfully requests that the Selected Alternative for the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan at a minimum: 1) Include the provisions of current Alternative C as relates to motorized travel and recreation in order to retain suitability of 80% of the lands of Apache-Sitgreaves National Forests for future consideration of new motorized areas and trails. 2) Include guidance for the upcoming implementation of the national Travel Management Rule and for authorized cross-country travel, in order to simultaneously achieve the required preservation and conservation objectives AND allow reasonable motorized access, travel and recreation for dispersed camping, big game retrieval, firewood collection, dispersed shooting as outlined in the above comments and the Navajo County Motorized Travel and Recreation Management Objectives.</p>	<p>Including Provisions of Alternative C</p>	
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Ban XC travel now	Implement a ban on cross-country travel with the implementation of the forest plan. Waiting for implementation of the Travel Management Plan is unacceptable.	Implement a ban on cross-country travel with the implementation of the land management plan instead of waiting on the implementation of the Travel Management Plan.	XXXX	Implement a ban on cross-country travel with the implementation of the forest plan. Waiting for implementation of the Travel Management Plan is unacceptable.		Travel Management	
Restrict OHVs	Other forests have set guidelines that restrict the use of OHV's on their lands, why can't the ASNF?	Explain why the forest doesn't have guidelines that restrict the use of OHVs (off-highway vehicles) on NFS land.	XXXX	Other forests have set guidelines that restrict the use of OHV's on their lands, why can't the ASNF?		Restrict Motorized Use	
LE needed	I'm well aware of the damage caused by uncaring people on motor driven vehicles but you don't close an entire lake or restrict access because of a few idiots on the water. Where is the enforcement??	Explain where the enforcement is to address people driving motor vehicles that cause damage.	XXXX	I'm well aware of the damage caused by uncaring people on motor driven vehicles but you don't close an entire lake or restrict access because of a few idiots on the water. Where is the enforcement??		Travel Management	
Wildlife-related recreation	These areas also possess outstandingly remarkable wildlife related recreational values. The Department believes that hunting, fishing, and watchable wildlife opportunities are key components of these values, and that future management of these areas should allow for the continued use of these areas by the public for wildlife related recreational activities.	Wildlife-related recreational (hunting, fishing, watchable wildlife) opportunities should continue to be allowed in eligible and suitable wild and scenic rivers.	XXXX	These areas also possess outstandingly remarkable wildlife related recreational values. The Department believes that hunting, fishing, and watchable wildlife opportunities are key components of these values, and that future management of these areas should allow for the continued use of these areas by the public for wildlife related recreational activities.		Value of Hunting and Fishing	PC 1076-1 The Forest Service should address and define the ecological value of these large, contiguous tracts of wild lands for wildlife and these areas also possess outstandingly remarkable wildlife related recreational values. Hunting, fishing, and watchable wildlife opportunities are key components of these values and future management of these areas should allow for the continued use by the public for wildlife related recreational

							activities.
WSR SIO	Eligible and suitable scenic river segments should be managed for very high scenic integrity, not just moderate to high.	Eligible and suitable scenic river segments should be managed for very high scenic integrity, not just moderate to high.	XXXX	Eligible and suitable scenic river segments should be managed for very high scenic integrity, not just moderate to high.		Manage for Very High Scenic Integrity	
WSR - impact to AZGFD	The Department requests that the A-S coordinate closely with the Department regarding any development of management direction for these areas to ensure that full consideration is given to the potential impacts on the ability of the Department to continue to manage fish and wildlife resources, and thus maintain and enhance those identified values.	AZGFD requests the Apache-Sitgreaves NFs coordinate closely regarding any development of management direction for eligible and suitable wild and scenic rivers to ensure full consideration is given to the potential impacts on the ability of AZGFD to manage fish and wildlife resources.	<b>**Check out Kaibab p. 4, last comment</b>	The Department requests that the A-S coordinate closely with the Department regarding any development of management direction for these areas to ensure that full consideration is given to the potential impacts on the ability of the Department to continue to manage fish and wildlife resources, and thus maintain and enhance those identified values.		Coordination with State on Management Direction	PC 1156-2 The Forest Service should coordinate closely with the Department regarding any development of management direction for areas eligible to be included in the National Wild and Scenic Rivers System to ensure that full consideration is given to the potential impacts on the ability of the Department to continue to manage fish and wildlife resources, and thus maintain and enhance those identified values.
No WSRs	We certainly don't want any wild and scenic rivers or any other restricted or enlarged restricted areas on the Sitgreaves-Apache forest	No wild and scenic rivers or any other restricted or enlarged restricted areas.	XXXX	We certainly don't want any wild and scenic rivers or any other restricted or enlarged restricted areas on the Sitgreaves-Apache forest		No Wild and Scenic River Restrictions	1) more specific, clear language and strategy, 2) by reformatting to streamline presentation of information in a more logical flow, omitting duplication and conflicting information, and correcting format, grammar and punctuation for purposes of

						<p>clarity., 3) provide links to downloadable reference materials available on the internet (and if documents are not yet on the internet, put them there).,4) add an alphabetic index of acronyms., 5) Add a comprehensive summary / discussions to just how well the first Forest Plan worked, both the good and the not-so good, 6) add a reference on the importance of litter, 7) define: "rare"; "unique"; "habitat" and" protection" (from what?) Page 61: Rare and unique habitats should be protected</p>
No WSRs	We certainly don't want any Wild and Scenic Rivers on any other restricted or enlarged restricted areas on the Apache – Sitgreaves Forest.	No wild and scenic rivers or any other restricted or enlarged restricted areas.	XXXX	We certainly don't want any Wild and Scenic Rivers on any other restricted or enlarged restricted areas on the Apache – Sitgreaves Forest.	No Wild and Scenic River Restrictions	<p>1) more specific, clear language and strategy, 2) by reformatting to streamline presentation of information in a more logical flow, omitting duplication and conflicting information, and correcting format, grammar and punctuation for purposes of clarity., 3) provide links to downloadable reference materials available on the internet (and if documents are not yet on the internet, put them there).,4) add an alphabetic index of acronyms., 5) Add a comprehensive summary / discussions to just how well the first Forest Plan worked, both the good and the not-so good, 6) add a reference on the importance of litter, 7) define: "rare"; "unique"; "habitat" and" protection"</p>

							(from what?) Page 61: Rare and unique habitats should be protected
Complete suitability studies	More miles of Wild and Scenic eligible rivers should be studied for suitability status.	More miles of eligible wild and scenic rivers should be studied for suitability.	XXXX	More miles of Wild and Scenic eligible rivers should be studied for suitability status.		Wild and Scenic Rivers	
Protect eligible WSRs	To protect the health of all eligible wild and scenic river segments, roads should be kept as far from the waterways as possible, and maintained to reduce sediment inputs. Proper crossings should be built and maintained where required. Roadways can contribute a hugely detrimental sediment load to rivers <sup>56</sup> , and should especially be kept away from our most special, Wild and Scenic eligible, river segments.	To protect the health of all eligible wild and scenic river segments, roads should be kept as far from the waterways as possible, and maintained to reduce sediment inputs. Proper crossings should be built and maintained where required.	XXXX	To protect the health of all eligible wild and scenic river segments, roads should be kept as far from the waterways as possible, and maintained to reduce sediment inputs. Proper crossings should be built and maintained where required. Roadways can contribute a hugely detrimental sediment load to rivers <sup>56</sup> , and should especially be kept away from our most special, Wild and Scenic eligible, river segments.		Wild and Scenic Rivers	
Time frame for WSR studies	The forests must determine eligibility of rivers and cease carrying the “potentially” eligible designation and not completing the required analysis and final conclusion. The plan should include a timeline for completion.	The forests must determine eligibility of rivers and cease carrying the “potentially” eligible designation. The plan should indicate a timeframe for analysis and designation of wild and scenic rivers.	XXXX	The forests must determine eligibility of rivers and cease carrying the “potentially” eligible designation and not completing the required analysis and final conclusion. The plan should include a timeline for completion.		Potentially Eligible Designation	

Time frame for WSR studies	[re: wild and scenic rivers] The ASNFs' plan should indicate a timeframe for accomplishment of analysis and completion of designation actions.	The forests must determine eligibility of rivers and cease carrying the "potentially" eligible designation. The plan should indicate a timeframe for analysis and designation of wild and scenic rivers.	XXXX	The ASNFs' plan should indicate a timeframe for accomplishment of analysis and completion of designation actions.		Time Line	
Time frame for WSR studies	[re: wild and scenic rivers] The plan should include a timeline for completion.	The forests must determine eligibility of rivers and cease carrying the "potentially" eligible designation. The plan should indicate a timeframe for analysis and designation of wild and scenic rivers.	XXXX	The plan should include a timeline for completion.		Time Line	
WSR - conflict with WUI	The Campbell Blue W&SR designation, which is restrictive in nature engulfs the Luce Ranch. This conflicts with the Wildland Urban Interface (WUI) there. The already extant WUI designation of this area is part of the Greenlee County Wildfire Protection Plan (signed off on by Apache-Sitgreaves Forest Supervisor Elaine Zieroth) and requires treatments to protect the health and safety of the people. A layering of a possibly restrictive designation, on top of a WUI and crippling to its purposes, has always been considered counterproductive and inappropriate.	Concern that the Campbell Blue wild and scenic river designation conflicts with the wildland urban interface treatments to protect the health and safety of people.	XXXX				

WSR - conflict with multiple use	The Wild and Scenic River (W&SR) designations are blanketing ASFN waterways with regulations which conflicts with ASNF's mandate to be managed for multiple uses. This designation can severely restrict, through FS imposition of regulations, the ability of multiple use land owners to perform proper stewardship in caring for these waterways. W&SR designations have in many historical cases proven devastating to "preserving cultural and socio-economic conditions" locally.	Concern that wild and scenic river designations conflict with multiple use management, including other land owner's ability to manage the land.	XXXX				
IRA - Roadless Rule implementation	When the roadless lands were reconsidered in the 2000 Roadless Area Conservation FEIS, there was no additional inventory or adjustment of boundaries to reflect these activities." This is not factually accurate.	Correct the statement "When the roadless lands were reconsidered in the 2000 Roadless Area Conservation FEIS, there was no additional inventory or adjustment of boundaries to reflect these activities" (DEIS p. 349). There was an opportunity in 2000 for the forests to alter boundaries of the inventoried roadless area (IRA) boundaries, but based on public and internal reviews the forest did not do so.	XXXX	When the roadless lands were reconsidered in the 2000 Roadless Area Conservation FEIS, there was no additional inventory or adjustment of boundaries to reflect these activities." This is not factually accurate.		Missing Information and Corrections to Information	
Effects of roads	Wilderness and roadless areas are key to protecting what remains of continuous, pristine ecosystems. Their already exist a myriad of fragmented and degraded landscapes due to roads and development. A single road creates an edge effect, allowing predators, invasive species, pollution into	Recognize that once roads are allowed into roadless areas, the ecological values and other attributes of roadless and wilderness areas are degraded to a point of affecting the whole system.	XXXX	Wilderness and roadless areas are key to protecting what remains of continuous, pristine ecosystems. Their already exist a myriad of fragmented and degraded landscapes due to roads and development. A single road creates an edge effect, allowing predators, invasive species, pollution into		Protection of Pristine Ecosystems	PC 309-1 The Forest Service should adopt an ecosystem approach that will be maximally protective of natural ecosystems, wilderness, roadless areas, biological diversity, and social and economic needs because they are important to our water, air and land systems. The Forest

	areas previous untouchable.			areas previous untouchable.			Service should maintain habitat and ecosystems that are currently in good condition, and to aid recovery of at-risk aquatic species and their habitat and restrict destructive grazing, mining, road building and logging.
Effects of roads	... once roads are allowed (including OHV trails) into roadless areas their ecological values are degraded to a point of affecting the whole system, which is already in dire decline from poor management and OHV use.	Recognize that once roads are allowed into roadless areas, the ecological values and other attributes of roadless and wilderness areas are degraded to a point of affecting the whole system.	XXXX	Once we destroy our forest resources, they are gone, that is, once roads are allowed (including OHV trails) into roadless areas their ecological values are degraded to a point of affecting the whole system, which is already in dire decline from poor management and OHV use.		Motorized Use in Roadless and Wilderness Areas	
Effects of roads	Again, I state, that once we lose the attributes of roadless and wilderness areas we cannot get them back.	Recognize that once roads are allowed into roadless areas, the ecological values and other attributes of roadless and wilderness areas are degraded to a point of affecting the whole system.	XXXX	Again, I state, that once we lose the attributes of roadless and wilderness areas we cannot get them back.		Motorized Use in Roadless and Wilderness Areas	
Leave IRAs alone	It would be less costly to manage these area's by leaving them alone...just the way they are, a place for peace and solitude and not ruined by the hand of man.	Protect inventoried roadless areas (IRAs).	XXXX	It would be less costly to manage these area's by leaving them alone...just the way they are, a place for peace and solitude and not ruined by the hand of man.		No additional Development	

Leave IRAs alone	Our human free wilderness area's all across this nation provide ecosystems that are important to our water, air and land systems. Leave well enough alone or you will be doing an un-service to all who use them and call them home!!	Protect inventoried roadless areas (IRAs).	XXXX	Our human free wilderness area's all across this nation provide ecosystems that are important to our water, air and land systems. Leave well enough alone or you will be doing an un-service to all who use them and call them home!!	No additional Development	
Leave IRAs alone	Under the national Roadless Area Conservation Rule--which Earthjustice and allies fought to preserve for more than a decade--these roadless lands should be safe from damaging road construction and logging.	Protect inventoried roadless areas (IRAs).	XXXX	Under the national Roadless Area Conservation Rule--which Earthjustice and allies fought to preserve for more than a decade--these roadless lands should be safe from damaging road construction and logging.	National Roadless Area Conservation Rule	
Leave IRAs alone	Also by managing Inventoried Roadless Areas (IRAs) under the 2001 Roadless Rule, these areas will not be open for the public to use and enjoy with motorized vehicles. Management under the Roadless Rule, while not as restrictive of human activities as designated "wilderness," will keep many areas from ever being developed.	Protect inventoried roadless areas (IRAs).	XXXX	Also by managing Inventoried Roadless Areas (IRAs) under the 2001 Roadless Rule, these areas will not be open for the public to use and enjoy with motorized vehicles. Management under the Roadless Rule, while not as restrictive of human activities as designated "wilderness," will keep many areas from ever being developed.	National Roadless Area Conservation Rule	
IRAs were released to multiple use	I would suggest that those RARE II lands (roadless area inventory) were (according to the Specialists Report) released for multiple use management . FS management still has the responsibility to manage and use such but does not have authority to make them quasi-wilderness.	RARE II lands were released to multiple use management per the 1984 Wilderness Act. Therefore, these released lands (inventoried roadless areas) should be managed under multiple use and other land management regulations.	XXXX	I would suggest that those RARE II lands (roadless area inventory) were (according to the Specialists Report) released for multiple use management . FS management still has the responsibility to manage and use such but does not have authority to make them quasi-wilderness.	Managing For Multiple Use	PC 1205- 6 The Forest Service should address that the RARE II lands (roadless area inventory) were released for multiple use management and the Forest Service still has the responsibility to manage and use such, but does not have authority to make them quasi-wilderness. The Forest Service should address that retaining them by disregarding the clear

							language of the ACT containing specific congressional exclusions. . . would be improper.
IRAs were released to multiple use	It would have been appropriate for the 1987 Forest Plan to not address roadless areas since they had been released for multiple use. The Congress was clear about not providing special protection near the boundaries.	RARE II lands were released to multiple use management per the 1984 Wilderness Act. Therefore, these released lands (inventoried roadless areas) should be managed under multiple use and other land management regulations.	XXXX	It would have been appropriate for the 1987 Forest Plan to not address roadless areas since they had been released for multiple use. The Congress was clear about not providing special protection near the boundaries.		Managing For Multiple Use	PC 1205- 6 The Forest Service should address that the RARE II lands (roadless area inventory) were released for multiple use management and the Forest Service still has the responsibility to manage and use such, but does not have authority to make them quasi-wilderness. The Forest Service should address that retaining them by disregarding the clear language of the ACT containing specific congressional exclusions. . . would be improper.
IRAs were released to multiple use	I believe consideration of these inventoried roadless areas in the DEIS alternatives even if there were handbook or policy guidance since that guidance would be in conflict with the 1984 Wilderness Act and release language.	RARE II lands were released to multiple use management per the 1984 Wilderness Act. Therefore, these released lands (inventoried roadless areas) should be managed under multiple use and other land management regulations.	XXXX	I believe consideration of these inventoried roadless areas in the DEIS alternatives even if there were handbook or policy guidance since that guidance would be in conflict with the 1984 Wilderness Act and release language.		Conflicts with Wilderness Act	

IRAs were released to multiple use	The responsibility the Forest Service is to manage released lands under the Multiple Use and other land management regulations.	RARE II lands were released to multiple use management per the 1984 Wilderness Act. Therefore, these released lands (inventoried roadless areas) should be managed under multiple use and other land management regulations.	XXXX	The responsibility the Forest Service is to manage released lands under the Multiple Use and other land management regulations.		Multiple Use and other Land Management Regulations	
IRAs were released to multiple use	In 1987 the inventoried roadless areas were history, and I am not aware of any new statutory or executive authority to make subsequent inventories. To bring them back into the current planning revision and disregarding the clear language of the ACT containing specific congressional exclusions...would be improper.	RARE II lands were released to multiple use management per the 1984 Wilderness Act. Therefore, these released lands (inventoried roadless areas) should be managed under multiple use and other land management regulations.	XXXX	In 1987 the inventoried roadless areas were history, and I am not aware of any new statutory or executive authority to make subsequent inventories. To bring them back into the current planning revision and disregarding the clear language of the ACT containing specific congressional exclusions...would be improper.		1987 IRA's	
Complete IRA process	The 1979 RARE II process was performed over 35 years ago. It is about time for the ASNFs to complete the process and either designate or drop the inventoried areas. Stating that the Apache- Sitgreaves NFs are unable to adjust IRA boundaries to remove those portions which no longer have roadless characteristics is not an acceptable determination when the preparation of this plan should address the IRAs once and for all.	The plan should adjust inventoried roadless area (IRA) boundaries to remove those portions which no longer have roadless characteristics. The plan should indicate a timeframe for accomplishment of analysis and designation.	XXXX	The 1979 RARE II process was performed over 35 years ago. It is about time for the ASNFs to complete the process and either designate or drop the inventoried areas. Stating that the Apache- Sitgreaves NFs are unable to adjust IRA boundaries to remove those portions which no longer have roadless characteristics is not an acceptable determination when the preparation of this plan should address the IRAs once and for all.		Rare II	

Complete IRA process	[re: inventoried roadless areas] The ASNFs' plan should indicate a timeframe for accomplishment of analysis and completion of designation actions.	The plan should adjust inventoried roadless area (IRA) boundaries to remove those portions which no longer have roadless characteristics. The plan should indicate a timeframe for accomplishment of analysis and designation.	XXXX	The ASNFs' plan should indicate a timeframe for accomplishment of analysis and completion of designation actions.		Time Line	
Effects - wallow	The Proposed Plan, while providing a detailed description of the desired conditions for each of the various "wilderness" and related land use designations, fails to mention anything concerning the current condition. When reading the Proposed Plan, the public has no baseline (current conditions) to compare the desired conditions to. The desired conditions all appear to be the panacea of no human presence on the land. This disdain for human activities on National Forest lands has overrun the reality of on-the-ground resource management and manifests itself in "Wilderness" Management.	The current condition, including the impacts of the 2011 Wallow Fire, of wilderness should be described in the plan.	** Check out Kaibab, p. 7 last comment & p. 27	The Proposed Plan, while providing a detailed description of the desired conditions for each of the various "wilderness" and related land use designations, fails to mention anything concerning the current condition. When reading the Proposed Plan, the public has no baseline (current conditions) to compare the desired conditions to. The desired conditions all appear to be the panacea of no human presence on the land. This disdain for human activities on National Forest lands has overrun the reality of on-the-ground resource management and manifests itself in "Wilderness" Management.		Current Conditions and Desired Conditions	The Forest Service should add current condition when discussing desired conditions as a baseline to compare the desired conditions to and Plan and implement management based on actual current conditions that will achieve the desired conditions. Human activity on the land should also be discussed.
Effects - wallow	While there is some mention of the recent Wallow Fire in the Wilderness Specialist Report, the impacts of this very destructive wildfire and its long lasting changes to the ecosystems and "wilderness" characteristics of thousands of acres on the Forest are not mentioned in the Proposed Plan	The current condition, including the impacts of the 2011 Wallow Fire, of wilderness should be described in the plan.	XXXX	While there is some mention of the recent Wallow Fire in the Wilderness Specialist Report, the impacts of this very destructive wildfire and its long lasting changes to the ecosystems and "wilderness" characteristics of thousands of acres on the Forest are not mentioned in the Proposed Plan		Impacts from Wallow Fire	

Effects - wallow	While there is some mention of the recent Wallow Fire in the Wilderness Specialist Report, the impacts of this very destructive wildfire and its long lasting changes to the ecosystems and "wilderness" characteristics of thousands of acres on the Forest are not mention in the Proposed Plan.	The current condition, including the impacts of the 2011 Wallow Fire, of wilderness should be described in the plan.	XXXX				
Effects - wallow	The Proposed Plan, while providing a detailed description of the desired conditions for each of the various wilderness and related land use designations, fails to mention anything concerning the current condition. When reading the Proposed Plan, the public has no baseline (current conditions) to compare the desired conditions to.	The current condition, including the impacts of the 2011 Wallow Fire, of wilderness should be described in the plan.	XXXX				
AZGFD- BG-Edit	Plan, Background for "Wilderness, page 120: Add to the first paragraph regarding Mt. Baldy wilderness. "The East Fork Little Colorado River and West Fork Little Colorado River originate on Mt. Baldy and flow throughout the year through this wilderness, providing habitat for the threatened Apache trout." This language mirrors language provided for the Bear Wallow Wilderness and Bear Wallow Creek.	Wilderness Background (proposed plan p. 120) Add to the first paragraph regarding Mt. Baldy wilderness. "The East Fork Little Colorado River and West Fork Little Colorado River originate on Mt. Baldy and flow throughout the year through this wilderness, providing habitat for the threatened Apache trout." This language mirrors language provided for the Bear Wallow Wilderness and Bear Wallow Creek.		Plan, Background for "Wilderness, page 120: Add to the first paragraph regarding Mt. Baldy wilderness. "The East Fork Little Colorado River and West Fork Little Colorado River originate on Mt. Baldy and flow throughout the year through this wilderness, providing habitat for the threatened Apache trout." This language mirrors language provided for the Bear Wallow Wilderness and Bear Wallow Creek.			

Effects on humans	Eagar requests that the Forest Service address the effects of designating new areas of "Wilderness" (and the other areas which restrict human activities) on the human environment. This should include how the restriction of human activities due to land use designations will impact functioning ecosystems and the quality of life that will be experienced by future generations.	Consider the effects of wilderness or other restrictive land use on the human and natural environment. Remove assumptions and conclusions that human activity creates negative impacts on wildlife (DEIS p. 366).	XXXX	Eagar requests that the Forest Service address the effects of designating new areas of "Wilderness" (and the other areas which restrict human activities) on the human environment. This should include how the restriction of human activities due to land use designations will impact functioning ecosystems and the quality of life that will be experienced by future generations.	Effects on Human Environment	PC 1254-3 The Forest Service should address the effects of designating new areas of "Wilderness" (and the other areas which restrict human activities) on the human environment to disclose the effect and impact that the "wilderness" or other restrictive land use designations can have on the environment, water yield and availability, their daily lives as well as future generations due to land use designations that restrict human activities.
Effects on humans	Eagar requests that the Forest Service refrain from basing the future management of the Forest on faulty ideas such as the idea that all human activity automatically creates negative impacts on wildlife and wildlife habitat.	Consider the effects of wilderness or other restrictive land use on the human and natural environment. Remove assumptions and conclusions that human activity creates negative impacts on wildlife (DEIS p. 366).	XXXX	Eagar requests that the Forest Service refrain from basing the future management of the Forest on faulty ideas such as the idea that all human activity automatically creates negative impacts on wildlife and wildlife habitat.	Forest Management	PC 1254-3 The Forest Service should address the effects of designating new areas of "Wilderness" (and the other areas which restrict human activities) on the human environment to disclose the effect and impact that the "wilderness" or other restrictive land use designations can have on the environment, water yield and availability, their daily lives as well as future generations due to land use designations that restrict human activities.
Effects on humans	The Wilderness Specialist Report needs to address the effects on the quality of the human environment, not the effects to the wilderness resources.	Consider the effects of wilderness or other restrictive land use on the human and natural environment. Remove assumptions and conclusions that human activity creates negative impacts on wildlife (DEIS p. 366).	XXXX	The Wilderness Specialist Report needs to address the effects on the quality of the human environment, not the effects to the wilderness resources.	Effects on Human Environment	

Effects on humans	Wilderness Specialist Report, page 11, first paragraph, page 11 Remedy: Revise documents to fairly describe the effects of wilderness or other restrictive land use designations on the human as well as the natural environment.	Consider the effects of wilderness or other restrictive land use on the human and natural environment. Remove assumptions and conclusions that human activity creates negative impacts on wildlife (DEIS p. 366).	XXXX	Wilderness Specialist Report, page 11, first paragraph, page 11 Remedy: Revise documents to fairly describe the effects of wilderness or other restrictive land use designations on the human as well as the natural environment.		Effects of Wilderness on Human and Natural Environment	
Effects on humans	Issue: The DEIS incorrectly presumes that human activity always results in negative impact. (last paragraph, page 366, DEIS): Remedy: Remove presumptive assumptions and conclusions that human activity creates negative impacts on wildlife and wildlife habitat; provide measurement data in cases of actual negative impact	Consider the effects of wilderness or other restrictive land use on the human and natural environment. Remove assumptions and conclusions that human activity creates negative impacts on wildlife (DEIS p. 366).	XXXX	Issue: The DEIS incorrectly presumes that human activity always results in negative impact. (last paragraph, page 366, DEIS): Remedy: Remove presumptive assumptions and conclusions that human activity creates negative impacts on wildlife and wildlife habitat; provide measurement data in cases of actual negative impact		Impacts	PC 1265-13 The Forest Service should remove assumptions and conclusions that human activity creates negative impacts on water yields, wildlife and wildlife habitat, and provide measurement data in cases of actual negative impact.
Effects to fire mgmt	Eagar requests that the Forest Service amend this language to acknowledge that "wilderness" designation will affect the use of fire as a vegetation treatment tool. Burning within designated "wilderness" areas carries with it many more restriction than burning outside of "wilderness". Area access, smoke concerns, camp and helicopter landing areas, use of fire lines to contain and stop the spread of fire are all items that will be impacted by a "wilderness" designation and could prevent the treatment of vegetation within a "wilderness" area.	Acknowledge that wilderness designation will affect the use of fire a vegetation treatment tool (DEIS p. 367).	XXXX	Eagar requests that the Forest Service amend this language to acknowledge that "wilderness" designation will affect the use of fire as a vegetation treatment tool. Burning within designated "wilderness" areas carries with it many more restriction than burning outside of "wilderness". Area access, smoke concerns, camp and helicopter landing areas, use of fire lines to contain and stop the spread of fire are all items that will be impacted by a "wilderness" designation and could prevent the treatment of vegetation within a "wilderness" area.		Burning within Wilderness Areas	PC 1254-2 The Forest Service should address that recommended wilderness would affect the ability to mechanically treat vegetation to restore ecosystems and reduce fuel loading and that area access, smoke concerns, camp and helicopter landing areas, use of fire lines to contain and stop the spread of fire are all items that will be impacted by a "wilderness" designation and could prevent the treatment of vegetation within a "wilderness" area.

Effects to fire mgmt	Issue: The DEIS incorrectly states that wilderness designation will not affect the use of fire as a vegetation treatment tool. (3rd paragraph, page 367, DEIS): Remedy: Remove misleading statements implying that wilderness designation will not affect the use of fire as a vegetation treatment tool.	Acknowledge that wilderness designation will affect the use of fire a vegetation treatment tool (DEIS p. 367).	XXXX	Issue: The DEIS incorrectly states that wilderness designation will not affect the use of fire as a vegetation treatment tool. (3rd paragraph, page 367, DEIS): Remedy: Remove misleading statements implying that wilderness designation will not affect the use of fire as a vegetation treatment tool.	Fire as Vegetation Treatment Tool in Wilderness	PC 1265-4 The Forest Service should remove misleading statements implying that wilderness designation will not affect the use of fire as a vegetation treatment tool.
Effects on resource mgmt	Eagar requests that the Forest Service amend this language so as not to mislead the public by giving the impression that the proposed "wilderness" and other restrictive land use designations will have no direct effects on the management of the Forest. The Forest Service should clearly disclose the effect that the "wilderness" or other restrictive land use designations can have on their daily lives as well as the environment.	Acknowledge that wilderness designation will affect active management practices such as mechanical thinning.	XXXX	Eagar requests that the Forest Service amend this language so as not to mislead the public by giving the impression that the proposed "wilderness" and other restrictive land use designations will have no direct effects on the management of the Forest. The Forest Service should clearly disclose the effect that the "wilderness" or other restrictive land use designations can have on their daily lives as well as the environment.	Effects of Proposed Wilderness on Human and Natural Environment	
Effects on resource mgmt	One of the conflicts with additional wilderness is the extreme difficult with active management practices such as mechanical thinning. As we have said elsewhere in these comments, it is essential that mechanical thinning be available as a tool for forest treatments.	Acknowledge that wilderness designation will affect active management practices such as mechanical thinning.	XXXX	One of the conflicts with additional wilderness is the extreme difficult with active management practices such as mechanical thinning. As we have said elsewhere in these comments, it is essential that mechanical thinning be available as a tool for forest treatments.	Mechanical Thinning	PC 701-1 The Forest Service should address that it is essential that mechanical thinning be available as a tool for forest treatments

Wilderness use	[Alternative B would address public desire for more wilderness by recommending 7,074 acres for inclusion in the National Wilderness Preservation System. Concern: This statement indicates that the public desires more "wilderness". There is no basis for this statement. while there may be a segment of the public that want more lands designated as "wilderness", there is no evidence that the majority desires it.] Eagar requests that the Forest Service simply delete this statement.	Use data regarding what percentage of the public does or does not want more wilderness to inform recommendations for wilderness designation. Delete the statement that indicates the public desires more wilderness (DEIS p. 364)	XXXX	Eagar requests that the Forest Service simply delete this statement.	Missing Information and Corrections to Information	
Wilderness use	Issue: The DEIS fails to disclose that only a minority of the public is in favor of wilderness. DEIS page 364, paragraph one Remedy: Disclose accurate data regarding what percentage of the public does or does not want more wilderness, and reassess recommendations for wilderness designation based upon a false notion that the public wants more wilderness.	Use data regarding what percentage of the public does or does not want more wilderness to inform recommendations for wilderness designation. Delete the statement that indicates the public desires more wilderness (DEIS p. 364)	XXXX	Issue: The DEIS fails to disclose that only a minority of the public is in favor of wilderness. DEIS page 364, paragraph one Remedy: Disclose accurate data regarding what percentage of the public does or does not want more wilderness, and reassess recommendations for wilderness designation based upon a false notion that the public wants more wilderness.	Data Corrections	PC 1265-9 The Forest Service should disclose accurate data regarding what percentage of the public does or does not want more wildernesses, reassess recommendations for wilderness designation based upon a false notion that the public wants more wildernesses, and address the public effect of wilderness
Wilderness use	Page 119 paragraph 4 of chapter 3 in the proposed management plan speaks of wilderness but not of public effect of the same. Less than 6 % of the public uses the wilderness.	Use data regarding what percentage of the public does or does not want more wilderness to inform recommendations for wilderness designation. Delete the statement that indicates the public desires more wilderness (DEIS p. 364)	XXXX	Page 119 paragraph 4 of chapter 3 in the proposed management plan speaks of wilderness but not of public effect of the same. Less than 6 % of the public uses the wilderness.	Effects on Human Environment	"Consumptive Use of Ground Water by Phreatophytes and Hydrophytes" Harry F. Blaney Irrigation Engineer, Western Soil and Water Management Research Branch, Soil and Water Conservation Research Division, Agricultural research Service, USDA because the paper measures the amounts of water loss to the water table

						and surface water due to consumptive use (evapotranspiration) by Phreatophytes and especially the vast consumption by Hydrophytes especially willows and cottonwoods. The Forest Service should add standards that formerly address riparian areas not meeting proper functioning condition because most streams have been
Wilderness Group Size	<p>pg 121 –1st parag. This restriction of party size to 12 and/or 12 head of stock is way too restrictive. If I take my family with a total of 9 and we have 9 horses then we would be in violation. Take out the “or” part of the statement and then up to 12 persons and 12 head of stock is fair.</p> <p>Remember the mountain was made for men ---not men for the mountain. Also, the party size of only 6 persons for overnight camping is totally unrealistic. If I take my family into the wilderness which 3 members of the family do we leave outside the wilderness boundary line? If I take a Boy Scout troop or other youth group into the wilderness and there are 9 boys in the group it would be very difficult to leave several youth behind. This policy is anti-family and anti-youth groups. Most scouting units have more than 6 total particularly when adults leaders are included. Please</p>	<p>The wilderness party size standard is too restrictive: "Party size of 12 persons and/or 12 head of stock for hiking and riding groups in Mount Baldy Wilderness shall not be exceeded. A party size of 6 persons for overnight camping shall not be exceeded" (proposed plan p.121). Concern that it may impact families and scout troops.</p>	XXXX	<p>pg 121 –1st parag. This restriction of party size to 12 and/or 12 head of stock is way too restrictive. If I take my family with a total of 9 and we have 9 horses then we would be in violation. Take out the “or” part of the statement and then up to 12 persons and 12 head of stock is fair.</p> <p>Remember the mountain was made for men ---not men for the mountain. Also, the party size of only 6 persons for overnight camping is totally unrealistic. If I take my family into the wilderness which 3 members of the family do we leave outside the wilderness boundary line? If I take a Boy Scout troop or other youth group into the wilderness and there are 9 boys in the group it would be very difficult to leave several youth behind. This policy is anti-family and anti-youth groups. Most scouting units have more than 6 total particularly when adults leaders are included. Please</p>	Party Size	

	don't allow this restriction to continue.			don't allow this restriction to continue.			
AZGFD-St-Edit	Plan, Standards for Wilderness, page 121: "Party size of 12 persons and/or 12 head of stock for <i>recreational</i> hiking and riding groups in Mount Baldy Wilderness shall not be exceeded. A party size of 6 persons for overnight <i>recreational</i> camping shall not be exceeded." This standard should not apply to wildlife and fisheries management activities (e.g. stream renovation and fish restocking activities)	The party size standards for wilderness and primitive area should not apply to wildlife and fisheries management activities (e.g. stream renovation and fish restocking activities).		Plan, Standards for Wilderness, page 121: "Party size of 12 persons and/or 12 head of stock for <i>recreational</i> hiking and riding groups in Mount Baldy Wilderness shall not be exceeded. A party size of 6 persons for overnight <i>recreational</i> camping shall not be exceeded." This standard should not apply to wildlife and fisheries management activities (e.g. stream renovation and fish restocking activities)			
AZGFD-St-Edit	Plan, Standards for Wilderness, page 121: "Party size of 12 persons and/or 15 head of stock for <i>recreational</i> hiking and riding groups in Escudilla and Bear Wallow Wilderness and the Blue Range Primitive Area shall not be exceeded." This standard should not apply to wildlife and fisheries management activities (e.g. stream renovation and fish restocking activities).	The party size standards for wilderness and primitive area should not apply to wildlife and fisheries management activities (e.g. stream renovation and fish restocking activities).		Plan, Standards for Wilderness, page 121: "Party size of 12 persons and/or 15 head of stock for <i>recreational</i> hiking and riding groups in Escudilla and Bear Wallow Wilderness and the Blue Range Primitive Area shall not be exceeded." This standard should not apply to wildlife and fisheries management activities (e.g. stream renovation and fish restocking activities).			

Wilderness- fire	Issue: The Plan provides conflicting information about ignited fires in wilderness. (Guidelines for Wilderness, page 121, Proposed Plan): Remedy: Correct conflicting guidelines.	Correct conflicting Wilderness guidelines about fire (proposed plan p. 121).	XXXX	Issue: The Plan provides conflicting information about ignited fires in wilderness. (Guidelines for Wilderness, page 121, Proposed Plan): Remedy: Correct conflicting guidelines. Fires should be ignited and managed within designated wilderness with utmost care so "natural fires" do not escape the wilderness and destroy valuable resources that provide benefits to the public.	Conflicting Information on igniting Fires in Wilderness	PC 908-1 The Forest Service should provide clear and understandable guidelines and recommendations and remove/correct conflicting direction in the Proposed Plan to include the conflicting information on igniting fires in the wilderness (page 121), and the recommendations on page 21 (3rd paragraph).
Wilderness - AZGFD	The Department is not opposed to wilderness designations that do not affect our ability to manage wildlife, the public's ability to access public lands, or limits multiple use on public lands.	Provide provisions for AZGFD management in wilderness. Specific actions which may be necessary, and may necessitate the use of motorized equipment, include periodic fish surveys and non-native fish removal utilizing nets or battery and gas powered electrofishing equipment, construction or maintenance of fish barriers, chemical stream renovations, fish stocking, low-level aerial wildlife surveys, research, and law enforcement flights, wildlife capture, construction of temporary release pens, construction and maintenance of wildlife waters, providing salt and mineral supplements, depredation, and wildlife mortality investigations.	**Check out Kaibab p. 4, last comment	The Department is not opposed to wilderness designations that do not affect our ability to manage wildlife, the public's ability to access public lands, or limits multiple use on public lands.	Keep AZ ability to manage wildlife, access public lands, and not limiting multiple use with any Wilderness Designations	PC 1259-1 The Forest Service should address the long-term value to wildlife and the public that wilderness designations may provide, as long as the ability to actively manage wildlife is maintained in these areas, and wilderness designations that do not the State of Arizona's ability to manage wildlife, the public's ability to access public lands, or limits multiple use on public lands.

Wilderness - AZGFD	<p>Although a wilderness designation offers much value, the Department has experienced significant restrictions in its ability to fulfill its public trust responsibilities resulting from such special land use designations. The Department therefore requests that full consideration be given to, and provisions provided, that ensure the ability of the Department to fulfill its public trust responsibilities through active wildlife management within wilderness areas. Specific management actions which may be necessary, and may necessitate the use of motorized equipment include, but are not restricted to: periodic fish surveys and non-native fish removal utilizing nets or battery and gas powered electrofishing equipment, construction or maintenance of fish barriers, chemical stream renovations, fish stocking, low-level aerial wildlife surveys, research, and law enforcement flights, wildlife capture, construction of temporary release pens, construction and maintenance of wildlife waters, providing salt and mineral supplements, depredation, and wildlife mortality investigations.</p>	<p>Provide provisions for AZGFD management in wilderness. Specific actions which may be necessary, and may necessitate the use of motorized equipment, include periodic fish surveys and non-native fish removal utilizing nets or battery and gas powered electrofishing equipment, construction or maintenance of fish barriers, chemical stream renovations, fish stocking, low-level aerial wildlife surveys, research, and law enforcement flights, wildlife capture, construction of temporary release pens, construction and maintenance of wildlife waters, providing salt and mineral supplements, depredation, and wildlife mortality investigations.</p>	<p><b>**Check out Kaibab p. 4, last comment</b></p>	<p>Although a wilderness designation offers much value, the Department has experienced significant restrictions in its ability to fulfill its public trust responsibilities resulting from such special land use designations. The Department therefore requests that full consideration be given to, and provisions provided, that ensure the ability of the Department to fulfill its public trust responsibilities through active wildlife management within wilderness areas. Specific management actions which may be necessary, and may necessitate the use of motorized equipment include, but are not restricted to: periodic fish surveys and non-native fish removal utilizing nets or battery and gas powered electrofishing equipment, construction or maintenance of fish barriers, chemical stream renovations, fish stocking, low-level aerial wildlife surveys, research, and law enforcement flights, wildlife capture, construction of temporary release pens, construction and maintenance of wildlife waters, providing salt and mineral supplements, depredation, and wildlife mortality investigations.</p>	Land Designations	
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Wilderness - AZGFD2	<p>Additionally, the Department must maintain motorized access to and around the dam to adequately monitor and maintain this structure. Inadequate maintenance of this dam can create a safety issue to those using the lake and those downstream of the lake, and presents liabilities that the Department is not willing to assume</p>	<p>Additionally, the Department must maintain motorized access to and around the [Chevelon Lake] dam to adequately monitor and maintain this structure. Inadequate maintenance of this dam can create a safety issue to those using the lake and those downstream of the lake, and presents liabilities that the Department is not willing to assume.</p>	<p><b>**Check out Kaibab p. 4, last comment</b></p>			
Wilderness boundary mgmt	<p>Other comments relate to trespass and unclear boundaries. If these are problems they can be dealt with within current management capabilities. Incidents cited are in 2005 and 2007. Apparently there have not been incidents since . . . or the FS is not capable of monitoring land use. In either situation the addition of MA's which will be treated like wilderness will not solve the problem. If signing is needed or boundary established that should be a current management action. If additional areas were added to adjust boundary for Tool Box Draw it would simply move the boundary. If that is a more desirable way to control access, then I suggest putting the signing at the proposed MA boundary and that will be advance warning of proximity to the wilderness boundary.</p>	<p>Trespass into wilderness and unclear boundaries should be dealt with within current management capabilities.</p>	<p>XXXX</p>	<p>Other comments relate to trespass and unclear boundaries. If these are problems they can be dealt with within current management capabilities. Incidents cited are in 2005 and 2007. Apparently there have not been incidents since . . . or the FS is not capable of monitoring land use. In either situation the addition of MA's which will be treated like wilderness will not solve the problem. If signing is needed or boundary established that should be a current management action. If additional areas were added to adjust boundary for Tool Box Draw it would simply move the boundary. If that is a more desirable way to control access, then I suggest putting the signing at the proposed MA boundary and that will be advance warning of proximity to the wilderness boundary.</p>	<p>Boundaries</p>	<p>PC 1264-1 The Forest Service should monitor land use, and make boundaries clear to prevent trespass instead of treating management areas as wilderness.</p>

Wilderness - remove designation	Eagar requests that the Forest Service remove the "wilderness" designation for areas where the designation was solely based upon the desire to provide recreation opportunities for a select segment of the population that enjoys hiking in "designated 'wilderness'".	Remove wilderness designation for areas where the designation was solely based upon the desire to provide recreation opportunities.	XXXX	Eagar requests that the Forest Service remove the "wilderness" designation for areas where the designation was solely based upon the desire to provide recreation opportunities for a select segment of the population that enjoys hiking in "designated 'wilderness'".	Wilderness Designation Process	
Primitive Area - wilderness recommendation	Eagar requests that the Forest Service stop attempting to add "wilderness" areas to the National Wilderness Preservation System or implement "wilderness" management disguised under some other name. The situation concerning the Blue Range Primitive Area has occurred for too long and the Forest Service should withdraw its recommendation to designate this area as "wilderness" and move forward managing the lands for the various resources values they contain.	The Forest Service should withdraw its recommendation to designate the Blue Range Primitive Area as wilderness and move forward managing the lands for the various resource values they contain.	XXXX	Eagar requests that the Forest Service stop attempting to add "wilderness" areas to the National Wilderness Preservation System or implement "wilderness" management disguised under some other name. The situation concerning the Blue Range Primitive Area has occurred for too long and the Forest Service should withdraw its recommendation to designate this area as "wilderness" and move forward managing the lands for the various resources values they contain.	Blue Range Primitive Area	
Recommended wilderness - fire mgmt	Remedy: Revise Guidelines so that recommended wilderness areas are managed as multiple use lands. Remove the extra burden of implementing arbitrary and potential costly fire management for these lands when nothing requires the change in fire management to take place	Revise recommended wilderness guidelines to manage these areas as multiple use lands.	XXXX	Remedy: Revise Guidelines so that recommended wilderness areas are managed as multiple use lands. Remove the extra burden of implementing arbitrary and potential costly fire management for these lands when nothing requires the change in fire management to take place	Agency Fire Management	

<p>Recommended wilderness - use of chainsaw</p>	<p>Suggest changing forth bullet statement under Guidelines to read: Gasoline powered equipment (i.e., chain saws) may be used for trail maintenance. (Chainsaws don't use a motor. Using the same term as the one used for passenger vehicles will lead to confusion and argument on the part of both public and courts.)</p>	<p>Modify the Recommended Wilderness guideline "Motorized equipment (i.e., chain saws) may be used for trail maintenance" (proposed plan p. 124) by (1) change 'motorized equipment' to 'gasoline powered equipment' and (2) add 'and fence repair'.</p>	<p>** Check out Prescott p. 26 last comment</p>	<p>Suggest changing forth bullet statement under Guidelines to read: Gasoline powered equipment (i.e., chain saws) may be used for trail maintenance. (Chainsaws don't use a motor. Using the same term as the one used for passenger vehicles will lead to confusion and argument on the part of both public and courts.)</p>	<p>Gas Powered Equipment and Trail Maintenance</p>	<p>PC 1263-1 The Forest Service should change the forth bullet statement under Guidelines (Page 124) to read: Gasoline powered equipment (i.e., chain saws) may be used for trail maintenance because chainsaws don't use a motor and using the same term as the one used for passenger vehicles will lead to confusion and argument on the part of both public and courts</p>
<p>Recommended wilderness - use of chainsaw</p>	<p>Pg 124, Guidelines for Recommended Wilderness, 4th bulletin: Motorized equipment (i.e., chainsaws) may be used for trail maintenance and fence repair. Fences are used by hikers, hunters and riders as routes in the wilderness and should be treated as the same as trails. An unmaintained fence is unsightly and dangerous. Lost travelers can follow fence lines to a destination along with routes for search and rescue. Existing wilderness fences need to be up kept and cost, safety and decrease of footprint is good for the wilderness by using chainsaws.</p>	<p>Modify the Recommended Wilderness guideline "Motorized equipment (i.e., chain saws) may be used for trail maintenance" (proposed plan p. 124) by (1) change 'motorized equipment' to 'gasoline powered equipment' and (2) add 'and fence repair'.</p>	<p>** Check out Prescott p. 26 last comment</p>	<p>Pg 124, Guidelines for Recommended Wilderness, 4th bulletin: Motorized equipment (i.e., chainsaws) may be used for trail maintenance and fence repair. Fences are used by hikers, hunters and riders as routes in the wilderness and should be treated as the same as trails. An unmaintained fence is unsightly and dangerous. Lost travelers can follow fence lines to a destination along with routes for search and rescue. Existing wilderness fences need to be up kept and cost, safety and decrease of footprint is good for the wilderness by using chainsaws.</p>	<p>Fence Maintenance Guidelines</p>	<p>PC 1258-2 The Forest Service should address the guidelines on motorized equipment in recommended wilderness to include fences used by hikers, hunters and riders as routes in the wilderness and should be treated the same as trails. Existing wilderness fences need to be up kept and cost, safety and decrease of footprint is good for the wilderness by using chainsaws</p>
<p>Wilderness-like lands - need more/protect</p>	<p>Maintain or expand roadless and wilderness area and restoration of degraded areas should also be a high priority.</p>	<p>There is a need for more protections for wilderness-like type areas (i.e., designated wilderness, primitive area, roadless areas, recommended wilderness, potential wilderness).</p>	<p>XXXX</p>	<p>Maintain or expand roadless and wilderness area and restoration of degraded areas should also be a high priority.</p>	<p>Maintain, Expand and Protect Wilderness</p>	<p>PC 1265-12 The Forest Service should make maintaining or expanding roadless and wilderness areas and restoration of degraded areas a high priority and manage more of the forest as wilderness or primitive areas where natural fire can take its course because</p>

							funds are limited for restoration treatments and prescribed burning. The Forest Service should increase the proposed wilderness addition in Alternative B to wrap around the south side of Terry Flat along the Alpine Wildland Urban Interface (WUI) boundary to Crackerjack Lake, and recommend wilderness on Escudilla Mountain along the lines of the White Mountain Conservation League's 2009 proposal because of its accessibility to urban populations within a half day's drive.
Wilderness-like lands - need more/protect	We need roadless areas and intensive wilderness studies that focus on managing our forests to protect and increase biological diversity. This goal should trump any plans to develop roads that will have a negative impact on habitat.	There is a need for more protections for wilderness-like type areas (i.e., designated wilderness, primitive area, roadless areas, recommended wilderness, potential wilderness).	XXXX	We need roadless areas and intensive wilderness studies that focus on managing our forests to protect and increase biological diversity. This goal should trump any plans to develop roads that will have a negative impact on habitat.		Emphasize Conservation of Biological Diversity	Comment #14.2
Wilderness-like lands - need more/protect	But I'm concerned that the ASNF proposed draft plan may not protect these wild places	There is a need for more protections for wilderness-like type areas (i.e., designated wilderness, primitive area, roadless areas, recommended wilderness, potential wilderness).	XXXX	But I'm concerned that the ASNF proposed draft plan may not protect these wild places		Maintain, Expand and Protect Wilderness	

Wilderness-like lands - need more/protect	We are counting on your agency to make sure that our children and grandchildren and all planetary beings have a wilderness to be in awe of without having to visit a theme park to do it. Please don't let us down.	There is a need for more protections for wilderness-like type areas (i.e., designated wilderness, primitive area, roadless areas, recommended wilderness, potential wilderness).	XXXX	We are counting on your agency to make sure that our children and grandchildren and all planetary beings have a wilderness to be in awe of without having to visit a theme park to do it. Please don't let us down.	Maintain, Expand and Protect Wilderness	PC 1265-7 The Forest Service should add stronger protections for wilderness-quality lands to protect large contiguous habitats, ecological value, their remote nature, spectacular scenery, and protect opportunities for quiet recreation. The Forest Service should protect as wilderness the roadless lands surrounding the Blue Range Primitive Area (specifically Pipestem, Lower San Francisco, Mitchell Peak and Sunset Roadless Areas) and the Leonard Canyon and Chevelon Canyon Roadless units on the Sitgreaves side of the Forest.
Wilderness-like lands - need more/protect	In my opinion, it is way past time to realize if we do not protect our wilderness area's they won't be around for future generations. Forest management needs to use extreme caution when and where logging is to occur. Greed plays too large of a role in this.	There is a need for more protections for wilderness-like type areas (i.e., designated wilderness, primitive area, roadless areas, recommended wilderness, potential wilderness).	XXXX	In my opinion, it is way past time to realize if we do not protect our wilderness area's they won't be around for future generations. Forest management needs to use extreme caution when and where logging is to occur. Greed plays too large of a role in this.	Protection	
Wilderness-like lands - need more/protect	What we need are stronger protections for wilderness-quality lands.	There is a need for more protections for wilderness-like type areas (i.e., designated wilderness, primitive area, roadless areas, recommended wilderness, potential wilderness).	XXXX	What we need are stronger protections for wilderness-quality lands.	Protection	

Wilderness-like lands - need more/potect	not enough protections for wilderness-type areas.	There is a need for more protections for wilderness-like type areas (i.e., designated wilderness, primitive area, roadless areas, recommended wilderness, potential wilderness).	XXXX	not enough protections for wilderness-type areas.		Protect IRA's	PC 1205-7 The Forest Service should maintain, restore degraded areas, and expand roadless and wilderness areas as a high priority to include strengthening protection for these areas because they are an important part of our American heritage as well as a natural ecological laboratory where nature can be observed at work without obstruction. The Forest Service should specifically protect Pipestem, Lower San Francisco, Mitchell Peak and Sunset Inventoried Roadless Areas as potential wilderness in order to protect the largest and most ecologically productive wildland unit on National Forest Lands in Arizona.
Wilderness-like lands - need more/potect	We need to truly protect our biological legacy for our kids and their kids. This means protecting the forest soils and lands still in any state with wild characteristics, this includes roadless and wilderness designated areas.	There is a need for more protections for wilderness-like type areas (i.e., designated wilderness, primitive area, roadless areas, recommended wilderness, potential wilderness).	XXXX	We need to truly protect our biological legacy for our kids and their kids. This means protecting the forest soils and lands still in any state with wild characteristics, this includes roadless and wilderness designated areas.		Protection	
Wilderness-like lands - need more/potect	The same may be said for continued wilderness-type management and eventual Congressional consideration for wilderness designation of the Blue Range Primitive Area and its contiguous roadless areas and the inventoried roadless areas along the Black River,	There is a need for more protections for wilderness-like type areas (i.e., designated wilderness, primitive area, roadless areas, recommended wilderness, potential wilderness).	XXXX	The same may be said for continued wilderness-type management and eventual Congressional consideration for wilderness designation of the Blue Range Primitive Area and its contiguous roadless areas and the inventoried roadless areas along the Black River,		Protect IRA's	

Wilderness-like lands - need more/protect	I am writing in support of the strongest wilderness protections possible for the Apache-Sitgreaves National Forest.	There is a need for more protections for wilderness-like type areas (i.e., designated wilderness, primitive area, roadless areas, recommended wilderness, potential wilderness).	XXXX	I am writing in support of the strongest wilderness protections possible for the Apache-Sitgreaves National Forest.		Maintain, Expand and Protect Wilderness	PC 1265-7 The Forest Service should add stronger protections for wilderness-quality lands to protect large contiguous habitats, ecological value, their remote nature, spectacular scenery, and protect opportunities for quiet recreation. The Forest Service should protect as wilderness the roadless lands surrounding the Blue Range Primitive Area (specifically Pipestem, Lower San Francisco, Mitchel Peak and Sunset Roadless Areas) and the Leonard Canyon and Chevelon Canyon Roadless units on the Sitgreaves side of the Forest.
Wilderness-like lands - need more/protect	Protect all of potential wilderness lands listed under Alternative D.	There is a need for more protections for wilderness-like type areas (i.e., designated wilderness, primitive area, roadless areas, recommended wilderness, potential wilderness).	XXXX				
Wilderness Act - and public access	Issue: The DEIS improperly uses Wilderness Act to bar public from A-S lands. DEIS page 364, paragraph 3: Remedy: Review policy that enables the Wilderness Act to lock the public off of National Forest lands, especially when the lands do not meet the requirements for wilderness designation.	Review areas of recommended wilderness, including additions to the Escudilla Wilderness, that do not meet the requirements for wilderness designation (DEIS p. 364 paragraph 3).	** Check out Prescott p. 60 1st comment	Issue: The DEIS improperly uses Wilderness Act to bar public from A-S lands. DEIS page 364, paragraph 3: Remedy: Review policy that enables the Wilderness Act to lock the public off of National Forest lands, especially when the lands do not meet the requirements for wilderness designation.		Plan and Management Direction	PC 1265-1 The Forest Service should review the policy that enables the Wilderness Act to lock the public off of National Forest lands, especially when the lands do not meet the requirements for wilderness designation, and address that Wilderness areas restrict and limit access for the disabled and aging population.

Wilderness - DEIS correction	Pg 124 , Table 4 – Bear Wallow Wilderness Additions 261 acres- ? page 364 of the Draft EIS shows on the page in 2nd paragraph 88 acres and 172 acres which total 260 - ?	Explain why table 4 (proposed plan p. 124) displays 261 acres for Bear Wallow Wilderness Additions and the DEIS shows 260 acres (p. 364).	XXXX	Pg 124 , Table 4 – Bear Wallow Wilderness Additions 261 acres- ? page 364 of the Draft EIS shows on the page in 2nd paragraph 88 acres and 172 acres which total 260 - ?		Data Corrections	PC 1265-5 The Forest Service should correct the discrepancy in the number of Bear Wallow Wilderness additions from 261 to 260. (Pg. 124 , Table 4 – Bear Wallow Wilderness Additions 261 acres- page 364 of the Draft EIA
Wilderness - access for persons with disabilities	WAs discriminate against the Handicapped and Senior Citizens who no longer can hike mile after mile.	Wilderness areas and recommended wilderness restrict access for senior citizens and persons with disabilities.	XXXX	WAs discriminate against the Handicapped and Senior Citizens who no longer can hike mile after mile.		Access	PC 1265-1 The Forest Service should review the policy that enables the Wilderness Act to lock the public off of National Forest lands, especially when the lands do not meet the requirements for wilderness designation, and address that Wilderness areas restrict and limit access for the disabled and aging population.
Wilderness - access for persons with disabilities	Wilderness areas restrict the ability of the aging population to use the forest especially by limiting the means of access	Wilderness areas and recommended wilderness restrict access for senior citizens and persons with disabilities.	XXXX	Wilderness areas restrict the ability of the aging population to use the forest especially by limiting the means of access		Access	
Wilderness - access for persons with disabilities	Since wilderness areas limit this access for recreation, it is prejudicial to disabled people. It is obvious this is an attempt to satisfy a small segment of people and has lasting effects on public welfare.	Wilderness areas and recommended wilderness restrict access for senior citizens and persons with disabilities.	XXXX	Since wilderness areas limit this access for recreation, it is prejudicial to disabled people. It is obvious this is an attempt to satisfy a small segment of people and has lasting effects on public welfare.		Access	PC 1265-1 The Forest Service should review the policy that enables the Wilderness Act to lock the public off of National Forest lands, especially when the lands do not meet the requirements for wilderness designation, and address that Wilderness areas restrict and limit access for the disabled and aging population.

Wilderness - access for persons with disabilities	The desire by some to expand the Escudilla and other wilderness areas is not necessary. Access needs to remain to all of the current areas where it is now available. It is not fair or equitable to restrict more areas as most people including those who are handicapped and elderly will forever be stopped from entering those areas.	Wilderness areas and recommended wilderness restrict access for senior citizens and persons with disabilities.	XXXX	The desire by some to expand the Escudilla and other wilderness areas is not necessary. Access needs to remain to all of the current areas where it is now available. It is not fair or equitable to restrict more areas as most people including those who are handicapped and elderly will forever be stopped from entering those areas.	Forest Access	PC 2610-5 The Forest Service should address that moving towards the more "historic" condition is neither wise nor feasible because of past management practices, impacts from a larger population, many other circumstance have happened, and many factors are now present and/or are different than they were in "historic" times conceding that we will have impacts to some degree. The Forest Service should numerically quantify as is necessary "so called historic conditions" in today in forest monitoring plan and wisely use our forest. The Forest Service should address the uncertainty of the stated desired conditions could and would be removed if the two basic tenets of "restoration to an unknown historical condition" and the use of the 1987 TES Data" were removed.
Wilderness designation - authority	Congress clearly expressed its intent to not expand them with buffer zones or protection. ONLY Congress/President can designate wilderness lands. So management actions to make them quasi-wilderness and manage them as wilderness is administratively an abuses of discretion.	Explain how the Forest Service has the authority to provide management area guidance for recommended wilderness. Concern is that only Congress can create wilderness areas.	XXXX	Congress clearly expressed its intent to not expand them with buffer zones or protection. ONLY Congress/President can designate wilderness lands. So management actions to make them quasi-wilderness and manage them as wilderness is administratively an abuses of discretion.	Management Direction	

Wilderness designation - authority	Management action to retain those inventoried or new inventoried areas in the plan revision would be administratively improper if not illegal. Allowing special Management Area designation is not the purpose of the DEIS which is to establish current conditions and guidance NOT to “go back and recapture” what Congress already released for multiple use management.	Explain how the Forest Service has the authority to provide management area guidance for recommended wilderness. Concern is that only Congress can create wilderness areas.	XXXX	Management action to retain those inventoried or new inventoried areas in the plan revision would be administratively improper if not illegal. Allowing special Management Area designation is not the purpose of the DEIS which is to establish current conditions and guidance NOT to “go back and recapture” what Congress already released for multiple use management.	Management Direction	
Wilderness designation - authority	Just because there is “some support” for additional wilderness the first question must be who has authority to take action or make recommendations. Direction came from “on high” to perform the RARE II analysis.....recommendations were made by the FS and the Secretary of Agriculture....Congress acted. If decisions are based of “some support” it would be equally true that there is “some support” for not adding areas.	Explain how the Forest Service has the authority to provide management area guidance for recommended wilderness. Concern is that only Congress can create wilderness areas.	XXXX	Just because there is “some support” for additional wilderness the first question must be who has authority to take action or make recommendations. Direction came from “on high” to perform the RARE II analysis.....recommendations were made by the FS and the Secretary of Agriculture....Congress acted. If decisions are based of “some support” it would be equally true that there is “some support” for not adding areas.	Management Direction	
Wilderness designation - authority	I have looked thru your maps and have some concerns. The wilderness areas appear to have been greatly expanded. Also, a lot of de facto wilderness has been added. It is my understanding that Congress is the only one that can create wilderness areas. This seems to be a usurpation of Congressional Authority. Most of these areas have not	Explain how the Forest Service has the authority to provide management area guidance for recommended wilderness. Concern is that only Congress can create wilderness areas.	XXXX	I have looked thru your maps and have some concerns. The wilderness areas appear to have been greatly expanded. Also, a lot of de facto wilderness has been added. It is my understanding that Congress is the only one that can create wilderness areas. This seems to be a usurpation of Congressional Authority. Most of these areas have not	Plan and Management Direction	PC 1265-10 The Forest Service should not add or designate more wilderness areas because Congress is the only one that can create wilderness areas, expanding the Escudilla and other wilderness areas is not necessary, the Forest Service can’t manage what we have, it restricts access by any means other than on foot or by horse, and discriminates against those

	been true wilderness for a long time anyway			been true wilderness for a long time anyway			who are unable to use it.
Justification for wilderness	The DEIS states that "opportunity" for additional wilderness/primitive areas exists; however no justification is provided as to the purpose of designating more.	The DEIS states that "opportunity" for additional wilderness/primitive areas exists; however no justification is provided as to the purpose of designating more.	XXXX				
New Alt - WMCL Escudilla proposal	Making sure to protect as recommended wilderness the maximum additions to Escudilla Wilderness as have been submitted in the citizen proposal by the White Mountain Conservation League and the Arizona Wilderness Coalition.	Complete a conservation vision for Escudilla Mountain that allows for planned vegetation management and motorized access to Terry Flat loop while protecting solitude and quiet wilderness of Escudilla Wilderness: (1) Protect as recommended wilderness the maximum additions to Escudilla Wilderness as submitted by the White Mountain Conservation League and the Arizona Wilderness Coalition, (2) Increase the proposed wilderness addition in Alternative B to wrap around the south side of Terry Flat along Alpine wildland urban interface boundary (WUI) to Crackerjack Lake and the boundary of the Nutrioso WUI, (3) maintain the Hulsey Bench Wildlife Quiet Area and extend	XXXX	Making sure to protect as recommended wilderness the maximum additions to Escudilla Wilderness as have been submitted in the citizen proposal by the White Mountain Conservation League and the Arizona Wilderness Coalition.		Escudilla Mountain	PC 1265-7 The Forest Service should add stronger protections for wilderness-quality lands to protect large contiguous habitats, ecological value, their remote nature, spectacular scenery, and protect opportunities for quiet recreation. The Forest Service should protect as wilderness the roadless lands surrounding the Blue Range Primitive Area (specifically Pipestem, Lower San Francisco, Mitchel Peak and Sunset Roadless Areas) and the Leonard Canyon and Chevelon Canyon Roadless units on the Sitgreaves side of the Forest.

		it into Paddy Creek drainage to eventually share its boundary with the wilderness proposal at Crackerjack Lake.				
New Alt - WMCL Escudilla proposal	Increasing the proposed wilderness addition in Alternative B to wrap around the south side of Terry Flat along the Alpine Wildland Urban Interface (WUI) boundary to Crackerjack Lake.	Complete a conservation vision for Escudilla Mountain that allows for planned vegetation management and motorized access to Terry Flat loop while protecting solitude and quiet wilderness of Escudilla Wilderness: (1) Protect as recommended wilderness the maximum additions to Escudilla Wilderness as submitted by the White Mountain Conservation League and the Arizona Wilderness Coalition, (2) Increase the proposed wilderness addition in Alternative B to wrap around the south side of Terry Flat along Alpine wildland urban interface boundary (WUI) to Crackerjack Lake and the boundary of the Nutrioso WUI, (3) maintain the Hulsey Bench Wildlife Quiet Area and extend it into Paddy Creek drainage to eventually share its boundary with the wilderness proposal at Crackerjack Lake.	XXXX	Increasing the proposed wilderness addition in Alternative B to wrap around the south side of Terry Flat along the Alpine Wildland Urban Interface (WUI) boundary to Crackerjack Lake.	Wilderness Addition and Conservation Vision for Escudilla Mountain	

<p>New Alt - WMCL Escudilla proposal</p>	<p>Hulsey Bench and the Paddy Creek drainage could be managed as planned for in the Nutrioso WUI while still maintaining a quiet area for wildlife and recreationist including hunters.</p>	<p>Complete a conservation vision for Escudilla Mountain that allows for planned vegetation management and motorized access to Terry Flat loop while protecting solitude and quiet wilderness of Escudilla Wilderness: (1) Protect as recommended wilderness the maximum additions to Escudilla Wilderness as submitted by the White Mountain Conservation League and the Arizona Wilderness Coalition, (2) Increase the proposed wilderness addition in Alternative B to wrap around the south side of Terry Flat along Alpine wildland urban interface boundary (WUI) to Crackerjack Lake and the boundary of the Nutrioso WUI, (3) maintain the Hulsey Bench Wildlife Quiet Area and extend it into Paddy Creek drainage to eventually share its boundary with the wilderness proposal at Crackerjack Lake.</p>	<p>XXXX</p>	<p>Hulsey Bench and the Paddy Creek drainage could be managed as planned for in the Nutrioso WUI while still maintaining a quiet area for wildlife and recreationist including hunters.</p>	<p>Keep Existing Areas and Add All Proposed Areas</p>	<p>PC 2717-3 The Forest Service should maintain the existing Hulsey Bench Wildlife Quiet Area and extend in into Paddy Creek drainage to share its boundary with the wilderness proposal at Crackerjack Lake and managed it as planned in the Nutrioso WUI.</p>
<p>New Alt - WMCL Escudilla proposal</p>	<p>Maintaining the existing Hulsey Bench Wildlife Quiet Area and extend it into Paddy Creek drainage to eventually share its boundary with the wilderness proposal at Crackerjack Lake.</p>	<p>Complete a conservation vision for Escudilla Mountain that allows for planned vegetation management and motorized access to Terry Flat loop while protecting solitude and quiet wilderness of Escudilla Wilderness: (1) Protect as recommended wilderness the maximum additions to Escudilla Wilderness as submitted by the White Mountain Conservation League and the Arizona Wilderness</p>	<p>XXXX</p>	<p>Maintaining the existing Hulsey Bench Wildlife Quiet Area and extend it into Paddy Creek drainage to eventually share its boundary with the wilderness proposal at Crackerjack Lake.</p>	<p>Wilderness Addition and Conservation Vision for Escudilla Mountain</p>	

		<p>Coalition, (2) Increase the proposed wilderness addition in Alternative B to wrap around the south side of Terry Flat along Alpine wildland urban interface boundary (WUI) to Crackerjack Lake and the boundary of the Nutrioso WUI, (3) maintain the Hulsey Bench Wildlife Quiet Area and extend it into Paddy Creek drainage to eventually share its boundary with the wilderness proposal at Crackerjack Lake.</p>				
<p>New Alt - WMCL Escudilla proposal</p>	<p>The argument for increasing the amount of recommended wilderness on Escudilla Mountain along the lines of the White Mountain Conservation League's 2009 proposal (probably better conceived than Alt D in the DEIS) seems very compelling, particularly in view of its iconic status nationally as a result of its connection to Leopold and its accessibility to urban populations within a half day's drive.</p>	<p>Complete a conservation vision for Escudilla Mountain that allows for planned vegetation management and motorized access to Terry Flat loop while protecting solitude and quiet wilderness of Escudilla Wilderness: (1) Protect as recommended wilderness the maximum additions to Escudilla Wilderness as submitted by the White Mountain Conservation League and the Arizona Wilderness Coalition, (2) Increase the proposed wilderness addition in Alternative B to wrap around the south side of Terry Flat along Alpine wildland urban interface boundary (WUI) to Crackerjack Lake and the boundary of the Nutrioso WUI, (3) maintain the Hulsey Bench Wildlife Quiet Area and extend it into Paddy Creek drainage to eventually share its boundary with the wilderness proposal at Crackerjack Lake.</p>	<p>XXXX</p>	<p>The argument for increasing the amount of recommended wilderness on Escudilla Mountain along the lines of the White Mountain Conservation League's 2009 proposal (probably better conceived than Alt D in the DEIS) seems very compelling, particularly in view of its iconic status nationally as a result of its connection to Leopold and its accessibility to urban populations within a half day's drive.</p>	<p>Wilderness Addition and Conservation Vision for Escudilla Mountain</p>	

New Alt - WMCL Escudilla proposal	At a minimum, complete a conservation vision for Escudilla Mountain that allows for planned vegetation management and motorized access to the scenic Terry Flat Loop while protecting solitude and quiet wilderness opportunities in the existing Escudilla Wilderness by Increasing the proposed wilderness addition in Alternative B to wrap around the south side of Terry Flat along the Alpine Wildland Urban Interface (WUI) boundary to Crackerjack Lake and the boundary of the Nutrioso WUI.	Complete a conservation vision for Escudilla Mountain that allows for planned vegetation management and motorized access to Terry Flat loop while protecting solitude and quiet wilderness of Escudilla Wilderness: (1) Protect as recommended wilderness the maximum additions to Escudilla Wilderness as submitted by the White Mountain Conservation League and the Arizona Wilderness Coalition, (2) Increase the proposed wilderness addition in Alternative B to wrap around the south side of Terry Flat along Alpine wildland urban interface boundary (WUI) to Crackerjack Lake and the boundary of the Nutrioso WUI, (3) maintain the Hulsey Bench Wildlife Quiet Area and extend it into Paddy Creek drainage to eventually share its boundary with the wilderness proposal at Crackerjack Lake.	XXXX	At a minimum, complete a conservation vision for Escudilla Mountain that allows for planned vegetation management and motorized access to the scenic Terry Flat Loop while protecting solitude and quiet wilderness opportunities in the existing Escudilla Wilderness by Increasing the proposed wilderness addition in Alternative B to wrap around the south side of Terry Flat along the Alpine Wildland Urban Interface (WUI) boundary to Crackerjack Lake and the boundary of the Nutrioso WUI.	Complete Conservation Vision for Escudilla Mountain	PC 2717-3 The Forest Service should maintain the existing Hulsey Bench Wildlife Quiet Area and extend in into Paddy Creek drainage to share its boundary with the wilderness proposal at Crackerjack Lake and managed it as planned in the Nutrioso WUI.
New Alt - WMCL Escudilla proposal	Hulsey Bench and the Paddy Creek drainage could be managed as planned for in the Nutrioso WUI while still maintaining a quiet area for wildlife and recreationist including hunters.	Complete a conservation vision for Escudilla Mountain that allows for planned vegetation management and motorized access to Terry Flat loop while protecting solitude and quiet wilderness of Escudilla Wilderness: (1) Protect as recommended wilderness the maximum additions to Escudilla Wilderness as submitted by the White Mountain Conservation League and the Arizona Wilderness	XXXX	Hulsey Bench and the Paddy Creek drainage could be managed as planned for in the Nutrioso WUI while still maintaining a quiet area for wildlife and recreationist including hunters.	Keep Existing Areas and Add All Proposed Areas	PC 2717-3 The Forest Service should maintain the existing Hulsey Bench Wildlife Quiet Area and extend in into Paddy Creek drainage to share its boundary with the wilderness proposal at Crackerjack Lake and managed it as planned in the Nutrioso WUI.

		Coalition, (2) Increase the proposed wilderness addition in Alternative B to wrap around the south side of Terry Flat along Alpine wildland urban interface boundary (WUI) to Crackerjack Lake and the boundary of the Nutrioso WUI, (3) maintain the Hulsey Bench Wildlife Quiet Area and extend it into Paddy Creek drainage to eventually share its boundary with the wilderness proposal at Crackerjack Lake.				
New Alt - WMCL Escudilla proposal	At a minimum, complete a conservation vision for Escudilla Mountain that allows for planned vegetation management and motorized access to the scenic Terry Flat Loop while protecting solitude and quiet wilderness opportunities in the existing Escudilla Wilderness by: Making sure to protect as recommended wilderness the maximum additions to Escudilla Wilderness as have been submitted in the citizen proposal by the White Mountain Conservation League and the Arizona Wilderness Coalition.	Complete a conservation vision for Escudilla Mountain that allows for planned vegetation management and motorized access to Terry Flat loop while protecting solitude and quiet wilderness of Escudilla Wilderness: (1) Protect as recommended wilderness the maximum additions to Escudilla Wilderness as submitted by the White Mountain Conservation League and the Arizona Wilderness Coalition, (2) Increase the proposed wilderness addition in Alternative B to wrap around the south side of Terry Flat along Alpine wildland urban interface boundary (WUI) to Crackerjack Lake and the boundary of the Nutrioso WUI, (3) maintain the Hulsey Bench Wildlife Quiet Area and extend it into Paddy Creek drainage to eventually share its boundary with the wilderness proposal at Crackerjack Lake.	XXXX	At a minimum, complete a conservation vision for Escudilla Mountain that allows for planned vegetation management and motorized access to the scenic Terry Flat Loop while protecting solitude and quiet wilderness opportunities in the existing Escudilla Wilderness by: Making sure to protect as recommended wilderness the maximum additions to Escudilla Wilderness as have been submitted in the citizen proposal by the White Mountain Conservation League and the Arizona Wilderness Coalition.	Escudilla Mountain	

New Alt - WMCL Escudilla proposal	Maintaining the existing Hulsey Bench Wildlife Quiet Area and extend it into Paddy Creek drainage to eventually share its boundary with the wilderness proposal at Crackerjack Lake	Complete a conservation vision for Escudilla Mountain that allows for planned vegetation management and motorized access to Terry Flat loop while protecting solitude and quiet wilderness of Escudilla Wilderness: (1) Protect as recommended wilderness the maximum additions to Escudilla Wilderness as submitted by the White Mountain Conservation League and the Arizona Wilderness Coalition, (2) Increase the proposed wilderness addition in Alternative B to wrap around the south side of Terry Flat along Alpine wildland urban interface boundary (WUI) to Crackerjack Lake and the boundary of the Nutrioso WUI, (3) maintain the Hulsey Bench Wildlife Quiet Area and extend it into Paddy Creek drainage to eventually share its boundary with the wilderness proposal at Crackerjack Lake.	XXXX	Maintaining the existing Hulsey Bench Wildlife Quiet Area and extend it into Paddy Creek drainage to eventually share its boundary with the wilderness proposal at Crackerjack Lake		Keep Existing Areas and Add All Proposed Areas	
New Alt - WMCL Escudilla proposal	The Citizens' Escudilla Wilderness Additions Proposal should be used to identify potential additional wilderness areas on Escudilla Mountain.	Complete a conservation vision for Escudilla Mountain that allows for planned vegetation management and motorized access to Terry Flat loop while protecting solitude and quiet wilderness of Escudilla Wilderness: (1) Protect as recommended wilderness the maximum additions to Escudilla Wilderness as submitted by the White Mountain Conservation League and the Arizona Wilderness	XXXX				

		Coalition, (2) Increase the proposed wilderness addition in Alternative B to wrap around the south side of Terry Flat along Alpine wildland urban interface boundary (WUI) to Crackerjack Lake and the boundary of the Nutrioso WUI, (3) maintain the Hulsey Bench Wildlife Quiet Area and extend it into Paddy Creek drainage to eventually share its boundary with the wilderness proposal at Crackerjack Lake.				
Recommended wilderness - support BRPA contiguous	The Forest Service should classify the lands that are contiguous to the Blue Range Primitive Area as Potential Wilderness (whether recommended for wilderness or not), so the public agency managers, permit holders, and the public clearly understand the management obligations, objectives and restrictions associated with those unique lands. This will encourage management activities that are compatible with preserving wilderness values and will deflect incompatible projects to occur in more appropriate locations.	The contiguous roadless lands surrounding the Blue Range Primitive Area to the north, west, and south (including the Pipestem, Lower San Francisco, Mitchel Peak, and Sunset Inventoried Roadless Areas) should be recommended for wilderness designation and must be managed to preserve wilderness values per Parker v. U.S.	XXXX	The Forest Service should classify the lands that are contiguous to the Blue Range Primitive Area as Potential Wilderness (whether recommended for wilderness or not), so the public agency managers, permit holders, and the public clearly understand the management obligations, objectives and restrictions associated with those unique lands. This will encourage management activities that are compatible with preserving wilderness values and will deflect incompatible projects to occur in more appropriate locations.		Protect as Recommended Wilderness
Recommended wilderness - support BRPA contiguous	Blue Range Primitive Area (PA) and Contiguous Roadless lands: In February 2008, a coalition comprised of 18 groups and individuals submitted a report entitled "The Blue Range Primitive Area: Its unique place in the Wilderness Preservation System" to the Forest	The contiguous roadless lands surrounding the Blue Range Primitive Area to the north, west, and south (including the Pipestem, Lower San Francisco, Mitchel Peak, and Sunset Inventoried Roadless Areas) should be recommended for wilderness designation and	XXXX			

	<p>Supervisor indicating there is a unique legal obligation for managing the Blue Range PA and all of the contiguous roadless lands to protect wilderness values until Congress eventually acts with regard to the Blue Range PA as is required by the Wilderness Act of 1964. The term "contiguous" is well documented in wilderness case law, referring to those roadless lands that are directly adjacent to a Primitive Area without any separation by a maintained road or other man made development. That paper is attached, and we ask that the content be carefully considered during the Forest Plan Revision process and be included within the public record.</p>	<p>must be managed to preserve wilderness values per Parker v. U.S.</p>				
<p>Recommended wilderness - support canyons</p>	<p>Make sure to protect as recommended wilderness the Leonard Canyon and Chevelon Canyon Roadless units on the Sitgreaves side of the Forest. These canyons exhibit spectacular scenery, and with the high road density on this portion of the Forest it would protect the solitude and quiet recreation opportunities as well as important wildlife corridors.</p>	<p>Leonard Canyon, West Chevelon Canyon, Chevelon Canyon North, Chevelon Canyon, Wildcat Canyon South, Black Canyon, and Chevelon Lake should be recommended for wilderness designation.</p>	<p>XXXX</p>	<p>Make sure to protect as recommended wilderness the Leonard Canyon and Chevelon Canyon Roadless units on the Sitgreaves side of the Forest. These canyons exhibit spectacular scenery, and with the high road density on this portion of the Forest it would protect the solitude and quiet recreation opportunities as well as important wildlife corridors.</p>	<p>Protect as Recommended Wilderness</p>	

Recommended wilderness - support canyons	Protect as recommended wilderness the potential wilderness the seven Sitgreaves units found eligible by Forest Staff (66,463 acres; DEIS:358,360): Leonard Canyon 22,406 acres (includes 2,981 acres on the Coconino NF) West Chevelon Canyon 9,493 acres Chevelon Canyon North 6,673 acres Chevelon Canyon 9,421 acres Wildcat Canyon South 6,972 acres Black Canyon 4,913 acres Chevelon Lake 6,585 acres	Leonard Canyon, West Chevelon Canyon, Chevelon Canyon North, Chevelon Canyon, Wildcat Canyon South, Black Canyon, and Chevelon Lake should be recommended for wilderness designation.	XXXX	Protect as recommended wilderness the potential wilderness the seven Sitgreaves units found eligible by Forest Staff (66,463 acres; DEIS:358,360): Leonard Canyon 22,406 acres (includes 2,981 acres on the Coconino NF) West Chevelon Canyon 9,493 acres Chevelon Canyon North 6,673 acres Chevelon Canyon 9,421 acres Wildcat Canyon South 6,972 acres Black Canyon 4,913 acres Chevelon Lake 6,585 acres	Protect as Recommended Wilderness	
Recommended wilderness - reject	No more Wilderness Areas	There is no need for additional wilderness.	XXXX	No more Wilderness Areas	No More Wilderness	
Recommended wilderness - reject	We do NOT want any more areas designated as wilderness areas not allowing us access to OUR forests.	There is no need for additional wilderness.	XXXX	We do NOT want any more areas designated as wilderness areas not allowing us access to OUR forests.	No More Wilderness	PC 1265-10 The Forest Service should not add or designate more wilderness areas because Congress is the only one that can create wilderness areas, expanding the Escudilla and other wilderness areas is not necessary, the Forest Service can't manage what we have, it restricts access by any means other than on foot or by horse, and discriminates against those who are unable to use it.

Recommended wilderness - reject	nor do we need more wilderness areas.	There is no need for additional wilderness.	XXXX	nor do we need more wilderness areas.		No More Wilderness	PC 1265-10 The Forest Service should not add or designate more wilderness areas because Congress is the only one that can create wilderness areas, expanding the Escudilla and other wilderness areas is not necessary, the Forest Service can't manage what we have, it restricts access by any means other than on foot or by horse, and discriminates against those who are unable to use it.
Recommended wilderness - reject	I am against increasing wilderness areas or adding any special study areas that restrict access by any means other than on foot or by horse.	There is no need for additional wilderness.	XXXX	I am against increasing wilderness areas or adding any special study areas that restrict access by any means other than on foot or by horse.		Access	
Recommended wilderness - reject	The plan proposes additional wilderness areas be established. With the exception of the small acreage addition to the Bear Wallow Wilderness, we opposed any additional wilderness areas, particularly in the absence of a final TMR that will allow fully understanding the changes in allowable recreational usages. The support for the Bear Wallow addition is solely to help better define the boundaries of this wilderness.	There is no need for additional wilderness.	XXXX	The plan proposes additional wilderness areas be established. With the exception of the small acreage addition to the Bear Wallow Wilderness, we opposed any additional wilderness areas, particularly in the absence of a final TMR that will allow fully understanding the changes in allowable recreational usages. The support for the Bear Wallow addition is solely to help better define the boundaries of this wilderness.		Oppose Additional Wilderness Areas	

Recommended wilderness - reject	1. We don't need any more wilderness - Forest Service can't manage what we have	There is no need for additional wilderness.	XXXX	1. We don't need any more wilderness - Forest Service can't manage what we have	No More Wilderness	PC 1265-10 The Forest Service should not add or designate more wilderness areas because Congress is the only one that can create wilderness areas, expanding the Escudilla and other wilderness areas is not necessary, the Forest Service can't manage what we have, it restricts access by any means other than on foot or by horse, and discriminates against those who are unable to use it.
Recommended wilderness - change based on fire	Issue: The DEIS uses circular reasoning for wilderness designation parameters. Wilderness Specialist Report, page 10, second paragraph:" DEIS page 352, paragraph 2 Remedy:_ Change designation of wilderness areas within the Wallow fire that were burned with moderate and high intensity. These areas should be managed to stop further degradation caused by erosion and be re-vegetated as quickly as possible to prevent the loss of their potential to produce PNVTs that will be beneficial to future generations.	Remove wilderness designations and wilderness recommendations for areas within the Wallow Fire that burned with moderate and high intensity. Concern is these areas should be managed to stop further degradation and be re-vegetated.	XXXX	Issue: The DEIS uses circular reasoning for wilderness designation parameters. Wilderness Specialist Report, page 10, second paragraph:" DEIS page 352, paragraph 2 Remedy:_ Change designation of wilderness areas within the Wallow fire that were burned with moderate and high intensity. These areas should be managed to stop further degradation caused by erosion and be re-vegetated as quickly as possible to prevent the loss of their potential to produce PNVTs that will be beneficial to future generations.	Designation of Wilderness Areas within Wallow Fire	
Recommended wilderness - reject Chevelon Lake	Chevelon Lake: Although not included in the Proposed Alternative, the Department does not support the inclusion of Chevelon Lake as a recommended wilderness.	Chevelon Lake should not be recommended for wilderness designation.	XXXX	Chevelon Lake: Although not included in the Proposed Alternative, the Department does not support the inclusion of Chevelon Lake as a recommended wilderness.	Oppose Additional Wilderness Areas	

<p>RNA - affected environment (wallow)</p>	<p>Our other concern dealing with these proposed RNA's is the lack of information provided concerning the current condition of these and the other areas being proposed as RNA's. How much of the area being proposed as RNA's in the Proposed Plan was damaged in the Wallow Fire? Were any of the lands being proposed as RNA's severely impacted by high intensity fire or the erosion and flooding that was a result of the Wallow Fire? These and other questions should be answered in a current condition description in the Proposed Plan.</p>	<p>Clarify the affected environment for the proposed research natural areas (RNAs): (1) amount burned in 2011 Wallow Fire and (2) whether lands were impacted by high intensity fire, erosion, or flooding.</p>	<p>Information about the current conditions within each existing and proposed RNA is presented and discussed in-depth in the Research Natural Areas Specialist Report and in the Research Natural Area Processes for Forest Plan Revisi</p>	<p>Our other concern dealing with these proposed RNA's is the lack of information provided concerning the current condition of these and the other areas being proposed as RNA's. How much of the area being proposed as RNA's in the Proposed Plan was damaged in the Wallow Fire? Were any of the lands being proposed as RNA's severely impacted by high intensity fire or the erosion and flooding that was a result of the Wallow Fire? These and other questions should be answered in a current condition description in the Proposed Plan.</p>	<p>Current Conditions and Desired Conditions</p>	
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			<p>on under the 1982 Planni ng Rule Provisi ons, both of these docum ents are availa ble in the projec t record</p>			
<p>RNA - affecte d environ ment (wallow )</p>	<p>The other concern dealing with these proposed RNA's is the lack of information provided concerning the current condition of these and the other areas being proposed as RNA's. How much of the area being proposed as RNA's in the Proposed Plan was burnt in the Wallow Fire? Were any of the lands being proposed as RNA's severely impacted by high intensity fire or the erosion and flooding that was a result of the Wallow Fire? These and other questions should be answered in a current condition description in the Proposed Plan.</p>	<p>Clarify the affected environment for the proposed research natural areas (RNAs): (1) amount burned in 2011 Wallow Fire and (2) whether lands were impacted by high intensity fire, erosion, or flooding.</p>	<p>Inform ation about the curren t conditi ons within each existin g and propo sed RNA is presen ted and discus sed in- depth</p>	<p>The other concern dealing with these proposed RNA's is the lack of information provided concerning the current condition of these and the other areas being proposed as RNA's. How much of the area being proposed as RNA's in the Proposed Plan was burnt in the Wallow Fire? Were any of the lands being proposed as RNA's severely impacted by high intensity fire or the erosion and flooding that was a result of the Wallow Fire? These and other questions should be answered in a current condition description in the Proposed Plan.</p>	<p>Current Condition of Proposed RNA's</p>	

		<p>in the Resear ch Natur al Areas Specia list Report and in the Resear ch Natur al Area Proces s for Forest Plan Revisi on under the 1982 Planni ng Rule Provisi ons, both of these docum ents are availa ble in the projec t record</p>			
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AZGFD-BG-Edit	<p>Plan, Background for Recommended Research Natural Areas, page 118: The recommended Sandrock Research Natural Area is described as having been excluded from domestic grazing for 25 years. Though the intent was to exclude livestock grazing for the period described, livestock were present on Sandrock throughout the entire period.</p>	<p>Modify Background for Recommended Research Natural Areas (proposed plan p. 118). The recommended Sandrock Research Natural Area is described as having been excluded from domestic grazing for 25 years. Though the intent was to exclude livestock grazing for the period described, livestock were present on Sandrock throughout the entire period.</p>	<p>Plan, Background for Recommended Research Natural Areas, page 118: The recommended Sandrock Research Natural Area is described as having been excluded from domestic grazing for 25 years. Though the intent was to exclude livestock grazing for the period described, livestock were present on Sandrock throughout the entire period.</p>			
AZGFD-DC-Edit	<p>Plan, Desired Conditions for Recommended Research Natural Areas, page 118: "The Three Forks Closure Area (30 acres) of the recommended Three Forks RNA is free from human trampling and other disturbances to protect very sensitive and unique species, such as the Three Forks springsnail, California floater, New Mexico meadow jumping mouse, <i>and</i> Chiricahua leopard frog, <del>and leach minnow.</del>" Loach minnow have never been documented within the actual closure area. Loach minnow have been documented within the mainstem of the East Fork Black River, which runs parallel to but not within or through the closure area. Designated Critical Habitat for loach minnow also exists on the East Fork Black River but not within the closure area.</p>	<p>Modify Recommended Research Natural Areas Desired Condition (proposed plan p. 118) "The Three Forks Closure Area (30 acres) of the recommended Three Forks RNA is free from human trampling and other disturbances to protect very sensitive and unique species, such as the Three Forks springsnail, California floater, New Mexico meadow jumping mouse, <i>and</i> Chiricahua leopard frog, <del>and leach minnow.</del>" Loach minnow have never been documented within the actual closure area. Loach minnow have been documented within the mainstem of the East Fork Black River, which runs parallel to but not within or through the closure area. Designated Critical Habitat for loach minnow also exists on the East Fork Black River but not within the closure area.</p>	<p>Plan, Desired Conditions for Recommended Research Natural Areas, page 118: "The Three Forks Closure Area (30 acres) of the recommended Three Forks RNA is free from human trampling and other disturbances to protect very sensitive and unique species, such as the Three Forks springsnail, California floater, New Mexico meadow jumping mouse, <i>and</i> Chiricahua leopard frog, <del>and leach minnow.</del>" Loach minnow have never been documented within the actual closure area. Loach minnow have been documented within the mainstem of the East Fork Black River, which runs parallel to but not within or through the closure area. Designated Critical Habitat for loach minnow also exists on the East Fork Black River but not within the closure area.</p>			

RNA - wilderness-like designation?	Eagar requests that the Forest Service not attempt to implement "wilderness" management under some other name.	Remove research natural area (RNA) designations. Concern is that it leads to de facto wilderness management.	XXXX	Eagar requests that the Forest Service not attempt to implement "wilderness" management under some other name.		Implementing Wilderness Management	PC 1309-1 The Forest Service should not implement "wilderness" management under some other name.
RNA - wilderness-like designation?	Issue: The Plan misleads the public through the use of non-Wilderness RNA designations to achieve de facto Wilderness designations. (last two paragraph, page 117, Proposed Plan): Remedy: Remove wording and change guidelines that lead to de facto wilderness management disguised as other designations.	Remove research natural area (RNA) designations. Concern is that it leads to de facto wilderness management.	XXXX	Issue: The Plan misleads the public through the use of non-Wilderness RNA designations to achieve de facto Wilderness designations. (last two paragraph, page 117, Proposed Plan): Remedy: Remove wording and change guidelines that lead to de facto wilderness management disguised as other designations.		Research Natural Areas	
RNA - supreme court	There is a proposed "Research Natural Area" (RNA) for the East Fork of the Black River. This spot has been a favorite to people and families who for generations have fished, hiked there. In US v. NM the Supreme Court defined the law as to the limitations of Forest Service's use of water resources and forbid the agency's use of waters for the purposes of such as these "Research Natural Areas". This Supreme Court ruling has not been overturned.	Concern that in U.S. v. NM, the Supreme Court defined the law as to the limitations of Forest Service's use of water resources and forbid the agency's use of waters for the purposes of such as research natural areas.	XXXX				

Scenic Resources	Any link between ecological function and "appearance" or "scenic values" has not been demonstrated.	Explain the link between ecological function and scenic values.	XXXX			
Lands - address road trespasses	The ASNFs should commit to address road trespass, in particular, where private inholdings have alternative legal access across non-Federal lands.	Address road trespass, in particular, where private inholdings have alternative legal access across non-Federal lands.	XXXX	The ASNFs should commit to address road trespass, in particular, where private inholdings have alternative legal access across non-Federal lands.		Address Road Trespass
Lands - recreation residence edit	Lands and Special Uses, Table 133 (129?), Recreation Residence – Table indicates only 7 permits. Is this correct? Just the Little Colorado Recreation Residences total more than 7 permits	Clarify whether the number of recreation residences is correct in table 133 (DEIS p. 393).	XXXX	Lands and Special Uses, Table 133 (129?), Recreation Residence – Table indicates only 7 permits. Is this correct? Just the Little Colorado Recreation Residences total more than 7 permits		Missing Information and Corrections to Information
Special Uses - guideline recommendation 1	Page 101, Guidelines for Special Uses, 11th bullet this page reads: "Large group and recreation event special uses should not be authorized within wilderness, recommended wilderness, primitive area, wildlife quiet areas, eligible "wild" river corridors, Phelps Cabin Botanical Area, Phelps Cabin Research Natural Area, or recommended research natural areas to protect the unique character of these	Modify the Special Uses guideline "Large group and recreation event special uses should not be authorized within wilderness, recommended wilderness, primitive area, wildlife quiet areas, eligible "wild" river corridors, Phelps Cabin Botanical Area, Phelps Cabin Research Natural Area, or recommended research natural areas to protect the unique character of these areas" (proposed plan p. 101)	XXXX	Page 101, Guidelines for Special Uses, 11th bullet this page reads: "Large group and recreation event special uses should not be authorized within wilderness, recommended wilderness, primitive area, wildlife quiet areas, eligible "wild" river corridors, Phelps Cabin Botanical Area, Phelps Cabin Research Natural Area, or recommended research natural areas to protect the unique character of these		Large Group and Recreation Events

	areas." Comment: We recommend excluding or limiting riparian and wetlands areas as sites authorized for large group and recreational special use events, where practicable.	to exclude or limit riparian and wetlands areas as sites authorized for large group and recreational special use events, where practicable.		areas." Comment: We recommend excluding or limiting riparian and wetlands areas as sites authorized for large group and recreational special use events, where practicable.			
Special Uses - guideline recommendation 2	Suggest changing 9th bullet statement to read: Commercial outfitters and guides should not be authorized to use developed campgrounds and developed trailheads so those sites remain available for noncommercial forest visitors.	Modify the Special Uses guideline to read "Commercial outfitters and guides should not be authorized to use developed campgrounds <i>and developed trailheads</i> so those sites remain available for noncommercial forest visitors" (proposed plan 101).	XXXX	Suggest changing 9th bullet statement to read: Commercial outfitters and guides should not be authorized to use developed campgrounds and developed trailheads so those sites remain available for noncommercial forest visitors.		Commercial Outfitters	PC 1409-1 Forest Service should change the 9th bullet statement to read: Commercial outfitters and guides should not be authorized to use developed campgrounds and developed trailheads so those sites remain available for noncommercial forest visitors.
Water resources - recognize community dependence	Water Resources, Special Uses – The fact that small communities (ex., Eagar, Alpine) depend on water sources (wells, springs) located on the ASNFs should be addressed and discussed in this section.	Recognize that small communities (e.g., Eagar, Alpine) depend on water sources (e.g., wells, springs) located on the Apache-Sitgreaves NFs.	XXXX	Water Resources, Special Uses – The fact that small communities (ex., Eagar, Alpine) depend on water sources (wells, springs) located on the ASNFs should be addressed and discussed in this section.		Local Dependence on Water Sources	PC 500-1 The Forest Service should develop and address recovery plans because small communities (ex., Eagar, Alpine) depend on water sources located on the ASNFs.
Lands - purchase	I urge you to select a plan that will protect the greatest amount of biodiversity and will allow you to purchase more land of such a type and quality.	Select a plan that will greatest amount of biodiversity and allow you to purchase more land of such type and quality.	XXXX	I urge you to select a plan that will protect the greatest amount of biodiversity and will allow you to purchase more land of such a type and quality.		Purchase of Land	PC 1411-1 The Forest Service should select a plan that will protect the greatest amount of biodiversity and will allow you to purchase more land of such a type and quality.

Lands - exchange	I urge you strongly to forbid the exchange or sale of any land to any public or private entity for other land.	Forbid the exchange or sale of any land to any public or private entity.	XXXX	I urge you strongly to forbid the exchange or sale of any land to any public or private entity for other land.	Forbid Exchange or Sale of Land	PC 1411-2 The Forest Service should forbid the exchange or sale of any land to any public or private entity for other land.
Permits - signs	Sign – Is the “Greer” sign on the SW corner at the SR260 and SR373 junction permitted? What about the “temporary sign” on the SE corner that was originally placed there to thank the Wallow Fife firefighters and is now promoting Greer community activities? There are numerous private signs (non-standard and unauthorized) located on the ASNFs. Are trespass signs to be permitted or removed.	Explain how non-permitted signs located on the forests are managed.	XXXX	Sign – Is the “Greer” sign on the SW corner at the SR260 and SR373 junction permitted? What about the “temporary sign” on the SE corner that was originally placed there to thank the Wallow Fife firefighters and is now promoting Greer community activities? There are numerous private signs (non-standard and unauthorized) located on the ASNFs. Are trespass signs to be permitted or removed.	Signs	
Cultural resources - historic sites	Though out the plan the "Historic reference Condition" refers to a time period pre-European settlement or right at the beginning of settlement. However, Historic places include not only Indian ruins, but also Ranger stations, fire lookouts and Administrative sites. There are also historic stock driveways from when livestock was first introduced to the forest region, but those stock driveways fail to get mentioned. The Sheep Driveway is one and Grapevine Canyon is another. Those should have a place and be recognized within the plan as	Recognize that historic places include not only Indian ruins, but also ranger stations, fire lookouts, administrative sites, historic stock driveways (Sheep Driveway and Grapevine Canyon), old cabins (Greenwood cabin), and corrals.	** Check out Kaibab, p. 63 last comment	Though out the plan the "Historic reference Condition" refers to a time period pre-European settlement or right at the beginning of settlement. However, Historic places include not only Indian ruins, but also Ranger stations, fire lookouts and Administrative sites. There are also historic stock driveways from when livestock was first introduced to the forest region, but those stock driveways fail to get mentioned. The Sheep Driveway is one and Grapevine Canyon is another. Those should have a place and be recognized within the plan as	Historic Reference Condition and Historic Places	

	well.			well.		
Cultural resources - historic sites	<p>Pg 88 . . . There is a tendency to focus mostly on Native American sites, but there is great interest in historic sites as well. Countless visitors have told me personally, and eco-cultural tourism studies confirm, that many cite as one of the highlights of their travels seeing and photographing cowboys and cows on the forest. I am pleased to see the ranger stations, lookouts, administrative sites and Butterfly Lodge being recognized. There are also a few remaining old cabins, corrals and historic stock driveways from early settlers and when livestock were first introduced to the forest. The Greenwood Cabin , the Sheep Driveway and the Grapevine Canyon Driveway are some of these that fail to be recognized. There may be sites from the early timber industry that should also be included with these in the plan. They are an important part of the forest heritage .Under desired conditions for cultural resources these fit right in and</p>	<p>Recognize that historic places include not only Indian ruins, but also ranger stations, fire lookouts, administrative sites, historic stock driveways (Sheep Driveway and Grapevine Canyon), old cabins (Greenwood cabin), and corrals.</p>	<p><b>** Check out Kaibab , p. 63 last comm ent</b></p>	<p>Pg 88 Cultural Resources Historic cultural resources are of great interest to many visitors to our forest, as well as to many locals. I served on the Four Corners Heritage Council for over ten years and came to realize the importance to our own pride of place and to tourism alike of preserving the places and the memories of prehistoric and historic culture. There is a tendency to focus mostly on Native American sites, but there is great interest in historic sites as well. Countless visitors have told me personally, and eco-cultural tourism studies confirm, that many cite as one of the highlights of their travels seeing and photographing cowboys and cows on the forest. I am pleased to see the ranger stations, lookouts, administrative sites and Butterfly Lodge being recognized. There are also a few remaining old cabins, corrals and historic stock driveways from early settlers and when livestock were first introduced to the forest. The</p>	<p>Expanding Historic Places Included in the Plan</p>	<p>PC 2670-1 The Forest Service should address historic stock driveways, old cabins and corrals (e.g. (The Sheep Driveway, Greenwood Cabin, and Grapevine Canyon) in the plan as well because they are an important part of the forest heritage and they fit in under desired conditions for cultural resources.</p>

	lend themselves easily to interpretation, brochures and heritage programs to share with all the forests' users. They should be included in the plan.			Greenwood Cabin , the Sheep Driveway and the Grapevine Canyon Driveway are some of these that fail to be recognized. There may be sites from the early timber industry that should also be included with these in the plan. They are an important part of the forest heritage .Under desired conditions for cultural resources these fit right in and lend themselves easily to interpretation, brochures and heritage programs to share with all the forests' users. They should be included in the plan.			
Cultural resources - EIS correction	Please note that on page 402 of the PDEIS for the A-S NFLMP in Table 137 you list Protohistoric (Apache) occupation. This should include Yavapai as well. The Yavapai should also be considered in prehistoric.	Correct table 137 (DEIS p. 402) to include Yavapai under protohistoric and prehistoric occupation.	XXXX	Please note that on page 402 of the PDEIS for the A-S NFLMP in Table 137 you list Protohistoric (Apache) occupation. This should include Yavapai as well. The Yavapai should also be considered in prehistoric.		Yavapai	
Cultural resources - mgmt approach	Pg 263 Cultural Resources – possible management action to develop an efficient method to research all culture clearance on ASNF and develop a data base for example like AZGF HabiMap.	Consider using a database like AZGFD HabiMap as an efficient method to research all culture clearances on the Apache-Sitgreaves NFS.	XXXX	Pg 263 Cultural Resources – possible management action to develop an efficient method to research all culture clearance on ASNF and develop a data base for example like AZGF HabiMap.		Cultural Clearances	shows on the page in 2nd paragraph 88 acres and 172 acres which total 260)-

American Indian - traditional forest resources	<p>Issues: The Plan contains many errors and omissions. "Members of affiliated Tribes have access to gather traditional forest resources" (p 54) "Traditional forest resources" is not defined. There is no way to know what it includes, or what difference, if any, non-Tribal activities such as hunting big game, cutting timber, grazing livestock, fishing for Apache trout that occur today might be different from Tribal.</p>	<p>'Members of affiliated Tribes have access to gather traditional forest resources" (p 54). "Traditional forest resources" is not defined.</p>	XXXX	<p>Issues: The Plan contains many errors and omissions. "Members of affiliated Tribes have access to gather traditional forest resources" (p 54) "Traditional forest resources" is not defined. There is no way to know what it includes, or what difference, if any, non-Tribal activities such as hunting big game, cutting timber, grazing livestock, fishing for Apache trout that occur today might be different from Tribal.</p>	Errors and Omissions in Definitions and Terminology	
American Indian - consultation with non-tribes	<p>This provision [affected tribes are consulted] should extend to other people as well some of whom may have important ancestral links to places and artifacts</p>	<p>The provision of consulting tribes during planning and project design to incorporate tribal perspectives and knowledge into decisions should be extended to other people, including those that have ancestral links to places and artifacts.</p>	XXXX	<p>This provision should extend to other people as well some of whom may have important ancestral links to places and artifacts</p>	Ancestral Links	
General effects - forest to climate change	<p>With the carbon-dioxide levels reaching 400ppm and with all the enormously expensive consequences this will mean, how in the world can anybody concerned over government costs be willing to allow yet more destruction of the very trees that help mitigate carbon dioxide in the atmosphere?</p>	<p>The Forest Service must consider and disclose the contribution of foreseeable management activities to climate change including, but not limited to: (1) groundwater extraction; (2) surface water diversions and withdrawals; (3) use of existing roads and trails; (4) construction of new roads and trails; (5) livestock grazing; (6) fire and fuel management; and (7) timber harvest, (8) minerals development, and (9) spread of invasive species.</p>	XXXX	<p>With the carbon-dioxide levels reaching 400ppm and with all the enormously expensive consequences this will mean, how in the world can anybody concerned over government costs be willing to allow yet more destruction of the very trees that help mitigate carbon dioxide in the atmosphere?</p>	Forest Health	

<p>General effects - forest to climate change</p>	<p>Also trees absorb carbon dioxide and produce oxygen for us to breathe. If those trees are cut down, then there will be less oxygen for us to breathe, and more carbon dioxide to support Global Warming and get us poisoned, and even die.</p>	<p>The Forest Service must consider and disclose the contribution of foreseeable management activities to climate change including, but not limited to: (1) groundwater extraction; (2) surface water diversions and withdrawals; (3) use of existing roads and trails; (4) construction of new roads and trails; (5) livestock grazing; (6) fire and fuel management; and (7) timber harvest, (8) minerals development, and (9) spread of invasive species.</p>	<p>XXXX</p>	<p>Also trees absorb carbon dioxide and produce oxygen for us to breathe. If those trees are cut down, then there will be less oxygen for us to breathe, and more carbon dioxide to support Global Warming and get us poisoned, and even die.</p>	<p>Threats and Effects from Climate Change</p>	<p>PC 307-2 The Forest Service should protect environment from the consequences of increased carbon-dioxide levels of global warming by not logging.</p>
<p>General effects - forest to climate change</p>	<p>Potential environmental consequences that may be caused by climate change are highly significant (Malcolm et al. 2007, Millar et al. 2007, Seager et al. 2007). In its EIS on the plan revision, the Forest Service must assess and disclose the potential contribution of multiple resource uses and management activities that may contribute to or compound ongoing changes to the regional and global climate system including, but not limited to: (1) groundwater extraction; (2) surface water diversions and withdrawals; (3) continued use of existing roads and trails; (4) development of new roads and trails; (5) livestock grazing; (6) fire and fuel management; (7) minerals development; (8) logging; and (9) spread of invasive species.</p>	<p>The Forest Service must consider and disclose the contribution of foreseeable management activities to climate change including, but not limited to: (1) groundwater extraction; (2) surface water diversions and withdrawals; (3) use of existing roads and trails; (4) construction of new roads and trails; (5) livestock grazing; (6) fire and fuel management; and (7) timber harvest, (8) minerals development, and (9) spread of invasive species.</p>	<p>** Check out Kaibab p. 89 &amp; Prescott p. 9</p>	<p>Potential environmental consequences that may be caused by climate change are highly significant (Malcolm et al. 2007, Millar et al. 2007, Seager et al. 2007). In its EIS on the plan revision, the Forest Service must assess and disclose the potential contribution of multiple resource uses and management activities that may contribute to or compound ongoing changes to the regional and global climate system including, but not limited to: (1) groundwater extraction; (2) surface water diversions and withdrawals; (3) continued use of existing roads and trails; (4) development of new roads and trails; (5) livestock grazing; (6) fire and fuel management; (7) minerals development; (8) logging; and (9) spread of invasive species.</p>	<p>Effects and Environmental Consequences of Climate Change</p>	

<p>General effects - forest to climate change</p>	<p>The Forest Service must consider and disclose the contribution of foreseeable management activities to climate change including, but not limited to: (1) groundwater extraction; (2) surface water diversions and withdrawals; (3) use of existing roads and trails; (4) construction of new roads and trails; (5) livestock grazing; (6) fire and fuel management; and (7) timber harvest. Conversely, the agency also must consider and disclose foreseeable effects of climate change on the availability of resources that it presumes to be available for the multiple-use program that it envisions for a revised forest plan.</p>	<p>The Forest Service must consider and disclose the contribution of foreseeable management activities to climate change including, but not limited to: (1) groundwater extraction; (2) surface water diversions and withdrawals; (3) use of existing roads and trails; (4) construction of new roads and trails; (5) livestock grazing; (6) fire and fuel management; and (7) timber harvest, (8) minerals development, and (9) spread of invasive species.</p>	<p>** Check out Kaibab p. 89 &amp; Prescott p. 9</p>	<p>The Forest Service must consider and disclose the contribution of foreseeable management activities to climate change including, but not limited to: (1) groundwater extraction; (2) surface water diversions and withdrawals; (3) use of existing roads and trails; (4) construction of new roads and trails; (5) livestock grazing; (6) fire and fuel management; and (7) timber harvest. Conversely, the agency also must consider and disclose foreseeable effects of climate change on the availability of resources that it presumes to be available for the multiple-use program that it envisions for a revised forest plan.</p>	<p>Effects and Environmental Consequences of Climate Change</p>	
<p>General effects - forest to climate change</p>	<p>The Forest Service must consider and disclose the potential environmental consequences and climate change implications resulting from any anticipated continued commercial harvest of timber on our national forests.</p>	<p>The Forest Service must consider and disclose the contribution of foreseeable management activities to climate change including, but not limited to: (1) groundwater extraction; (2) surface water diversions and withdrawals; (3) use of existing roads and trails; (4) construction of new roads and trails; (5) livestock grazing; (6) fire and fuel management; and (7) timber harvest, (8) minerals development, and (9) spread of invasive species.</p>	<p>XXXX</p>	<p>The Forest Service must consider and disclose the potential environmental consequences and climate change implications resulting from any anticipated continued commercial harvest of timber on our national forests.</p>	<p>Disclosure of Information</p>	

<p>Forest Products - max ASQ</p>	<p>Navajo County respectfully requests that the current Alternative B in the Programmatic Draft Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan be rejected as relates to Forest Products. Specifically, under Alternative B: 1) Not enough acres are logged annually for the implementation of ecological restoration at the required pace; 2) Valuable forest products resources are wasted owing to the unnecessary treatment with fire as a thinning tool of acres that can be treated with mechanical thinning; 3) The maximum allowable sale quantity (ASQ) volume of 122,000 CCF per year provides only approximately half the short term foreseeable requirements of the existing or currently developing industry in the White Mountains.</p>	<p>Concern that the maximum allowable sale quantity (ASQ) volumes identified by alternative in the EIS may prove a limiting factor for the continued long term growth of the existing industry, even without considering the Four Forest Restoration Initiative (4FRI) contract. It is unrealistic to expect long term sustained contributions from non-suitable lands to the availability of steady volumes of industrial forest products. Increase the ASQ volume to 450,000 CCF annually, in order implement a restoration program designed to support the existing and currently developing industry in the White Mountains and to simultaneously support the contract(s) expected to result from the second analysis of the 4FRI. To ensure that this higher volume is harvested, follow these strategies for the lifetime of the plan: (1) subordinate the focus on restoring grasslands and other non-suitable timberlands; (2) reduce extensive use of moderate and/or high severity fire as a first entry thinning treatment on suitable timberlands and treat with mechanical harvest instead.</p>	<p>XXXX</p>	<p>Navajo County respectfully requests that the current Alternative B in the Programmatic Draft Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan be rejected as relates to Forest Products. Specifically, under Alternative B: 1) Not enough acres are logged annually for the implementation of ecological restoration at the required pace; 2) Valuable forest products resources are wasted owing to the unnecessary treatment with fire as a thinning tool of acres that can be treated with mechanical thinning; 3) The maximum allowable sale quantity (ASQ) volume of 122,000 CCF per year provides only approximately half the short term foreseeable requirements of the existing or currently developing industry in the White Mountains.</p>	<p>Forest Products</p>	
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<p>Forest Products - max ASQ</p>	<p>Navajo County is therefore concerned that the maximum legally allowable sale quantity (ASQ) volume identified in Alternative C may/will prove inadequate if/when the 4FRI contract is executed IN ADDITION to the requirements of the existing industry. Similarly, but at a lesser level, Navajo County is also concerned that the maximum allowable sale quantity (ASQ) volume identified in Alternative C may prove a limiting factor for the continued long term growth of the existing industry, even without considering the 4FRI contract. This concern is increased by the projections that the Alternative C estimated annual ASQ volume will steadily decrease from 268,000 CCF in the first decade down to 178,000 CCF by the fifth decade of the planning cycle (PDEIS p. 439).</p>	<p>Concern that the maximum allowable sale quantity (ASQ) volumes identified by alternative in the EIS may prove a limiting factor for the continued long term growth of the existing industry, even without considering the Four Forest Restoration Initiative (4FRI) contract. It is unrealistic to expect long term sustained contributions from non-suitable lands to the availability of steady volumes of industrial forest products. Increase the ASQ volume to 450,000 CCF annually, in order implement a restoration program designed to support the existing and currently developing industry in the White Mountains and to simultaneously support the contract(s) expected to result from the second analysis of the 4FRI. To ensure that this higher volume is harvested, follow these strategies for the lifetime of the plan: (1) subordinate the focus on restoring grasslands and other non-suitable timberlands; (2) reduce extensive use of moderate and/or high severity fire as a first entry thinning treatment on suitable timberlands and treat with mechanical harvest instead.</p>	<p>XXXX</p>	<p>Navajo County is therefore concerned that the maximum legally allowable sale quantity (ASQ) volume identified in Alternative C may/will prove inadequate if/when the 4FRI contract is executed IN ADDITION to the requirements of the existing industry. Similarly, but at a lesser level, Navajo County is also concerned that the maximum allowable sale quantity (ASQ) volume identified in Alternative C may prove a limiting factor for the continued long term growth of the existing industry, even without considering the 4FRI contract. This concern is increased by the projections that the Alternative C estimated annual ASQ volume will steadily decrease from 268,000 CCF in the first decade down to 178,000 CCF by the fifth decade of the planning cycle (PDEIS p. 439).</p>	<p>Forest Products</p>	<p>PC 203-6 The Forest Service should include the current provisions of Alternative C as it relates to Forest Products in order to: 1) Increase the number of acres logged annually in order to accelerate the pace of ecological restoration; 2) Increase the amount of forest byproducts resources by prioritizing wherever possible mechanical thinning treatments over fire as a thinning tool treatments; 3) Increase the maximum allowable sale quantity (ASQ) volume to 268,000 CCF per year to meet the short term foreseeable requirements of the existing and currently developing industry in the White Mountains.</p>
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<p>Forest Products - max ASQ</p>	<p>Clearly, under Alternative C the requirements of EITHER the existing and developing industry OR the expected appropriate scale industry recently contracted and to be implemented under the Four Forest Restoration Initiative (4FRI) can be met, but NOT BOTH.</p>	<p>Concern that the maximum allowable sale quantity (ASQ) volumes identified by alternative in the EIS may prove a limiting factor for the continued long term growth of the existing industry, even without considering the Four Forest Restoration Initiative (4FRI) contract. It is unrealistic to expect long term sustained contributions from non-suitable lands to the availability of steady volumes of industrial forest products. Increase the ASQ volume to 450,000 CCF annually, in order implement a restoration program designed to support the existing and currently developing industry in the White Mountains and to simultaneously support the contract(s) expected to result from the second analysis of the 4FRI. To ensure that this higher volume is harvested, follow these strategies for the lifetime of the plan: (1) subordinate the focus on restoring grasslands and other non-suitable timberlands; (2) reduce extensive use of moderate and/or high severity fire as a first entry thinning treatment on suitable timberlands and treat with mechanical harvest instead.</p>	<p>XXXX</p>	<p>Clearly, under Alternative C the requirements of EITHER the existing and developing industry OR the expected appropriate scale industry recently contracted and to be implemented under the Four Forest Restoration Initiative (4FRI) can be met, but NOT BOTH.</p>	<p>Forest Products</p>	<p>PC 203-6 The Forest Service should include the current provisions of Alternative C as it relates to Forest Products in order to: 1) Increase the number of acres logged annually in order to accelerate the pace of ecological restoration; 2) Increase the amount of forest byproducts resources by prioritizing wherever possible mechanical thinning treatments over fire as a thinning tool treatments; 3) Increase the maximum allowable sale quantity (ASQ) volume to 268,000 CCF per year to meet the short term foreseeable requirements of the existing and currently developing industry in the White Mountains.</p>
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<p>Forest Products - max ASQ</p>	<p>Navajo County realizes that the Apache-Sitgreaves National Forests team always has the possibility to initiate an Amendment to its Forest Land Management Plan, but questions whether it would not be more strategic to include in the upcoming Programmatic Final Environmental Impact Statement the analysis and subsequent legal authority for the Responsible Official to meet multiple resources objectives including a maximum allowable sale quantity (ASQ) volume of 450,000 CCF annually.</p>	<p>Concern that the maximum allowable sale quantity (ASQ) volumes identified by alternative in the EIS may prove a limiting factor for the continued long term growth of the existing industry, even without considering the Four Forest Restoration Initiative (4FRI) contract. It is unrealistic to expect long term sustained contributions from non-suitable lands to the availability of steady volumes of industrial forest products. Increase the ASQ volume to 450,000 CCF annually, in order implement a restoration program designed to support the existing and currently developing industry in the White Mountains and to simultaneously support the contract(s) expected to result from the second analysis of the 4FRI. To ensure that this higher volume is harvested, follow these strategies for the lifetime of the plan: (1) subordinate the focus on restoring grasslands and other non-suitable timberlands; (2) reduce extensive use of moderate and/or high severity fire as a first entry thinning treatment on suitable timberlands and treat with mechanical harvest instead.</p>	<p>XXXX</p>	<p>Navajo County realizes that the Apache-Sitgreaves National Forests team always has the possibility to initiate an Amendment to its Forest Land Management Plan, but questions whether it would not be more strategic to include in the upcoming Programmatic Final Environmental Impact Statement the analysis and subsequent legal authority for the Responsible Official to meet multiple resources objectives including a maximum allowable sale quantity (ASQ) volume of 450,000 CCF annually.</p>	<p>Including a Maximum Allowable Sale Quantity</p>	<p>PC 1555-2 The Forest Service should include the analysis to meet multiple resources objectives including a maximum allowable sale quantity (ASQ) volume of 450,000 CCF annually in order to avoid initiating and amendment to the LMP</p>
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WMSP	<p>Discussion: The Agency guaranteed 5000 acres/year to the White Mountain Stewardship project, a ten year program (this is last year). The statement that there is management emphasis for treatment is not the case. The actual treatment is approximately 12% by acreage, which doesn't keep up with growth (growth is currently four times the extraction rate).</p> <p>Remedy: Omit the statement or correct it to reflect the actual circumstances.</p>	<p>Concern that the Forest Service guaranteed 5,000 acres/year to the White Mountain Stewardship project resulting in approximately 12% of the forest actually treated. Thus the Fire Specialist Report statement which says that "since 2001, there has been a management emphasis to treat areas identified in the CWPPs and WUIs" should be removed or corrected.</p>	XXXX				
Forest products - permit	<p>Page 94, Standards for Forest Products: We recommend adding additional information to include conditions on forest product harvest permits that ensure the needs of aquatic and riparian resources, watershed protection, and listed species habitat needs.</p>	<p>Modify the Forest Products standard "Permits which authorize the collection of forest products shall include permit provisions to ensure the needs of wildlife, which depend upon those forest products, will continue to be met (e.g., cone and mushroom collection and the overwinter forage needs of squirrels)" (proposed plan p. 94) to include conditions on forest product harvest permits that ensure the needs of aquatic and riparian resources, watershed protection, and listed species habitat needs.</p>	XXXX	<p>Page 94, Standards for Forest Products: We recommend adding additional information to include conditions on forest product harvest permits that ensure the needs of aquatic and riparian resources, watershed protection, and listed species habitat needs.</p>		<p>Adding Additional Information to Standard</p>	<p>PC 1956-1 The Forest Service should add additional information to include conditions on forest product harvest permits that ensure the needs of aquatic and riparian resources, watershed protection, and listed species habitat needs.</p>

Forest products - logging	Bring Back and leave logging alone so the forest can be groomed	Bring back logging so the forest can be groomed.	** Check out Prescott, p. 20 1st comment	Bring Back and leave logging alone so the forest can be groomed	Forest Restoration and Grooming	
Forest products - Restoration - forest products/industry	This is clearly in contradiction with Navajo County overriding priority of implementing as expeditiously as possible landscape scale restoration.	Forest products management actions should be dictated primarily by the expeditious implementation of landscape scale restoration primarily through mechanical treatments that produce products to sustain the existing forest industry and to allow natural resources-based rural economic development through new infrastructure of small diameter tree utilization at industrial scale. To ensure that this can be done most expeditiously, follow these strategies for the lifetime of the plan: (1) subordinate the focus on scientific silviculture priorities and traditional forestry methods of uneven-aged management and sustained yield of harvest volumes on a regulated non declining even-flow basis for the long term; (2) sustain the social license required for the re-introduction of appropriate scale industry logging activities at the landscape scale in a non-conflictual and non-litigious manner.	XXXX	This is clearly in contradiction with Navajo County overriding priority of implementing as expeditiously as possible landscape scale restoration.	Landscape Scale Restoration	PC 202-8 The Forest Service Should address the contradictions with the County objectives

<p>Forest products - Restoration - forest products/industry</p>	<p>[use of fire] This is also clearly in contradiction with the Navajo County objective of wherever possible, prioritizing forest byproducts treatments (mechanical treatments) funded by economically viable utilization, over non byproducts treatments (fire as first entry thinning treatments) in order to create and sustain the wood supply necessary for a new era of forest products industry-based economic growth and employment in eastern Arizona with multiple industrial scale new investments.</p>	<p>Forest products management actions should be dictated primarily by the expeditious implementation of landscape scale restoration primarily through mechanical treatments that produce products to sustain the existing forest industry and to allow natural resources-based rural economic development through new infrastructure of small diameter tree utilization at industrial scale. To ensure that this can be done most expeditiously, follow these strategies for the lifetime of the plan: (1) subordinate the focus on scientific silviculture priorities and traditional forestry methods of uneven-aged management and sustained yield of harvest volumes on a regulated non declining even-flow basis for the long term; (2) sustain the social license required for the re-introduction of appropriate scale industry logging activities at the landscape scale in a non-conflictual and non-litigious manner.</p>	<p>XXXX</p>	<p>This is also clearly in contradiction with the Navajo County objective of wherever possible, prioritizing forest byproducts treatments (mechanical treatments) funded by economically viable utilization, over non byproducts treatments (fire as first entry thinning treatments) in order to create and sustain the wood supply necessary for a new era of forest products industry-based economic growth and employment in eastern Arizona with multiple industrial scale new investments.</p>	<p>Treatments</p>	<p>PC 202-8 The Forest Service Should address the contradictions with the County objectives</p>
<p>Forest products - Restoration - forest products/industry</p>	<p>However, it will take years if not decades to reestablish the industry and public trust What plan do you have for rebuilding the public trust to ensure the availability of raw materials necessary to supply and to reestablish the needed industry?</p>	<p>Forest products management actions should be dictated primarily by the expeditious implementation of landscape scale restoration primarily through mechanical treatments that produce products to sustain the existing forest industry and to allow natural resources-based rural</p>	<p>XXXX</p>	<p>However, it will take years if not decades to reestablish the industry and public trust What plan do you have for rebuilding the public trust to ensure the availability of raw materials necessary to supply and to reestablish the needed industry?</p>	<p>Forest Products</p>	

		<p>economic development through new infrastructure of small diameter tree utilization at industrial scale. To ensure that this can be done most expeditiously, follow these strategies for the lifetime of the plan: (1) subordinate the focus on scientific silviculture priorities and traditional forestry methods of uneven-aged management and sustained yield of harvest volumes on a regulated non declining even-flow basis for the long term; (2) sustain the social license required for the re-introduction of appropriate scale industry logging activities at the landscape scale in a non-conflictual and non-litigious manner.</p>				
<p>Forest products - Restoration - forest products/industry</p>	<p>Navajo County suggests that forest products management actions for the upcoming planning cycle must be dictated not only by traditional silviculture science and best practices, but primarily by the absolute priority of implementing landscape scale restoration as expeditiously as possible using mechanical treatments that produce the forest products necessary to not only sustain the existing forest industry in the White Mountains, but to allow robust natural resources-based rural economic development through the creation of an entirely new infrastructure of</p>	<p>Forest products management actions should be dictated primarily by the expeditious implementation of landscape scale restoration primarily through mechanical treatments that produce products to sustain the existing forest industry and to allow natural resources-based rural economic development through new infrastructure of small diameter tree utilization at industrial scale. To ensure that this can be done most expeditiously, follow these strategies for the lifetime of the plan: (1) subordinate the focus on scientific silviculture priorities and traditional</p>	<p>XXXX</p>	<p>Navajo County suggests that forest products management actions for the upcoming planning cycle must be dictated not only by traditional silviculture science and best practices, but primarily by the absolute priority of implementing landscape scale restoration as expeditiously as possible using mechanical treatments that produce the forest products necessary to not only sustain the existing forest industry in the White Mountains, but to allow robust natural resources-based rural economic development through the creation of an entirely new infrastructure of</p>	<p>Implementing Landscape Scale Restoration</p>	

	small diameter trees utilization at industrial scale.	forestry methods of uneven-aged management and sustained yield of harvest volumes on a regulated non declining even-flow basis for the long term; (2) sustain the social license required for the re-introduction of appropriate scale industry logging activities at the landscape scale in a non-conflictual and non-litigious manner.		small diameter trees utilization at industrial scale.		
Forest products - Restoration - forest products/industry	Navajo County proposes that both the County and the Apache-Sitgreaves National Forests operate under very specific circumstantial constraints when it comes to forest restoration, in as much as the forest products industry in Arizona is the funding mechanism for landscape scale restoration in eastern Arizona, which imposes the concept of social acceptability or 'social license' for the re-introduction of appropriate scale industry logging activities at the landscape scale on the Apache-Sitgreaves National Forests.	Forest products management actions should be dictated primarily by the expeditious implementation of landscape scale restoration primarily through mechanical treatments that produce products to sustain the existing forest industry and to allow natural resources-based rural economic development through new infrastructure of small diameter tree utilization at industrial scale. To ensure that this can be done most expeditiously, follow these strategies for the lifetime of the plan: (1) subordinate the focus on scientific silviculture priorities and traditional forestry methods of uneven-aged management and sustained yield of harvest volumes on a regulated non declining even-flow basis for the long term; (2) sustain the social license required for the re-introduction of appropriate scale industry logging activities at the landscape scale in a non-	XXXX	Navajo County proposes that both the County and the Apache-Sitgreaves National Forests operate under very specific circumstantial constraints when it comes to forest restoration, in as much as the forest products industry in Arizona is the funding mechanism for landscape scale restoration in eastern Arizona, which imposes the concept of social acceptability or 'social license' for the re-introduction of appropriate scale industry logging activities at the landscape scale on the Apache-Sitgreaves National Forests.		Forest Service Restoration

		conflictual and non-litigious manner.					
Forest products - fuelwood	We, like many people here on the mountain, heat with wood. Shutting us out of the forest and not allowing us to cut wood would cause great hardship. We cannot afford the rising costs of electricity and propane, and don't want the bureaucrats telling us we can't cut wood for our survival.	Do not eliminate ability to cut firewood used to heat homes.	XXXX	We, like many people here on the mountain, heat with wood. Shutting us out of the forest and not allowing us to cut wood would cause great hardship. We cannot afford the rising costs of electricity and propane, and don't want the bureaucrats telling us we can't cut wood for our survival.		Firewood	PC 1558-1 The Forest Service should provide logging opportunities for wood cutting, ensure the availability of raw materials necessary to supply and to reestablish the needed industry, and provide timber sales with sufficient product, quality and value so the operator could do the forest restoration work while making a profit and in order to provide a stumpage income to the Government.
Forest products - multiproduct	With the ever increasing need to manage the forest health, stand densities, fuel loading, species composition, and etc. coupled with the exorbitant cost to pay for this work from taxpayer dollars, the redevelopment of a commodity base would benefit the communities.,. the forest and the taxpayer.	Concern with recent policy of accomplishing forest restoration work by paying contractors to do all the work, while the national deficit increases and budgets diminish. The Forest needs to provide timber sales with sufficient product, quality and value so operators can do forest restoration work while making a profit and in so doing provide stumpage income to the Government. Eliminating certain size classes of timber from consideration needs to be modified in order to establish multiproduct sales that will accomplish restoration. Permit	XXXX	With the ever increasing need to manage the forest health, stand densities, fuel loading, species composition, and etc. coupled with the exorbitant cost to pay for this work from taxpayer dollars, the redevelopment of a commodity base would benefit the communities.,. the forest and the taxpayer.		Commodity Base	

		cutting (including sanitation cuts) of any size material or trees necessary to manage for desired stand conditions (eg, stand densities, fuel loading, species composition, etc.).					
Forest products - multiproduct	With the current National deficit and diminishing budgets, the ability of the Forest to continue paying someone to do forest restoration work is tenuous at best. In the interest of reducing costs and providing an opportunity to reestablish the missing industry, it seems that the Forest eventually needs to provide timber sales with sufficient product, quality and value so the operator could do the forest restoration work while making a profit and in doing so would provide a stumpage income to the Government. Any sane person can see if the Forest can only accomplish forest restoration work by paying someone to do it, that sooner or later the checkbook is going to run dry. Why would any industry come in knowing that tomorrow the checkbook may run dry and product they depend on is no longer available? I recommend that multiproduct sales be established that will accomplish the necessary restoration work that can	Concern with recent policy of accomplishing forest restoration work by paying contractors to do all the work, while the national deficit increases and budgets diminish. The Forest needs to provide timber sales with sufficient product, quality and value so operators can do forest restoration work while making a profit and in so doing provide stumpage income to the Government. Eliminating certain size classes of timber from consideration needs to be modified in order to establish multiproduct sales that will accomplish restoration. Permit cutting (including sanitation cuts) of any size material or trees necessary to manage for desired stand conditions (eg, stand densities, fuel loading, species composition, etc.).	XXXX	I recommend that multiproduct sales be established that will accomplish the necessary restoration work that can actually be sold without the need to pay someone to take it		Funding	

	actually be sold without the need to pay someone to take it					
Livestock grazing - DC - science ecological contribution	The Desired Condition for Livestock Grazing (Plan at 95) is that "Livestock grazing and associated activities contribute to healthy, diverse plant communities, satisfactory soils, and wildlife habitat." NEPA requires you to disclose scientific controversy, and this is an example of one. I am aware of no science that says livestock grazing "contributes" to satisfactory soils and virtually every current study acknowledges that livestock degrade diverse plant communities and wildlife habitat.	Disclose scientific controversy related to the statement "Livestock grazing and associated activities contribute to healthy, diverse plant communities, satisfactory soils, and wildlife habitat" (proposed plan p. 95). Concern is there is no science that says livestock grazing 'contributes' to satisfactory soils and virtually every current study acknowledges that livestock degrade diverse plant communities and wildlife habitat.	** Check out Kaibab p. 76 - 1st comment	The Desired Condition for Livestock Grazing (Plan at 95) is that "Livestock grazing and associated activities contribute to healthy, diverse plant communities, satisfactory soils, and wildlife habitat." NEPA requires you to disclose scientific controversy, and this is an example of one. I am aware of no science that says livestock grazing "contributes" to satisfactory soils and virtually every current study acknowledges that livestock degrade diverse plant communities and wildlife habitat.	Statements of Benefits	PC 1601-1The Forest Service should address that NEPA requires disclosure of scientific controversy, and the statement "Livestock grazing and associated activities contribute to healthy, diverse plant communities, satisfactory soils, and wildlife habitat." (page 95) is an example of one because of no science that says livestock grazing "contributes" to satisfactory soils and virtually every current study acknowledges that livestock degrade diverse plant communities and wildlife habitat.
Livestock grazing - DC - science ecological contribution	We request the supporting documentation by which the Forest would develop and draft a DC which would promote an activity which is scientifically proven to be deleterious to the natural functions of the Forests ecosystems.	Disclose scientific controversy related to the statement "Livestock grazing and associated activities contribute to healthy, diverse plant communities, satisfactory soils, and wildlife habitat" (proposed plan p. 95). Concern is there is no science that says livestock grazing 'contributes' to satisfactory soils and virtually every current study acknowledges that livestock degrade diverse plant communities and wildlife	** Check out Kaibab p. 76 - 1st comment	We request the supporting documentation by which the Forest would develop and draft a DC which would promote an activity which is scientifically proven to be deleterious to the natural functions of the Forests ecosystems.	Documentation for developing and Forest Ecosystem drafting DC	

		habitat.				
Livestock grazing - DC - science ecological contribution	Review of the DEIS and Draft Plan we can find no science based ecological rational for herbivore by non-native species. The only rational we could find for the continuation of grazing by domestic livestock is found in the DIES on page 449, in the section titled Affected Environment, "Grazing on the forests helps to maintain ranching traditions, social customers and local ranching operations".	Disclose scientific controversy related to the statement "Livestock grazing and associated activities contribute to healthy, diverse plant communities, satisfactory soils, and wildlife habitat" (proposed plan p. 95). Concern is there is no science that says livestock grazing 'contributes' to satisfactory soils and virtually every current study acknowledges that livestock degrade diverse plant communities and wildlife habitat.	** Check out Kaibab p. 76 - 1st comment	Review of the DEIS and Draft Plan we can find no science based ecological rational for herbivore by non-native species. The only rational we could find for the continuation of grazing by domestic livestock is found in the DIES on page 449, in the section titled Affected Environment, "Grazing on the forests helps to maintain ranching traditions, social customers and local ranching operations".	Science Based Rational	PC 1600-15 The Forest Service should address why there are no science based ecological rational for herbivore by non-native species when the only rational we could find for the continuation of grazing by domestic livestock is found in the DIES on page 449, in the section titled Affected Environment, "Grazing on the forests helps to maintain ranching traditions, social customers and local ranching operations".
Livestock grazing - DC - science ecological contribution	Further,,,,," Also, it would not allow the attainment of the desired condition for livestock grazing to contribute to the social, economic and cultural diversity and stability of rural communities." We request the Forest provide a detailed explanation to these intrinsic / romantic statements of benefit and how they are so important that they off-set the negative impacts of herbivore by these non-native species within the ecosystems of the Forest.	Explain the statement "Also, it would not allow the attainment of the desired condition for livestock grazing to contribute to the social, economic, and cultural diversity and stability of rural communities" (DEIS p. 15). Concern how these intrinsic/romantic statements of benefit off-set the negative impacts of non-native herbivores.	** Check out Kaibab p. 76 - 1st comment	Further,,,,," Also, it would not allow the attainment of the desired condition for livestock grazing to contribute to the social, economic and cultural diversity and stability of rural communities." We request the Forest provide a detailed explanation to these intrinsic / romantic statements of benefit and how they are so important that they off-set the negative impacts of herbivore by these non-native species within the ecosystems of the Forest.	Statements of Benefits	PC 1601-2 The Forest Service should provide a detailed explanation to the statements of benefit and how they are so important that they off-set the negative impacts of herbivore by these non-native species within the ecosystems of the Forest.

AZGFD-DC-Edit	Plan, Desired Conditions for Livestock Grazing, page 95: "Livestock grazing is in balance with available forage (i.e. grazing and browsing by authorized <i>and unauthorized</i> livestock, wild horses, <i>feral horses and hogs</i> , and wildlife do not exceed available forage production within established use levels)"	Modify Livestock Grazing Desired Conditions (proposed plan p. 95) "Livestock grazing is in balance with available forage (i.e. grazing and browsing by authorized <i>and unauthorized</i> livestock, wild horses, <i>feral horses and hogs</i> , and wildlife do not exceed available forage production within established use levels)"		Plan, Desired Conditions for Livestock Grazing, page 95: "Livestock grazing is in balance with available forage (i.e. grazing and browsing by authorized <i>and unauthorized</i> livestock, wild horses, <i>feral horses and hogs</i> , and wildlife do not exceed available forage production within established use levels)"			
AZGFD-DC-Edit2	Plan, Desired Conditions for Livestock Grazing, page 95: Add "Livestock Grazing does not negatively affect wildlife habitat and populations." This mirrors a desired condition under Managed Recreation on page 69.	Modify Livestock Grazing Desired Conditions (proposed plan p. 95) Add "Livestock Grazing does not negatively affect wildlife habitat and populations." There is a similar desired condition under Managed Recreation on page 69.		Plan, Desired Conditions for Livestock Grazing, page 95: Add "Livestock Grazing does not negatively affect wildlife habitat and populations." This mirrors a desired condition under Managed Recreation on page 69.			
Forage from restoration	Page 89, second paragraph. The DEIS states riparian areas produce very large amounts of forage, and provide water and cooler temperatures. We recommend explaining how forest restoration that opens canopies will be expected to produce additional forage to a degree that would decrease livestock use in riparian areas.	Explain how forest restoration that opens canopies will be expected to produce additional forage to a degree that would decrease livestock use in riparian areas (DEIS p. 89).	XXXX	Page 89, second paragraph. The DEIS states riparian areas produce very large amounts of forage, and provide water and cooler temperatures. We recommend explaining how forest restoration that opens canopies will be expected to produce additional forage to a degree that would decrease livestock use in riparian areas.		Forest Restoration and Additional Forage	PC 2658-3 The Forest Service should address and clearly define how forest restoration that opens canopies will be expected to produce additional forage to a degree that would decrease livestock use in riparian areas.
Effects of grazing	Finally, you have not obtained the needed information to discuss this plan sensibly. You have not obtained soil and riparian and vegetation information, particularly with respect to livestock grazing, that is needed to be able to make the claims you make that these areas will improve with implementation of the new	Obtain soil, riparian, and vegetation information, particularly with respect to livestock grazing, to substantiate claims that areas will improve with implementation of the plan.	XXXX	Finally, you have not obtained the needed information to discuss this plan sensibly. You have not obtained soil and riparian and vegetation information, particularly with respect to livestock grazing, that is needed to be able to make the claims you make that these areas will improve with implementation of the new		Capability Analysis	PC 2800-9 The Forest Service should include information on soil, riparian and vegetation in respect to livestock grazing, and a comparison of historic soil condition in order to support the claim that livestock grazing will improve with implementation of the new plan. The Forest Service should clarify if the discussion on

	plan.			plan.			“Grazing on the Forests helps to maintain ranching traditions, social customs and local ranching operations.” is considering the soil conditions and livestock grazing supports capability and suitability.
Climate change	The Forest Service does not account for this information, which has been repeatedly supplied to it through numerous public comments on allotment-specific management plans.	Consider the anticipated continuation of livestock grazing and its contribution to climate change. Disclose effects from herbivory by non-native species in both wet as well as drought periods.	**Check out Prescott p. 23	The Forest Service does not account for this information, which has been repeatedly supplied to it through numerous public comments on allotment-specific management plans.		Account for Information on Allotment Specific Management Plans	
Climate change	The Forest Service must also consider the anticipated continuation of any livestock grazing and its contribution to climate change. A recent report from the Food and Agriculture Organization of the United Nations found that livestock are responsible for eighteen percent of greenhouse gas emissions, representing a larger share than that of transport (Steinfeld et al. 2006). Livestock grazing is widespread on national forest lands, and the contribution of grazing to climate change must be assessed and disclosed (see, e.g., Beschta et al. 2012).	Consider the anticipated continuation of livestock grazing and its contribution to climate change. Disclose effects from herbivory by non-native species in both wet as well as drought periods.	**Check out Prescott p. 23	The Forest Service must also consider the anticipated continuation of any livestock grazing and its contribution to climate change. A recent report from the Food and Agriculture Organization of the United Nations found that livestock are responsible for eighteen percent of greenhouse gas emissions, representing a larger share than that of transport (Steinfeld et al. 2006). Livestock grazing is widespread on national forest lands, and the contribution of grazing to climate change must be assessed and disclosed (see, e.g., Beschta et al. 2012).		Include in Analysis	

Climate change	The ASNF must analyze and provide to the public the effects of mid to small scale climate change, wet periods to that of drought periods. How these changes in moisture regimes effect the ecosystems on the Forest as well as the key elements within those ecosystems,,,, AND the effects of herbivore by non-natives in both the wet as well as drought periods.	Consider the anticipated continuation of livestock grazing and its contribution to climate change. Disclose effects from herbivory by non-native species in both wet as well as drought periods.	<b>**Check out Prescott p. 23</b>	The ASNF must analyze and provide to the public the effects of mid to small scale climate change, wet periods to that of drought periods. How these changes in moisture regimes effect the ecosystems on the Forest as well as the key elements within those ecosystems,,,, AND the effects of herbivore by non-natives in both the wet as well as drought periods.	Climate Effects to Range Suitability	PC 2800-3 The Forest Service should address moisture cycles, and the effects of mid to small scale climate change and how these changes effect the key elements of ecosystems
Climate change	The Forest must provide site specific science which clearly demonstrates that herbivore by non-native species during prolonged periods of drought is not deleterious to native systems and species – both plant and animal.	Consider the anticipated continuation of livestock grazing and its contribution to climate change. Disclose effects from herbivory by non-native species in both wet as well as drought periods.	<b>**Check out Prescott p. 23</b>	The Forest must provide site specific science which clearly demonstrates that herbivore by non-native species during prolonged periods of drought is not deleterious to native systems and species – both plant and animal.	Non-Native Species	PC 2800-3 The Forest Service should address moisture cycles, and the effects of mid to small scale climate change and how these changes effect the key elements of ecosystems
Effects of grazing 2	We note that footnote 1 of page 16 states that the Forest Service anticipates increases in frequency of intense storms, wildfire, nonnative invasive species, and demand for increasing water supplies. Every one of these is strongly implicated by livestock grazing and the chronic impacts livestock cause to soil productivity, water quantity and quality, soil stability, forest fires, and invasive species. These impacts need to be addressed.	Address the impacts of livestock grazing including: soil productivity, water quantity and quality, soil stability, forest fires, and invasive or non-native species.	<b>**Check out Kaibab p. 37, 3rd comment &amp; p. 69 2nd comment</b>	We note that footnote 1 of page 16 states that the Forest Service anticipates increases in frequency of intense storms, wildfire, nonnative invasive species, and demand for increasing water supplies. Every one of these is strongly implicated by livestock grazing and the chronic impacts livestock cause to soil productivity, water quantity and quality, soil stability, forest fires, and invasive species. These impacts need to be addressed.	Impacts from Livestock Grazing	PC 1600-13 The Forest Service needs to address the impacts from anticipated increases in frequency of intense storms, wildfire, nonnative invasive species, and demand for increasing water supplies. The Forest Service should address that every one of these is strongly implicated by livestock grazing and the chronic impacts livestock cause to soil productivity, water quantity and quality, soil stability, forest fires, and invasive species.

Effects of grazing 2	After knowing how much forage and water are removed annually by these non-native species how is it possible for any Forest Service employee to say, that cows have little to no impact on the land or any aspect of the ASNF ecosystems?	Address the impacts of livestock grazing including: soil productivity, water quantity and quality, soil stability, forest fires, and invasive or non-native species.	** Check out Kaibab p. 37, 3rd comment & p. 69 2nd comment	After knowing how much forage and water are removed annually by these non-native species how is it possible for any Forest Service employee to say, that cows have little to no impact on the land or any aspect of the ASNF ecosystems?	Non-Native Species	PC 2800-6 The Forest Service should consider the amount of forage and water removed annually by non-native species and the impact it has on the land and ecosystems in the capability assessment.
Effects of grazing 2	The Forest must prove that use by non-native species; cows and elk have not historically, are not today nor will in the foreseeable future be a detriment to the natural functions of the ecosystems of the ASNF. Proof is through ecosystem specific scientific literature NOT the arbitrary decisions of a forest service employee.	Address the impacts of livestock grazing including: soil productivity, water quantity and quality, soil stability, forest fires, and invasive or non-native species.	** Check out Kaibab p. 37, 3rd comment & p. 69 2nd comment	The Forest must prove that use by non-native species; cows and elk have not historically, are not today nor will in the foreseeable future be a detriment to the natural functions of the ecosystems of the ASNF. Proof is through ecosystem specific scientific literature NOT the arbitrary decisions of a forest service employee.	Non-Native Species	2800-8 The Forest Service should provide the following information in the DEIS for grazing by elk and domestic livestock to continue on the forest: 1) add a specific distance to water as a new criteria in the determination of lands capable of supporting livestock 2) Add a requirement that there is a quantitative and qualitative analysis that there is adequate availability of open and ample water supply for livestock and native wildlife prior to issuance any AOI. 3) Both of the requirements start immediately on all allotments when the plan is approved. 4) use by non-native species is not a detriment to the natural functions of the ecosystems through ecosystem specific scientific literature.

Effects of range developments	The analysis should take a hard look at effects of foreseeable range “improvements” to the environment, propose standards and guidelines to limit their impact, quantify the financial cost to taxpayers that may result, and specify any source of appropriated funds that the Forest Service intends to use to pay for them.	Take a hard look at the effects of foreseeable range improvements to the environment. Propose standards and guidelines to limit their impact, quantify the financial cost to taxpayers that may result, and specify any source of appropriated funds that the Forest Service intends to use to pay for them.	XXXX	The analysis should take a hard look at effects of foreseeable range “improvements” to the environment, propose standards and guidelines to limit their impact, quantify the financial cost to taxpayers that may result, and specify any source of appropriated funds that the Forest Service intends to use to pay for them.		Economic Impacts	
Livestock grazing suitability - soil condition	With just 1,016,000 acres considered Satisfactory, the ASNF is still permitting and actively promoting herbivore by non- native species both livestock and elk grazing on 700,000 to 900,000 acres which are classified as Impaired, Un-Satisfactory & Inherently Unstable. One must question how serious the Forest is on actually improving soil conditions or are they more concerned with keeping the ranching lifestyle on the Forest ?	Explain how the Forest Service can improve soil conditions while still permitting herbivory by non-native species both livestock and elk grazing.	** Check out Prescott p. 23	With just 1,016,000 acres considered Satisfactory, the ASNF is still permitting and actively promoting herbivore by non- native species both livestock and elk grazing on 700,000 to 900,000 acres which are classified as Impaired, Un-Satisfactory & Inherently Unstable. One must question how serious the Forest is on actually improving soil conditions or are they more concerned with keeping the ranching lifestyle on the Forest ?		Soil Conditions	
Livestock grazing suitability - soil condition	The question becomes is the use of these public lands by domestic livestock a correct use given; § Cows and elk ( at there current population levels), are a non-native species, they do not fill any ecological gap left by the extirpation of a species such as bison, the ASNF must detail what ecological benefit these species bring to the ecosystems they inhabit on the ASNF ? § Cows and elk are competing	Explain how the Forest Service can improve soil conditions while still permitting herbivory by non-native species both livestock and elk grazing.	** Check out Prescott p. 23				

	<p>with native wildlife for forage and water, where is the site specific science to prove this use, part of it private for commercial gain is not detrimental to native species and there ecosystems ?</p> <p>§ The current drought, which requires some permittees to haul water for their livestock, if there is not enough moisture to fill stock ponds adequately how can there be enough moisture to support adequate growth of the small plant community ?</p>					
Integrate science	<p>Integrate the scientific research and implement the science-based recommendations developed by rangelands resources management peer-reviewed expert scientists such as Allan Savory of the Savory Institute; Steve Rich of the Rangeland Restoration Academy; Eric Schwennesen of Resource Management International; Dr. Lamar Smith, Associate Professor Emeritus at the University of Arizona; Dr. Jerry Holechek, Professor at New Mexico State University; and Dr. J. Wayne Burkhardt, Professor Emeritus at University of Nevada, Reno.</p>	<p>Integrate the scientific research and implement the science-based recommendations developed by rangelands resources management peer-reviewed expert scientists such as Allan Savory of the Savory Institute; Steve Rich of the Rangeland Restoration Academy; Eric Schwennesen of Resource Management International; Dr. Lamar Smith, Associate Professor Emeritus at the University of Arizona; Dr. Jerry Holechek, Professor at New Mexico State University; and Dr. J. Wayne Burkhardt, Professor Emeritus at University of Nevada, Reno. Also include information from the National Riparian Team.</p>	<p>** Check out Prescott p. 38 last comment</p>			

Integrate science	<p>I notice here and through the entire plan that there seem to be no sources used for grazing or riparian management other than your own in house publications. There has been much well documented research done in recent years by well qualified universities and range scientists that should not be ignored. Your own staff collaboratively worked with the University of Arizona range staff, local permittees and other groups and agencies to develop the scientifically backed Guide to Rangeland Monitoring and Assessment. Why then do you not reference it and apply it in your plan? The National Riparian Team has worked here in our area and has some well respected papers published with the latest documented findings on riparian management that might be helpful to incorporate.</p>	<p>Integrate the scientific research and implement the science-based recommendations developed by rangelands resources management peer-reviewed expert scientists such as Allan Savory of the Savory Institute; Steve Rich of the Rangeland Restoration Academy; Eric Schwennesen of Resource Management International; Dr. Lamar Smith, Associate Professor Emeritus at the University of Arizona; Dr. Jerry Holechek, Professor at New Mexico State University; and Dr. J. Wayne Burkhardt, Professor Emeritus at University of Nevada, Reno. Also include information from the National Riparian Team.</p>	<p>** Check out Prescott p. 38 last comment</p>			
Integrate science	<p>Page 96: Guidelines for Livestock Grazing: see opening comments. It is extremely problematic that an entire set of management regulations for a particular class of land stewardship, is based on so little science. Example: in the heading above: what is the format scientifically tested, validated, universal definition of "grazing"? Since there appears not to be one, how</p>	<p>Integrate the scientific research and implement the science-based recommendations developed by rangelands resources management peer-reviewed expert scientists such as Allan Savory of the Savory Institute; Steve Rich of the Rangeland Restoration Academy; Eric Schwennesen of Resource Management International; Dr. Lamar Smith, Associate</p>	<p>** Check out Prescott p. 38 last comment</p>			

	can there be valid guidelines for the management of it?	Professor Emeritus at the University of Arizona; Dr. Jerry Holechek, Professor at New Mexico State University; and Dr. J. Wayne Burkhardt, Professor Emeritus at University of Nevada, Reno. Also include information from the National Riparian Team.					
Integrate science	Integrate the scientific research and implement the science-based recommendations developed by rangelands resources management peer-reviewed expert scientists such as Dr. Lamar Smith, Associate Professor Emeritus at the University of Arizona.	Integrate the scientific research and implement the science-based recommendations developed by rangelands resources management peer-reviewed expert scientists such as Allan Savory of the Savory Institute; Steve Rich of the Rangeland Restoration Academy; Eric Schwennesen of Resource Management International; Dr. Lamar Smith, Associate Professor Emeritus at the University of Arizona; Dr. Jerry Holechek, Professor at New Mexico State University; and Dr. J. Wayne Burkhardt, Professor Emeritus at University of Nevada, Reno. Also include information from the National Riparian Team.	** Check out Prescott p. 38 last comment				
available rangeland	The statement that "available" rangeland may vary by alternative must be clarified as to its meaning and how it varies from one alternative to another.	The statement that available rangeland may vary by alternative must be clarified as to its meaning and how it varies from one alternative to another.	XXXX				

Forage reserves - support	The Department supports the objective of establishing forage reserves as opportunities arise.	Support for establishing forage reserves as opportunities arise (proposed plan p. 96).	XXXX	The Department supports the objective of establishing forage reserves as opportunities arise.		Establishing Forage Reserves
Forage reserves - reject	Under desired conditions for livestock grazing and the objectives for livestock grazing, the plan speaks about establishing forage reserves. The plan states , Forage reserves are available and provide forage to allow for management activities and/or natural ecological processes." The objective for livestock grazing states, Within the planning period, and as opportunities arise, establish at least one forage reserve on each ranger district." This idea is not necessary. Extra forage exists currently and most often can be found within existing allotments. Should a natural process require livestock be moved from the current allotment or pasture within the allotment, extra forage can temporarily be found on neighboring allotments or unused/unstocked allotments. An allotment that is pulled out of an active permit quickly becomes dilapidated regarding upkeep of infrastructure and proves to be unable to be used immediately any way. Forage	The establishment of forage reserves is not necessary (proposed plan p. 96).	XXXX	Under desired conditions for livestock grazing and the objectives for livestock grazing, the plan speaks about establishing forage reserves. The plan states , Forage reserves are available and provide forage to allow for management activities and/or natural ecological processes." The objective for livestock grazing states, Within the planning period, and as opportunities arise, establish at least one forage reserve on each ranger district." This idea is not necessary. Extra forage exists currently and most often can be found within existing allotments. Should a natural process require livestock be moved from the current allotment or pasture within the allotment, extra forage can temporarily be found on neighboring allotments or unused/unstocked allotments. An allotment that is pulled out of an active permit quickly becomes dilapidated regarding upkeep of infrastructure and proves to be unable to be used immediately any way. Forage		Establishing Forage Reserves  PC 1605-2 The Forest Service should support establishing forage reserves as opportunities arise because reserves can significantly aid in the facilitation of forest and grassland restoration activities by providing forage to livestock and wildlife where such activities would impact localized, short-term forage availability. The A-S should also consider allowing for the utilization of forage reserves by permittees conducting habitat restoration on their Arizona State Land Department leases and private grazing lands when conducted as part of a landscape scale restoration project.

	reserves should not be incorporated in the plan .			reserves should not be incorporated in the plan .			
Forage reserves - reject	<p>Livestock Grazing pgs 95 and 96 Under desired conditions for livestock grazing and the objectives for livestock grazing, the plan speaks about establishing forage reserves. The plan states , Forage reserves are available and provide forage to allow for management activities and/or natural ecological processes." The objective for livestock grazing states , Within the planning period, and as opportunities arise, establish at least one forage reserve on each ranger district." This idea is not necessary. Extra forage exists currently and most often can be found within existing allotments. Should a natural process require livestock be moved from the current allotment or pasture within the allotment, extra forage can temporarily be found on neighboring allotments or unused/unstocked allotments. An allotment that is pulled out of an active permit quickly becomes dilapidated regarding upkeep of infrastructure and proves to be unable to be used</p>	<p>The establishment of forage reserves is not necessary (proposed plan p. 96).</p>	XXXX	<p>Livestock Grazing pgs 95 and 96 Under desired conditions for livestock grazing and the objectives for livestock grazing, the plan speaks about establishing forage reserves. The plan states , Forage reserves are available and provide forage to allow for management activities and/or natural ecological processes." The objective for livestock grazing states , Within the planning period, and as opportunities arise, establish at least one forage reserve on each ranger district." This idea is not necessary. Extra forage exists currently and most often can be found within existing allotments. Should a natural process require livestock be moved from the current allotment or pasture within the allotment, extra forage can temporarily be found on neighboring allotments or unused/unstocked allotments. An allotment that is pulled out of an active permit quickly becomes dilapidated regarding upkeep of infrastructure and proves to be unable to be used</p>	Use of Neighboring/Unstocked Allotments instead of Forest Reserves	PC 2668-3 The Forest Service should not incorporate forage reserves in part of the plan because they are not necessary because extra forage currently exists and can be found in existing allotments.	

	immediately any way. Forage reserves should not be incorporated in the plan.			immediately any way. Forage reserves should not be incorporated in the plan.		
Forage reserves - reject	<p>Pg 95, 96 &amp; 97 Livestock Grazing Forage reserves do not need to be established. They are a well-intentioned but misplaced idea. Land put into reserves suffers from deterioration of improvements like water developments, fences and other infrastructure. This neglect leaves the reserve greatly diminished in value and usability when it is needed. Forage reserves actually are already in place in under or unstocked allotments, wildlife reserves, etc. In case of emergency or interagency needs such as management of burning on adjacent state land, this forage can be well utilized as was demonstrated by the permittee cooperation during the Wallow Fire. Because these "reserves" were managed by permittees, the infrastructure was well maintained and ready to use.</p>	<p>The establishment of forage reserves is not necessary (proposed plan p. 96).</p>	XXXX	<p>Pg 95, 96 &amp; 97 Livestock Grazing Forage reserves do not need to be established. They are a well-intentioned but misplaced idea. Land put into reserves suffers from deterioration of improvements like water developments, fences and other infrastructure. This neglect leaves the reserve greatly diminished in value and usability when it is needed. Forage reserves actually are already in place in under or unstocked allotments, wildlife reserves, etc. In case of emergency or interagency needs such as management of burning on adjacent state land, this forage can be well utilized as was demonstrated by the permittee cooperation during the Wallow Fire. Because these "reserves" were managed by permittees, the infrastructure was well maintained and ready to use.</p>	Forage Reserves	

Forage reserves - how managed	p. 96 the objectives for livestock grazing include "establish at least one forage reserve on each ranger district." How will these be selected? Who will have access to them? Who will do the maintenance on the fences and waters? A better solution for pastures that are not currently in a grazing management plan for an active allotment is to get them in one. Only in this way will they be properly managed.	Explain how forage reserves would be managed (e.g., how the reserves will be selected, who will have access to them, who will do the maintenance on the fences and waters) (proposed plan p. 96).	XXXX	p. 96 the objectives for livestock grazing include "establish at least one forage reserve on each ranger district." How will these be selected? Who will have access to them? Who will do the maintenance on the fences and waters? A better solution for pastures that are not currently in a grazing management plan for an active allotment is to get them in one. Only in this way will they be properly managed.	Establishing Forage Reserves	
Forage reserves - how managed	Page 97 The use of vacant allotments or pastures as "forage reserves" may sound reasonable at first reading, but it is primarily just a way to reduce livestock stocking rates on a broader basis. At the levels of livestock use (i.e. forage utilization on key species is slight to light) on the A-S Forests there is seldom a need for additional forage that cannot be met by adjustments in the grazing plan and/or utilization rates within a given allotment or by an arrangement with a neighboring allotment. Obviously a widespread impact like that of the Wallow Fire will have negative impacts on many allotments for a short period. But that event also highlighted that "vacant" allotments were often not practical to use because of the need to move livestock long distances to them. In addition,	Explain how forage reserves would be managed (e.g., how the reserves will be selected, who will have access to them, who will do the maintenance on the fences and waters) (proposed plan p. 96).	XXXX			

	<p>in many cases, the improvements (fences, waters, corrals) had not been maintained on these allotments so that they were unusable on short notice or without considerable time and money to get them operating again. Improvements on permits are maintained by the permittee and there is no assurance that the Forest Service will maintain or provide funds to maintain improvements on allotments or pastures not used as part of a regular permit(i.e. with no permittee to take care of them).</p>					
<p>Forage reserves - how managed</p>	<p>Objectives for livestock grazing (page 96) includes "establish at least one forage reserve on each ranger district." This seems an innocuous and sensible objective but it is not, since key information is missing, such as how the reserves will be selected, who will have access to them, who will do the maintenance on the fences and waters. It appears that livestock forage reserves may be just another way to reduce landscape stocking rates and marginalize the permittees</p>	<p>Explain how forage reserves would be managed (e.g., how the reserves will be selected, who will have access to them, who will do the maintenance on the fences and waters) (proposed plan p. 96).</p>	<p>XXXX</p>	<p>Objectives for livestock grazing (page 96) includes "establish at least one forage reserve on each ranger district." This seems an innocuous and sensible objective but it is not, since key information is missing, such as how the reserves will be selected, who will have access to them, who will do the maintenance on the fences and waters. It appears that livestock forage reserves may be just another way to reduce landscape stocking rates and marginalize the permittees</p>	<p>Key Information Missing in the Objectives of Establishing Forest Reserves</p>	

<p>Forage reserves - how managed</p>	<p>Page 96, Objectives for Livestock Grazing: The Plan proposes "as opportunities arise, the Forest Service, [shall] establish at least one forage reserve on each ranger district." With exception to NF lands not currently within a grazing allotment and the Black River Conservation Area, please provide some examples of lands that are suitable for grazing but not currently available and could be used as a forage reserve. It is unclear if forage reserves would be limited only to vacant allotments or pastures or if areas currently excluded from livestock for protection of riparian and/or listed species habitat would be considered as a potential forage reserve. A forage reserve is defined as an area not normally allocated for livestock grazing but that may be used when an authorized pasture or allotment is unavailable (page 147). Lands not currently within a grazing allotment are not considered suitable for grazing according to Table 5 on page 127. Please review to ensure the definition and information in Table 5 and on page 147 do not contradict each other.</p>	<p>Explain how forage reserves would be managed (e.g., how the reserves will be selected, who will have access to them, who will do the maintenance on the fences and waters) (proposed plan p. 96).</p>	<p>XXXX</p>	<p>Page 96, Objectives for Livestock Grazing: The Plan proposes "as opportunities arise, the Forest Service, [shall] establish at least one forage reserve on each ranger district." With exception to NF lands not currently within a grazing allotment and the Black River Conservation Area, please provide some examples of lands that are suitable for grazing but not currently available and could be used as a forage reserve. It is unclear if forage reserves would be limited only to vacant allotments or pastures or if areas currently excluded from livestock for protection of riparian and/or listed species habitat would be considered as a potential forage reserve. A forage reserve is defined as an area not normally allocated for livestock grazing but that may be used when an authorized pasture or allotment is unavailable (page 147). Lands not currently within a grazing allotment are not considered suitable for grazing according to Table 5 on page 127. Please review to ensure the definition and information in Table 5 and on page 147 do not contradict each other.</p>	<p>Establishing Forage Reserves</p>	<p>PC 1605-5 The Forest Service should provide examples of lands that are suitable for grazing but not currently available and could be used as a forage reserve, and clarify if forage reserves would be limited only to vacant allotments or pastures or if areas currently excluded from livestock for protection of riparian and/or listed species habitat would be considered as a potential forage reserve. The Forest Service should review the definition and information in Table 5 and on page 147 to ensure they do not contradict each other.</p>
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Forage reserves - how managed	<p>p.95 Forage reserves ...</p> <p>Forage reserves are available but the fallacy of these reserves is that with the elimination of a planned grazing program all of the infrastructure has been removed or gone into a state of disrepair. The reserves have lost their capacity to be functional. Create a plan to make the ones we have functional rather than create more.</p>	<p>Explain how forage reserves would be managed (e.g., how the reserves will be selected, who will have access to them, who will do the maintenance on the fences and waters) (proposed plan p. 96).</p>	XXXX				
Forage reserves - use by AZ State Land	<p>The A-S should also consider allowing for the utilization of forage reserves by permittees conducting habitat restoration on their Arizona State Land Department leases and private grazing lands when conducted as part of a landscape scale restoration project.</p>	<p>Consider allowing the utilization of forage reserves by permittees conducting habitat restoration on their Arizona State Land Department leases and private grazing lands when conducted as part of a landscape scale restoration project.</p>	XXXX	<p>The A-S should also consider allowing for the utilization of forage reserves by permittees conducting habitat restoration on their Arizona State Land Department leases and private grazing lands when conducted as part of a landscape scale restoration project.</p>		Range Management	
Livestock Grazing - herbaceous height and hiding cover	<p>Page 96. Standards for Livestock Grazing: If available, we recommend including livestock grazing standards that identify how desired conditions for grasslands and other PNVTs would be met. For example, on page 56, Landscape Scale Desired conditions, the Plan describes that ground cover is 35 percent or greater and herbaceous vegetation height ranges from 10 to 31 inches, and on page 57, Fine-Scaled Desired Conditions, the Plan describes that adequate hiding cover (10 to 18 inches) be</p>	<p>Include livestock grazing standards that identify how desired conditions for grasslands and other PNVTs would be met.</p>	XXXX	<p>Page 96. Standards for Livestock Grazing: If available, we recommend including livestock grazing standards that identify how desired conditions for grasslands and other PNVTs would be met. For example, on page 56, Landscape Scale Desired conditions, the Plan describes that ground cover is 35 percent or greater and herbaceous vegetation height ranges from 10 to 31 inches, and on page 57, Fine-Scaled Desired Conditions, the Plan describes that adequate hiding cover (10 to 18 inches) be</p>		<p>Include standard that Identifies How Conditions for Grasslands and PNVT's will be met</p>	<p>PC 1606-1 The Forest Service should revise the standards to include livestock grazing standards that identify how desired conditions for grasslands and other PNVTs would be met because there are no specific standards under Livestock Grazing that relate to meeting these identified desired conditions</p>

	developed for antelope fawns. In contrast, there are no specific standards under Livestock Grazing that relate to meeting these identified desired conditions.			developed for antelope fawns. In contrast, there are no specific standards under Livestock Grazing that relate to meeting these identified desired conditions.		
Livestock grazing - riparian stnd	Proposed standards for livestock grazing do not address the degraded condition of riparian areas.	There is a need for livestock grazing standards to address the degraded condition of riparian areas.	XXXX	Proposed standards for livestock grazing do not address the degraded condition of riparian areas.		Conditions
AZGFD-St-Edit	Plan, Standards for Livestock Grazing, page 96: "New or reconstructed fencing shall allow for wildlife passage, except where specifically intended to exclude wildlife (e.g. elk). <i>Construction of new fences parallel to existing fences shall not be allowed unless there is concurrent removal of the existing unneeded fence.</i> "	Modify Livestock Grazing Standard (proposed plan p. 96) "New or reconstructed fencing shall allow for wildlife passage, except where specifically intended to exclude wildlife (e.g. elk). <i>Construction of new fences parallel to existing fences shall not be allowed unless there is concurrent removal of the existing unneeded fence.</i> "		Plan, Standards for Livestock Grazing, page 96: "New or reconstructed fencing shall allow for wildlife passage, except where specifically intended to exclude wildlife (e.g. elk). <i>Construction of new fences parallel to existing fences shall not be allowed unless there is concurrent removal of the existing unneeded fence.</i> "		
Livestock Grazing - trailing	"To prevent resource damage, trailing of livestock should not occur along riparian areas." This guideline is unacceptable.	Delete or modify the Livestock Grazing guideline "To prevent resource damage, trailing of livestock should not occur along riparian areas" (proposed plan p. 96). Concern that it is not attainable because there are times when it is necessary to move livestock through these areas.	XXXX	"To prevent resource damage, trailing of livestock should not occur along riparian areas." This guideline is unacceptable.		Duplicate and Unacceptable Guidelines

Livestock Grazing - trailing	To prevent resource damage, trailing of livestock should not occur along riparian areas." This statement is not attainable, as many times across the entire forest, in order to reach an allotment or move from pasture to pasture with livestock it is necessary and the only way possible to move livestock in a managed grazing system. Riparian areas are many times key areas and are already managed specially in order to minimize negative impacts. This statement should be deleted or modified as to allow for movement between permits and or pastures .	Delete or modify the Livestock Grazing guideline "To prevent resource damage, trailing of livestock should not occur along riparian areas" (proposed plan p. 96). Concern that it is not attainable because there are times when it is necessary to move livestock through these areas.	XXXX	To prevent resource damage, trailing of livestock should not occur along riparian areas." This statement is not attainable, as many times across the entire forest, in order to reach an allotment or move from pasture to pasture with livestock it is necessary and the only way possible to move livestock in a managed grazing system. Riparian areas are many times key areas and are already managed specially in order to minimize negative impacts. This statement should be deleted or modified as to allow for movement between permits and or pastures .	Trailing in Riparian Areas	
Livestock Grazing - trailing	Pg 96 – bulletin 10 - East Eagle Allotment has to trail cattle through the riparian along FS road to reach pastures. Studies have been conducted on East Eagle and Mud Springs Allotment that show done properly and just passing through the riparian does not cause damage. The wording “should not occur” needs to be edited or define the word “ along”. After the Chitty Fire and flood, a lot of the riparian sealed and the plants began to die, after the cattle trailed, seeps would began to form and soon the plants were green again. This occurred again after Wallow fire. Some catastrophic events occur and the trailing is a tool so saying never is not flexible.	Delete or modify the Livestock Grazing guideline "To prevent resource damage, trailing of livestock should not occur along riparian areas" (proposed plan p. 96). Concern that it is not attainable because there are times when it is necessary to move livestock through these areas.	XXXX	Pg 96 – bulletin 10 - East Eagle Allotment has to trail cattle through the riparian along FS road to reach pastures. Studies have been conducted on East Eagle and Mud Springs Allotment that show done properly and just passing through the riparian does not cause damage. The wording “should not occur” needs to be edited or define the word “ along”. After the Chitty Fire and flood, a lot of the riparian sealed and the plants began to die, after the cattle trailed, seeps would began to form and soon the plants were green again. This occurred again after Wallow fire. Some catastrophic events occur and the trailing is a tool so saying never is not flexible.	Trailing Through the Riparian	PC 1600-9 The Forest Service should addressing trailing of cattle through the riparian along FS road to reach pastures because done properly and just passing through the riparian does not cause damage. The wording “should not occur” needs to be edited or define the word “ along”.

Livestock Grazing - trailing	2nd to last paragraph "to prevent resource damage, trailing of livestock should not occur along riparian areas". In some areas that is not feasible or possible. There are some riparian areas that have physical limitations and the only way to get cattle out of those areas may be to trail them along a portion of the area. This can be a goal but should be where practical and feasible and coupled with common sense. This statement needs to be removed from the forest plan, then changed and included in the annual operating plan for grazing allotments. With the current language FS employees and others could try to prevent permittees from crossing a riparian area or even gathering and trailing cattle out of a riparian area.	Delete or modify the Livestock Grazing guideline "To prevent resource damage, trailing of livestock should not occur along riparian areas" (proposed plan p. 96). Concern that it is not attainable because there are times when it is necessary to move livestock through these areas.	XXXX	2nd to last paragraph "to prevent resource damage, trailing of livestock should not occur along riparian areas". In some areas that is not feasible or possible. There are some riparian areas that have physical limitations and the only way to get cattle out of those areas may be to trail them along a portion of the area. This can be a goal but should be where practical and feasible and coupled with common sense. This statement needs to be removed from the forest plan, then changed and included in the annual operating plan for grazing allotments. With the current language FS employees and others could try to prevent permittees from crossing a riparian area or even gathering and trailing cattle out of a riparian area.	Trailing in Riparian Areas	
Livestock Grazing - trailing	Guidelines-trailing of livestock in riparian areas: The wording on this should be changed to say only that it should be managed to minimize resource damage", not to forbid it. According to Mims, 20% shearing of banks is definitely "healable." Even if ground should be somewhat compacted, when it freezes, and then thaws, it is no longer compacted." (Al Medina, well known riparian expert). Often in order to reach an allotment or move from pasture to	Delete or modify the Livestock Grazing guideline "To prevent resource damage, trailing of livestock should not occur along riparian areas" (proposed plan p. 96). Concern that it is not attainable because there are times when it is necessary to move livestock through these areas.	XXXX	Guidelines-trailing of livestock in riparian areas: The wording on this should be changed to say only that it should be managed to minimize resource damage", not to forbid it. According to Mims, 20% shearing of banks is definitely "healable." Even if ground should be somewhat compacted, when it freezes, and then thaws, it is no longer compacted." (Al Medina, well known riparian expert). Often in order to reach an allotment or move from pasture to	Managed to Minimize Resource Damage	PC 2665-4 the Forest Service should reword the "Guidelines-trailing of livestock in riparian areas" to say only that it should be managed to minimize resource damage", not to forbid it because Riparian areas are already managed to minimize negative impacts

	<p>pasture as required in managed grazing systems, it is the only way possible to get there. Riparian areas are often key areas and are already managed to minimize negative impacts. Resiliency means that damage is temporary and does recover. We do want our forest to be resilient.</p>			<p>pasture as required in managed grazing systems, it is the only way possible to get there. Riparian areas are often key areas and are already managed to minimize negative impacts. Resiliency means that damage is temporary and does recover. We do want our forest to be resilient.</p>		
<p>Livestock grazing - sheep</p>	<p>There is discussion of the need to separate domestic sheep from wild sheep to preclude the introduction of lethal diseases from domestic to wild sheep. This is a well-documented issue and invariably the wild sheep are the group that perish. In addition to the discussion of methods to keep the two from close contact, it seems appropriate to mention other methods to aid wild sheep recovery such as the purchase and retirement of existing sheep allotments or conversion of these allotments to other types of use such as cattle operations. Both of these options have been used successfully elsewhere. Given the increased availability of Rocky Mountain Bighorn Sheep and a growing partnership between the Arizona Desert Bighorn Sheep Society and the Arizona Game and Fish Department, restoration efforts will undoubtedly expand in the near future and having a full array of</p>	<p>Mention other methods to separate domestic sheep from wild sheep to preclude the introduction of lethal diseases such as purchase and retirement of existing sheep allotments or conversion of these allotments to other types of use such as cattle operations.</p>	<p>XXXX</p>	<p>There is discussion of the need to separate domestic sheep from wild sheep to preclude the introduction of lethal diseases from domestic to wild sheep. This is a well-documented issue and invariably the wild sheep are the group that perish. In addition to the discussion of methods to keep the two from close contact, it seems appropriate to mention other methods to aid wild sheep recovery such as the purchase and retirement of existing sheep allotments or conversion of these allotments to other types of use such as cattle operations. Both of these options have been used successfully elsewhere. Given the increased availability of Rocky Mountain Bighorn Sheep and a growing partnership between the Arizona Desert Bighorn Sheep Society and the Arizona Game and Fish Department, restoration efforts will undoubtedly expand in the near future and having a full array of</p>	<p>Domestic and Wild Sheep</p>	<p>PC 2667-4 the Forest Service should address the need to separate domestic sheep from wild sheep to preclude the introduction of lethal diseases from domestic to wild sheep and methods to keep the two from close contact and to aid wild sheep recovery such as the purchase and retirement of existing sheep allotments or conversion of these allotments to other types of use such as cattle operations.</p>

	management options to avoid contact between these animals is important to restoration efforts.			management options to avoid contact between these animals is important to restoration efforts.		
Livestock grazing - sheep2	Page 96, Guidelines for Livestock Grazing, eighth bullet reads: "Efforts (e.g., temporary fencing, increased herding, herding dogs) should be made to prevent transfer of disease from domestic sheep and goats to bighorn sheep wherever bighorn sheep occur. Permit conversions to domestic sheep or goats should not be allowed in areas inhabited by bighorn sheep." Comment: We recommend the Plan adopt the recommendation that 9- to 14-mile wide buffer zones be established between bighorn sheep habitat and domestic sheep grazing (Western Association of Fish and Wildlife Agencies 2010). Therefore, there would be no need to include temporary fencing, herding or herding dogs to prevent domestic sheep from interacting with bighorn sheep.	Adopt the recommendation that 9- to 14-mile wide buffer zones be established between bighorn sheep habitat and domestic sheep grazing (Western Association of Fish and Wildlife Agencies 2010).	XXXX	Page 96, Guidelines for Livestock Grazing, eighth bullet reads: "Efforts (e.g., temporary fencing, increased herding, herding dogs) should be made to prevent transfer of disease from domestic sheep and goats to bighorn sheep wherever bighorn sheep occur. Permit conversions to domestic sheep or goats should not be allowed in areas inhabited by bighorn sheep." Comment: We recommend the Plan adopt the recommendation that 9- to 14-mile wide buffer zones be established between bighorn sheep habitat and domestic sheep grazing (Western Association of Fish and Wildlife Agencies 2010). Therefore, there would be no need to include temporary fencing, herding or herding dogs to prevent domestic sheep from interacting with bighorn sheep.	Bighorn and Domestic Sheep	PC 1607-3 The Forest Service should adopt the recommendation that 9- to 14-mile wide buffer zones be established between bighorn sheep habitat and domestic sheep grazing (Western Association of Fish and Wildlife Agencies 2010) then there would be no need to include temporary fencing, herding or herding dogs to prevent domestic sheep from interacting with bighorn sheep.

Livestock grazing - salt2	Page 96, Guidelines for Livestock Grazing, ninth bullet reads: "To minimize potential resource impacts from livestock, salt or nutritional supplements should not be placed within a quarter of a mile of any riparian area or water source. Salt or nutritional supplements should also be located to minimize herbivory impacts to aspen clones." Comment: We recommend placing salt or supplement blocks near water sources such as troughs to coach livestock to use the troughs instead of nearby riparian areas or wetlands	Remove Livestock Grazing guideline ""To minimize potential resource impacts from livestock, salt or nutritional supplements should not be placed within a quarter of a mile of any riparian area or water source. ..." (proposed plan 96). Salt is used as a method to move cattle and treat areas, it is addressed in the annual operating instructions (AOI).	XXXX	Page 96, Guidelines for Livestock Grazing, ninth bullet reads: "To minimize potential resource impacts from livestock, salt or nutritional supplements should not be placed within a quarter of a mile of any riparian area or water source. Salt or nutritional supplements should also be located to minimize herbivory impacts to aspen clones." Comment: We recommend placing salt or supplement blocks near water sources such as troughs to coach livestock to use the troughs instead of nearby riparian areas or wetlands		Salt Placement	Comment #112.25
Livestock grazing - salt2	Pg 96 – bulletin 9 - salt is used as a method to move cattle and treat areas...this is already in the AOI's and should be a management process, there may be a point of time where a riparian maybe needed to be treated...keep flexibility...also note that salt is placed on the forest by hunters to draw animals and this becomes an issue that is confusion on who placed it	Remove Livestock Grazing guideline ""To minimize potential resource impacts from livestock, salt or nutritional supplements should not be placed within a quarter of a mile of any riparian area or water source. ..." (proposed plan 96). Salt is used as a method to move cattle and treat areas, it is addressed in the annual operating instructions (AOI).	XXXX	Pg 96 – bulletin 9 - salt is used as a method to move cattle and treat areas...this is already in the AOI's and should be a management process, there may be a point of time where a riparian maybe needed to be treated...keep flexibility...also note that salt is placed on the forest by hunters to draw animals and this becomes an issue that is confusion on who placed it		Salt used as a Management Process	PC 1608-2 The Forest Service should revise their approach to salt (Pg. 96 – bulletin 9) - salt is used as a method to move cattle and treat areas...because it is already in the AOI's and should be a management process, there may be a point of time where a riparian maybe needed to be treated, and address that salt is placed on the forest by hunters to draw animals and this becomes an issue about on who placed it.
Livestock grazing - maintenance of features	Pg 96 – Guidelines for Livestock Grazing – Bulletin 1 & 5 the changes to existing inventory should be worded “ to occur as a partnering process to improve wildlife habitat” and be flexible because culture clearance backlog will prevent timely occurrence. Cost to	Modify Livestock Grazing guidelines "During maintenance of existing watering facilities, escape ramps that are ineffective or missing should be replaced" and " New livestock troughs, tanks, and holding facilities should be located out of	XXXX	Pg 96 – Guidelines for Livestock Grazing – Bulletin 1 & 5 the changes to existing inventory should be worded “ to occur as a partnering process to improve wildlife habitat” and be flexible because culture clearance backlog will prevent timely occurrence. Cost to		Changes to Inventory	

	meet the new statement could be very high	riparian areas to prevent concentration of livestock in these areas. Existing facilities in riparian areas should be modified, relocated, or removed where their presence is determined to inhibit movement toward desired riparian or aquatic conditions" (proposed plan p. 96) to add "to occur as partnering process to improve wildlife habitat" and to be flexible because cultural and wildlife clearance prevent timely occurrence.		meet the new statement could be very high		
Livestock grazing - maintenance of features	Page 96 – maintenance has become bogged down by archeology and wildlife studies and the work load of FS staff, therefore this sentence needs to be altered somehow.	Modify Livestock Grazing guidelines "During maintenance of existing watering facilities, escape ramps that are ineffective or missing should be replaced" and " New livestock troughs, tanks, and holding facilities should be located out of riparian areas to prevent concentration of livestock in these areas. Existing facilities in riparian areas should be modified, relocated, or removed where their presence is determined to inhibit movement toward desired riparian or aquatic conditions" (proposed plan p. 96) to add "to occur as partnering process to improve wildlife habitat" and to be flexible because cultural and wildlife clearance prevent timely occurrence.	XXXX	Page 96 – maintenance has become bogged down by archeology and wildlife studies and the work load of FS staff, therefore this sentence needs to be altered somehow.	Impacts from Livestock Grazing	PC 1600-10 The Forest Service should address that Page 96 – maintenance has become bogged down by archeology and wildlife studies and the work load of FS staff, therefore this sentence needs to be altered somehow.

Livestock grazing - maintenance of features	pg 96 under guidelines for livestock grazing. The paragraph in the middle of the page states that "existing facilities in riparian areas should be modified, relocated or removed...." That may not be possible or feasible in some cases, due to situations such as where there is no possibility to move a tank due to a lack of gravity flow potential. A statement such as, "where possible and practical and economically feasible", needs to be added.	Modify Livestock Grazing guidelines "During maintenance of existing watering facilities, escape ramps that are ineffective or missing should be replaced" and " New livestock troughs, tanks, and holding facilities should be located out of riparian areas to prevent concentration of livestock in these areas. Existing facilities in riparian areas should be modified, relocated, or removed where their presence is determined to inhibit movement toward desired riparian or aquatic conditions" (proposed plan p. 96) to add "to occur as partnering process to improve wildlife habitat" and to be flexible because cultural and wildlife clearance prevent timely occurrence.	XXXX	pg 96 under guidelines for livestock grazing. The paragraph in the middle of the page states that "existing facilities in riparian areas should be modified, relocated or removed...." That may not be possible or feasible in some cases, due to situations such as where there is no possibility to move a tank due to a lack of gravity flow potential. A statement such as, "where possible and practical and economically feasible", needs to be added.	Facilities in Riparian Areas	
Livestock grazing - maintenance of features	If something is already there, why have to have an archeology study? Is it to give someone a job or make it a hardship for the rancher? There is only a short window of time when can get it done before the rain comes.	Modify Livestock Grazing guidelines "During maintenance of existing watering facilities, escape ramps that are ineffective or missing should be replaced" and " New livestock troughs, tanks, and holding facilities should be located out of riparian areas to prevent concentration of livestock in these areas. Existing facilities in riparian areas should be modified, relocated, or removed where their presence is determined to inhibit movement toward desired riparian or aquatic conditions"	XXXX	If something is already there, why have to have an archeology study? Is it to give someone a job or make it a hardship for the rancher? There is only a short window of time when can get it done before the rain comes.	Range Management	

		(proposed plan p. 96) to add "to occur as partnering process to improve wildlife habitat" and to be flexible because cultural and wildlife clearance prevent timely occurrence.				
Livestock grazing - modify guideline to add 'and riparian'	Pg 96 – Bulletin 4... “ and riparian areas” should be added after season allotments... in the near future, riparian grazing maybe necessary or become a research project due to the density of growth and drought occurrence in the riparian	Modify the Livestock Grazing guideline "Grazing use on seasonal allotments should be timed to the appropriate plant growth stage and soil moisture" (proposed plan p. 96) by adding "and riparian areas" after seasonal allotments to allow for future riparian grazing if necessary.	XXXX	Pg 96 – Bulletin 4... “ and riparian areas” should be added after season allotments... in the near future, riparian grazing maybe necessary or become a research project due to the density of growth and drought occurrence in the riparian	Grazing in Riparian	PC 1607-6 The Forest Service should add “ and riparian areas” after season allotments... (Pg. 96 – Bulletin 4) because in the near future, riparian grazing maybe necessary or become a research project due to the density of growth and drought occurrence in the riparian.
Livestock grazing - modify guideline range developments	pg. 97—top paragraph concerning “new range developments should be located to minimize impacts” A statement such as “where possible and practical” needs to be added to the above so that grazing permittees are not restricted completely from installing and using new range developments. FS staff, and individuals and groups with anti-grazing and anti- multiple use goals could argue that any improvement is not minimizing impacts, and therefore the current language is too restrictive. Also, if a new development needs to be located a certain distance from a main road in order to satisfy someone’s perception of	Modify the Livestock Grazing guideline "New range developments should be located to minimize impacts ..." (proposed plan p. 97) to include "where possible and practical".	XXXX	pg. 97—top paragraph concerning “new range developments should be located to minimize impacts” A statement such as “where possible and practical” needs to be added to the above so that grazing permittees are not restricted completely from installing and using new range developments. FS staff, and individuals and groups with anti-grazing and anti- multiple use goals could argue that any improvement is not minimizing impacts, and therefore the current language is too restrictive. Also, if a new development needs to be located a certain distance from a main road in order to satisfy someone’s perception of	Range Developments	

	impacts to scenic resources, will it be possible to get permission to build a new road if necessary for access to the improvement?			impacts to scenic resources, will it be possible to get permission to build a new road if necessary for access to the improvement?			
AZGFD-GL-Edit1	Plan, Guidelines for Livestock Grazing, page 96: "New livestock watering facilities shall be designed to allow wildlife access and escape. <i>Existing livestock watering facilities shall be modified as opportunities arise to allow for wildlife access and escape.</i> "	Modify Livestock Grazing Guideline (proposed plan p. 96) "New livestock watering facilities shall be designed to allow wildlife access and escape. <i>Existing livestock watering facilities shall be modified as opportunities arise to allow for wildlife access and escape.</i> "		Plan, Guidelines for Livestock Grazing, page 96: "New livestock watering facilities shall be designed to allow wildlife access and escape. <i>Existing livestock watering facilities shall be modified as opportunities arise to allow for wildlife access and escape.</i> "			
AZGFD-GL-Edit2	Plan, Guidelines for Livestock Grazing, page 96: "Efforts (e.g. temporary fencing, increased herding, herding dogs) should be made to prevent transfer of disease from domestic sheep and goats to bighorn sheep wherever bighorn sheep occur. Permit conversions to domestic sheep or goats should not be allowed in areas <i>adjacent to or</i> inhabited by bighorn sheep <i>or areas identified by the Arizona Game and Fish Department for bighorn sheep reintroductions</i> ".	Modify Livestock Grazing Guideline (proposed plan p. 96) "Efforts (e.g. temporary fencing, increased herding, herding dogs) should be made to prevent transfer of disease from domestic sheep and goats to bighorn sheep wherever bighorn sheep occur. Permit conversions to domestic sheep or goats should not be allowed in areas <i>adjacent to or</i> inhabited by bighorn sheep <i>or areas identified by the Arizona Game and Fish Department for bighorn sheep reintroductions</i> ".		Plan, Guidelines for Livestock Grazing, page 96: "Efforts (e.g. temporary fencing, increased herding, herding dogs) should be made to prevent transfer of disease from domestic sheep and goats to bighorn sheep wherever bighorn sheep occur. Permit conversions to domestic sheep or goats should not be allowed in areas <i>adjacent to or</i> inhabited by bighorn sheep <i>or areas identified by the Arizona Game and Fish Department for bighorn sheep reintroductions</i> ".			

Livestock grazing - guide to rangeland mgmt	I do not see anywhere in the plan where the collaboratively authored 11Guide to Rangeland Monitoring and Assessment" is referred to. This document was co-authored by Range staff in the USFS as well as other agencies and is backed by science, peer reviewed and commonly accepted as good science. It should be referenced and sited as a source of Information.	In the plan , reference the document "Guide to Rangeland Monitoring and Assessment" produced by Arizona Grazing Lands Conservation Association.	XXXX	I do not see anywhere in the plan where the collaboratively authored 11Guide to Rangeland Monitoring and Assessment" is referred to. This document was co-authored by Range staff in the USFS as well as other agencies and is backed by science, peer reviewed and commonly accepted as good science. It should be referenced and sited as a source of Information.	Other Sources of Information	
Livestock grazing - guide to rangeland mgmt	Again in the sited sources of Information, the Guide to Rangelands Monitoring and Assessment should be listed and referred to in this section. It is a collaborative effort of many agencies including the USFS, and is adopted for use and consensus.	In the plan , reference the document "Guide to Rangeland Monitoring and Assessment" produced by Arizona Grazing Lands Conservation Association.	XXXX	Again in the sited sources of Information, the Guide to Rangelands Monitoring and Assessment should be listed and referred to in this section. It is a collaborative effort of many agencies including the USFS, and is adopted for use and consensus. To not mention and use this resource is a slap in the face of the hard work of the rangeland professionals including those who work for the USFS itself.	Sources of Information	
Livestock grazing - guide to rangeland mgmt	The final comment is that the "Guide to Rangeland Monitoring and Assessment" produced by Arizona Grazing Lands Conservation Association should be referenced in the Management Plan. The work was done by partnership over a long period of time to better define monitoring and assessment for grazing.	In the plan , reference the document "Guide to Rangeland Monitoring and Assessment" produced by Arizona Grazing Lands Conservation Association.	XXXX	The final comment is that the "Guide to Rangeland Monitoring and Assessment" produced by Arizona Grazing Lands Conservation Association should be referenced in the Management Plan. The work was done by partnership over a long period of time to better define monitoring and assessment for grazing.	Adding Reference to Plan	PC 1606-3 The Forest Service should reference the "Guide to Rangeland Monitoring and Assessment" produced by Arizona Grazing Lands Conservation Association in the Management Plan because the work was done by partnership over a long period of time to better define monitoring and assessment for grazing.

Livestock grazing - guide to rangeland mgmt	We need to continue to utilize adaptive management and refer to books and reference materials such as the "Guide to rangeland monitoring and Assessment" which the FS recently assisted in developing and writing.	In the plan , reference the document "Guide to Rangeland Monitoring and Assessment" produced by Arizona Grazing Lands Conservation Association.	XXXX			
Livestock grazing - guide to rangeland mgmt	Pg 35 Other Sources of Information for Riparian Areas I notice here and through the entire plan that there seem to be no sources used for grazing or riparian management other than your own in house publications. There has been much well documented research done in recent years by well qualified universities and range scientists that should not be ignored. Your own staff collaboratively worked with the University of Arizona range staff, local permittees and other groups and agencies to develop the scientifically backed Guide to Rangeland Monitoring and Assessment. Why then do you not reference it and apply it in your plan? The National Riparian Team has worked here in our area and has some well-respected papers published with the latest documented findings on riparian management that might be helpful to incorporate.	In the plan , reference the document "Guide to Rangeland Monitoring and Assessment" produced by Arizona Grazing Lands Conservation Association.	XXXX	Pg 35 Other Sources of Information for Riparian Areas I notice here and through the entire plan that there seem to be no sources used for grazing or riparian management other than your own in house publications. There has been much well documented research done in recent years by well qualified universities and range scientists that should not be ignored. Your own staff collaboratively worked with the University of Arizona range staff, local permittees and other groups and agencies to develop the scientifically backed Guide to Rangeland Monitoring and Assessment. Why then do you not reference it and apply it in your plan? The National Riparian Team has worked here in our area and has some well-respected papers published with the latest documented findings on riparian management that might be helpful to incorporate.	Sources of Information	

Livestock grazing - minimize or eliminate	The plan should eliminate or sharply curtail the extent and severity of livestock grazing allowed on the Forest to facilitate overall ecological resilience, predator reintroduction programs, aspen recruitment, restoration of natural fire regimes, recovery of riparian and aquatic ecosystems and species, and climate adaptation.	Eliminate or minimize livestock grazing.	** Check out Kaibab p. 70 last comment	The plan should eliminate or sharply curtail the extent and severity of livestock grazing allowed on the Forest to facilitate overall ecological resilience, predator reintroduction programs, aspen recruitment, restoration of natural fire regimes, recovery of riparian and aquatic ecosystems and species, and climate adaptation.	Eliminate / Curtail Livestock Grazing	
Livestock grazing - minimize or eliminate	The plan should eliminate or sharply curtail livestock grazing to facilitate overall ecological resilience, predator reintroduction programs, aspen recruitment, restoration of natural fire regimes, recovery of riparian and aquatic ecosystems and species, and climate adaptation.	Eliminate or minimize livestock grazing.	** Check out Kaibab p. 70 last comment	The plan should eliminate or sharply curtail livestock grazing to facilitate overall ecological resilience, predator reintroduction programs, aspen recruitment, restoration of natural fire regimes, recovery of riparian and aquatic ecosystems and species, and climate adaptation.	Eliminate / Curtail Livestock Grazing	PC 1608-1 The Forest Service should eliminate or sharply curtail livestock grazing to facilitate overall ecological resilience, predator reintroduction programs, aspen recruitment, restoration of natural fire regimes, recovery of riparian and aquatic ecosystems and species, and climate adaptation.
Livestock grazing - minimize or eliminate	I do believe the most important part includes ending livestock grazing in our forests. This is not the 19th century!	Eliminate or minimize livestock grazing.	** Check out Kaibab p. 70 last comment	I do believe the most important part includes ending livestock grazing in our forests. This is not the 19th century!	Eliminate / Curtail Livestock Grazing	

Livestock grazing - minimize or eliminate	We can no longer afford to sacrifice these habitats to livestock grazing, which destroys and damages our national forest lands. It should be eliminated in these precious, delicate areas. We have lost so much of our riparian areas and species. The situation is urgent and ecological resilience should be the guiding force over industry, grazing and timber interests. This is a finite resource and it belongs to ALL of us.	Eliminate or minimize livestock grazing.	** Check out Kaibab p. 70 last comment	We can no longer afford to sacrifice these habitats to livestock grazing, which destroys and damages our national forest lands. It should be eliminated in these precious, delicate areas. We have lost so much of our riparian areas and species. The situation is urgent and ecological resilience should be the guiding force over industry, grazing and timber interests. This is a finite resource and it belongs to ALL of us.	Impacts from Livestock Grazing	PC 1600-1 The Forest Service should curtail or forbid livestock grazing to facilitate overall ecological resilience, predator reintroduction programs, aspen recruitment, restoration of natural fire regimes, climate adaptation , and recovery of riparian and aquatic ecosystems and species. It should be eliminated because of the sacrifice of habitats and loss of species and riparian areas.
Livestock grazing - minimize or eliminate	To that end, I urge exclusion of all livestock grazing in the region.	Eliminate or minimize livestock grazing.	** Check out Kaibab p. 70 last comment	To that end, I urge exclusion of all livestock grazing in the region.	Eliminate / Curtail Livestock Grazing	PC 1608-1 The Forest Service should eliminate or sharply curtail livestock grazing to facilitate overall ecological resilience, predator reintroduction programs, aspen recruitment, restoration of natural fire regimes, recovery of riparian and aquatic ecosystems and species, and climate adaptation.
Livestock grazing - minimize or eliminate	Curtail or forbid livestock grazing, the most widespread and damaging use of national forest lands in the Southwest. Eliminate or sharply curtail livestock grazing to facilitate overall ecological resilience, predator reintroduction programs, aspen recruitment, restoration of natural fire regimes, recovery of riparian and aquatic ecosystems and species, and climate adaptation.	Eliminate or minimize livestock grazing.	** Check out Kaibab p. 70 last comment	Curtail or forbid livestock grazing, the most widespread and damaging use of national forest lands in the Southwest. Eliminate or sharply curtail livestock grazing to facilitate overall ecological resilience, predator reintroduction programs, aspen recruitment, restoration of natural fire regimes, recovery of riparian and aquatic ecosystems and species, and climate adaptation.	Impacts from Livestock Grazing	PC 1600-1 The Forest Service should curtail or forbid livestock grazing to facilitate overall ecological resilience, predator reintroduction programs, aspen recruitment, restoration of natural fire regimes, climate adaptation , and recovery of riparian and aquatic ecosystems and species. It should be eliminated because of the sacrifice of habitats and loss of species and riparian areas.

Livestock grazing - minimize or eliminate	[revisions in the management plan for Apache-Sitgreaves National Forest should be aimed primarily at accomplishing and safeguarding the greatest possible safe habitat for the restoration of Mexican wolves and for other native species of wildlife.] This equates to minimal grazing allotments for privately owned livestock	Eliminate or minimize livestock grazing.	** Check out Kaibab p. 70 last comment	This equates to minimal grazing allotments for privately owned livestock	Grazing Allotments Privately Owned Livestock	
Livestock grazing - minimize or eliminate	Curtail or forbid livestock grazing, the most widespread and damaging use of national forest lands in the Southwest.	Eliminate or minimize livestock grazing.	** Check out Kaibab p. 70 last comment	Curtail or forbid livestock grazing, the most widespread and damaging use of national forest lands in the Southwest.	Impacts from Livestock Grazing	PC 1600-1 The Forest Service should curtail or forbid livestock grazing to facilitate overall ecological resilience, predator reintroduction programs, aspen recruitment, restoration of natural fire regimes, climate adaptation , and recovery of riparian and aquatic ecosystems and species. It should be eliminated because of the sacrifice of habitats and loss of species and riparian areas.
Livestock grazing - minimize or eliminate	The draft EIS also refuses to consider in detail an alternative to eliminate livestock grazing in part because a “no grazing alternative would not meet the legal requirements of the National Forest Management Act or Multiple Use-Sustained Yield Act.”	Eliminate or minimize livestock grazing.	** Check out Kaibab p. 70 last comment	The draft EIS also refuses to consider in detail an alternative to eliminate livestock grazing in part because a “no grazing alternative would not meet the legal requirements of the National Forest Management Act or Multiple Use-Sustained Yield Act.”	Eliminating Livestock Grazing	

Livestock grazing - minimize or eliminate	The ASNF must develop proper Objectives, Guidelines and Management Approaches which reduce, minimize or eliminate herbivore by non-native species.	Eliminate or minimize livestock grazing.	** Check out Kaibab p. 70 last comment	The ASNF must develop proper Objectives, Guidelines and Management Approaches which reduce, minimize or eliminate herbivore by non-native species.	Reduce, Minimize or Eliminate Herbivore by Non-native Species.	PC 1605-7 The Forest Service must develop proper Objectives, Guidelines and Management Approaches which reduce, minimize or eliminate herbivore by non-native species. The Forest Service should discuss how the new plan will make a difference.
Livestock grazing - support more	More cattle need to be put on forest land. They are a cheap fire fighter. They keep the grass short and they till the soil with their feet and fertilize the soil to grow a renewable resource and help for rain to soak in. And eat underbrush to help fires from getting a big head of fire.	There is a need for more livestock grazing.	** Check out Kaibab p. 70 last comment	More cattle need to be put on forest land. They are a cheap fire fighter. They keep the grass short and they till the soil with their feet and fertilize the soil to grow a renewable resource and help for rain to soak in. And eat underbrush to help fires from getting a big head of fire.	More Cattle Grazing	PC 1602-3 the Forest Service should allow more cows on forestland because they are a cheap fire fighter, they till the soil and fertilize the soil to grow a renewable resource and help the rain soak in.
Livestock grazing - balance forage	One item says grazing is "balanced with available forage" but doesn't your current plan say something like this too? I still see extensive areas of heavy grazing with few, runty plants and lots of dirt. So how will the same thing in the new plan make any difference? In the same manner, I see salt blocks near water now, so how will that be different once you decide on a new plan	Explain how the desired condition that grazing is "balanced with available forage" will make a difference in the new plan since the 1987 plan had similar direction.	XXXX	One item says grazing is "balanced with available forage" but doesn't your current plan say something like this too? I still see extensive areas of heavy grazing with few, runty plants and lots of dirt. So how will the same thing in the new plan make any difference? In the same manner, I see salt blocks near water now, so how will that be different once you decide on a new plan	Grazing	

Livestock grazing - pasture rotation	How can you justify having a rancher's cattle on the same pastures year after year and expect to see change? I see nothing in the plan that speaks to this. I see cows up by Big Lake in early summer before the grass has even grown up but the plan doesn't address this and similar problems. I see cows in the PJs between Showlow and Overgaard when there are hardly a few blades of grass—what in the plan addresses this? When I read pages 448-451, none of these basic grazing considerations are addressed.	Explain where in the plan basic grazing considerations are addressed (ensuring cattle are not in the same pasture year after year).	XXXX	How can you justify having a rancher's cattle on the same pastures year after year and expect to see change? I see nothing in the plan that speaks to this. I see cows up by Big Lake in early summer before the grass has even grown up but the plan doesn't address this and similar problems. I see cows in the PJs between Showlow and Overgaard when there are hardly a few blades of grass—what in the plan addresses this? When I read pages 448-451, none of these basic grazing considerations are addressed.	Grazing Considerations	
Livestock grazing - amount of direction	Your comprehensive report says you have determined there is a "need to change", and by that it appears you mean a need for improvement on the forest. However, when I read the new plan I do not see much about change in some areas, especially the livestock grazing section. I don't see anything in this section that dictates a change in the manner cattle are grazed now that would bring about beneficial changes for forest plants and wildlife.	Alternatives should address the effects of grazing: (1) the loss of cold season grasses, (2) riparian systems, (3) water developments, (4) capability/suitability, (5) the amount of unsatisfactory or impaired lands, and (6) how monitoring has been implemented and what it has shown.	XXXX	Your comprehensive report says you have determined there is a "need to change", and by that it appears you mean a need for improvement on the forest. However, when I read the new plan I do not see much about change in some areas, especially the livestock grazing section. I don't see anything in this section that dictates a change in the manner cattle are grazed now that would bring about beneficial changes for forest plants and wildlife.	Indicators of the Need for Change	

Livestock grazing - amount of direction	This plan has almost nothing to say about livestock grazing. The plan discloses in several places that livestock grazing is affecting the landscape, but then is almost completely silent about grazing, suggesting that adaptive management and NEPA will take care of any problems. It is astonishing that in this EIS so little about livestock grazing, which is a lasting, chronic, and landscape-wide impact, is revealed.	Alternatives should address the effects of grazing: (1) the loss of cold season grasses, (2) riparian systems, (3) water developments, (4) capability/suitability, (5) the amount of unsatisfactory or impaired lands, and (6) how monitoring has been implemented and what it has shown.	XXXX	This plan has almost nothing to say about livestock grazing. The plan discloses in several places that livestock grazing is affecting the landscape, but then is almost completely silent about grazing, suggesting that adaptive management and NEPA will take care of any problems. It is astonishing that in this EIS so little about livestock grazing, which is a lasting, chronic, and landscape-wide impact, is revealed.	Impacts from Livestock Grazing	
Livestock grazing - amount of direction	We direct the Forest Service again to 36 CFR 219.20 and ask the agency to take a hard look at the effects of grazing and prepare alternatives that address this issue. You should address the loss of cold season grasses, riparian systems, water developments, capability/suitability, and the amount of unsatisfactory or impaired lands, as well as reveal how monitoring has been implemented and what it has shown. It is simply not credible that every single alternative is the same with regard to grazing, which is one of the most or possibly the single most environmentally damaging thing the Forest Service does on this landscape. There should be alternatives that address where grazing takes place as well as what kinds of standards it is governed by, and what kind of monitoring is required in order	Alternatives should address the effects of grazing: (1) the loss of cold season grasses, (2) riparian systems, (3) water developments, (4) capability/suitability, (5) the amount of unsatisfactory or impaired lands, and (6) how monitoring has been implemented and what it has shown.	XXXX	We direct the Forest Service again to 36 CFR 219.20 and ask the agency to take a hard look at the effects of grazing and prepare alternatives that address this issue. You should address the loss of cold season grasses, riparian systems, water developments, capability/suitability, and the amount of unsatisfactory or impaired lands, as well as reveal how monitoring has been implemented and what it has shown. It is simply not credible that every single alternative is the same with regard to grazing, which is one of the most or possibly the single most environmentally damaging thing the Forest Service does on this landscape. There should be alternatives that address where grazing takes place as well as what kinds of standards it is governed by, and what kind of monitoring is required in order	Range Management	PC 207-33 The Forest Service should add alternatives that address where grazing takes place as well as what kinds of standards it is governed by, and what kind of monitoring is required in order to protect natural resources. The Forest Service should look at different ways of meeting or maximizing net public benefits as required by the NFMA, and that includes grazing schemes and different mixes of standards and guidelines.

	to protect natural resources.			to protect natural resources.			
Livestock grazing - retirement allotment	Retirement of Grazing Allotments The new plan should expressly authorize the voluntary, permanent retirement of grazing allotments by permittees for conservation purposes, including endangered species recovery.	Authorize the voluntary, permanent retirement of grazing allotments by permittees for conservation purposes, including endangered species recovery.	** Check out Kaibab p. 72 last comment & Prescott p. 25 1st comment	Retirement of Grazing Allotments The new plan should expressly authorize the voluntary, permanent retirement of grazing allotments by permittees for conservation purposes, including endangered species recovery.		Range Management	
Livestock grazing - need more guidelines	Navajo County believes that the rangelands resources management process needs to be modified to include: I. Maximum management flexibility in terms of seasonal use, any use at all, numbers of livestock, classes of livestock, mixed combination of classes of livestock, intensity of grazing, duration of grazing, use of livestock as a prescription management tool through herding, attracting, temporary fencing, etc., matching livestock classes with desired outcome, etc.; II. Real time three tier rangelands resources management quantitative monitoring using	Rangelands resources management needs to be modified to include: (1) maximum management flexibility in terms of seasonal use, any use at all, numbers of livestock, etc., (2) real time three tier rangelands resources management quantitative monitoring, (3) dynamic real time adaptive management allowing the permittees to make required management adjustments on their own initiative in response to short-term variables.	** Check out Kaibab p. 69-70	Navajo County believes that the rangelands resources management process needs to be modified to include: I. Maximum management flexibility in terms of seasonal use, any use at all, numbers of livestock, classes of livestock, mixed combination of classes of livestock, intensity of grazing, duration of grazing, use of livestock as a prescription management tool through herding, attracting, temporary fencing, etc., matching livestock classes with desired outcome, etc.; II. Real time three tier rangelands resources management quantitative monitoring using		Range Management	

	<p>standard measurements such as stocking rate, ground cover, etc.; qualitative monitoring using measurements such as species composition, age, nutritional value, etc.; and effectiveness monitoring using outcome measurements such as range health, soil water holding capacity, soil organic content, livestock weight gain, presence of wildlife indicator species, etc.; III. Dynamic real time adaptive management allowing the permittees to make required management adjustments on their own initiative in response to short-term variables such as various combination of seasonable precipitations, temperature, etc. or unexpected events.</p>			<p>standard measurements such as stocking rate, ground cover, etc.; qualitative monitoring using measurements such as species composition, age, nutritional value, etc.; and effectiveness monitoring using outcome measurements such as range health, soil water holding capacity, soil organic content, livestock weight gain, presence of wildlife indicator species, etc.; III. Dynamic real time adaptive management allowing the permittees to make required management adjustments on their own initiative in response to short-term variables such as various combination of seasonable precipitations, temperature, etc. or unexpected events.</p>		
<p>Livestock grazing - need more guidelines</p>	<p>Conversely, in the absence of true adaptive management, Navajo County believes that specific guidelines regarding the timing, intensity, classes and duration of grazing, with consideration for the needs of other forest resources management, should be included in the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan, as well as a restocking plan for all vacant allotments, unless livestock grazing on such allotments can be shown to be incompatible with rangelands resources management</p>	<p>Rangelands resources management needs to be modified to include: (1) maximum management flexibility in terms of seasonal use, any use at all, numbers of livestock, etc., (2) real time three tier rangelands resources management quantitative monitoring, (3) dynamic real time adaptive management allowing the permittees to make required management adjustments on their own initiative in response to short-term variables.</p>	<p>** Check out Kaibab p. 69-70</p>	<p>Conversely, in the absence of true adaptive management, Navajo County believes that specific guidelines regarding the timing, intensity, classes and duration of grazing, with consideration for the needs of other forest resources management, should be included in the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan, as well as a restocking plan for all vacant allotments, unless livestock grazing on such allotments can be shown to be incompatible with rangelands resources management</p>		<p>Range Management</p>

	purposes and needs.			purposes and needs.			
Livestock grazing - adaptive mgmt	Forest management plans should encourage greater opportunity for adaptive management suited to the needs of improved resource conditions: i.e. flexibility of timing, intensity and duration of grazing periods, use of livestock as a tool for improving previously ungrazed and or debilitated areas managed with electric fences to limit the disconnect of landscape areas.	The plan should encourage greater opportunity for adaptive management suited to the needs of improved resource conditions: i.e. flexibility of timing, intensity and duration of grazing periods, use of livestock as a tool for improving previously ungrazed and or debilitated areas managed with electric fences to limit the disconnect of landscape areas.	** Check out Kaibab p. 69-70				
Minerals - affected env	Locatable Minerals – End of first paragraph should add some mention of phosphate mining activity on non- forest lands in Navajo County that are adjacent to ASNFs.	The DEIS should add some mention of phosphate mining activity on non-forest lands in Navajo County that are adjacent to the Apache-Sitgreaves NFs.	XXXX	Locatable Minerals – End of first paragraph should add some mention of phosphate mining activity on non- forest lands in Navajo County that are adjacent to ASNFs.	Phosphate Mining Activity in Lands Adjacent to ASNF	PC 1650-1 The Forest Service should clarify (Page 464)Locatable Minerals – End of first paragraph should by adding some mention of phosphate mining activity on non- forest lands in Navajo County because they are adjacent to ASNFs.	
Minerals - affected env	Proposed LMP, Pages 98-99, General Comment. The Guidelines for Minerals and Geology are devoid of any mention of guidelines relating to locatable minerals. Indeed, the section as a whole minimizes the fact that numerous unpatented mining claims are located on ASNF	The guidelines for Minerals and Geology (proposed plan p.98-99) should provide guidance related to locatable minerals and recognize the statutory rights of those who maintain unpatented mining claims and sites.	XXXX	Proposed LMP, Pages 98-99, General Comment. The Guidelines for Minerals and Geology are devoid of any mention of guidelines relating to locatable minerals. Indeed, the section as a whole minimizes the fact that numerous unpatented mining claims are located on ASNF	Mentioning locatable minerals, mining claims, and sites in the guidelines	PC 1655-3 The Forest Service should revise the guidelines for minerals and geology to include locatable minerals, address the statutory rights afforded those who maintain unpatented mining claims associated with locatable minerals and mining claims and sites because providing a	

	<p>lands. Furthermore, there is no acknowledgement whatsoever of the statutory rights afforded those who maintain unpatented mining claims. That is, subject to compliance with surface use regulations (see 36 C.F.R. Part 228), unpatented mining claims and sites may be utilized for mineral exploration, development, production, and for ancillary purposes pursuant to the General Mining Law of 1872 (see generally 30 U.S.C. §§ 21-42). Although we understand that the Proposed LMP does provide a simple reference to the General Mining Law of 1872 in the Appendix, such reference is wholly inadequate and without any useful purpose. That the Proposed LMP fails to properly address such important statutory rights associated with locatable minerals and mining claims and sites, in the context of the guidelines, or otherwise, is a major omission. As such, the Proposed LMP is flawed.</p>			<p>lands. Furthermore, there is no acknowledgement whatsoever of the statutory rights afforded those who maintain unpatented mining claims. That is, subject to compliance with surface use regulations (see 36 C.F.R. Part 228), unpatented mining claims and sites may be utilized for mineral exploration, development, production, and for ancillary purposes pursuant to the General Mining Law of 1872 (see generally 30 U.S.C. §§ 21-42). Although we understand that the Proposed LMP does provide a simple reference to the General Mining Law of 1872 in the Appendix, such reference is wholly inadequate and without any useful purpose. That the Proposed LMP fails to properly address such important statutory rights associated with locatable minerals and mining claims and sites, in the context of the guidelines, or otherwise, is a major omission. As such, the Proposed LMP is flawed.</p>		<p>simple reference to the General Mining Law of 1872 in the Appendix is inadequate and without any useful purpose.</p>
Minerals - guideline	<p>Guidelines for Minerals and Geology: The following two items state the same thing regarding administrative and recreation sites; recommend eliminating the second one (pages 98 and 99). • Key cultural sites, research natural areas, and administrative and recreation sites with an investment in facilities should</p>	<p>Recommend deleting the second Minerals and Geology guideline because they say the same thing: (1) " Key cultural sites, research natural areas, and administrative and recreation sites with an investment in facilities should be withdrawn from mineral entry to protect resources and existing infrastructure.</p>	XXXX	<p>Guidelines for Minerals and Geology: The following two items state the same thing regarding administrative and recreation sites; recommend eliminating the second one (pages 98 and 99). • Key cultural sites, research natural areas, and administrative and recreation sites with an investment in facilities should</p>		<p>Duplication of Statements in the Guidelines</p>

	be withdrawn from mineral entry to protect resources and existing infrastructure. Research natural areas • Administrative sites, high use developed recreation areas, and other areas with substantial investment in infrastructure should be withdrawn from mineral entry.	Research natural areas" or (2) "Administrative sites, high use developed recreation areas, and other areas with substantial investment in infrastructure should be withdrawn from mineral entry" (proposed plan p.98-99).		be withdrawn from mineral entry to protect resources and existing infrastructure. Research natural areas • Administrative sites, high use developed recreation areas, and other areas with substantial investment in infrastructure should be withdrawn from mineral entry.		
Cave Karst	I am writing to express my concern about the lack of karst and cave management language in the proposed land management plan for the Apache Sitgreaves National Forest.	The plan should provide guidance for karst and cave management. Reference the karst and cave implementation plan.	XXXX	I am writing to express my concern about the lack of karst and cave management language in the proposed land management plan for the Apache Sitgreaves National Forest.	Karst and Cave Management	
Cave Karst	I would like to offer some detailed suggestions for new language which could improve karst and cave management on the A-S, using the Tongass NF Land Resource Management Plan as a template.	The plan should provide guidance for karst and cave management. Reference the karst and cave implementation plan.	XXXX	I would like to offer some detailed suggestions for new language which could improve karst and cave management on the A-S, using the Tongass NF Land Resource Management Plan as a template.	Karst and Cave Management	PC 175-6 The Forest Service should add meaningful karst and cave management language to the forest plan and use the Tongass NF Land Resource Management Plan as a template.
Cave Karst	I have included my suggestions in the attached pages, and I urge you to take this opportunity to add meaningful karst and cave management language to your forest plan. I have also attached a generic cave and karst management plan which is working towards implementation in the Tonto, Coronado, and Coconino National forests based on consultations with the land managers from those forests.	The plan should provide guidance for karst and cave management. Reference the karst and cave implementation plan.	XXXX	I have included my suggestions in the attached pages, and I urge you to take this opportunity to add meaningful karst and cave management language to your forest plan. I have also attached a generic cave and karst management plan which is working towards implementation in the Tonto, Coronado, and Coconino National forests based on consultations with the land managers from those forests.	Karst and Cave Management	

Cave Karst	<p>Chapter 2: Forestwide Direction</p> <p>Generally speaking, It would be useful to add Karst Terrain as one of the ecosystem types specifically called out such as Air, Soil, Water, or other PVNTs. Another potential area for inclusion would be in the minerals and geology section, though I believe that the surface water to groundwater interactions of Karst terrain make it far more appropriate for inclusion as an ecosystem type such as a riparian area.</p>	<p>The plan should provide guidance for karst and cave management. Reference the karst and cave implementation plan.</p>	XXXX				
Cave Karst	<p>Chapter 2: Forestwide Direction, Minerals and Geology, Related plan content for Minerals and Geology, Page 99: You should make reference to your karst and cave implementation plan in the section</p>	<p>The plan should provide guidance for karst and cave management. Reference the karst and cave implementation plan.</p>	XXXX				
Cave Karst - Mgmt Area	<p>Chapter 3: Management Area Direction, p105</p> <p>Please consider adding a separate Karst and Caves Geologic Areas land use designation to the existing list:</p> <p>Karst and Cave areas Background for Karst and Cave Geologic Areas Karst and Cave Geologic Areas are geologic landforms where the predominate shaping process is controlled by soluble bedrock, usually calcareous nature. Karst landscape is characterized by</p>	<p>Karst and cave geologic areas should be identified as a management area and have specific management direction.</p>	XXXX				

closed depressions, disappearing streams, and solutional shaping. On the Apache Sitgreaves National Forest, significant portions of the Black Mesa Ranger District, including the areas around Soldier's sink and the rim lakes recreation areas are classified as Karst.

Desired Conditions for Karst and Cave Geologic Areas

- Maintain the ability of karst landscapes to regenerate healthy and productive forests after harvesting
- Maintain the surface and subsurface habitats of karst ecosystems to ensure biodiversity
- Maintain the natural flows and water quality of karst hydrologic systems
- Maintain the natural rates of air exchange between the surface and subsurface
- Protect significant surface karst features (e.g., sinkholes, sinking streams, springs, cave entrances) and subsurface karst resources (e.g., caves, underground streams, subterranean fauna)
- Provide recreational opportunities where appropriate.

Standards for Karst and Cave Geologic Areas

- Karst Inventory should be performed as necessary to monitor and protect the

	<p>resource</p> <ul style="list-style-type: none"> <li>• Significant Karst Features should be protected</li> <li>• Sinking streams and riparian areas should be managed according to current best management practices</li> <li>• Road construction in Karst areas should consider underlying karst feature before, during, and after all work or upgrades to avoid damage to karst ecosystems and construction equipment</li> <li>• Timber harvesting in Karst areas should follow buffer zone guidelines to minimize impact to karst ecosystems and logging equipment</li> </ul> <p>Related Plan Content for Karst and Cave Geologic Areas See the following Sections: Appendix {TBD} Karst and Cave Management Plan</p>					
Minerals - locatable	<p>As a general matter, the premise upon which the DEIS and Proposed LMP is based with respect to locatable minerals is flawed. In particular, the Minerals Report, Proposed LMP, and DEIS contain inaccurate statements and are incomplete, at best. We recommend that the DEIS, Proposed LMP and Related Plan Documents properly reflect the fact that a world class copper deposit is located in the immediate vicinity of the southern portion of the ASNF, that the potential for locatable</p>	<p>Correct the Minerals Report, proposed plan, and DEIS to reflect the fact that a world class copper deposit is located in the immediate vicinity of the southern portion of the forest, that the potential for locatable minerals is extremely high in this area, and that the potential for locatable minerals on Apache-Sitgreaves NFs lands may be much greater at depth than surface geology would otherwise suggest.</p>	XXXX	<p>As a general matter, the premise upon which the DEIS and Proposed LMP is based with respect to locatable minerals is flawed. In particular, the Minerals Report, Proposed LMP, and DEIS contain inaccurate statements and are incomplete, at best. We recommend that the DEIS, Proposed LMP and FENNEMORE CRAIG, P.C. USDA Forest Service May 17,2013 Page 3 Related Plan Documents properly reflect the fact that a world class copper deposit is located in the</p>	Locatable Minerals	<p>PC 1658-1 The Forest Service should address locatable minerals and reflect in the Minerals Report, Proposed LMP, and DEIS that a world class copper deposit is located in the immediate vicinity of the southern portion of the ASNF, that the potential for locatable minerals is extremely high in this area, and that the potential for locatable minerals on ASNF lands may be much greater at depth than surface geology would otherwise suggest.</p>

	minerals is extremely high in this area, and that the potential for locatable minerals on ASNF lands may be much greater at depth than surface geology would otherwise suggest.			immediate vicinity of the southern portion of the ASNF, that the potential for locatable minerals is extremely high in this area, and that the potential for locatable minerals on ASNF lands may be much greater at depth than surface geology would otherwise suggest.		
Minerals - mining claims	Minerals Report, Table 1, Page 4. The Minerals Report indicates that it was last updated on December 6, 2012. However, the table of active unpatented mining claims and sites on ASNF lands indicates that it is current only as of 2009. Freeport maintains numerous unpatented mining claims and sites on ASNF lands in conjunction with its Morenci copper mining operations. Although some of these unpatented mining claims and sites were located in the early 1970's, many were located as recently as late last year, in 2012. The table of active unpatented mining claims does not properly account for all the unpatented mining claims and sites maintained by Freeport (and possibly other third-parties as well). We recommend that the Minerals Report be updated to properly reflect all unpatented mining claims and sites maintained on ASNF lands as of at least December 6, 2012.	Update the Minerals Report to properly reflect all unpatented mining claims and sites maintained on Apache-Sitgreaves NFs lands as of at least December 6, 2012.	XXXX	Minerals Report, Table 1, Page 4. The Minerals Report indicates that it was last updated on December 6, 2012. However, the table of active unpatented mining claims and sites on ASNF lands indicates that it is current only as of 2009. Freeport maintains numerous unpatented mining claims and sites on ASNF lands in conjunction with its Morenci copper mining operations. Although some of these unpatented mining claims and sites were located in the early 1970's, many were located as recently as late last year, in 2012. The table of active unpatented mining claims does not properly account for all the unpatented mining claims and sites maintained by Freeport (and possibly other third-parties as well). We recommend that the Minerals Report be updated to properly reflect all unpatented mining claims and sites maintained on ASNF lands as of at least December 6, 2012.	Minerals Report	PC 1658-2 The Forest Service should correct the Minerals Report, Table 1, Page 4 date to indicate that it was last updated on December 6, 2012 because the table of active unpatented mining claims and sites on ASNF lands indicates that it is current only as of 2009. The Forest Service should update the Minerals Report be updated to properly reflect all unpatented mining claims and sites maintained on ASNF lands as of at least December 6, 2012.

Minerals - mining claims	Minerals Report, General Comment. As indicated above, we have noted that Freeport owns and operates the world class Morenci copper mining complex, which is located adjacent to and in the immediate vicinity of the southern boundary of the ASNF. Further, we have noted that Freeport maintains numerous unpatented mining claims and sites on ASNF lands. We find it difficult to understand why the Minerals Report is devoid of any information detailing or otherwise acknowledging the existence of these important and relevant facts. Without such acknowledgment, the Minerals Report, Proposed LMP, DEIS, and other Related Plan Documents, are flawed, and incomplete, at best.	Update the Minerals Report to properly reflect all unpatented mining claims and sites maintained on Apache-Sitgreaves NFs lands as of at least December 6, 2012.	XXXX	Minerals Report, General Comment. As indicated above, we have noted that Freeport owns and operates the world class Morenci copper mining complex, which is located adjacent to and in the immediate vicinity of the southern boundary of the ASNF. Further, we have noted that Freeport maintains numerous unpatented mining claims and sites on ASNF lands. We find it difficult to understand why the Minerals Report is devoid of any information detailing or otherwise acknowledging the existence of these important and relevant facts. Without such acknowledgment, the Minerals Report, Proposed LMP, DEIS, and other Related Plan Documents, are flawed, and incomplete, at best.	Minerals Report	PC 1658-3 The Forest Service should update the Minerals Report, Proposed LMP, DEIS, and other Related Plan Documents to reflect that Freeport owns and operates the world class Morenci copper mining complex, which is located adjacent to and in the immediate vicinity of the southern boundary of the ASNF, and to reflect that Freeport maintains numerous unpatented mining claims and sites on ASNF lands because the LMP lacks an adequate characterization of the number and importance of these unpatented mining claims and sites maintained by Freeport.
Minerals - mining claims	Proposed LMP, Page 98. The statement that "several mill site claims are located on the Clifton Ranger District" is an understatement and extremely misleading. As previously noted, Freeport maintains numerous unpatented mining claims and sites on ASNF lands. The Proposed LMP lacks an adequate characterization of the number and importance of these unpatented mining claims and sites maintained by Freeport. Furthermore, the Proposed LMP does not adequately acknowledge the	Update the Minerals Report to properly reflect all unpatented mining claims and sites maintained on Apache-Sitgreaves NFs lands as of at least December 6, 2012.	XXXX	Proposed LMP, Page 98. The statement that "several mill site claims are located on the Clifton Ranger District" is an understatement and extremely misleading. As previously noted, Freeport maintains numerous unpatented mining claims and sites on ASNF lands. The Proposed LMP lacks an adequate characterization of the number and importance of these unpatented mining claims and sites maintained by Freeport. Furthermore, the Proposed LMP does not adequately acknowledge the	Unpatented Mining Claims	PC 1658-3 The Forest Service should update the Minerals Report, Proposed LMP, DEIS, and other Related Plan Documents to reflect that Freeport owns and operates the world class Morenci copper mining complex, which is located adjacent to and in the immediate vicinity of the southern boundary of the ASNF, and to reflect that Freeport maintains numerous unpatented mining claims and sites on ASNF lands because the LMP lacks an adequate characterization of the number

	fact that a world class copper deposit is located immediately adjacent to the ASNF. Without the proper characterization and acknowledgement, the Proposed LMP is flawed.			fact that a world class copper deposit is located immediately adjacent to the ASNF. Without the proper characterization and acknowledgement, the Proposed LMP is flawed.		and importance of these unpatented mining claims and sites maintained by Freeport.
Economics - general analysis	The Economic analysis prepared by the PNF is inadequate and incomplete, the next generation of DEIS and Plan must fully disclose to the public an economic analysis for recreation, grazing and wildlife on par with what was produced for the other functions.	Provide an economic analysis for recreation, grazing, and wildlife on par with what was produced for other functions.	** Check out Prescott, p 15 1st comment	The Economic analysis prepared by the PNF is inadequate and incomplete, the next generation of DEIS and Plan must fully disclose to the public an economic analysis for recreation, grazing and wildlife on par with what was produced for the other functions.	Incomplete Economic Analysis (Recreation, Grazing, Wildlife, Livestock)	PC 1705-2 The Forest Service should provide a complete economic analysis to include the cost to the ASNF to administer the livestock program and disclose to the public and economic analysis for recreation, grazing, and wildlife on par with what was produced for the other functions.
Economics - grazing	We request a detailed accounting of the economic impact – implied gain to the Forest, local communities and state specific to this activity. We look forward to the Forests detailed explanation, not only financial, social but ecological as well. Our analysis of the Socioeconomic Report 11/2012 shows a much different story; v 130,000 AUM's on the Forest v AMU fee of \$1.35 each v Annual AUM income = \$175,500.00 v Annual payments to Counties = \$43,875.00 v Annual net income to the Forest \$131.625.00 v GAO cost of administration of one FS AUM = \$11.32 v Annual cost to administer 130,000 AUM's =	Provide a detailed accounting of the economic impact of grazing including the cost to administer the livestock program.	XXXX	We request a detailed accounting of the economic impact – implied gain to the Forest, local communities and state specific to this activity. We look forward to the Forests detailed explanation, not only financial, social but ecological as well. Our analysis of the Socioeconomic Report 11/2012 shows a much different story; v 130,000 AUM's on the Forest v AMU fee of \$1.35 each v Annual AUM income = \$175,500.00 v Annual payments to Counties = \$43,875.00 v Annual net income to the Forest \$131.625.00 v GAO cost of administration of one FS AUM = \$11.32 v Annual cost to administer 130,000 AUM's =	Providing Detailed Accounting of Economic Impact/Gain to Counties	PC 1705-1 The Forest Service should include a detailed accounting of the economic (financial, social, and ecological) impact, the implied gain to the forest, local communities and the state specific to the activities. The Forest Service should address the importance of the annual contribution to the local counties and consider funding those counties (see comment) because it would the least negative impact to the land and save the tax payers \$1,296,000.00 per year

	\$1,471,600.00 v Net annual cost to administer Livestock Grazing on the ASNF - \$1,339,975.00 v Net annual cost per allotment on the ASNF = -\$13,958.00			\$1,471,600.00 v Net annual cost to administer Livestock Grazing on the ASNF - \$1,339,975.00 v Net annual cost per allotment on the ASNF = -\$13,958.00		
Economics - grazing	<p>Economic Analysis; The Economic analysis prepared by the Forest Service for the ASNF draft plan and DEIS is woefully inadequate and incomplete. Analysis of these documents found glaring omissions including the total lack of consideration to the detailed contributions of the different pieces lumped under the heading Recreation, which includes camping, hiking, rock climbing, caving, enjoying the views of the landscape, snow sports, wildlife watching, use of wilderness, fishing and hunting. Phone calls to those who drafted the documents told they had not included these factors for two primary reasons;</p> <p>§ there was not sufficient – valid - high quality information / data they could use to develop and economic value.</p> <p>§ the model used did not require or have an entry point for such information.</p> <p>The size of those omissions is significant in the terms of dollars generated from the</p>	Provide a detailed accounting of the economic impact of grazing including the cost to administer the livestock program.	** Check out Kaibab p. 84	Economic Analysis; The Economic analysis prepared by the Forest Service for the ASNF draft plan and DEIS is woefully inadequate and incomplete.	Incomplete Economic Analysis (Recreation, Grazing, Wildlife, Livestock)	PC 1705-2 The Forest Service should provide a complete economic analysis to include the cost to the ASNF to administer the livestock program and disclose to the public and economic analysis for recreation, grazing, and wildlife on par with what was produced for the other functions.

	<p>resources of the ASNF and the rational put forward for these omissions is very suspect, did the developers not have valid data or were they directed not to display and factor in the values due to there overpowering values ?</p> <p>A second major issue is both reports have values for Labor Dollars an abstract economic value rather than a much more simplistic method of values generated and there associated costs.</p>						
Economics - grazing	Not found in the Socioeconomic Report is the cost to the ASNF to administer this livestock program.	Provide a detailed accounting of the economic impact of grazing including the cost to administer the livestock program.	XXXX	Not found in the Socioeconomic Report is the cost to the ASNF to administer this livestock program.		Incomplete Economic Analysis (Recreation, Grazing, Wildlife, Livestock)	PC 1705-2 The Forest Service should provide a complete economic analysis to include the cost to the ASNF to administer the livestock program and disclose to the public and economic analysis for recreation, grazing, and wildlife on par with what was produced for the other functions.
Economics of grazing	The Forest Service charges grazing permit holders an unreasonably low fee to run livestock on national forest lands. As a result, it returns less than 10 percent of its expenditure of public funds for grazing management to the U.S. Treasury. Federal subsidies shield the grazing permit holder from paying market rates for services it acquires on public lands free of charge. The agency should make this clear in its analysis.	Provide an assessment of returns to the treasury and costs to the public of livestock grazing. Concern is that the Forest Service charges grazing permit holders a low fee (subsidy) and returns less than 10 percent of its expenditure for grazing management to the U.S. Treasury.	** Check out Kaibab p. 84	The Forest Service charges grazing permit holders an unreasonably low fee to run livestock on national forest lands. As a result, it returns less than 10 percent of its expenditure of public funds for grazing management to the U.S. Treasury. Federal subsidies shield the grazing permit holder from paying market rates for services it acquires on public lands free of charge. The agency should make this clear in its analysis.		Range Management	

Economics of grazing	As for economics, we are particularly interested in an honest assessment of returns to the treasury and costs to the public of livestock grazing.	Provide an assessment of returns to the treasury and costs to the public of livestock grazing. Concern is that the Forest Service charges grazing permit holders a low fee (subsidy) and returns less than 10 percent of its expenditure for grazing management to the U.S. Treasury.	** Check out Kaibab p. 84	As for economics, we are particularly interested in an honest assessment of returns to the treasury and costs to the public of livestock grazing.	Economic Impacts	PC 1600-12 The Forest Service should address economics, and an honest assessment of returns to the treasury and costs to the public of livestock grazing
Economics of grazing 3	However, Navajo County believes that the economic impact analysis provided by the Apache-Sitgreaves National Forests Land Management Plan team is heavily biased toward demonstrating the favorable economic impact of grazing on public land allotments on the permittees profitability. While focusing on the benefits provided is laudable, Navajo County also believes that a more complete analysis needs to include a calculation of the economic costs of the constraints imposed on the permittees by the current rangelands resources management agency processes that limits considerably the ability of the permittees to manage optimally the land and the livestock due to the rigidity of the administrative processes.	The economic analysis needs to include a calculation of the economic costs of the constraints imposed on the permittees by the current rangelands resources management agency processes that limits the ability of the permittees to manage optimally the land and the livestock due to the rigidity of the administrative processes.	** Check out Kaibab p. 84	However, Navajo County believes that the economic impact analysis provided by the Apache-Sitgreaves National Forests Land Management Plan team is heavily biased toward demonstrating the favorable economic impact of grazing on public land allotments on the permittees profitability. While focusing on the benefits provided is laudable, Navajo County also believes that a more complete analysis needs to include a calculation of the economic costs of the constraints imposed on the permittees by the current rangelands resources management agency processes that limits considerably the ability of the permittees to manage optimally the land and the livestock due to the rigidity of the administrative processes.	Economic Impacts	

Economics - contribution to local	Finally, Navajo County is concerned that, in the Apache-Sitgreaves National Forests Land Management Plan team's own analysis, the current level of economic contribution of approximately 66 jobs and \$713,000 in labor income annually is only approximately half of the approximately 120 jobs and \$1.3 million in labor income annually that can be supported by the full utilization of the available animal unit months (AUMs) (PDEIS p. 491).	Concern that the current level of economic contribution of livestock grazing, approximately 66 jobs and \$713,000 in labor income annually, is only approximately half of the approximately 120 jobs and \$1.3 million in labor income annually that can be supported by the full utilization of the available animal unit months (AUMs) (DEIS p. 491).	XXXX	Finally, Navajo County is concerned that, in the Apache-Sitgreaves National Forests Land Management Plan team's own analysis, the current level of economic contribution of approximately 66 jobs and \$713,000 in labor income annually is only approximately half of the approximately 120 jobs and \$1.3 million in labor income annually that can be supported by the full utilization of the available animal unit months (AUMs) (PDEIS p. 491).	Economic Impacts
Economics of grazing 2	Given the contribution to the local counties of \$43,900.00 annually is important to those counties. The practical – common sense approach and the one that would have the least negative impact to the land would be for the Forest to fund those counties the \$43,900.00 and save the tax payers \$1,296,000.00 per year.	The forest should eliminate livestock grazing and fund counties an annual payment of \$43,900 to save the tax payers \$1,296,000 per year.	XXXX	Given the contribution to the local counties of \$43,900.00 annually is important to those counties. The practical – common sense approach and the one that would have the least negative impact to the land would be for the Forest to fund those counties the \$43,900.00 and save the tax payers \$1,296,000.00 per year.	Counties and Local Communities
Economics - recreation	Navajo County is keenly aware of the detrimental effects caused by national forests rules and management plans restricting business and outdoors recreational opportunities. Additional roadless areas designations and/or roads closure and/or limitation of suitability for future consideration of new motorized areas and trails and/or indiscriminate cross-country motorized travel restrictions would further decrease the recreational	Consider the economic impact of additional roadless area designations and/or roads closure and/or limitation of suitability for future consideration of new motorized areas and trails and/or indiscriminate cross-country motorized travel restrictions that would further decrease recreation opportunities.	XXXX	Navajo County is keenly aware of the detrimental effects caused by national forests rules and management plans restricting business and outdoors recreational opportunities. Additional roadless areas designations and/or roads closure and/or limitation of suitability for future consideration of new motorized areas and trails and/or indiscriminate cross-country motorized travel restrictions would further decrease the recreational	Detrimental Effects of Limiting Motorized Use

	opportunities that Navajo County is able to offer to its residents and visitors, further constraining an already difficult economic outlook.			opportunities that Navajo County is able to offer to its residents and visitors, further constraining an already difficult economic outlook.		
Economics - value hunting fishing	It is important to note there no value for hunting and fishing	Explain why there is no value for hunting and fishing.	XXXX	It is important to note there no value for hunting and fishing	Value of Hunting and Fishing	PC 1076-1 The Forest Service should address and define the ecological value of these large, contiguous tracts of wild lands for wildlife and these areas also possess outstandingly remarkable wildlife related recreational values. Hunting, fishing, and watchable wildlife opportunities are key components of these values and future management of these areas should allow for the continued use by the public for wildlife related recreational activities.
Landscape Disturbance - non-native	There is text within the Plan that discusses reseeding after large-scale fire. This is a concept that we endorse but urge that the Plan reflect a clear preference to the use of native species where practical. We believe it would be appropriate to outline some triggers that would have to be met before the using non-native seeds to manage soil erosion. It seems reasonable to us that a set of criteria based on size of the burn and the slope where the burn occurred would be reasonable upon	Identify criteria (e.g., size of burn, slope) to be met before using non-native seeds to manage soil erosion post-wildfire.	XXXX	There is text within the Plan that discusses reseeding after large-scale fire. This is a concept that we endorse but urge that the Plan reflect a clear preference to the use of native species where practical. We believe it would be appropriate to outline some triggers that would have to be met before the using non-native seeds to manage soil erosion. It seems reasonable to us that a set of criteria based on size of the burn and the slope where the burn occurred would be reasonable upon	Reseeding Criteria for Native and Non-Native Seeds	PC 650-6 The Forest Service should address discussions on reseeding after large-scale fire and reflect a clear preference to the use of native species where practical. We believe it would Triggers should be included that would have to be met before the using non-native seeds to manage soil erosion. The set of criteria should be based on size of the burn and the slope where the burn occurred would be reasonable upon which to base criteria upon which to base the decision of when and where

	which to base criteria upon which to base the decision of when and where non-native seed would be used			which to base criteria upon which to base the decision of when and where non-native seed would be used		non-native seed would be used.
Landscape disturbance - natural recovery	A crucial but now rare component of wildlife habitat are areas of burned but standing forest or even single burned snags. These should only be managed for protection and not looked to for commercial gain and allowed to recover naturally.	Burned but standing forest and single burned snags should be managed for natural recovery and not looked to for commercial gain.	** Check out Kaibab p. 33, 1st comment	A crucial but now rare component of wildlife habitat are areas of burned but standing forest or even single burned snags. These should only be managed for protection and not looked to for commercial gain and allowed to recover naturally.	Protection for Burned Areas	
Landscape disturbance - natural recovery	Patches of severely burned forest, or snag forests, are among the rarest of all wildlife habitats in the West; they should be managed for natural recovery.	Burned but standing forest and single burned snags should be managed for natural recovery and not looked to for commercial gain.	** Check out Kaibab p. 33, 1st comment	Patches of severely burned forest, or snag forests, are among the rarest of all wildlife habitats in the West; they should be managed for natural recovery. Post-fire logging and road building should not be allowed more than one-quarter (1/4) mile from existing roads.	Post Fire Logging and Road Building	PC 959-3 The Forest Service should add standards managing patches of severely burned forest, or snag forests for natural recovery. Post-fire logging and road building should not be allowed more than one-quarter (1/4) mile from existing roads
Forest products - salvage	It is imperative that "salvage" logging after fire must not be equated with ecological restoration or forest management objectives other than economically-motivated multiple use	Salvage logging should not be equated with ecological restoration or forest management objectives other than economically-motivated multiple use.	** Check out Kaibab p. 33, 2nd comment	According to the Forest Service, an additional "need for change" is to "develop plan components to focus on restoration of fire-adapted ecosystem[s]," including utilization of "a wide variety of methods, including silvicultural treatments, tree planting and salvage" (USDA 2008b: 28). It is imperative that "salvage" logging after fire must not be equated with ecological restoration or forest		

				management objectives other than economically-motivated multiple use		
Livestock grazing - post-fire mgmt	I don't see anything in the new plan that says, remove or reduce the number of cows when there's little rain and the grass doesn't grow, or when fire burns the vegetation up. In fact, I couldn't believe cows were back after that big fire in 2011 and there were quite a number of places where they were tearing up the newly burnt soil.	There is a need to remove or reduce livestock grazing post-fire.	XXXX	I don't see anything in the new plan that says, remove or reduce the number of cows when there's little rain and the grass doesn't grow, or when fire burns the vegetation up. In fact, I couldn't believe cows were back after that big fire in 2011 and there were quite a number of places where they were tearing up the newly burnt soil.	Eliminate / Curtail Livestock Grazing	PC 1608-3 The Forest Service should include removing or reducing the number of cows when there's little rain, grass doesn't grow, or when fire burns the vegetation up.
Livestock grazing - post-fire mgmt	As for wildfire, the Plan is a great place to impose standards that prohibit livestock grazing on fragile post-fire landscapes, but this is not addressed.	There is a need to remove or reduce livestock grazing post-fire.	XXXX	As for wildfire, the Plan is a great place to impose standards that prohibit livestock grazing on fragile post-fire landscapes, but this is not addressed.	Prohibiting Livestock in Post-Fire Landscapes	PC 2667-6 The Forest Service should address and impose standards that prohibit livestock grazing on fragile post-fire landscapes.
Livestock grazing - post-fire mgmt	Your plan also states that you set at the "highest priority" actions that will "remove risk factors that may threaten the integrity of the watershed (plan at 18) but do not acknowledge livestock grazing to be such a risk factor and do not take any steps to limit post-fire grazing, or even to mention it or included even guidelines that might address	There is a need to remove or reduce livestock grazing post-fire.	XXXX	Your plan also states that you set at the "highest priority" actions that will "remove risk factors that may threaten the integrity of the watershed (plan at 18) but do not acknowledge livestock grazing to be such a risk factor and do not take any steps to limit post-fire grazing, or even to mention it or included even guidelines that might address	Impacts from Livestock Grazing	PC 1600-14 The Forest Service should address and clarify why the "highest priority" actions that will "remove risk factors that may threaten the integrity of the watershed (plan at 18) are not mentioned or included in guidelines that might address the problem of livestock grazing being a risk factor.

	the problem. Given that you say there will be more wildfires and given the scope of the recent Wallow fire, this is a significant lapse			the problem. Given that you say there will be more wildfires and given the scope of the recent Wallow fire, this is a significant lapse		
Livestock grazing - drought	The ASNF must develop a real drought policy and put it in the new Plan. The drought policy would use the latest and best scientific resources; we strongly urge the Forest use the Drought Monitor. This policy would be used in a proactive approach rather than a subjective approach based on professional opinions leading to arbitrary decisions. The policy must address both; what is a drought, what resources were used to determine the severity of the drought AND then what actions the PNF will take to insure harm is not inflicted to the various ecosystems on the Forest from those impacts it can control, IE; humans and domestic livestock.	Add a drought policy to the plan. Recommend using the Drought Monitor from the National Climate Data Center.	** Check out Kaibab p. 75 last comment & Prescott p. 10 2nd comment	The ASNF must develop a real drought policy and put it in the new Plan. The drought policy would use the latest and best scientific resources; we strongly urge the Forest use the Drought Monitor. This policy would be used in a proactive approach rather than a subjective approach based on professional opinions leading to arbitrary decisions.	Forest Health	
AZGFD-GL-Edit	Plan, Guidelines for Landscape Scale Disturbance Events, page 66: "Erosion control mitigation features should be implemented to protect significant resource values and infrastructure such as stream channels, roads, structures, threatened and endangered species, and cultural resources. <i>The use of</i>	Modify Landscape Scale Disturbance Events Guideline (proposed plan p.66) "Erosion control mitigation features should be implemented to protect significant resource values and infrastructure such as stream channels, roads, structures, threatened and endangered species, and		Plan, Guidelines for Landscape Scale Disturbance Events, page 66: "Erosion control mitigation features should be implemented to protect significant resource values and infrastructure such as stream channels, roads, structures, threatened and endangered species, and cultural resources. <i>The use of</i>		

	<p><i>nonnative grass seed for aerial seeding should be discouraged.</i>" The Department is concerned with the use by the A-S of "non persistent" nonnative grass seed to mitigate wildfire impacts. Although the Department acknowledges the need for erosion control mitigation following a large fire event, the use of nonnative seed, as occurred following the Wallow Fire, has resulted in unintended consequences. These include concentrating elk within seeded locations, discouraging normal daily and seasonal movement patterns, outcompeting native forbs and grasses, and impacting aspen regeneration.</p>	<p>cultural resources. <i>The use of nonnative grass seed for aerial seeding should be discouraged.</i>" Concern with the use of "non persistent" nonnative grass seed to mitigate wildfire impacts and possible unintended consequences such as concentrating elk within seeded locations, discouraging normal daily and seasonal movement patterns, outcompeting native forbs and grasses, and impacting aspen regeneration.</p>		<p><i>nonnative grass seed for aerial seeding should be discouraged.</i>" The Department is concerned with the use by the A-S of "non persistent" nonnative grass seed to mitigate wildfire impacts. Although the Department acknowledges the need for erosion control mitigation following a large fire event, the use of nonnative seed, as occurred following the Wallow Fire, has resulted in unintended consequences. These include concentrating elk within seeded locations, discouraging normal daily and seasonal movement patterns, outcompeting native forbs and grasses, and impacting aspen regeneration.</p>		
Conservation Ed - edit	<p>"There is a clear lack of public understanding regarding forest issues, laws, consequences of forest user behavior, and forest management actions" This is under conservation education and highlights our failures with the written word. Recommend deleting it.</p>	<p>Delete the statement in Conservation Education background ""There is a clear lack of public understanding regarding forest issues, laws, consequences of forest user behavior, and forest management actions" (proposed plan p. 85).</p>	XXXX	<p>"There is a clear lack of public understanding regarding forest issues, laws, consequences of forest user behavior, and forest management actions" This is under conservation education and highlights our failures with the written word. Recommend deleting it.</p>	Removing Ambiguous Wording	
Conservation Ed - edit2	<p>Suggest changing the last sentence in Management Approaches for Conservation Education to read: The forests place an emphasis on providing interpretive programs, especially through its visitor centers (Big Lake and Mogollon Rim) and front line desk at Ranger Districts and Supervisor's Office and development of education tools (e.g., invasive species</p>	<p>Modify the last sentence in the Conservation Education management approach (proposed plan p. 86) to read: "The forests place an emphasis on providing interpretive programs, especially through its visitor centers (Big Lake and Mogollon Rim) and front line desk at Ranger Districts and Supervisor's Office and development of education tools (e.g., invasive species</p>	XXXX	<p>Suggest changing the last sentence in Management Approaches for Conservation Education to read: The forests place an emphasis on providing interpretive programs, especially through its visitor centers (Big Lake and Mogollon Rim) and front line desk at Ranger Districts and Supervisor's Office and development of education tools (e.g., invasive species</p>	Change Wording in Management Approach for Conservation Education	PC 1801-1 The Forest Service should change the last sentence (page 86) in Management Approaches for Conservation Education to read: The forests place an emphasis on providing interpretive programs, especially through its visitor centers (Big Lake and Mogollon Rim) and front line desk at Ranger Districts and Supervisor's Office and

	prevention).	prevention)."		prevention).			development of education tools (e.g., invasive species prevention).
Ecosystem Health - clarify DC	Issues: The Plan contains many errors and omissions. "Landscape Scale Desired Condition" (p12) Habitat quality, distribution and abundance exist to support the recovery and/or stabilization of federally listed and other species, however there is no justification for this provided, and no discussion of instances when such habitat never occurred on the site or is incapable of being produced now.	Clarify the Overall Ecosystem Health desired condition "Habitat quality, distribution, and abundance exist to support the recovery of federally listed species and the continued existence of all native and desirable nonnative species" (proposed plan p.17). Explain the justification for this discuss instances when such habitat never occurred on the site or is incapable of being produced now.	XXXX	Issues: The Plan contains many errors and omissions. "Landscape Scale Desired Condition" (p12) Habitat quality, distribution and abundance exist to support the recovery and/or stabilization of federally listed and other species, however there is no justification for this provided, and no discussion of instances when such habitat never occurred on the site or is incapable of being produced now.		Landscape Scale (Errors and Omissions)	
Ecosystem Health - clarify terms	Page 17 "Ecotone shifts..." The word, ecotone, is an obsolete concept that refers to the transition between two plant communities. This was based on the view of plant communities as objective and discrete entities. A more reasonable view is the all vegetation changes continually in space in response to site factors and "ecotones" are merely areas where those factors change more rapidly.	Clarify terms used in the Overall Ecosystem Health section of the plan, including ecotone, high geomorphic, hydrologic, biotic integrity, ecological maintenance, and natural potential condition.	XXXX				

Ecosystem Health - clarify terms	High geomorphic, hydrologic, biotic integrity and natural potential condition are not defined. Parameters for measurement for these terms are not provided.	Clarify terms used in the Overall Ecosystem Health section of the plan, including ecotone, high geomorphic, hydrologic, biotic integrity, ecological maintenance, and natural potential condition.	XXXX	High geomorphic, hydrologic, biotic integrity and natural potential condition are not defined. Parameters for measurement for these terms are not provided.	Errors and Omissions in Definitions and Terminology	
Ecosystem Health - clarify terms	Issue: Glossary terms are incorrect, misleading or incomplete. Ecotone - Ecotone was a term used by Clements and other ecologists who espoused the concept that plant communities were comparable to organisms or quasi organisms with emergent properties. The transitions from one community to another were called ecotones. If one adopts the "continuum" or "individualistic" concept (e.g Gleason) plant species abundance is seen to vary in response to environmental gradients, thus "ecotones" are only zones of rapid change as opposed to more gradual change where environmental conditions are relatively constant. Thus, the definition used in this plan (a community sharing species of adjacent communities) would apply to any plant community, and thus has no meaning.	Clarify terms used in the Overall Ecosystem Health section of the plan, including ecotone, high geomorphic, hydrologic, biotic integrity, ecological maintenance, and natural potential condition.	XXXX	Issue: Glossary terms are incorrect, misleading or incomplete. Ecotone - Ecotone was a term used by Clements and other ecologists who espoused the concept that plant communities were comparable to organisms or quasi organisms with emergent properties. The transitions from one community to another were called ecotones. If one adopts the "continuum" or "individualistic" concept (e.g Gleason) plant species abundance is seen to vary in response to environmental gradients, thus "ecotones" are only zones of rapid change as opposed to more gradual change where environmental conditions are relatively constant. Thus, the definition used in this plan (a community sharing species of adjacent communities) would apply to any plant community, and thus has no meaning.	Errors and Omissions in Definitions and Terminology	PC 3600-1 The Forest Service should revise and clarify the incorrect, misleading, or incomplete glossary terms as follows: 1. Unique – the term is used repeatedly in this document with different meanings example: "unique riparian vegetation types" (p. 5) "unique species", referring to plant and animal species claimed to be found only on the A-S NF. (p.5) "unique waters", referring to designation by ASDWR to certain streams. "Communities, populations, and individual plant and animal species are uniquely adapted to and dependent on ecosystem diversity.", implying a high degree of evolutionary organization (p11). 2. Ecotone - Ecotone was a term used by Clements and other ecologists who espoused the concept that plant communities were comparable to organisms or quasi organisms with emergent properties. The transitions from one community to another were called ecotones. If one adopts the "continuum"

						<p>or "individualistic" concept (e.g Gleason) plant species abundance is seen to vary in response to environmental gradients, thus "ecotones" are only zones of rapid change as opposed to more gradual change where environmental conditions are relatively constant. Thus, the definition used in this plan (a community sharing species of adjacent communities) would apply to any plant community, and thus has no meaning. 3. Herbivory - is defined as "loss of vegetation due to consumption by another organism." It actually means the act of consumption of vegetation by an herbivore, or an animal that eats plants. 4. Livestock Grazing - is defined as "foraging by permitted livestock" which implies that foraging that is not "permitted" is not grazing. 5. Resiliency - the concept of resiliency is somewhat controversial, but generally means a system that has the capacity to change in response to some stress and to recover from that stress. Resilience is different from stability - which is resistance to change. These concepts seem to be somewhat confused in this document. 6. Scenic integrity - This definition is confusing. In one place it says high scenic integrity is the "state of</p>
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								naturalness" or "without disturbance created by humans." In another, it says the highest scenic integrity ratings are given to those landscapes that have little or no deviation from the landscape character valued by constituents for its aesthetic quality, which could mean that scenic integrity is in the eye of the beholder. There is no reason to believe that the "historic condition" is the only landscape character that can be appropriately valued by "constituents".
Ecosystem Health - clarify terms	we did not find any reference to "ecological maintenance" in the current forest plan, so it is not clear what that means.	Clarify terms used in the Overall Ecosystem Health section of the plan, including ecotone, high geomorphic, hydrologic, biotic integrity, ecological maintenance, and natural potential condition.	XXXX					
Ecosystem Health - clarify terms	"In order to achieve overall ecosystem health and provide for species diversity, the A-S NF's focus on achieving satisfactory watershed conditions and restoring ecological functions, especially natural fire regimes." (p77) This statement equates the nebulous concept of species diversity (without a definition) and ecosystem health, another term which is not easy to define with "watershed condition" (also undefined) and restored ecological	Clarify terms used in the Overall Ecosystem Health section of the plan, including ecotone, high geomorphic, hydrologic, biotic integrity, ecological maintenance, and natural potential condition.	XXXX					

	functions (also not defined). [NOTE - not is proposed plan]						
Ecosystem Health - resilient	p.15 ...ecosystems were considered to be resilient. This statement implies that ranchers, settlers and farmers were the inherent cause of deviation from desired conditions.	Concern that the Overall Ecosystem Health background statement "...ecosystems were considered to be resilient" (proposed plan p.15) implies that ranchers, settlers and farmers were the inherent cause of deviation from desired conditions.	XXXX	p.15 ...ecosystems were considered to be resilient. This statement implies that ranchers, settlers and farmers were the inherent cause of deviation from desired conditions.		Ecosystems (Clarify Description)	PC 2655-2 The Forest Service should address and provide that basis for historical soil condition being 5% impaired, discuss the significance of naturally unstable areas contribute to sediment loads, and why naturally unstable areas did not apparently contribute sediment in the past.
Ecosystem Health - resilient 2	p.16 ...allow for a shifting of plant communities .... Plant communities are resilient.. This statement is contradictory and shifting means changing and resilient means going back to the same.	Correct the Overall Ecosystem Health desired condition "Natural ecological processes allow for a shifting of plant communities ...plant communities and the variety within the communities are resilient to disturbances" (proposed plan p. 17). Statement is contradictory, shifting means changing and resilient means going back to the same.	XXXX	p.16 ...allow for a shifting of plant communities .... Plant communities are resilient.. This statement is contradictory and shifting means changing and resilient means going back to the same.		Plant Communities (Clarify Description)	
CFI - burning frequency	Prescribed burning was very effective at reducing fire intensity, rate of spread and mortality. Results are varied by age of treatment. Benefits of prescribed burning only could be detected in burn patterns and mortality for 15 years following the burn with	Prescribed burning or natural fires need to be repeated not more than every 10 years. Critical locations could be treated more frequently.	XXXX	Prescribed burning was very effective at reducing fire intensity, rate of spread and mortality. Results are varied by age of treatment. Benefits of prescribed burning only could be detected in burn patterns and mortality for 15 years following the burn with		Prescribed Burning	

	<p>most benefits negligible after 20 years but still detectable. Therefore, -prescribed burning or natural fires need to be repeated not more than every 10 years. To do this would be a significant increase in annual burned acreage and most likely not realistic but it would be nice to achieve.. Critical locations could be treated more frequently</p>			<p>most benefits negligible after 20 years but still detectable. Therefore, -prescribed burning or natural fires need to be repeated not more than every 10 years. To do this would be a significant increase in annual burned acreage and most likely not realistic but it would be nice to achieve.. Critical locations could be treated more frequently</p>			
CFI - size	<p>The half mile treatment areas around the Community-Forest Intermix (Urban Interface) area would be much more effective if they are increased to one mile wide minimum, two miles is better.</p>	<p>Increase the treatment areas around the Community-Forest Intermix Management Area from half-mile to one- or two-miles.</p>	XXXX	<p>The half mile treatment areas around the Community-Forest Intermix (Urban Interface) area would be much more effective if they are increased to one mile wide minimum, two miles is better.</p>		Fuel Treatments	
AZGFD-DC-Edit	<p>Plan, Desired Conditions for Community-Forest Intermix, page 106: "Native grasses, forbs, shrubs, and litter (i.e., fine fuels) are abundant enough to maintain and support natural fire regimes, protect soils, <i>provide for wildlife needs</i>, and support water infiltration."</p>	<p>Modify Community-Forest Intermix Desired Condition (proposed plan p. 106) "Native grasses, forbs, shrubs, and litter (i.e., fine fuels) are abundant enough to maintain and support natural fire regimes, protect soils, <i>provide for wildlife needs</i>, and support water infiltration."</p>		<p>Plan, Desired Conditions for Community-Forest Intermix, page 106: "Native grasses, forbs, shrubs, and litter (i.e., fine fuels) are abundant enough to maintain and support natural fire regimes, protect soils, <i>provide for wildlife needs</i>, and support water infiltration."</p>			
Energy Corridor - motorized access	<p>Plan, Guidelines for Energy Corridors, page 110: "Energy corridors should be managed as nonmotorized areas <del>to avoid</del> <i>where</i> conflicts with corridor maintenance needs <i>exist</i>, <del>although maintenance activities may use motorized equipment."</del> The Department believes that utilizing energy corridors for motorized use, where these</p>	<p>The plan should allow for utilities to have motorized access to the energy corridors as well as within the energy corridor.</p>		<p>Plan, Guidelines for Energy Corridors, page 110: "Energy corridors should be managed as nonmotorized areas <del>to avoid</del> <i>where</i> conflicts with corridor maintenance needs <i>exist</i>, <del>although maintenance activities may use motorized equipment."</del> The Department believes that utilizing energy corridors for motorized use, where these</p>			

	uses can be compatible, can limit additional habitat degradation by helping to meet motorized recreational demands while reducing the need for additional NFS motorized roads and trails in less disturbed areas.			uses can be compatible, can limit additional habitat degradation by helping to meet motorized recreational demands while reducing the need for additional NFS motorized roads and trails in less disturbed areas.			
Energy Corridor - motorized access	Plan, Motorized Use Suitability, page 132: Table 9 indicates that NFS motorized trails <50" are not suitable within energy corridors. The Department believes that utilizing energy corridors for motorized use, where these uses can be compatible, can limit additional habitat degradation by helping to meet motorized recreational demands while reducing the need for additional NFS motorized roads and trails in less disturbed areas.	The plan should allow for utilities to have motorized access to the energy corridors as well as within the energy corridor.		Plan, Motorized Use Suitability, page 132: Table 9 indicates that NFS motorized trails <50" are not suitable within energy corridors. The Department believes that utilizing energy corridors for motorized use, where these uses can be compatible, can limit additional habitat degradation by helping to meet motorized recreational demands while reducing the need for additional NFS motorized roads and trails in less disturbed areas.			
Energy Corridor - motorized access	The "Guidelines for Energy Corridor" on page 110 of the Proposed Land Management Plan, state that "energy corridors should be managed as non-motorized areas to avoid conflicts with corridor maintenance needs, although maintenance activities may use motorized equipment". Utilities will also need motorized access to the energy corridors for operation and maintenance purposes. The Final Land Management Plan should allow for utilities to have motorized access to the energy corridors as well as	The plan should allow for utilities to have motorized access to the energy corridors as well as within the energy corridor.	XXXX	The "Guidelines for Energy Corridor" on page 110 of the Proposed Land Management Plan, state that "energy corridors should be managed as non-motorized areas to avoid conflicts with corridor maintenance needs, although maintenance activities may use motorized equipment". Utilities will also need motorized access to the energy corridors for operation and maintenance purposes. The Final Land Management Plan should allow for utilities to have motorized access to the energy corridors as well as		Allowing Utilities Motorized Access to Energy Corridors	

	within the energy corridor.			within the energy corridor.		
Energy Corridor - compliance req	SRP recommends that the final Land Management Plan include NERC compliance requirements for vegetation (EC 14171,0513 ) clearing within and adjacent to energy corridors under the "Guidelines for Energy Corridor" section on page 110 of the Proposed Land Management Plan.	Include National Energy Regulatory Commission compliance requirements for vegetation clearing within and adjacent to energy corridors and the 2010 Memorandum of Understanding providing for the coordination among federal agency reviews of electric transmission facilities in the plan.	XXXX	SRP recommends that the final Land Management Plan include NERC compliance requirements for vegetation (EC 14171,0513 ) clearing within and adjacent to energy corridors under the "Guidelines for Energy Corridor" section on page 110 of the Proposed Land Management Plan.	Including NERC Compliance Requirements and MOU between Federal Departments	
Energy Corridor - compliance req	One item to note is the 2010 Memorandum of Understanding (MOU) between several federal departments, providing for the coordination among federal agency reviews of electric transmission facilities, was not referenced in the new plan. The MOU was created to help improve efficiency in coordinating the processes and procedures of the various federal agencies in the development of energy projects. SRP recommends the MOU should be referenced in the Proposed Plan as a valuable tool to be utilized in the maintenance and development of energy projects.	Include National Energy Regulatory Commission compliance requirements for vegetation clearing within and adjacent to energy corridors and the 2010 Memorandum of Understanding providing for the coordination among federal agency reviews of electric transmission facilities in the plan.	XXXX	One item to note is the 2010 Memorandum of Understanding (MOU) between several federal departments, providing for the coordination among federal agency reviews of electric transmission facilities, was not referenced in the new plan. The MOU was created to help improve efficiency in coordinating the processes and procedures of the various federal agencies in the development of energy projects. SRP recommends the MOU should be referenced in the Proposed Plan as a valuable tool to be utilized in the maintenance and development of energy projects.	Including NERC Compliance Requirements and MOU between Federal Departments	PC 2711-1 The Forest Service should reference the MOU between several federal agencies providing coordination among federal agency review of electric transmission lines and as a valuable tool to be utilized in the maintenance and development of energy projects.

101.29	In addition to the eight designated WQAs proposed for retention in the Plan, the Department requests that the Carr Lake and Palomino areas be officially designated as WQAs as well. Although not designated as such, these areas have been closed to public motorized use and have been managed as WQAs for at least the past 20 years.	The Carr Lake and Palomino areas, in addition to the eight existing wildlife quiet areas (WQAs), should be designated as wildlife quiet areas.	XXXX	In addition to the eight designated WQAs proposed for retention in the Plan, the Department requests that the Carr Lake and Palomino areas be officially designated as WQAs as well. Although not designated as such, these areas have been closed to public motorized use and have been managed as WQAs for at least the past 20 years.		Keep Existing Areas and Add All Proposed Areas	PC 2717-2 The Forest Service should add Carr Lake, Palomino areas as WQA's because these areas have been closed to public motorized use and have been managed as WQA's for the past 20 years and the benefits for the benefits to wildlife as well as the hunting and wildlife viewing benefits for the public. Cottonwood and Bear Springs areas should also be included as WQA's to improve the hunting experiences in a heavily motorized use and roaded area.
WQAs - support	The Department supports the inclusion of these areas as WQAs given the current management of these areas and given this designation would not impede the Department's ability to actively manage wildlife in the area.	The Carr Lake and Palomino areas, in addition to the eight existing wildlife quiet areas (WQAs), should be designated as wildlife quiet areas.	XXXX	The Department supports the inclusion of these areas as WQAs given the current management of these areas and given this designation would not impede the Department's ability to actively manage wildlife in the area.		Keep Existing Areas and Add All Proposed Areas	PC 2717-1 The Forest Service should keep all existing Wildlife Quiet Areas and adding all new proposed areas under Alternative D to include ample wilderness recommendations to protect large habitats, management of wildlife, and to protect opportunities for quiet recreation away from motorized vehicles. The Forest Service should address that the quiet spaces are few and greatly spaced (pages 305-306).
WQAs - support 2	The Plan also includes designation of two additional WQAs (Cottonwood and Bear Springs). In the interest of improving the hunting experience in these areas, the Department supports such designation.	The commentor supports the designation of Cottonwood and Bear Springs areas as wildlife quiet areas.	XXXX	The Plan also includes designation of two additional WQAs (Cottonwood and Bear Springs). In the interest of improving the hunting experience in these areas, the Department supports such designation.		Keep Existing Areas and Add All Proposed Areas	PC 2717-2 The Forest Service should add Carr Lake, Palomino areas as WQA's because these areas have been closed to public motorized use and have been managed as WQA's for the past 20 years and the benefits for the benefits to wildlife as well as the hunting and wildlife

							viewing benefits for the public. Cottonwood and Bear Springs areas should also be included as WQA's to improve the hunting experiences in a heavily motorized use and roaded area.
WQA-affected environment	Eagar requests that the Forest Service use actual data concerning wildlife populations on the Forest and their interaction with motorized vehicles as the basis for restricting motor vehicle use.	The plan (e.g., need for Wildlife Quiet Area Management Area) should be based on actual data concerning wildlife populations on the forest and wildlife interaction with motorized vehicles.	XXXX	Eagar requests that the Forest Service use actual data concerning wildlife populations on the Forest and their interaction with motorized vehicles as the basis for restricting motor vehicle use.		Provide Data Concerning Wildlife Populations	PC 2717-4 The Forest Service should use actual data concerning wildlife population on the Forest and their interaction with motorized vehicles as the basis for restricting motor vehicle use.
WQA-affected environment	Issue: The Plan fails to use actual data for wildlife populations. (last paragraph, page 112, Proposed Plan): Remedy: Base Standards on actual on-the-ground situations. Provide actual data concerning wildlife populations on the Forest and wildlife interaction with motorized vehicles.	The plan (e.g., need for Wildlife Quiet Area Management Area) should be based on actual data concerning wildlife populations on the forest and wildlife interaction with motorized vehicles.	XXXX	Issue: The Plan fails to use actual data for wildlife populations. (last paragraph, page 112, Proposed Plan): Remedy: Base Standards on actual on-the-ground situations. Provide actual data concerning wildlife populations on the Forest and wildlife interaction with motorized vehicles.		Wildlife	
WQAs - spacing	We are concerned that the existing Sitgreaves' Wildlife Quiet Areas (approximately 22,588 acres), as pointed out on pages 305-306, are "few and greatly spaced."	There is a concern that the existing Sitgreaves' wildlife quiet areas (DEIS p. 305-306) are "few and greatly spaced."	XXXX	We are concerned that the existing Sitgreaves' Wildlife Quiet Areas (approximately 22,588 acres), as pointed out on pages 305-306, are "few and greatly spaced."		Keep Existing Areas and Add All Proposed Areas	PC 2717-1 The Forest Service should keep all existing Wildlife Quiet Areas and adding all new proposed areas under Alternative D to include ample wilderness recommendations to protect large habitats, management of wildlife, and to protect opportunities for quiet recreation away from motorized vehicles. The Forest Service should address that the quiet spaces are few and

							greatly spaced (pages 305-306).
Natural landscape - defacto wilderness	The Forest Service should manage the lands that make up the majority of the Forest for the greatest benefit to the public	Remove Natural Landscape Management Area. Concern is that it leads to de facto wilderness management.	XXXX	The Forest Service should manage the lands that make up the majority of the Forest for the greatest benefit to the public		Manage for Greatest Benefit to Public	
Natural landscape - defacto wilderness	Eagar requests that the Forest Service not consider areas for special land use designations as a means of keeping the door open for future designations as "wilderness".	Remove Natural Landscape Management Area. Concern is that it leads to de facto wilderness management.	XXXX	Eagar requests that the Forest Service not consider areas for special land use designations as a means of keeping the door open for future designations as "wilderness".		Considering Wilderness Designation under other Names	PC 2721-1 The Forest Service should clarify (page 14 3rd paragraph and page 114 4th paragraph of the plan) and not add "wilderness areas" to the National Wilderness Preservation System or implement "wilderness" management under some other name because the National Forests were created for many purposes to benefit people and not simply to become an ecosystem and wildlife preserve where humans are not welcome.

Natural landscape - defacto wilderness	Eagar requests that the Forest Service not attempt to add "wilderness" areas to the National Wilderness Preservation System or implement "wilderness" management disguised under some other name. The National Forests were created for many purposes including the benefit of the people, not simply to become an ecosystem and wildlife preserve where humans are not welcome.	Remove Natural Landscape Management Area. Concern is that it leads to de facto wilderness management.	XXXX	Eagar requests that the Forest Service not attempt to add "wilderness" areas to the National Wilderness Preservation System or implement "wilderness" management disguised under some other name. The National Forests were created for many purposes including the benefit of the people, not simply to become an ecosystem and wildlife preserve where humans are not welcome.	Considering Wilderness Designation under other Names	PC 2721-1 The Forest Service should clarify (page 14 3rd paragraph and page 114 4th paragraph of the plan) and not add "wilderness areas" to the National Wilderness Preservation System or implement "wilderness" management under some other name because the National Forests were created for many purposes to benefit people and not simply to become an ecosystem and wildlife preserve where humans are not welcome.
Natural landscape - defacto wilderness	Issue: The Plan misleads the public through the use of non-Wilderness landscape designations to achieve de facto Wilderness designations.. (4th paragraph, page 114, Proposed Plan): Remedy: Remove wording and change guidelines that lead to de facto wilderness management disguised as other designations.	Remove Natural Landscape Management Area. Concern is that it leads to de facto wilderness management.	XXXX	Issue: The Plan misleads the public through the use of non-Wilderness landscape designations to achieve de facto Wilderness designations.. (4th paragraph, page 114, Proposed Plan): Remedy: Remove wording and change guidelines that lead to de facto wilderness management disguised as other designations.	De Facto Wilderness Designations	
Natural landscape - defacto wilderness	Navajo County respectfully suggests that the Selected Alternative in the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan include specific information on the potential location of the proposed 405,000 acres of Natural Landscape Areas under Alternative B.	Provide information on the potential location of the proposed 405,000 acres of Natural Landscape Management Area.	XXXX	Navajo County respectfully suggests that the Selected Alternative in the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan include specific information on the potential location of the proposed 405,000 acres of Natural Landscape Areas under Alternative B.	Locations of Proposed Natural Landscape Areas	

Livestock grazing suitability - non-allotment or special use	Grazing -Allow grazing in areas that may not be under allotment or in special use areas that are otherwise suitable for grazing.	Allow grazing in areas that may not be under allotment or in special use areas that are otherwise suitable for grazing.	XXXX	Grazing -Allow grazing in areas that may not be under allotment or in special use areas that are otherwise suitable for grazing.	Allow Grazing	
RNA - livestock grazing suitability RNA	Navajo County therefore supports the designation of appropriate size Recommended Research Natural Areas, considered not suitable for grazing, in order to improve rangelands resources management science and practice	Support removing proposed and designated research natural areas from suitable rangelands. However, these rangelands should be managed for the specific purpose of quantifying and improving the understanding of the rangelands resources ecosystem processes and how they relate to improved management practices.	XXXX	Navajo County therefore supports the designation of appropriate size Recommended Research Natural Areas, considered not suitable for grazing, in order to improve rangelands resources management science and practice	Research Natural Areas	
RNA - livestock grazing suitability RNA	provided that the research conducted on the Research Natural Areas removed from suitable grazing lands is designed to quantify and improve the understanding of the ecosystem processes unfolding on these rangelands and how they relate to improved management practices.	Support removing proposed and designated research natural areas from suitable rangelands. However, these rangelands should be managed for the specific purpose of quantifying and improving the understanding of the rangelands resources ecosystem processes and how they relate to improved management practices.	XXXX	provided that the research conducted on the Research Natural Areas removed from suitable grazing lands is designed to quantify and improve the understanding of the ecosystem processes unfolding on these rangelands and how they relate to improved management practices.	Research Natural Areas	

<p>RNA - livestock grazing suitability RNA</p>	<p>Navajo County therefore respectfully requests that the Selected Alternative for the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan designate the new proposed Research Natural Areas removed from suitable rangelands for the specific purpose of quantifying and improving the understanding of the rangelands resources ecosystem processes and how they relate to improved management practices.</p>	<p>Support removing proposed and designated research natural areas from suitable rangelands. However, these rangelands should be managed for the specific purpose of quantifying and improving the understanding of the rangelands resources ecosystem processes and how they relate to improved management practices.</p>	<p>XXXX</p>	<p>Navajo County therefore respectfully requests that the Selected Alternative for the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan designate the new proposed Research Natural Areas removed from suitable rangelands for the specific purpose of quantifying and improving the understanding of the rangelands resources ecosystem processes and how they relate to improved management practices.</p>	<p>Research Natural Areas</p>	
<p>Livestock grazing suitability - general</p>	<p>USDA (2008b: 53-54). As recently as 2011, range capability was significantly reduced from what was assumed in the first round of forest planning: In 2011, permitted livestock Animal Unit Months (AUMs) totaled 130,000 of which 8,912 were from sheep and the rest was mostly cattle with incidental amounts from work horses and burros. In the same year, authorized livestock AUMS totaled 81,433 before the Wallow Fire disrupted grazing on all or part of 45 grazing allotments. In most years, the numbers of livestock permitted under the term grazing permits is more than what is authorized (actually allowed to graze and billed for by the forests).</p>	<p>Explain how the Forest Service met the requirements to identify capable and suitable lands for livestock grazing. Concern that the Forest Service needs to calculate suitability and capability as required by regulations at 219.20.</p>	<p>** Check out Kaibab p. 68 last comment &amp; p. 71 last comment &amp; Prescott p. 22</p>	<p>USDA (2008b: 53-54). As recently as 2011, range capability was significantly reduced from what was assumed in the first round of forest planning: In 2011, permitted livestock Animal Unit Months (AUMs) totaled 130,000 of which 8,912 were from sheep and the rest was mostly cattle with incidental amounts from work horses and burros. In the same year, authorized livestock AUMS totaled 81,433 before the Wallow Fire disrupted grazing on all or part of 45 grazing allotments. In most years, the numbers of livestock permitted under the term grazing permits is more than what is authorized (actually allowed to graze and billed for by the forests).</p>	<p>Range Capability</p>	

Livestock grazing suitability - general	The Forest Service does not explain in the PDEIS how or why it considers range capability determinations from the mid-1980s to have “not changed significantly,” nor does it address the significance of newer information.	Explain how the Forest Service met the requirements to identify capable and suitable lands for livestock grazing. Concern that the Forest Service needs to calculate suitability and capability as required by regulations at 219.20.	** Check out Kaibab p. 68 last comment & p. 71 last comment & Prescott p. 22	The Forest Service does not explain in the PDEIS how or why it considers range capability determinations from the mid-1980s to have “not changed significantly,” nor does it address the significance of newer information.	Range Capability	
Livestock grazing suitability - general	We are disappointed in this proposed Plan's failure to address the impacts of livestock grazing. Livestock have been grazed for over a century on the Apache-Sitgreaves landscape and the EIS and Plan acknowledge that to this day livestock grazing is damaging the area's riparian areas and uplands. The EIS failed to conduct an honest grazing suitability analysis and apparently followed the old Forest Plan's lead by conducting no capability analysis at all	Explain how the Forest Service met the requirements to identify capable and suitable lands for livestock grazing. Concern that the Forest Service needs to calculate suitability and capability as required by regulations at 219.20.	** Check out Kaibab p. 68 last comment & p. 71 last comment & Prescott p. 22	We are disappointed in this proposed Plan's failure to address the impacts of livestock grazing. Livestock have been grazed for over a century on the Apache-Sitgreaves landscape and the EIS and Plan acknowledge that to this day livestock grazing is damaging the area's riparian areas and uplands. The EIS failed to conduct an honest grazing suitability analysis and apparently followed the old Forest Plan's lead by conducting no capability analysis at all	Capability Analysis	PC 2800-1the Forest Service should address the impacts of livestock grazing on riparian areas and uplands and conduct a capability analysis for suitability of livestock grazing on the Apache Sitgreaves NF because the DEIS does not meet the requirements under 36CFR 219.20(a) in identifying capable lands.
Livestock grazing suitability - general	Gone also are the requirements that you actually evaluate capacity, something the Forest Service hasn't done anyway in decades. Under these guidelines there is very little that the Forest Service cannot do, and I shudder to think what the ranching community is going to be able	Explain how the Forest Service met the requirements to identify capable and suitable lands for livestock grazing. Concern that the Forest Service needs to calculate suitability and capability as required by regulations at 219.20.	** Check out Kaibab p. 68 last comment & p. 71 last	Gone also are the requirements that you actually evaluate capacity, something the Forest Service hasn't done anyway in decades. Under these guidelines there is very little that the Forest Service cannot do, and I shudder to think what the ranching community is going to be able	Strengthening and Keeping Existing Standards , Objectives, and Guidelines	PC 150-4 The Forest Service should carry forward, strengthen and clarify the existing standards and guidelines to the new Forest Plan with binding standards and guidelines that provide consistency in meeting desired conditions. The Forest Service should keep the current

	to compel/harangue it to do in the future.		comment & Prescott p. 22	to compel/harangue it to do in the future.		standard and guidelines because it will protect the environment, ensure viability of federally listed and regionally sensitive wildlife populations, as well as old growth forests, protect the agency against inappropriate lobbying efforts, public pressure, and provide public accountability.
Livestock grazing suitability - general	Finally there is the issue of Capability/Suitability for grazing. Under the 1982 regulations, suitable and capable lands "shall be identified." 36 CFR 219.20(a). Their condition and trend "shall be determined." And those lands "in less than satisfactory condition shall be identified and appropriate action planned for their restoration." Id. This document meets essentially none of the requirements of 219.20, and definitely fails to identify capable lands. The DEIS insists this was done in 1987, but a review of the 1987 Plan does not suggest that, and in fact suggests the opposite—that capability of lands were to be determined as the permits were renewed. In any event, the Forest had no GIS capabilities then and much less experience with different grazing strategies than it does now, which is one component of a capability analysis. It's not the 1980's any more and the	Explain how the Forest Service met the requirements to identify capable and suitable lands for livestock grazing. Concern that the Forest Service needs to calculate suitability and capability as required by regulations at 219.20.	** Check out Kaibab p. 68 last comment & p. 71 last comment & Prescott p. 22	Finally there is the issue of Capability/Suitability for grazing. Under the 1982 regulations, suitable and capable lands "shall be identified." 36 CFR 219.20(a). Their condition and trend "shall be determined." And those lands "in less than satisfactory condition shall be identified and appropriate action planned for their restoration." Id. This document meets essentially none of the requirements of 219.20, and definitely fails to identify capable lands. The DEIS insists this was done in 1987, but a review of the 1987 Plan does not suggest that, and in fact suggests the opposite—that capability of lands were to be determined as the permits were renewed. In any event, the Forest had no GIS capabilities then and much less experience with different grazing strategies than it does now, which is one component of a capability analysis.	Capability Analysis	PC 2800-1the Forest Service should address the impacts of livestock grazing on riparian areas and uplands and conduct a capability analysis for suitability of livestock grazing on the Apache Sitgreaves NF because the DEIS does not meet the requirements under 36CFR 219.20(a) in identifying capable lands.

	<p>Forest Service needs now to go out and calculate suitability and capability in a scientifically justifiable manner and reveal what it finds in its EIS and Forest Plans, as required by the regulations at 219.20. (It then needs to develop alternative ways of grazing, and meet the other requirements of that section.)</p>					
<p>Livestock grazing suitability - general</p>	<p>As for the suitability analysis, this DEIS repeatedly reveals that there are problems with riparian grazing and also upland grazing, and it is not a scientific controversy that grazing can be and has been and is still causing damage to natural resources. The Forest Service never wants to address suitability: in the Plan you say you will do it in the individual analyses, in the individual analyses you refer to the Plan. But this is the place to do it and it should be done honestly. Your current system of just taking cows out of a handful of acres of Research Natural Areas is insulting. The entire capable landscape of the ASNF is demonstrably not suitable for livestock grazing and you need to admit that or prove otherwise.</p>	<p>Explain how the Forest Service met the requirements to identify capable and suitable lands for livestock grazing. Concern that the Forest Service needs to calculate suitability and capability as required by regulations at 219.20.</p>	<p>** Check out Kaibab p. 68 last comment &amp; p. 71 last comment &amp; Prescott p. 22</p>	<p>As for the suitability analysis, this DEIS repeatedly reveals that there are problems with riparian grazing and also upland grazing, and it is not a scientific controversy that grazing can be and has been and is still causing damage to natural resources. The Forest Service never wants to address suitability: in the Plan you say you will do it in the individual analyses, in the individual analyses you refer to the Plan. But this is the place to do it and it should be done honestly. Your current system of just taking cows out of a handful of acres of Research Natural Areas is insulting. The entire capable landscape of the ASNF is demonstrably not suitable for livestock grazing and you need to admit that or prove otherwise.</p>	<p>Capability Analysis</p>	<p>PC 2800-1the Forest Service should address the impacts of livestock grazing on riparian areas and uplands and conduct a capability analysis for suitability of livestock grazing on the Apache Sitgreaves NF because the DEIS does not meet the requirements under 36CFR 219.20(a) in identifying capable lands.</p>

Livestock grazing suitability - general	<p>Unfortunately the 1987 Forest Plan EIS does not provide any detail to the condition of soils as there is today to where a comparison could be made to the conditions then to now. That would have provided a metric to how well the current forest plan and FS personal functioned the plan. Opportunity lost. Review of the data shows a very disturbing fact, after 110 years of administration by the Forest Service there are 672,000 acres that are considered Impaired or Un-Satisfactory condition.</p>	<p>Explain how the Forest Service met the requirements to identify capable and suitable lands for livestock grazing. Concern that the Forest Service needs to calculate suitability and capability as required by regulations at 219.20.</p>	<p>** Check out Kaibab p. 68 last comment &amp; p. 71 last comment &amp; Prescott p. 22</p>	<p>Unfortunately the 1987 Forest Plan EIS does not provide any detail to the condition of soils as there is today to where a comparison could be made to the conditions then to now. That would have provided a metric to how well the current forest plan and FS personal functioned the plan. Opportunity lost. Review of the data shows a very disturbing fact, after 110 years of administration by the Forest Service there are 672,000 acres that are considered Impaired or Un-Satisfactory condition.</p>	Soil Conditions	<p>PC 1705-1 The Forest Service should include a detailed accounting of the economic (financial, social, and ecological) impact, the implied gain to the forest, local communities and the state specific to the activities. The Forest Service should address the importance of the annual contribution to the local counties and consider funding those counties (see comment) because it would the least negative impact to the land and save the tax payers \$1,296,000.00 per year</p>
Livestock grazing suitability - general	<p>Page 449 of the DEIS "Grazing on the Forests helps to maintain ranching traditions, social customs and local ranching operations." Here we learn that the ASNF has decided that social, romantic feelings are much more important than the soil conditions on the Forest. One can quickly see the commitment by the ASNF to the primary tenant of NFMA and ESA to manage the land for long-term Sustainability. This discussion of soil conditions and livestock grazing leads to a primary question; are the 1.7 – 1.9 million acres of the ASNF identified as capable and suitable to support herbivore by non-native species the correct decision ?</p>	<p>Explain how the Forest Service met the requirements to identify capable and suitable lands for livestock grazing. Concern that the Forest Service needs to calculate suitability and capability as required by regulations at 219.20.</p>	<p>** Check out Kaibab p. 68 last comment &amp; p. 71 last comment &amp; Prescott p. 22</p>	<p>Page 449 of the DEIS "Grazing on the Forests helps to maintain ranching traditions, social customs and local ranching operations." Here we learn that the ASNF has decided that social, romantic feelings are much more important than the soil conditions on the Forest. One can quickly see the commitment by the ASNF to the primary tenant of NFMA and ESA to manage the land for long-term Sustainability. This discussion of soil conditions and livestock grazing leads to a primary question; are the 1.7 – 1.9 million acres of the ASNF identified as capable and suitable to support herbivore by non-native species the correct decision ?</p>	Soil Conditions	<p>PC 2800-9 The Forest Service should include information on soil, riparian and vegetation in respect to livestock grazing, and a comparison of historic soil condition in order to support the claim that livestock grazing will improve with implementation of the new plan. The Forest Service should clarify if the discussion on "Grazing on the Forests helps to maintain ranching traditions, social customs and local ranching operations." is considering the soil conditions and livestock grazing supports capability and suitability.</p>

Livestock grazing suitability - should have considered these	It's important to point out that the DEIS presented makes no mention to any details of slope in determining lands capable or suitable to support non-native herbivore. The Forest Service does not have any site specific science to support the criteria - lands with slopes 40% / 60% or less are capable of ecologically supporting use by domestic livestock. The only science we have been able to find clearly states that livestock prefer slopes less than 20%.	In the livestock grazing suitability analysis, consider (1) food and hiding cover for wildlife, (2) distance from water, (3) amount of litter, (4) amount of bare soil, (5) erosion rates, (6) current plant composition, abundance and distribution as compared to historical and/or potential, (7) fire, (8) moisture cycles, and (9) slope.	XXXX	It's important to point out that the DEIS presented makes no mention to any details of slope in determining lands capable or suitable to support non-native herbivore. The Forest Service does not have any site specific science to support the criteria - lands with slopes 40% / 60% or less are capable of ecologically supporting use by domestic livestock. The only science we have been able to find clearly states that livestock prefer slopes less than 20%.	Site Specific Science to Support Criteria	PC 2800-4 The Forest Service should include details and site specific science for lands with 40/60% slope in determining lands capability or suitability to support non-native herbivore .
Livestock grazing suitability - should have considered these	Second; when looking at the proportion of the forage removed, consideration must be given to the needs of native wildlife such as deer and antelope. It is very important to point out the primary dietary need of these species is forbs and the next most important is shrubs.	In the livestock grazing suitability analysis, consider (1) food and hiding cover for wildlife, (2) distance from water, (3) amount of litter, (4) amount of bare soil, (5) erosion rates, (6) current plant composition, abundance and distribution as compared to historical and/or potential, (7) fire, (8) moisture cycles, and (9) slope.	XXXX	Second; when looking at the proportion of the forage removed, consideration must be given to the needs of native wildlife such as deer and antelope. It is very important to point out the primary dietary need of these species is forbs and the next most important is shrubs.	Corrections to Suitability Tables	PC 2800-7 The Forest Service should consider the primary dietary needs of native wildlife for the capability analysis.
Livestock grazing suitability - should have considered these	Another very important key aspect not analyzed in the DEIS or the first determination of suitability and capability for grazing of non-native species is moisture cycles.	In the livestock grazing suitability analysis, consider (1) food and hiding cover for wildlife, (2) distance from water, (3) amount of litter, (4) amount of bare soil, (5) erosion rates, (6) current plant composition, abundance and distribution as compared to historical and/or potential, (7) fire, (8) moisture cycles, and (9) slope.	XXXX	Another very important key aspect not analyzed in the DEIS or the first determination of suitability and capability for grazing of non-native species is moisture cycles.	Non-Native Species	

Livestock grazing suitability - should have considered these	Those map units that do not meet the criteria of litter would be removed from consideration to be capable of supporting herbivore by non-native species.	In the livestock grazing suitability analysis, consider (1) food and hiding cover for wildlife, (2) distance from water, (3) amount of litter, (4) amount of bare soil, (5) erosion rates, (6) current plant composition, abundance and distribution as compared to historical and/or potential, (7) fire, (8) moisture cycles, and (9) slope.	XXXX	Those map units that do not meet the criteria of litter would be removed from consideration to be capable of supporting herbivore by non-native species.		Providing a Standard in Tons per Acre for Unacceptable Erosion Rates	PC 410-1 The Forest Service should add a standard in tons per acre specifically for unacceptable erosion rates. Those map units that do not meet these criteria would be removed from consideration to be capable of supporting herbivore by non-native species
Livestock grazing suitability - should have considered these	Further we ask the Forest to provide in the next document a standard in tons per acre specifically for unacceptable erosion rates. Those map units that do not meet these criteria would be removed from consideration to be capable of supporting herbivore by non-native species.	In the livestock grazing suitability analysis, consider (1) food and hiding cover for wildlife, (2) distance from water, (3) amount of litter, (4) amount of bare soil, (5) erosion rates, (6) current plant composition, abundance and distribution as compared to historical and/or potential, (7) fire, (8) moisture cycles, and (9) slope.	XXXX	Further we ask the Forest to provide in the next document a standard in tons per acre specifically for unacceptable erosion rates. Those map units that do not meet these criteria would be removed from consideration to be capable of supporting herbivore by non-native species.		Providing a Standard in Tons per Acre for Unacceptable Erosion Rates	PC 410-1 The Forest Service should add a standard in tons per acre specifically for unacceptable erosion rates. Those map units that do not meet these criteria would be removed from consideration to be capable of supporting herbivore by non-native species
Livestock grazing suitability - should have considered these	We must ask why the Agency / ASNF does not use distance from water as a primary criteria in determining lands capable of supporting herbivore by non-native species only relying on slope and production.	In the livestock grazing suitability analysis, consider (1) food and hiding cover for wildlife, (2) distance from water, (3) amount of litter, (4) amount of bare soil, (5) erosion rates, (6) current plant composition, abundance and distribution as compared to historical and/or potential, (7) fire, (8) moisture cycles, and (9) slope.	XXXX				

<p>Livestock grazing suitability - should have considered these</p>	<p>Looking at the references noted by Holechek - Range Management Principles and Practices, 5th edition , Cook did not provide any specificity to slope, however he did speak to there being “21 independent variables” that should be analyzed to determine utilization by livestock and that “no one factor could be used as a reliable index.” The public needs to know why the other key factors of; § food and hiding cover for wildlife § distance from water § amount of litter § amount of bare soil § erosion rates § current plant composition, abundance and distribution as compared to historical and/or potential § fire are not given equal importance by the Forest Service.</p>	<p>In the livestock grazing suitability analysis, consider (1) food and hiding cover for wildlife, (2) distance from water, (3) amount of litter, (4) amount of bare soil, (5) erosion rates, (6) current plant composition, abundance and distribution as compared to historical and/or potential, (7) fire, (8) moisture cycles, and (9) slope.</p>	<p>XXXX</p>			
<p>Livestock grazing suitability - general 3</p>	<p>For grazing by domestic livestock and elk to continue on the ASNF, they must provide; § a new criteria in the determination of those lands capable of supporting livestock use a specific distance to water such as that of Holechek as well as “other” criteria as noted by Cook. § A requirement that there is a quantitative and qualitative analysis prior to the issuance of any AOI that there is adequate</p>	<p>Include the following in the plan and implement immediately once the plan is approved: (1) new criteria for lands capable of supporting livestock using a specific distance to water (Holechek) as well as “other” criteria as noted by Cook, (2) a requirement that there is a quantitative and qualitative analysis prior to the issuance of any annual operating instruction (AOI), that there is</p>	<p>XXXX</p>	<p>For grazing by domestic livestock and elk to continue on the ASNF, they must provide; § a new criteria in the determination of those lands capable of supporting livestock use a specific distance to water such as that of Holechek as well as “other” criteria as noted by Cook. § A requirement that there is a quantitative and qualitative analysis prior to the issuance of any AOI that there is adequate</p>	<p>Additional Guidelines</p>	<p>2800-8 The Forest Service should provide the following information in the DEIS for grazing by elk and domestic livestock to continue on the forest: 1) add a specific distance to water as a new criteria in the determination of lands capable of supporting livestock 2) Add a requirement that there is a quantitative and qualitative analysis that there is adequate availability of open and ample water supply for</p>

	open water available for the term of livestock grazing AND ample supply to support the current populations of native wildlife in the area adjacent to that open water. § Both of these new requirements will be implemented immediately on all allotments starting with the next AOI's when the new plan is approved.	adequate open water available for the term of livestock grazing and ample supply to support the current populations of native wildlife in the area adjacent to that open water.		open water available for the term of livestock grazing AND ample supply to support the current populations of native wildlife in the area adjacent to that open water. § Both of these new requirements will be implemented immediately on all allotments starting with the next AOI's when the new plan is approved.			livestock and native wildlife prior to issuance any AOI. 3) Both of the requirements start immediately on all allotments when the plan is approved. 4) use by non-native species is not a detriment to the natural functions of the ecosystems through ecosystem specific scientific literature.
Livestock grazing suitability - general 5	Because we know that ungulate grazing is detrimental to aspen, there should be a change in suitability for grazing in and around aspen stands. Livestock grazing should be moved away from aspen stands.	There should be a change in suitability for grazing in and around aspen stands: livestock grazing should be moved away from aspen stands.	** Check out Kaibab, p. 31, 4th comment & p. 71 1st comment	Because we know that ungulate grazing is detrimental to aspen, there should be a change in suitability for grazing in and around aspen stands. Livestock grazing should be moved away from aspen stands.		Additional Guidelines	Comment #162.85
Livestock grazing suitability - general 6	Change the grazing suitability of Piñon-Juniper woodlands, so that the understory can rebound. This will allow the understory to conduct a natural type of fire and protect Piñon-Juniper forests from becoming overstocked in the future	There should be a change in grazing suitability of pinon-juniper woodlands so that the understory can rebound.	XXXX	Change the grazing suitability of Piñon-Juniper woodlands, so that the understory can rebound. This will allow the understory to conduct a natural type of fire and protect Piñon-Juniper forests from becoming overstocked in the future		Additional Guidelines	PC 2800-10 The Forest Service should change the grazing suitability of Pinon-Juniper woodlands so that the understory can rebound.
Livestock grazing suitability - general 7	Landscape scale conditions that determine capability have not changed significantly since the first evaluation." PDEIS at 451. That statement is contradicted by the forests' own analysis (USDA 2009: 5): The [1987 Forest Plan] EIS identified a maximum permitted use of 219,510	Explain the statement that landscape scale conditions that determine capability have not changed significantly since the first evaluation (DEIS p. 451). Concern that the 1987 plan permitted use of 219,510 AUMS, in 2008 authorized use was 200,259 AUMs, and the 2000 analysis estimated the	XXXX	Landscape scale conditions that determine capability have not changed significantly since the first evaluation." PDEIS at 451. That statement is contradicted by the forests' own analysis (USDA 2009: 5): The [1987 Forest Plan] EIS identified a maximum permitted use of 219,510		Range Capability	

	<p>AUMs. In 2008 – the total authorized 200,259 AUMs. Note: A review of forage production and estimated available AUMs was completed in 2000. Based on this data (see attached) the grazing capacity is estimated at 78,984 AUMs. According to the 2000 analysis, the lower level of grazing demonstrates availability of vegetation primarily for the protection of watersheds, soils, and streams (riparian areas), as well as providing for wildlife needs (habitat, hiding cover, fawning cover, and forage).</p>	<p>grazing capacity to be 78,984 AUMs. Concern that rangelands in the planning area ever will unlikely return to “historical norms” that supported forage production capacity over the past century.</p>		<p>AUMs. In 2008 – the total authorized 200,259 AUMs. Note: A review of forage production and estimated available AUMs was completed in 2000. Based on this data (see attached) the grazing capacity is estimated at 78,984 AUMs. According to the 2000 analysis, the lower level of grazing demonstrates availability of vegetation primarily for the protection of watersheds, soils, and streams (riparian areas), as well as providing for wildlife needs (habitat, hiding cover, fawning cover, and forage).</p>			
<p>Livestock grazing suitability - general 7</p>	<p>Moreover, the assumption that rangeland capability has “not significantly changed” since the mid-1980s clearly is erroneous in light of available scientific information. Prior estimates of range capability did not account for synergistic effects of livestock grazing and climate change on soil, water, vegetation and fire regime (Beschta et al. 2012). It is unlikely that rangelands in the planning area ever will return to “historical norms” that supported forage production capacity over the past century :</p>	<p>Explain the statement that landscape scale conditions that determine capability have not changed significantly since the first evaluation (DEIS p. 451). Concern that the 1987 plan permitted use of 219,510 AUMS, in 2008 authorized use was 200,259 AUMs, and the 2000 analysis estimated the grazing capacity to be 78,984 AUMs. Concern that rangelands in the planning area ever will unlikely return to “historical norms” that supported forage production capacity over the past century.</p>	<p>XXXX</p>				

Livestock grazing suitability - climate change	The Forest Service should disclose the foreseeable range of climate effects to range suitability, and candidly disclose past instances when livestock grazing has exceeded capability.	Disclose the foreseeable climate effects to range suitability and capability, and disclose past instances when excessive livestock grazing has exceeded capability.	XXXX	The Forest Service should disclose the foreseeable range of climate effects to range suitability, and candidly disclose past instances when livestock grazing has exceeded capability.		Range Capability	
Livestock grazing suitability - climate change	The Forest Service should disclose the foreseeable climate effects to range suitability and capability, and candidly disclose past instances when excessive livestock grazing has exceeded capability. The methods used to determine suitability and capability must be clearly described in a way that is understandable to the decision-maker and the general public.	Disclose the foreseeable climate effects to range suitability and capability, and disclose past instances when excessive livestock grazing has exceeded capability.	XXXX	The Forest Service should disclose the foreseeable climate effects to range suitability and capability, and candidly disclose past instances when excessive livestock grazing has exceeded capability.		Climate Effects to Range Suitability	PC 2800-13 The Forest Service should disclose the foreseeable climate effects to range suitability and capability, and disclose past instances when excessive livestock grazing has exceeded capability. The Forest Service should address that the capability of the lands [] to produce forage for grazing animals was determined in the 1980s and did not account for synergistic effects of livestock grazing and climate change on soil, water, vegetation and fire regime.
Livestock grazing suitability - production	Production, Pounds per Acre The second criteria to determine capability for use by domestic livestock is production of forage greater than or equal to 100 pounds per acre, See page 137 of the DEIS, footnote 18. As with the quest for the science to support the slope criteria, at the same time we were also asking for site / ecosystem specific science to support this standard, again starting in 2002.	Provide the science to support the livestock grazing capability and suitability criteria slope and production, pounds per acre.	XXXX	Production, Pounds per Acre The second criteria to determine capability for use by domestic livestock is production of forage greater than or equal to 100 pounds per acre, See page 137 of the DEIS, footnote 18. As with the quest for the science to support the slope criteria, at the same time we were also asking for site / ecosystem specific science to support this standard, again starting in 2002.		Site Specific Science to Support Criteria	PC 2800-5 The Forest Service should provide site and ecosystem specific science to support the standard that production of forage greater than or equal to 100 pounds per acre is capable of supporting domestic livestock.

Livestock grazing suitability - production	ASNF to provide the ecosystem specific scientific information that were used by the Forest Service in the drafting of the first / current forest plans which led them to decide on the qualifications of 100 pounds per acre and slopes equal to and less than 40% - 60% (depending on which NF in the Region 3), were capable of supporting herbivore by non-native species, and not be detrimental to native ecosystems and the key elements of those systems.	Provide the science to support the livestock grazing capability and suitability criteria slope and production, pounds per acre.	XXXX	ASNF to provide the ecosystem specific scientific information that were used by the Forest Service in the drafting of the first / current forest plans which led them to decide on the qualifications of 100 pounds per acre and slopes equal to and less than 40% - 60% (depending on which NF in the Region 3), were capable of supporting herbivore by non-native species, and not be detrimental to native ecosystems and the key elements of those systems.	Range Management	
Livestock grazing suitability - production	Clearly, by admission of the Director for Region 3 of Rangeland Management there is no site specific / ecosystem science to support the standard that lands producing 100 pounds per acre can ecologically support herbivore by non-native species.	Provide the science to support the livestock grazing capability and suitability criteria slope and production, pounds per acre.	XXXX	Clearly, by admission of the Director for Region 3 of Rangeland Management there is no site specific / ecosystem science to support the standard that lands producing 100 pounds per acre can ecologically support herbivore by non-native species.	Range Management	
Livestock grazing suitability - misc	Chapter 4. Suitability Table 5. presents management areas that are suitable or not suitable for livestock grazing. Pg 128 The plan currently states that "Current National Forest System land not in a grazing allotment" is not suitable for livestock grazing. This statement is not true. Many of the lands not currently in grazing allotments are still suitable for livestock grazing. Land exchanges of private property within the forest are certainly suitable for grazing and can and should be added	The following should be considered suitable for livestock grazing: (1) current NFS land not in a grazing allotment, (2) Black River Conservation Area. (proposed plan p.128).	XXXX	Chapter 4. Suitability Table 5. presents management areas that are suitable or not suitable for livestock grazing. Pg 128 The plan currently states that "Current National Forest System land not in a grazing allotment" is not suitable for livestock grazing. This statement is not true. Many of the lands not currently in grazing allotments are still suitable for livestock grazing. Land exchanges of private property within the forest are certainly suitable for grazing and can and should be added	Corrections to Suitability Tables	

	<p>to active and adjacent allotments to allow for more flexibility in managing grazing on those allotments. The table also names the Black River Conservation Area as unsuitable for livestock grazing. This area is made up of many different pastures waiver back to the USFS because of special agreements. It was never the intent to remove all of them from the grazing bank infinitely. Much of this land was ecologically changed by impact from the recent Wallow Fire that will soon make it more compatible with grazing in regards to forage production and canopy opening. Both these areas are suitable for livestock grazing and should not be included in the table as unsuitable for livestock grazing.</p>			<p>to active and adjacent allotments to allow for more flexibility in managing grazing on those allotments. The table also names the Black River Conservation Area as unsuitable for livestock grazing. This area is made up of many different pastures waiver back to the USFS because of special agreements. It was never the intent to remove all of them from the grazing bank infinitely. Much of this land was ecologically changed by impact from the recent Wallow Fire that will soon make it more compatible with grazing in regards to forage production and canopy opening. Both these areas are suitable for livestock grazing and should not be included in the table as unsuitable for livestock grazing.</p>		
<p>Livestock grazing suitability - misc</p>	<p>Pg 128 Suitability for Livestock Grazing Table five, other areas: This names "Current National Forest land not in a grazing allotment" as not suitable for grazing. Not true. Many of these lands are still suitable, and land exchanges of private property should be added to active, adjacent allotments to allow for more flexibility in managing grazing on those allotments. The Black River Conservation Area is also marked unsuitable. This area is made up of many different pastures waived back to the USFS because of special</p>	<p>The following should be considered suitable for livestock grazing: (1) current NFS land not in a grazing allotment, (2) Black River Conservation Area. (proposed plan p.128).</p>	<p>XXXX</p>	<p>Pg 128 Suitability for Livestock Grazing Table five, other areas: This names "Current National Forest land not in a grazing allotment" as not suitable for grazing. Not true. Many of these lands are still suitable, and land exchanges of private property should be added to active, adjacent allotments to allow for more flexibility in managing grazing on those allotments. The Black River Conservation Area is also marked unsuitable. This area is made up of many different pastures waived back to the USFS because of special</p>	<p>Capability Analysis</p>	<p>PC 2800-2 The Forest Service should correct Table 5 to reflect grazing suitability because: 1)"current National Forest System land not in a grazing allotment" is suitable for livestock grazing because land exchanges of private property with the forest are suitable for grazing and should be added to active and adjacent allotments ) Black River Conservation Area has many different pasture waivers and USFS agreements for grazing and allotments. 3) The areas designated as generally not suitable are designated</p>

	<p>agreements. It was never the intent to remove all of them from the grazing bank indefinitely. Much of this land was impacted by the Wallow Fire making it more compatible with livestock grazing due to increased forage production and more open canopy. These areas should not be marked unsuitable, thus removing them from productive use for grazing for the duration of this plan and perhaps beyond.</p>			<p>agreements. It was never the intent to remove all of them from the grazing bank indefinitely. Much of this land was impacted by the Wallow Fire making it more compatible with livestock grazing due to increased forage production and more open canopy. These areas should not be marked unsuitable, thus removing them from productive use for grazing for the duration of this plan and perhaps beyond.</p>			<p>without resource reasons and destocking an allotment does not make it non-suitable for grazing. 4) Much of the land was impacted by the Wallow Fire makes it suitable for grazing because of increased forage production and more open canopy.</p>
Special Uses Suit - Caves	<p>Chapter 4: Suitability, Livestock Grazing, p 127 Karst and Cave Geologic areas may be suitable for livestock grazing, though care should be taken to fence off any karst features with steep sides to prevent accelerated erosion from cattle coming in and out of those features.</p>	<p>Karst and cave geologic areas may be suitable for livestock grazing, energy transportation, communications infrastructure, recreation, timber production, and motorized uses in accordance with the guidelines and restrictions set forth in the Karst and Cave Management plan.</p>	XXXX				
Special Uses Suit - Caves	<p>Chapter 4: Suitability, Special Uses Suitability, p 128 Karst and Cave Geologic areas may be suitable for energy transportation and communications infrastructure, provided that those individual projects do not pass through areas immediately over known cave passage, adversely affect karst in feeder drainages, or otherwise impair healthy functionality of the karst ecosystem. Dams and other large scale water impoundment projects are unlikely to be successful due to the solubility and porosity of</p>	<p>Karst and cave geologic areas may be suitable for livestock grazing, energy transportation, communications infrastructure, recreation, timber production, and motorized uses in accordance with the guidelines and restrictions set forth in the Karst and Cave Management plan.</p>	XXXX				

	Karst terrain.						
Special Uses Suit - Caves	Chapter 4: Suitability, Recreation, p 133 Karst and Cave Geologic areas are suitable for recreation in accordance with the guidelines and restrictions set forth in the Karst and Cave Management plan.	Karst and cave geologic areas may be suitable for livestock grazing, energy transportation, communications infrastructure, recreation, timber production, and motorized uses in accordance with the guidelines and restrictions set forth in the Karst and Cave Management plan.	XXXX				
Special Uses Suit - Caves	Chapter 4: Suitability, Timber Production, p 129 Karst and Cave Geologic areas may be suitable for timber production, provided that the guidelines set forth in the Karst and Cave management plan are implemented and followed in and around karst buffer zones.	Karst and cave geologic areas may be suitable for livestock grazing, energy transportation, communications infrastructure, recreation, timber production, and motorized uses in accordance with the guidelines and restrictions set forth in the Karst and Cave Management plan.	XXXX				
Special Uses Suit - Caves	Chapter 4: Suitability, Motorized uses, p 131 Karst and Cave Geologic areas are suitable for motorized uses, provided that the guidelines for Road Construction and Maintenance set forth in the Karst and Cave Management plan are implemented.	Karst and cave geologic areas may be suitable for livestock grazing, energy transportation, communications infrastructure, recreation, timber production, and motorized uses in accordance with the guidelines and restrictions set forth in the Karst and Cave Management plan.	XXXX				

<p>Timber suitability - general</p>	<p>In addition to determining suitability for timber production on portions of the national forests, the Forest Service also must review its prior classification of lands as unsuitable for timber production. See 16 U.S.C. § 1604(k); 36 C.F.R. § 219.14(b) (1982). It is not sufficient under NFMA to list the lands that previously were deemed unsuitable and carry forward that designation into a revised forest plan. Further analysis and comparison of alternatives is required. To inform analysis of timber suitability, we ask the Forest Service to consider and analyze the following criteria for designating lands as unsuitable for timber production:</p> <ul style="list-style-type: none"> <li>• High or severe soil erosion hazard identified by Terrestrial Ecosystem Survey.</li> <li>• Slopes steeper than 30 percent.</li> <li>• Lands within one site-potential tree height of perennial or intermittent streams or wetlands (e.g., generally 100-150 feet on either side of a stream bank in conifer forest vegetation types).</li> <li>• Contiguous areas larger than 1,000 acres without roads in all vegetation types.</li> <li>• Occupied and/or critical habitat of threatened or endangered species or candidate species proposed for listing.</li> <li>• Designated conservation areas for</li> </ul>	<p>Review the prior classification of lands unsuitable for timber production, it is not sufficient under the National Forest Management Act to carry forward lands that previously were deemed unsuitable without further analysis.</p>	<p>XXXX</p>	<p>In addition to determining suitability for timber production on portions of the national forests, the Forest Service also must review its prior classification of lands as unsuitable for timber production. See 16 U.S.C. § 1604(k); 36 C.F.R. § 219.14(b) (1982). It is not sufficient under NFMA to list the lands that previously were deemed unsuitable and carry forward that designation into a revised forest plan. Further analysis and comparison of alternatives is required. To inform analysis of timber suitability, we ask the Forest Service to consider and analyze the following criteria for designating lands as unsuitable for timber production:</p> <ul style="list-style-type: none"> <li>• High or severe soil erosion hazard identified by Terrestrial Ecosystem Survey.</li> <li>• Slopes steeper than 30 percent.</li> <li>• Lands within one site-potential tree height of perennial or intermittent streams or wetlands (e.g., generally 100-150 feet on either side of a stream bank in conifer forest vegetation types).</li> <li>• Contiguous areas larger than 1,000 acres without roads in all vegetation types.</li> <li>• Occupied and/or critical habitat of threatened or endangered species or candidate species proposed for listing.</li> <li>• Designated conservation areas for</li> </ul>	<p>Classification of Suitable Timber Lands</p>
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	sensitive or management indicator species, including proposed "Wildlife Quiet Areas." • Occupied locations of endemic species with ranges limited to the national forests. • Lands impacted by high-severity fire effects to vegetation or soil.			sensitive or management indicator species, including proposed "Wildlife Quiet Areas." • Occupied locations of endemic species with ranges limited to the national forests. • Lands impacted by high-severity fire effects to vegetation or soil.
Timber suitability - general	In addition to determining suitability for timber production on portions of the national forests, the Forest Service also must review its prior classification of lands as unsuitable for timber production. It is not sufficient under NFMA to list the lands that previously were deemed unsuitable and carry forward that designation without further analysis.	Review the prior classification of lands unsuitable for timber production, it is not sufficient under the National Forest Management Act to carry forward lands that previously were deemed unsuitable without further analysis.	XXXX	In addition to determining suitability for timber production on portions of the national forests, the Forest Service also must review its prior classification of lands as unsuitable for timber production. It is not sufficient under NFMA to list the lands that previously were deemed unsuitable and carry forward that designation without further analysis.
Timber suitability - general 2	To inform analysis of timber suitability, we ask the Forest Service to consider and analyze the following criteria for designating lands as unsuitable for timber production: • High or severe erosion hazard soils • Steep slopes over 30 percent • Lands within one site-potential tree height of perennial or intermittent streams or	Consider the following as criteria for designating lands as unsuitable for timber production: (1) high or severe erosion hazard soils, (2) steep slopes over 30 percent, (3) lands within one site-potential tree height of perennial or intermittent streams or wetlands, (4) areas larger than 1,000 acres without roads, (5)	** Check out Kaibab p. 76 3rd comment & Prescott p. 19	To inform analysis of timber suitability, we ask the Forest Service to consider and analyze the following criteria for designating lands as unsuitable for timber production: • High or severe erosion hazard soils • Steep slopes over 30 percent • Lands within one site-potential tree height of perennial or intermittent streams or

Classification of Suitable Timber Lands

PC 2812-4 The Forest Service should review its prior classification of lands as unsuitable for timber production and not carry forward the list of unsuitable lands without analyzing and addressing the following criteria for designating lands as unsuitable for timber production: High or severe erosion hazard soils, Steep slopes over 30 percent, Lands within one site-potential tree height of perennial or intermittent streams or wetlands, Areas larger than 1,000 acres without roads, Critical habitat of threatened or endangered species, Lands impacted by high-severity fire effects to vegetation or soil

Classification of Suitable Timber Lands

PC 2812-4 The Forest Service should review its prior classification of lands as unsuitable for timber production and not carry forward the list of unsuitable lands without analyzing and addressing the following criteria for designating lands as unsuitable for timber production: High or severe

	<p>wetlands • Areas larger than 1,000 acres without roads • Critical habitat of threatened or endangered species • Lands impacted by high-severity fire effects to vegetation or soil. Regarding the last criterion listed above, long-term losses of soil productivity resulting from synergistic impacts of fire and mechanical disturbance (i.e., “salvage logging”) must be considered and analyzed in the timber suitability determination. Severe fire effects on suitable timberlands are reasonably foreseeable.</p>	<p>critical habitat of threatened or endangered species, and (6) lands impacted by high-severity fire effects to vegetation or soil.</p>		<p>wetlands • Areas larger than 1,000 acres without roads • Critical habitat of threatened or endangered species • Lands impacted by high-severity fire effects to vegetation or soil</p>
Timber suitability - post-fire	<p>Therefore, we propose adding a caveat to the timber suitability designation in the revised forest plan stating that forests affected by severe fire will be managed for natural recovery rather than for economic production.</p>	<p>Consider lands impacted by high-severity fire effects to vegetation or soil as criteria for designating lands as unsuitable for timber production. Consider long term losses of soil productivity resulting from synergistic impacts of fire and mechanical disturbance (i.e., “salvage logging”), particularly where spread of exotic invasive species is a risk, in the timber suitability determination. Add a caveat to the suitability designation stating that forests affected by severe fire will be managed for natural recovery rather than for economic production.</p>	XXXX	<p>Therefore, we propose adding a caveat to the timber suitability designation in the revised forest plan stating that forests affected by severe fire will be managed for natural recovery rather than for economic production.</p>
Timber suitability - post-fire	<p>logging and planting conifer species on sites impacted by wildland fire poses a different benefit-to-cost analysis from management of unburned forests Long-term losses of soil</p>	<p>Consider lands impacted by high-severity fire effects to vegetation or soil as criteria for designating lands as unsuitable for timber production. Consider long term losses of</p>	XXXX	

erosion hazard soils, Steep slopes over 30 percent, Lands within one site-potential tree height of perennial or intermittent streams or wetlands, Areas larger than 1,000 acres without roads, Critical habitat of threatened or endangered species, Lands impacted by high-severity fire effects to vegetation or soil

Role of Fire and Natural Recovery in Timber Suitability

	productivity resulting from synergistic impacts of fire and mechanical (e.g., “salvage logging”) disturbances, particularly where spread of exotic invasive species is a risk, must be considered and analyzed in the timber suitability determination	soil productivity resulting from synergistic impacts of fire and mechanical disturbance (i.e., “salvage logging”), particularly where spread of exotic invasive species is a risk, in the timber suitability determination. Add a caveat to the suitability designation stating that forests affected by severe fire will be managed for natural recovery rather than for economic production.		
Timber suitability - post-fire	Therefore, we propose adding a caveat to the suitability designation stating that forests affected by severe fire will be managed for natural recovery rather than for economic production.	Consider lands impacted by high-severity fire effects to vegetation or soil as criteria for designating lands as unsuitable for timber production. Consider long term losses of soil productivity resulting from synergistic impacts of fire and mechanical disturbance (i.e., “salvage logging”), particularly where spread of exotic invasive species is a risk, in the timber suitability determination. Add a caveat to the suitability designation stating that forests affected by severe fire will be managed for natural recovery rather than for economic production.	XXXX	Regarding the last criterion listed above, long-term losses of soil productivity resulting from synergistic impacts of fire and mechanical disturbance (i.e., “salvage logging”) must be considered and analyzed in the timber suitability determination. Severe fire effects on suitable timberlands are reasonably foreseeable. Therefore, we propose adding a caveat to the suitability designation stating that forests affected by severe fire will be managed for natural recovery rather than for economic production.
Timber suitability - old growth	The Center strongly recommends deferral of all old growth forest that meet standards and guidelines set forth in the current Forest Plan (USDA 1987a), as amended (USDA 1996), from designation as suitable for timber harvest.	Recommend deferral of all old growth forest that meet standards and guidelines set forth in the 1987 plan from designation as suitable for timber harvest.	XXXX	The Center strongly recommends deferral of all old growth forest that meet standards and guidelines set forth in the current Forest Plan (USDA 1987a), as amended (USDA 1996), from designation as suitable for timber harvest.

Role of Fire and Natural Recovery in Timber Suitability

PC 2812-5 The Forest Service should add a caveat to the suitability designation stating that forests affected by severe fire will be managed for natural recovery rather than for economic production.

Old Growth Suitability for Timber Harvest

Timber suitability - chainsaw terminology	Page 130 Footnotes 1, 2 and 3 refer to motorized or non-motorized equipment for trail maintenance. Suggest equipment be identified as gasoline powered or non-mechanized.	Recommend identifying chainsaws as gasoline powered or nonmechanized instead of motorized in table 7 footnotes (proposed plan p.130).	XXXX	Page 130 Footnotes 1, 2 and 3 refer to motorized or non-motorized equipment for trail maintenance. Suggest equipment be identified as gasoline powered or non-mechanized.
Timber suitability - cost-benefit	Timber suitability designations must apply cost-benefit analysis and "stratify" lands by allowable intensity of timber management.	Timber suitability designations must apply cost-benefit analysis and "stratify" lands by allowable intensity of timber management.	XXXX	
Monitoring - tie to plan	The EIS is an appropriate vehicle for proposing monitoring protocols that can be reliably implemented to support restoration-focused adaptive management.	Explain how the monitoring strategy will address attainment of objectives and compliance with guideline.	XXXX	The EIS is an appropriate vehicle for proposing monitoring protocols that can be reliably implemented to support restoration-focused adaptive management.
Monitoring - tie to plan	Page 135 Monitoring Strategy - I find this Chapter does not describe very well how monitoring will address the attainment of objectives and compliance with guidelines outlined in the Plan. For example, there is no mention of diversity, yet that is a major objective of the Plan. The monitoring methods often specify "a sample" will be reviewed for compliance with a monitoring question, but there is no detail on how large that sample will be or how it will be selected. Given the number of monitoring "questions" and the indicated frequency of measurement, I am very skeptical that the monitoring can be realistically done as outlined. I think it would be	Explain how the monitoring strategy will address attainment of objectives and compliance with guideline.	XXXX	Page 135 Monitoring Strategy - I find this Chapter does not describe very well how monitoring will address the attainment of objectives and compliance with guidelines outlined in the Plan. For example, there is no mention of diversity, yet that is a major objective of the Plan. The monitoring methods often specify "a sample" will be reviewed for compliance with a monitoring question, but there is no detail on how large that sample will be or how it will be selected. Given the number of monitoring "questions" and the indicated frequency of measurement, I am very skeptical that the monitoring can be realistically done as outlined. I think it would be

Clarify Equipment Used as Gasoline Powered or Non-Mechanized

Clarification of Monitoring Strategy and Protocols  
Clarification of Monitoring Strategy and Protocols

PC 2900-2 The Forest Service should revise the monitoring strategy to address how well monitoring will address meeting the objectives and comply with guidelines outlined in the plan. (e.g. there is no mention of diversity, yet that is a major plan objective.....) The strategy should include detailed descriptions of what will be monitored, how big the job is, how often the data will be collected, who will collect the data and how the data will be used.

	helpful to describe the things that can be monitored such as plant species composition, ground cover, tree density, etc. and what each measurement can be used for - most of the data can be used for more than on monitoring question (management objective). This approach would clarify how big the monitoring job is, who will collect the data, and how often does it need to be collected.			helpful to describe the things that can be monitored such as plant species composition, ground cover, tree density, etc. and what each measurement can be used for - most of the data can be used for more than on monitoring question (management objective). This approach would clarify how big the monitoring job is, who will collect the data, and how often does it need to be collected.	
Monitoring - diversity	Chapter 5, which describes the monitoring strategy, does not even mention diversity, but Forest Service regulations call for environmental monitoring to insure that natural diversity is maintained.	Explain how the monitoring strategy addresses diversity. Forest Service regulations call for environmental monitoring to insure that natural diversity is maintained.	XXXX	Chapter 5, which describes the monitoring strategy, does not even mention diversity, but Forest Service regulations call for environmental monitoring to insure that natural diversity is maintained.	Clarification of Monitoring Strategy and Protocols
Monitoring - science based	A science-based monitoring plan, resulting in an adaptive management strategy would maintain or if prudent improve ecological conditions and expand the plurality of stakeholder benefits.	Establish a science-based monitoring plan that results in an adaptive management strategy.	XXXX	A science-based monitoring plan, resulting in an adaptive management strategy would maintain or if prudent improve ecological conditions and expand the plurality of stakeholder benefits.	Monitoring and Adaptive Management PC 2900-4 The Forest Service should adopt a science based monitoring plan resulting in adaptive management strategy that would improve ecologic conditions and expand stakeholder benefits.
Monitoring - feasibility implementation	Execution of promises to monitor forest resources is a prerequisite to complying with the ESA, coping with scientific uncertainty regarding population and habitat trends of threatened and endangered species, and ensuring viability of sensitive species through adaptive management.	Identify what will be monitored and on what schedule.	XXXX		
Monitoring - feasibility implementation	There are many references to the use of monitoring to determine what iterative improvements can be made to the Forest Plan. Monitoring is	Identify what will be monitored and on what schedule.	XXXX	There are many references to the use of monitoring to determine what iterative improvements can be made to the Forest Plan. Monitoring is	Clarification of Monitoring Strategy and PC 2900-2 The Forest Service should revise the monitoring strategy to address how well monitoring will address meeting the objectives and

entation	always a tempting fly on the water, however, based on practical experience such as the complete lack of aspen monitoring after the Wallow Fire, implementation is difficult and seldom done. As the Plan is finalized, it would be very helpful to identify what will be monitored and on what schedule.			always a tempting fly on the water, however, based on practical experience such as the complete lack of aspen monitoring after the Wallow Fire, implementation is difficult and seldom done. As the Plan is finalized, it would be very helpful to identify what will be monitored and on what schedule.
Monitoring - wild suggestions	We believe that monitoring the impact of ever expanding wild horse populations and the response of aspen to stand-converting fires would be great places to start.	Monitor the impact of ever expanding wild horse populations and the response of aspen to stand-converting fires.	XXXX	We believe that monitoring the impact of ever expanding wild horse populations and the response of aspen to stand-converting fires would be great places to start.
Monitoring - success of past monitoring	The monitoring plan can only be judged based on how well the last one worked—if it didn't work, then some changes are in order. But the plan does not reveal that. As commenters who have experience with Apache-Sitgreaves grazing allotment NEPA projects, we know that in many, many cases, planned monitoring never occurred. We also know that “monitoring” can be reduced to asking a permittee whether he grazed the proper number of cows last year, or more. The Forest Service often does not reveal that it uses permittees to conduct its monitoring, and trusts their answers even though they have zero incentive to self-report their failings. This is an important	Disclose the source of monitoring results. Concern that the Forest Service often does not reveal that it uses permittees to conduct its monitoring, and trusts their answers even though they have zero incentive to self-report their failings.	XXXX	The monitoring plan can only be judged based on how well the last one worked—if it didn't work, then some changes are in order. But the plan does not reveal that. As commenters who have experience with Apache-Sitgreaves grazing allotment NEPA projects, we know that in many, many cases, planned monitoring never occurred. We also know that “monitoring” can be reduced to asking a permittee whether he grazed the proper number of cows last year, or more. The Forest Service often does not reveal that it uses permittees to conduct its monitoring, and trusts their answers even though they have zero incentive to self-report their failings. This is an important

Protocols comply with guidelines outlined in the plan. (e.g. there is no mention of diversity, yet that is a major plan objective.....) The strategy should include detailed descriptions of what will be monitored, how big the job is, how often the data will be collected, who will collect the data and how the data will be used.

Completed Monitoring PC 2900-5 The Forest Service should start monitoring the impact of wild horse populations and the response of aspen to stand converting fires.

Public Review of Monitoring Plan PC 2900-3 The Forest Service should include the extent that monitoring in the current plan was conducted, past successes and failures, and include consequences if monitoring does not get completed.

	<p>point that needs to be disclosed to the public if the public is to be able to draw a reasoned conclusion about the veracity of the agency's claims</p>		<p>point that needs to be disclosed to the public if the public is to be able to draw a reasoned conclusion about the veracity of the agency's claims</p>
<p>Monitoring - public involvement</p>	<p>Unfortunately, insufficient detail is provided in the Plan, including Chapter 5 - Monitoring Strategy, and the DEIS for the reader to evaluate the sufficiency of the proposed monitoring. The Department recommends that additional detail be provided on monitoring implementation.</p>	<p>Include in very specific terms the requirements for a quantitative, qualitative and effectiveness monitoring strategy, a very specific monitoring implementation plan, and a specific monitoring budget, required resources allocation and funding, to the planning and NEPA review process of all management projects, to be submitted to public review and comments in the Draft Environmental Impact Statements (DEIS), to be included in the Records of Decisions (ROD) and to be included in the Final Environmental Impact Statements (FEIS) of all management projects, in order to insure that monitoring will actually be implemented and funded. (1) Include in very specific terms the requirements for the responsible officials to be bound by the findings of multi-party monitoring boards and to act upon the findings of a multi-party monitoring boards in a manner that appropriately addresses the issues raised by the multi-party monitoring boards. (2) Include in very specific terms a fourth phase that outlines clearly the</p>	<p>Unfortunately, insufficient detail is provided in the Plan, including Chapter 5 - Monitoring Strategy, and the DEIS for the reader to evaluate the sufficiency of the proposed monitoring. The Department recommends that additional detail be provided on monitoring implementation.</p>

		<p>responsibility and authority of responsible officials to implement adaptive and if necessary corrective management action during the implementation of large scale long duration specific projects as a response to the quantitative, qualitative, and effectiveness monitoring of the project, in addition to the three phases of planning (assessment, planning, and monitoring) identified in Title 36, Code of Federal Regulations, part 219 (36 CFR part 219) and designed to support a framework for adaptive management. (3) Include clear and unambiguous guidelines to responsible officials to integrate social and economic sustainability and social and economic science into the framework of best available scientific information to inform their land management planning process and their management decision making process. (4) Include clear and unambiguous guidelines to responsible officials to implement substantive - even though possibly scientifically imperfect - management actions that move the ecosystems significantly toward the desired future conditions, when such actions are supported by social consensus, rather than spend years attempting to forcibly</p>	
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impose, and possibly trigger litigation of management actions that may be deemed scientifically more perfect but that do not benefit from the support of the social consensus. (5) Include an emphasis on executing well less than perfect projects now, over developing scientifically perfect projects that are never implemented. (6) Include an emphasis on allowing the public to participate meaningfully in, influence substantially, and when appropriate alter the content of the decision of responsible officials while they retain their statutory decision making authority. (7) Include a special forum for local government elected officials such as County Supervisors to represent the socio economic interests of the local residents in the decision making process of the Forest Service responsible officials. (8) Include clear and unambiguous guidelines to reviewing officers to exercise careful judgment in their resolution or rejection of objections, in relation to the true material importance of the objections – as opposed to their symbolic or emotional importance, and the potential effect of litigation on the implementation of the project.

<p>Monitoring - public involvement</p>	<p>Navajo County suggests that the Programmatic Draft Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan be expanded to include in very specific terms the requirements for quantitative, qualitative and effectiveness monitoring processes, and the resources allocation and funding necessary to implement them, somewhat akin to the structured quality control plans and budgets common in the business world, to insure that strategic monitoring plans are quantifiably and qualitatively implemented.</p>	<p>Include in very specific terms the requirements for a quantitative, qualitative and effectiveness monitoring strategy, a very specific monitoring implementation plan, and a specific monitoring budget, required resources allocation and funding, to the planning and NEPA review process of all management projects, to be submitted to public review and comments in the Draft Environmental Impact Statements (DEIS), to be included in the Records of Decisions (ROD) and to be included in the Final Environmental Impact Statements (FEIS) of all management projects, in order to insure that monitoring will actually be implemented and funded. (1) Include in very specific terms the requirements for the responsible officials to be bound by the findings of multi-party monitoring boards and to act upon the findings of a multi-party monitoring boards in a manner that appropriately addresses the issues raised by the multi-party monitoring boards. (2) Include in very specific terms a fourth phase that outlines clearly the responsibility and authority of responsible officials to implement adaptive and if necessary corrective management action during the</p>	<p>XXXX</p>	<p>Navajo County suggests that the Programmatic Draft Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan be expanded to include in very specific terms the requirements for quantitative, qualitative and effectiveness monitoring processes, and the resources allocation and funding necessary to implement them, somewhat akin to the structured quality control plans and budgets common in the business world, to insure that strategic monitoring plans are quantifiably and qualitatively implemented.</p>	<p>Clarification of Monitoring Strategy and Protocols</p>	<p>PC 2900-8 The Forest Service should include a very specific monitoring terms, and implementation strategy and budget be included in the planning and NEPA review process for all projects, be submitted for public review and comments, be included in the ROD, and FEIS to insure that monitoring will be implemented and funded.</p>
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		<p>implementation of large scale long duration specific projects as a response to the quantitative, qualitative, and effectiveness monitoring of the project, in addition to the three phases of planning (assessment, planning, and monitoring) identified in Title 36, Code of Federal Regulations, part 219 (36 CFR part 219) and designed to support a framework for adaptive management. (3) Include clear and unambiguous guidelines to responsible officials to integrate social and economic sustainability and social and economic science into the framework of best available scientific information to inform their land management planning process and their management decision making process. (4) Include clear and unambiguous guidelines to responsible officials to implement substantive - even though possibly scientifically imperfect - management actions that move the ecosystems significantly toward the desired future conditions, when such actions are supported by social consensus, rather than spend years attempting to forcibly impose, and possibly trigger litigation of management actions that may be deemed scientifically more perfect but that do not benefit from the</p>		
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		<p>support of the social consensus. (5) Include an emphasis on executing well less than perfect projects now, over developing scientifically perfect projects that are never implemented. (6) Include an emphasis on allowing the public to participate meaningfully in, influence substantially, and when appropriate alter the content of the decision of responsible officials while they retain their statutory decision making authority. (7) Include a special forum for local government elected officials such as County Supervisors to represent the socio economic interests of the local residents in the decision making process of the Forest Service responsible officials. (8) Include clear and unambiguous guidelines to reviewing officers to exercise careful judgment in their resolution or rejection of objections, in relation to the true material importance of the objections – as opposed to their symbolic or emotional importance, and the potential effect of litigation on the implementation of the project.</p>		
<p>Monitoring - public involvement</p>	<p>Specifically, Navajo County suggests that a very specific monitoring implementation plan and budget be added to the planning and NEPA review process of all projects, be submitted to public review and comments in the Draft</p>	<p>Include in very specific terms the requirements for a quantitative, qualitative and effectiveness monitoring strategy, a very specific monitoring implementation plan, and a specific monitoring budget, required resources</p>	<p>XXXX</p>	<p>Specifically, Navajo County suggests that a very specific monitoring implementation plan and budget be added to the planning and NEPA review process of all projects, be submitted to public review and comments in the Draft</p>

Clarification of Monitoring Strategy and Protocols

PC 2900-8 The Forest Service should include a very specific monitoring terms, and implementation strategy and budget be included in the planning and NEPA review process for all projects, be submitted for public review

	<p>Environmental Impact Statements (DEIS), be included in the Records of Decisions (ROD) and be included in the Final Environmental Impact Statements (FEIS) for all projects, so as to insure that monitoring will actually be implemented and funded.</p>	<p>allocation and funding, to the planning and NEPA review process of all management projects, to be submitted to public review and comments in the Draft Environmental Impact Statements (DEIS), to be included in the Records of Decisions (ROD) and to be included in the Final Environmental Impact Statements (FEIS) of all management projects, in order to insure that monitoring will actually be implemented and funded. (1) Include in very specific terms the requirements for the responsible officials to be bound by the findings of multi-party monitoring boards and to act upon the findings of a multi-party monitoring boards in a manner that appropriately addresses the issues raised by the multi-party monitoring boards. (2) Include in very specific terms a fourth phase that outlines clearly the responsibility and authority of responsible officials to implement adaptive and if necessary corrective management action during the implementation of large scale long duration specific projects as a response to the quantitative, qualitative, and effectiveness monitoring of the project, in addition to the three phases of planning (assessment, planning, and</p>	<p>Environmental Impact Statements (DEIS), be included in the Records of Decisions (ROD) and be included in the Final Environmental Impact Statements (FEIS) for all projects, so as to insure that monitoring will actually be implemented and funded.</p>	<p>and comments, be included in the ROD, and FEIS to insure that monitoring will be implemented and funded.</p>
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monitoring) identified in Title 36, Code of Federal Regulations, part 219 (36 CFR part 219) and designed to support a framework for adaptive management. (3) Include clear and unambiguous guidelines to responsible officials to integrate social and economic sustainability and social and economic science into the framework of best available scientific information to inform their land management planning process and their management decision making process. (4) Include clear and unambiguous guidelines to responsible officials to implement substantive - even though possibly scientifically imperfect - management actions that move the ecosystems significantly toward the desired future conditions, when such actions are supported by social consensus, rather than spend years attempting to forcibly impose, and possibly trigger litigation of management actions that may be deemed scientifically more perfect but that do not benefit from the support of the social consensus. (5) Include an emphasis on executing well less than perfect projects now, over developing scientifically perfect projects that are never implemented. (6) Include an emphasis on allowing the

		public to participate meaningfully in, influence substantially, and when appropriate alter the content of the decision of responsible officials while they retain their statutory decision making authority. (7) Include a special forum for local government elected officials such as County Supervisors to represent the socio economic interests of the local residents in the decision making process of the Forest Service responsible officials. (8) Include clear and unambiguous guidelines to reviewing officers to exercise careful judgment in their resolution or rejection of objections, in relation to the true material importance of the objections – as opposed to their symbolic or emotional importance, and the potential effect of litigation on the implementation of the project.		
Monitoring - public involvement	Navajo County further suggests that in addition to the requirement for three functionally different and complementary tiers, the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan specifically direct the responsible officials to include robust qualitative and effectiveness indicators since easy to collect and process quantitative indicators, such as	Include in very specific terms the requirements for a quantitative, qualitative and effectiveness monitoring strategy, a very specific monitoring implementation plan, and a specific monitoring budget, required resources allocation and funding, to the planning and NEPA review process of all management projects, to be submitted to public review and comments in the Draft Environmental Impact Statements (DEIS), to be included in the Records of	XXXX	Navajo County further suggests that in addition to the requirement for three functionally different and complementary tiers, the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan specifically direct the responsible officials to include robust qualitative and effectiveness indicators since easy to collect and process quantitative indicators, such as

Monitoring Plan PC 2900-10 The Forest Service should expand the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan to include specific requirement terms for the responsible officials to be bound by the findings of multi-party monitoring boards. The requirement should include qualitative and effectiveness indicators.

	<p>acres treated, tons of biomass removed or forage utilization, often yield very little meaningful information on the resulting health and resilience of a forest stand/or the health and productivity of a grazing range for example.</p>	<p>Decisions (ROD) and to be included in the Final Environmental Impact Statements (FEIS) of all management projects, in order to insure that monitoring will actually be implemented and funded. (1) Include in very specific terms the requirements for the responsible officials to be bound by the findings of multi-party monitoring boards and to act upon the findings of a multi- party monitoring boards in a manner that appropriately addresses the issues raised by the multi-party monitoring boards. (2) Include in very specific terms a fourth phase that outlines clearly the responsibility and authority of responsible officials to implement adaptive and if necessary corrective management action during the implementation of large scale long duration specific projects as a response to the quantitative, qualitative, and effectiveness monitoring of the project, in addition to the three phases of planning (assessment, planning, and monitoring) identified in Title 36, Code of Federal Regulations, part 219 (36 CFR part 219) and designed to support a framework for adaptive management. (3) Include clear and unambiguous guidelines to responsible</p>	<p>acres treated, tons of biomass removed or forage utilization, often yield very little meaningful information on the resulting health and resilience of a forest stand/or the health and productivity of a grazing range for example.</p>
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		<p>officials to integrate social and economic sustainability and social and economic science into the framework of best available scientific information to inform their land management planning process and their management decision making process. (4) Include clear and unambiguous guidelines to responsible officials to implement substantive - even though possibly scientifically imperfect - management actions that move the ecosystems significantly toward the desired future conditions, when such actions are supported by social consensus, rather than spend years attempting to forcibly impose, and possibly trigger litigation of management actions that may be deemed scientifically more perfect but that do not benefit from the support of the social consensus. (5) Include an emphasis on executing well less than perfect projects now, over developing scientifically perfect projects that are never implemented. (6) Include an emphasis on allowing the public to participate meaningfully in, influence substantially, and when appropriate alter the content of the decision of responsible officials while they retain their statutory decision making authority. (7) Include a special</p>	
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		forum for local government elected officials such as County Supervisors to represent the socio economic interests of the local residents in the decision making process of the Forest Service responsible officials. (8) Include clear and unambiguous guidelines to reviewing officers to exercise careful judgment in their resolution or rejection of objections, in relation to the true material importance of the objections – as opposed to their symbolic or emotional importance, and the potential effect of litigation on the implementation of the project.		
Monitoring - public involvement	Navajo County suggests that the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan be expanded to include in very specific terms the requirements for the responsible officials to be bound by the findings of multi-party monitoring boards.	Include in very specific terms the requirements for a quantitative, qualitative and effectiveness monitoring strategy, a very specific monitoring implementation plan, and a specific monitoring budget, required resources allocation and funding, to the planning and NEPA review process of all management projects, to be submitted to public review and comments in the Draft Environmental Impact Statements (DEIS), to be included in the Records of Decisions (ROD) and to be included in the Final Environmental Impact Statements (FEIS) of all management projects, in order to insure that monitoring will actually be implemented and funded. (1) Include in very	XXXX	Navajo County suggests that the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan be expanded to include in very specific terms the requirements for the responsible officials to be bound by the findings of multi-party monitoring boards.

Management

		<p>specific terms the requirements for the responsible officials to be bound by the findings of multi-party monitoring boards and to act upon the findings of a multi-party monitoring boards in a manner that appropriately addresses the issues raised by the multi-party monitoring boards. (2) Include in very specific terms a fourth phase that outlines clearly the responsibility and authority of responsible officials to implement adaptive and if necessary corrective management action during the implementation of large scale long duration specific projects as a response to the quantitative, qualitative, and effectiveness monitoring of the project, in addition to the three phases of planning (assessment, planning, and monitoring) identified in Title 36, Code of Federal Regulations, part 219 (36 CFR part 219) and designed to support a framework for adaptive management. (3) Include clear and unambiguous guidelines to responsible officials to integrate social and economic sustainability and social and economic science into the framework of best available scientific information to inform their land management planning process and their management</p>	
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		<p>decision making process. (4) Include clear and unambiguous guidelines to responsible officials to implement substantive - even though possibly scientifically imperfect - management actions that move the ecosystems significantly toward the desired future conditions, when such actions are supported by social consensus, rather than spend years attempting to forcibly impose, and possibly trigger litigation of management actions that may be deemed scientifically more perfect but that do not benefit from the support of the social consensus. (5) Include an emphasis on executing well less than perfect projects now, over developing scientifically perfect projects that are never implemented. (6) Include an emphasis on allowing the public to participate meaningfully in, influence substantially, and when appropriate alter the content of the decision of responsible officials while they retain their statutory decision making authority. (7) Include a special forum for local government elected officials such as County Supervisors to represent the socio economic interests of the local residents in the decision making process of the Forest Service responsible officials. (8) Include clear and unambiguous</p>		
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		<p>guidelines to reviewing officers to exercise careful judgment in their resolution or rejection of objections, in relation to the true material importance of the objections – as opposed to their symbolic or emotional importance, and the potential effect of litigation on the implementation of the project.</p>		
Monitoring - public involvement	<p>Navajo County suggests that the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan provide clear and unambiguous guidelines to responsible officials to integrate social and economic sustainability and social and economic science into the framework of best available scientific information to inform their land management planning process and their management decision making process.</p>	<p>Include in very specific terms the requirements for a quantitative, qualitative and effectiveness monitoring strategy, a very specific monitoring implementation plan, and a specific monitoring budget, required resources allocation and funding, to the planning and NEPA review process of all management projects, to be submitted to public review and comments in the Draft Environmental Impact Statements (DEIS), to be included in the Records of Decisions (ROD) and to be included in the Final Environmental Impact Statements (FEIS) of all management projects, in order to insure that monitoring will actually be implemented and funded. (1) Include in very specific terms the requirements for the responsible officials to be bound by the findings of multi-party monitoring boards and to act upon the findings of a multi- party monitoring boards in a manner that appropriately</p>	XXXX	<p>Navajo County suggests that the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan provide clear and unambiguous guidelines to responsible officials to integrate social and economic sustainability and social and economic science into the framework of best available scientific information to inform their land management planning process and their management decision making process.</p>

Economic Impacts

		<p>addresses the issues raised by the multi-party monitoring boards. (2) Include in very specific terms a fourth phase that outlines clearly the responsibility and authority of responsible officials to implement adaptive and if necessary corrective management action during the implementation of large scale long duration specific projects as a response to the quantitative, qualitative, and effectiveness monitoring of the project, in addition to the three phases of planning (assessment, planning, and monitoring) identified in Title 36, Code of Federal Regulations, part 219 (36 CFR part 219) and designed to support a framework for adaptive management. (3) Include clear and unambiguous guidelines to responsible officials to integrate social and economic sustainability and social and economic science into the framework of best available scientific information to inform their land management planning process and their management decision making process. (4) Include clear and unambiguous guidelines to responsible officials to implement substantive - even though possibly scientifically imperfect - management actions that move the ecosystems</p>		
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		<p>significantly toward the desired future conditions, when such actions are supported by social consensus, rather than spend years attempting to forcibly impose, and possibly trigger litigation of management actions that may be deemed scientifically more perfect but that do not benefit from the support of the social consensus. (5) Include an emphasis on executing well less than perfect projects now, over developing scientifically perfect projects that are never implemented. (6) Include an emphasis on allowing the public to participate meaningfully in, influence substantially, and when appropriate alter the content of the decision of responsible officials while they retain their statutory decision making authority. (7) Include a special forum for local government elected officials such as County Supervisors to represent the socio economic interests of the local residents in the decision making process of the Forest Service responsible officials. (8) Include clear and unambiguous guidelines to reviewing officers to exercise careful judgment in their resolution or rejection of objections, in relation to the true material importance of the objections – as opposed to their symbolic or emotional importance, and the potential</p>		
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		effect of litigation on the implementation of the project.		
Monitoring - public involvement	Specifically, Navajo County suggests that the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan instruct responsible officials to implement substantive - even though possibly scientifically imperfect - management actions that move the ecosystems significantly toward the desired future conditions, when such actions are supported by social consensus, rather than spend years attempting to forcibly impose, and possibly trigger litigation of management actions that may be deemed scientifically more perfect but that do not benefit from the support of the social consensus. In other terms, Navajo County suggests that the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan emphasize executing well less than perfect projects now, over developing scientifically perfect projects that are never implemented.	Include in very specific terms the requirements for a quantitative, qualitative and effectiveness monitoring strategy, a very specific monitoring implementation plan, and a specific monitoring budget, required resources allocation and funding, to the planning and NEPA review process of all management projects, to be submitted to public review and comments in the Draft Environmental Impact Statements (DEIS), to be included in the Records of Decisions (ROD) and to be included in the Final Environmental Impact Statements (FEIS) of all management projects, in order to insure that monitoring will actually be implemented and funded. (1) Include in very specific terms the requirements for the responsible officials to be bound by the findings of multi-party monitoring boards and to act upon the findings of a multi-party monitoring boards in a manner that appropriately addresses the issues raised by the multi-party monitoring boards. (2) Include in very specific terms a fourth phase that outlines clearly the responsibility and authority of	XXXX	Specifically, Navajo County suggests that the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan instruct responsible officials to implement substantive - even though possibly scientifically imperfect - management actions that move the ecosystems significantly toward the desired future conditions, when such actions are supported by social consensus, rather than spend years attempting to forcibly impose, and possibly trigger litigation of management actions that may be deemed scientifically more perfect but that do not benefit from the support of the social consensus. In other terms, Navajo County suggests that the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan emphasize executing well less than perfect projects now, over developing scientifically perfect projects that are never implemented.

Management

		<p>responsible officials to implement adaptive and if necessary corrective management action during the implementation of large scale long duration specific projects as a response to the quantitative, qualitative, and effectiveness monitoring of the project, in addition to the three phases of planning (assessment, planning, and monitoring) identified in Title 36, Code of Federal Regulations, part 219 (36 CFR part 219) and designed to support a framework for adaptive management. (3) Include clear and unambiguous guidelines to responsible officials to integrate social and economic sustainability and social and economic science into the framework of best available scientific information to inform their land management planning process and their management decision making process. (4) Include clear and unambiguous guidelines to responsible officials to implement substantive - even though possibly scientifically imperfect - management actions that move the ecosystems significantly toward the desired future conditions, when such actions are supported by social consensus, rather than spend years attempting to forcibly impose, and possibly trigger</p>	
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		<p>litigation of management actions that may be deemed scientifically more perfect but that do not benefit from the support of the social consensus. (5) Include an emphasis on executing well less than perfect projects now, over developing scientifically perfect projects that are never implemented. (6) Include an emphasis on allowing the public to participate meaningfully in, influence substantially, and when appropriate alter the content of the decision of responsible officials while they retain their statutory decision making authority. (7) Include a special forum for local government elected officials such as County Supervisors to represent the socio economic interests of the local residents in the decision making process of the Forest Service responsible officials. (8) Include clear and unambiguous guidelines to reviewing officers to exercise careful judgment in their resolution or rejection of objections, in relation to the true material importance of the objections – as opposed to their symbolic or emotional importance, and the potential effect of litigation on the implementation of the project.</p>		
Monitoring - public involve	Navajo County recognizes that under current federal statutes Forest Service line officers are not allowed to share their	Include in very specific terms the requirements for a quantitative, qualitative and effectiveness monitoring	XXXX	Navajo County recognizes that under current federal statutes Forest Service line officers are not allowed to share their

Shared Decision Making Authority

<p>ment</p>	<p>decision making authority. Nonetheless, Navajo County believes that a statutory monopoly of decision making authority does not necessarily imply an operational monopoly on decision content. Therefore, Navajo County suggests that the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan emphasize that while the line officers retain their sole legal ability to make the decision, they are also required by law and regulation “to meet the needs of present and future generations” (Forest Service Mission Statement), as expressed through public participation and collaboration among other channels.</p>	<p>strategy, a very specific monitoring implementation plan, and a specific monitoring budget, required resources allocation and funding, to the planning and NEPA review process of all management projects, to be submitted to public review and comments in the Draft Environmental Impact Statements (DEIS), to be included in the Records of Decisions (ROD) and to be included in the Final Environmental Impact Statements (FEIS) of all management projects, in order to insure that monitoring will actually be implemented and funded. (1) Include in very specific terms the requirements for the responsible officials to be bound by the findings of multi-party monitoring boards and to act upon the findings of a multi-party monitoring boards in a manner that appropriately addresses the issues raised by the multi-party monitoring boards. (2) Include in very specific terms a fourth phase that outlines clearly the responsibility and authority of responsible officials to implement adaptive and if necessary corrective management action during the implementation of large scale long duration specific projects as a response to the quantitative, qualitative, and</p>	<p>decision making authority. Nonetheless, Navajo County believes that a statutory monopoly of decision making authority does not necessarily imply an operational monopoly on decision content. Therefore, Navajo County suggests that the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan emphasize that while the line officers retain their sole legal ability to make the decision, they are also required by law and regulation “to meet the needs of present and future generations” (Forest Service Mission Statement), as expressed through public participation and collaboration among other channels.</p>	<p>through Public Participation and Collaboration</p>
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		<p>effectiveness monitoring of the project, in addition to the three phases of planning (assessment, planning, and monitoring) identified in Title 36, Code of Federal Regulations, part 219 (36 CFR part 219) and designed to support a framework for adaptive management. (3) Include clear and unambiguous guidelines to responsible officials to integrate social and economic sustainability and social and economic science into the framework of best available scientific information to inform their land management planning process and their management decision making process. (4) Include clear and unambiguous guidelines to responsible officials to implement substantive - even though possibly scientifically imperfect - management actions that move the ecosystems significantly toward the desired future conditions, when such actions are supported by social consensus, rather than spend years attempting to forcibly impose, and possibly trigger litigation of management actions that may be deemed scientifically more perfect but that do not benefit from the support of the social consensus. (5) Include an emphasis on executing well less than perfect projects now,</p>	
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		<p>over developing scientifically perfect projects that are never implemented. (6) Include an emphasis on allowing the public to participate meaningfully in, influence substantially, and when appropriate alter the content of the decision of responsible officials while they retain their statutory decision making authority. (7) Include a special forum for local government elected officials such as County Supervisors to represent the socio economic interests of the local residents in the decision making process of the Forest Service responsible officials. (8) Include clear and unambiguous guidelines to reviewing officers to exercise careful judgment in their resolution or rejection of objections, in relation to the true material importance of the objections – as opposed to their symbolic or emotional importance, and the potential effect of litigation on the implementation of the project.</p>		
Monitoring - public involvement	<p>Navajo County further suggests that the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan explain how and direct responsible officials to retain their legal decision making authority while allowing the public to participate meaningfully in, influence substantially, and</p>	<p>Include in very specific terms the requirements for a quantitative, qualitative and effectiveness monitoring strategy, a very specific monitoring implementation plan, and a specific monitoring budget, required resources allocation and funding, to the planning and NEPA review process of all management projects, to be submitted to</p>	XXXX	<p>Navajo County further suggests that the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan explain how and direct responsible officials to retain their legal decision making authority while allowing the public to participate meaningfully in, influence substantially, and</p>

Management

	<p>when appropriate alter the content of their decision.</p>	<p>public review and comments in the Draft Environmental Impact Statements (DEIS), to be included in the Records of Decisions (ROD) and to be included in the Final Environmental Impact Statements (FEIS) of all management projects, in order to insure that monitoring will actually be implemented and funded. (1) Include in very specific terms the requirements for the responsible officials to be bound by the findings of multi-party monitoring boards and to act upon the findings of a multi-party monitoring boards in a manner that appropriately addresses the issues raised by the multi-party monitoring boards. (2) Include in very specific terms a fourth phase that outlines clearly the responsibility and authority of responsible officials to implement adaptive and if necessary corrective management action during the implementation of large scale long duration specific projects as a response to the quantitative, qualitative, and effectiveness monitoring of the project, in addition to the three phases of planning (assessment, planning, and monitoring) identified in Title 36, Code of Federal Regulations, part 219 (36 CFR part 219) and designed to</p>	<p>when appropriate alter the content of their decision.</p>
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		<p>support a framework for adaptive management. (3) Include clear and unambiguous guidelines to responsible officials to integrate social and economic sustainability and social and economic science into the framework of best available scientific information to inform their land management planning process and their management decision making process. (4) Include clear and unambiguous guidelines to responsible officials to implement substantive - even though possibly scientifically imperfect - management actions that move the ecosystems significantly toward the desired future conditions, when such actions are supported by social consensus, rather than spend years attempting to forcibly impose, and possibly trigger litigation of management actions that may be deemed scientifically more perfect but that do not benefit from the support of the social consensus. (5) Include an emphasis on executing well less than perfect projects now, over developing scientifically perfect projects that are never implemented. (6) Include an emphasis on allowing the public to participate meaningfully in, influence substantially, and when appropriate alter the content</p>	
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		of the decision of responsible officials while they retain their statutory decision making authority. (7) Include a special forum for local government elected officials such as County Supervisors to represent the socio economic interests of the local residents in the decision making process of the Forest Service responsible officials. (8) Include clear and unambiguous guidelines to reviewing officers to exercise careful judgment in their resolution or rejection of objections, in relation to the true material importance of the objections – as opposed to their symbolic or emotional importance, and the potential effect of litigation on the implementation of the project.		
Monitoring - public involvement	Navajo County further suggests that a special role and a special forum be organized in the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan, for local elected officials such as County Supervisors to represent the socio economic interests of local populations in the decision making process of the Forest Service responsible officials. As the most local and often the most directly involved elected representatives in the democratic constitutional process, local elected officials	Include in very specific terms the requirements for a quantitative, qualitative and effectiveness monitoring strategy, a very specific monitoring implementation plan, and a specific monitoring budget, required resources allocation and funding, to the planning and NEPA review process of all management projects, to be submitted to public review and comments in the Draft Environmental Impact Statements (DEIS), to be included in the Records of Decisions (ROD) and to be included in the Final Environmental Impact Statements (FEIS) of all	XXXX	Navajo County further suggests that a special role and a special forum be organized in the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan, for local elected officials such as County Supervisors to represent the socio economic interests of local populations in the decision making process of the Forest Service responsible officials. As the most local and often the most directly involved elected representatives in the democratic constitutional process, local elected officials

Coordination with Local Government  
 PC 336-9 The Forest Service should develop a special role and a special forum be organized in the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan, for local elected officials such as County Supervisors to represent the socio economic interests of local populations in the decision making process of the Forest Service responsible officials.

	<p>can play a tremendously significant role in representing their constituents with line officers and insure that federal employees temporarily assigned to a national forest are given the best possible opportunity to integrate local custom, culture and economic well-being into their decision making process.</p>	<p>management projects, in order to insure that monitoring will actually be implemented and funded. (1) Include in very specific terms the requirements for the responsible officials to be bound by the findings of multi-party monitoring boards and to act upon the findings of a multi-party monitoring boards in a manner that appropriately addresses the issues raised by the multi-party monitoring boards. (2) Include in very specific terms a fourth phase that outlines clearly the responsibility and authority of responsible officials to implement adaptive and if necessary corrective management action during the implementation of large scale long duration specific projects as a response to the quantitative, qualitative, and effectiveness monitoring of the project, in addition to the three phases of planning (assessment, planning, and monitoring) identified in Title 36, Code of Federal Regulations, part 219 (36 CFR part 219) and designed to support a framework for adaptive management. (3) Include clear and unambiguous guidelines to responsible officials to integrate social and economic sustainability and social and economic science into the framework of best</p>	<p>can play a tremendously significant role in representing their constituents with line officers and insure that federal employees temporarily assigned to a national forest are given the best possible opportunity to integrate local custom, culture and economic well-being into their decision making process.</p>
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		<p>available scientific information to inform their land management planning process and their management decision making process. (4) Include clear and unambiguous guidelines to responsible officials to implement substantive - even though possibly scientifically imperfect - management actions that move the ecosystems significantly toward the desired future conditions, when such actions are supported by social consensus, rather than spend years attempting to forcibly impose, and possibly trigger litigation of management actions that may be deemed scientifically more perfect but that do not benefit from the support of the social consensus. (5) Include an emphasis on executing well less than perfect projects now, over developing scientifically perfect projects that are never implemented. (6) Include an emphasis on allowing the public to participate meaningfully in, influence substantially, and when appropriate alter the content of the decision of responsible officials while they retain their statutory decision making authority. (7) Include a special forum for local government elected officials such as County Supervisors to represent the socio economic interests of the</p>		
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		<p>local residents in the decision making process of the Forest Service responsible officials. (8) Include clear and unambiguous guidelines to reviewing officers to exercise careful judgment in their resolution or rejection of objections, in relation to the true material importance of the objections – as opposed to their symbolic or emotional importance, and the potential effect of litigation on the implementation of the project.</p>		
<p>Monitoring - public involvement</p>	<p>Navajo County suggests that the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan guide and direct the reviewing officers to exercise careful judgment in their resolution or rejection of objections, in relation to the true material importance of the objections – as opposed to their symbolic or emotional importance, and the potential effect of litigation on the implementation of the project.</p>	<p>Include in very specific terms the requirements for a quantitative, qualitative and effectiveness monitoring strategy, a very specific monitoring implementation plan, and a specific monitoring budget, required resources allocation and funding, to the planning and NEPA review process of all management projects, to be submitted to public review and comments in the Draft Environmental Impact Statements (DEIS), to be included in the Records of Decisions (ROD) and to be included in the Final Environmental Impact Statements (FEIS) of all management projects, in order to insure that monitoring will actually be implemented and funded. (1) Include in very specific terms the requirements for the responsible officials to be bound by the findings of multi-</p>	<p>XXXX</p>	<p>Navajo County suggests that the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan guide and direct the reviewing officers to exercise careful judgment in their resolution or rejection of objections, in relation to the true material importance of the objections – as opposed to their symbolic or emotional importance, and the potential effect of litigation on the implementation of the project.</p>

Objections

	<p>party monitoring boards and to act upon the findings of a multi-party monitoring boards in a manner that appropriately addresses the issues raised by the multi-party monitoring boards. (2) Include in very specific terms a fourth phase that outlines clearly the responsibility and authority of responsible officials to implement adaptive and if necessary corrective management action during the implementation of large scale long duration specific projects as a response to the quantitative, qualitative, and effectiveness monitoring of the project, in addition to the three phases of planning (assessment, planning, and monitoring) identified in Title 36, Code of Federal Regulations, part 219 (36 CFR part 219) and designed to support a framework for adaptive management. (3) Include clear and unambiguous guidelines to responsible officials to integrate social and economic sustainability and social and economic science into the framework of best available scientific information to inform their land management planning process and their management decision making process. (4) Include clear and unambiguous guidelines to responsible officials to implement</p>		
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		<p>substantive - even though possibly scientifically imperfect - management actions that move the ecosystems significantly toward the desired future conditions, when such actions are supported by social consensus, rather than spend years attempting to forcibly impose, and possibly trigger litigation of management actions that may be deemed scientifically more perfect but that do not benefit from the support of the social consensus. (5) Include an emphasis on executing well less than perfect projects now, over developing scientifically perfect projects that are never implemented. (6) Include an emphasis on allowing the public to participate meaningfully in, influence substantially, and when appropriate alter the content of the decision of responsible officials while they retain their statutory decision making authority. (7) Include a special forum for local government elected officials such as County Supervisors to represent the socio economic interests of the local residents in the decision making process of the Forest Service responsible officials. (8) Include clear and unambiguous guidelines to reviewing officers to exercise careful judgment in their resolution or rejection of objections, in relation to the</p>		
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		<p>true material importance of the objections – as opposed to their symbolic or emotional importance, and the potential effect of litigation on the implementation of the project.</p>		
<p>Monitoring - public involvement</p>	<p>the Forest Service misses a critical opportunity to build robustness in the system by failing to make the findings of multi-party monitoring boards binding on the Forest Service responsible official.</p>	<p>Include in very specific terms the requirements for a quantitative, qualitative and effectiveness monitoring strategy, a very specific monitoring implementation plan, and a specific monitoring budget, required resources allocation and funding, to the planning and NEPA review process of all management projects, to be submitted to public review and comments in the Draft Environmental Impact Statements (DEIS), to be included in the Records of Decisions (ROD) and to be included in the Final Environmental Impact Statements (FEIS) of all management projects, in order to insure that monitoring will actually be implemented and funded. (1) Include in very specific terms the requirements for the responsible officials to be bound by the findings of multi-party monitoring boards and to act upon the findings of a multi-party monitoring boards in a manner that appropriately addresses the issues raised by the multi-party monitoring boards. (2) Include in very specific terms a fourth phase</p>	<p>XXXX</p>	

		<p>that outlines clearly the responsibility and authority of responsible officials to implement adaptive and if necessary corrective management action during the implementation of large scale long duration specific projects as a response to the quantitative, qualitative, and effectiveness monitoring of the project, in addition to the three phases of planning (assessment, planning, and monitoring) identified in Title 36, Code of Federal Regulations, part 219 (36 CFR part 219) and designed to support a framework for adaptive management. (3) Include clear and unambiguous guidelines to responsible officials to integrate social and economic sustainability and social and economic science into the framework of best available scientific information to inform their land management planning process and their management decision making process. (4) Include clear and unambiguous guidelines to responsible officials to implement substantive - even though possibly scientifically imperfect - management actions that move the ecosystems significantly toward the desired future conditions, when such actions are supported by social consensus, rather than spend</p>	
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<p>Monitoring - public involvement2</p>	<p>Practically, Navajo County suggests a three tier monitoring plan articulated as follows: I. Quantitative implementation compliance monitoring. The purpose of the quantitative implementation compliance monitoring is to answer the question “was the job done?” While generally this assessment is made by the Forest Service contract management team when a contractor is involved, it is suggested that this step becomes the beginning of the process rather than often the end of it. Specific quantitative implementation compliance monitoring measures can be defined at the planning stage and specific resources requirements can be calculated at the planning stage. The plan must include, disclose and commit the responsible official to provide the resources and budget required. II. Qualitative implementation compliance monitoring. The purpose of the qualitative implementation compliance monitoring is to answer the question “was the job done correctly?” The need for qualitative implementation monitoring increases rapidly with the complexity of the actions undertaken. For example, complex forest restoration prescriptions implemented using designation by description (DxD) or</p>	<p>The three phases of planning (assessment, planning, and monitoring) should be augmented with a fourth phase that outlines clearly the responsibility and authority of responsible officials to implement adaptive and if necessary corrective action during the implementation of large scale long duration specific projects as a response to quantitative, qualitative, and effectiveness monitoring of the project. NEPA analysis of complex, large scale, long term projects should specifically be designed from inception to formalize the inclusion of a four phase adaptive management framework.</p>	<p>XXXX</p>	<p>Practically, Navajo County suggests a three tier monitoring plan articulated as follows: I. Quantitative implementation compliance monitoring. The purpose of the quantitative implementation compliance monitoring is to answer the question “was the job done?” While generally this assessment is made by the Forest Service contract management team when a contractor is involved, it is suggested that this step becomes the beginning of the process rather than often the end of it. Specific quantitative implementation compliance monitoring measures can be defined at the planning stage and specific resources requirements can be calculated at the planning stage. The plan must include, disclose and commit the responsible official to provide the resources and budget required. II. Qualitative implementation compliance monitoring. The purpose of the qualitative implementation compliance monitoring is to answer the question “was the job done correctly?” The need for qualitative implementation monitoring increases rapidly with the complexity of the actions undertaken. For example, complex forest restoration prescriptions implemented using designation by description (DxD) or</p>	<p>Monitoring Plan</p>	<p>PC 2900-9 The Forest Service should revise the monitoring strategy and adopt a three tier monitoring plan to include quantitative implementation compliance monitoring, qualitative implementation compliance monitoring, and effectiveness monitoring.</p>
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designation by prescription (DxP) create substantial room for interpretation by the operators and may result in outcomes substantially different on the ground from those intended by the resources specialists who write the prescriptions. Verifying that implementation complies not only quantitatively but qualitatively with the management decision is especially important when the third tier of monitoring is intended, as effectiveness can only be meaningfully analyzed if the actual treatments outcomes are aligned with the intended outcomes. Specific qualitative implementation compliance monitoring measures can be defined at the planning stage and specific resources requirements can be calculated at the planning stage. The plan must include, disclose and commit the responsible official to provide the resources and budget required. III. Effectiveness monitoring. The purpose of the effectiveness monitoring is to answer the question “do the outcomes of the management decision produce the intended effects?” The need for effectiveness monitoring increases rapidly with the complexity and spatial and temporal scopes of the actions undertaken, especially in

designation by prescription (DxP) create substantial room for interpretation by the operators and may result in outcomes substantially different on the ground from those intended by the resources specialists who write the prescriptions. Verifying that implementation complies not only quantitatively but qualitatively with the management decision is especially important when the third tier of monitoring is intended, as effectiveness can only be meaningfully analyzed if the actual treatments outcomes are aligned with the intended outcomes. Specific qualitative implementation compliance monitoring measures can be defined at the planning stage and specific resources requirements can be calculated at the planning stage. The plan must include, disclose and commit the responsible official to provide the resources and budget required. III. Effectiveness monitoring. The purpose of the effectiveness monitoring is to answer the question “do the outcomes of the management decision produce the intended effects?” The need for effectiveness monitoring increases rapidly with the complexity and spatial and temporal scopes of the actions undertaken, especially in

	<p>projects where cumulative effects analysis assumes a speculative nature owing to the scale and duration of the management action. For example, landscape scale forest restoration over 2 million acres in 20 years, as endeavored in the Four Forest Restoration Initiative, an initiative that Navajo County was instrumental in creating and fostering, is largely unconceivable without the concept of adaptive management, as we know the Forest Service realizes. However, adaptive management is but an empty rhetoric, and any management action and the NEPA analysis thereof is flawed, if robust three tier monitoring as described here above is not implement. Specific effectiveness monitoring processes can be defined at the planning stage and specific resources requirements can be calculated at the planning stage. The plan must include, disclose and commit the responsible official to provide the resources and budget required.</p>			<p>projects where cumulative effects analysis assumes a speculative nature owing to the scale and duration of the management action. For example, landscape scale forest restoration over 2 million acres in 20 years, as endeavored in the Four Forest Restoration Initiative, an initiative that Navajo County was instrumental in creating and fostering, is largely unconceivable without the concept of adaptive management, as we know the Forest Service realizes. However, adaptive management is but an empty rhetoric, and any management action and the NEPA analysis thereof is flawed, if robust three tier monitoring as described here above is not implement. Specific effectiveness monitoring processes can be defined at the planning stage and specific resources requirements can be calculated at the planning stage. The plan must include, disclose and commit the responsible official to provide the resources and budget required.</p>	
<p>Monitoring - public involvement2</p>	<p>Navajo County suggests that the three phases of planning (assessment, planning, and monitoring) in Title 36, Code of Federal Regulations, part 219 (36 CFR part 219) designed to support a framework for</p>	<p>The three phases of planning (assessment, planning, and monitoring) should be augmented with a fourth phase that outlines clearly the responsibility and authority of responsible officials to</p>	<p>XXXX</p>	<p>Navajo County suggests that the three phases of planning (assessment, planning, and monitoring) in Title 36, Code of Federal Regulations, part 219 (36 CFR part 219) designed to support a framework for</p>	<p>Adaptive Management</p>

	<p>adaptive management that will facilitate learning and continuous improvement in plans and agency decision making, be augmented in the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan with a fourth phase that outlines clearly the responsibility and authority of responsible officials to implement adaptive and if necessary corrective action during the implementation of large scale long duration specific projects as a response to quantitative, qualitative, and effectiveness monitoring of the project.</p>	<p>implement adaptive and if necessary corrective action during the implementation of large scale long duration specific projects as a response to quantitative, qualitative, and effectiveness monitoring of the project. NEPA analysis of complex, large scale, long term projects should specifically be designed from inception to formalize the inclusion of a four phase adaptive management framework.</p>		<p>adaptive management that will facilitate learning and continuous improvement in plans and agency decision making, be augmented in the Programmatic Final Environmental Impact Statement for the Apache-Sitgreaves National Forests Land Management Plan with a fourth phase that outlines clearly the responsibility and authority of responsible officials to implement adaptive and if necessary corrective action during the implementation of large scale long duration specific projects as a response to quantitative, qualitative, and effectiveness monitoring of the project.</p>
Monitoring - public involvement2	<p>Navajo County further suggests that in order to avoid the difficulty and complexity of having to complete new and different NEPA analyses prior to implementing adaptive or corrective action during the implementation of a given project, the NEPA analysis of complex, large scale, long term projects be specifically designed from inception to formalize the inclusion of a four phase adaptive management framework, and to include the possibility for and the responsibility of the line officers to implement a range of actions as necessary to adapt to the emergence of data from effectiveness</p>	<p>The three phases of planning (assessment, planning, and monitoring) should be augmented with a fourth phase that outlines clearly the responsibility and authority of responsible officials to implement adaptive and if necessary corrective action during the implementation of large scale long duration specific projects as a response to quantitative, qualitative, and effectiveness monitoring of the project. NEPA analysis of complex, large scale, long term projects should specifically be designed from inception to formalize the inclusion of a four phase adaptive management framework.</p>	XXXX	<p>Navajo County further suggests that in order to avoid the difficulty and complexity of having to complete new and different NEPA analyses prior to implementing adaptive or corrective action during the implementation of a given project, the NEPA analysis of complex, large scale, long term projects be specifically designed from inception to formalize the inclusion of a four phase adaptive management framework, and to include the possibility for and the responsibility of the line officers to implement a range of actions as necessary to adapt to the emergence of data from effectiveness</p>

Adaptive Management

	monitoring, and to meet the purpose and need of the proposed action and preferred alternative.			monitoring, and to meet the purpose and need of the proposed action and preferred alternative.
Monitoring - public involvement <sup>2</sup>	Navajo County believes that an entire fourth step of what is generally accepted by academia and the professional world as the adaptive management framework is missing from the proposed directive, namely: corrective action in the implementation of a large scale long duration management action.	The three phases of planning (assessment, planning, and monitoring) should be augmented with a fourth phase that outlines clearly the responsibility and authority of responsible officials to implement adaptive and if necessary corrective action during the implementation of large scale long duration specific projects as a response to quantitative, qualitative, and effectiveness monitoring of the project. NEPA analysis of complex, large scale, long term projects should specifically be designed from inception to formalize the inclusion of a four phase adaptive management framework.	XXXX	
Monitoring - compliance with 2012 rule	Navajo County is concerned that the scarce mentions of monitoring in the Programmatic Draft Environmental Impact Statement and the Apache-Sitgreaves National Forests Land Management Plan and the very cursory 'Monitoring Strategy' included in the Apache-Sitgreaves National Forests Land Management Plan may reflect an insufficient role for monitoring in the current planning process. This would be in contradiction with the requirement of the 2012	Explain how the Forest Service complied with the monitoring requirements of the 2012 planning rule.	XXXX	Navajo County is concerned that the scarce mentions of monitoring in the Programmatic Draft Environmental Impact Statement and the Apache-Sitgreaves National Forests Land Management Plan and the very cursory 'Monitoring Strategy' included in the Apache-Sitgreaves National Forests Land Management Plan may reflect an insufficient role for monitoring in the current planning process. This would be in contradiction with the requirement of the 2012

Clarification of Monitoring Strategy and Protocols  
 PC 2900-7 The Forest Service should consider the scarce mentions of monitoring in the DEIS and LMP may reflect an insufficient role for monitoring in the current planning process, and a contradiction with the 2012 Planning Rule requirements and implementation directives.

	national Planning Rule and its proposed implementation directives.			national Planning Rule and its proposed implementation directives.
Monitoring - compliance with 2012 rule	Navajo County believes that the proposed directives miss a critical opportunity to address and correct what is arguably the Achilles' heel of many if not most monitoring efforts endeavored by national forests staff. Specifically, however well planned, monitoring is often not implemented or superficially or partially implemented for lack of resources or funding.	Explain how the Forest Service complied with the monitoring requirements of the 2012 planning rule.	XXXX	
Monitoring - compliance with 2012 rule	Navajo County is concerned that the scarce mentions of monitoring and adaptive management in the Programmatic Draft Environmental Impact Statement and the Apache-Sitgreaves National Forests Land Management Plan may reflect an insufficient role for adaptive management in the current planning process. This would be in contradiction with the requirement of the 2012 national Planning Rule and its proposed implementation directives.	Explain how the Forest Service complied with the monitoring requirements of the 2012 planning rule.	XXXX	
Monitoring - compliance with 2012 rule	Navajo County believes that the proposed directives miss a critical opportunity to provide substantially clear directives to responsible officials in actually implementing adaptive management,	Explain how the Forest Service complied with the monitoring requirements of the 2012 planning rule.	XXXX	

Monitoring - compliance with 2012 rule	However, Navajo County believes that the proposed directives miss a critical opportunity to provide substantially clear directives to responsible officials in actually integrating social and economic sustainability and multiple uses, and in integrating social and economic science to the framework of best available scientific information to inform their land management planning process and their management decision making process.	Explain how the Forest Service complied with the monitoring requirements of the 2012 planning rule.	XXXX	
Monitoring - uncertainty	None of the conditions necessary for effective implementation of the ambitious program of adaptive management proposed in the Draft Plan is currently available to the Apache-Sitgreaves National Forests. The Forest Service is required by NFMA and NEPA to candidly disclose uncertainty and controversy associated with monitoring and adaptive management.	Disclose uncertainty and controversy associated with monitoring and adaptive management.	XXXX	None of the conditions necessary for effective implementation of the ambitious program of adaptive management proposed in the Draft Plan is currently available to the Apache-Sitgreaves National Forests. The Forest Service is required by NFMA and NEPA to candidly disclose uncertainty and controversy associated with monitoring and adaptive management.
Monitoring - public involvement	The complete monitoring plan, including study design and analysis protocols, should be made available for public review and comment before a decision is made to revise the forest plan. The Center has specific questions about the monitoring plan, including but not limited to: (1) criteria for selection of measurable indicators of change; (2)	The complete monitoring plan, including study design and analysis protocols, should be made available for public review and comment before a decision is made to revise the forest plan. Explain the (1) criteria for selection of measurable indicators of change; (2) sampling design power analysis and expected observational error rates; (3)	XXXX	The complete monitoring plan, including study design and analysis protocols, should be made available for public review and comment before a decision is made to revise the forest plan. The Center has specific questions about the monitoring plan, including but not limited to: (1) criteria for selection of measurable indicators of change; (2)

Monitoring and Adaptive Management

Public Review of Monitoring Plan

	<p>sampling design power analysis and expected observational error rates; (3) sampling procedures including monitoring cycle; (4) confidence levels to be applied in data analysis and reporting; (5) timeframe for evaluation of results; (6) triggers for management adaptation using new information; and (7) funding sources</p>	<p>sampling procedures including monitoring cycle; (4) confidence levels to be applied in data analysis and reporting; (5) timeframe for evaluation of results; (6) triggers for management adaptation using new information; and (7) funding sources.</p>		<p>sampling design power analysis and expected observational error rates; (3) sampling procedures including monitoring cycle; (4) confidence levels to be applied in data analysis and reporting; (5) timeframe for evaluation of results; (6) triggers for management adaptation using new information; and (7) funding sources</p>	
App D - additions	<p>Include these laws, regulation and agency directives into the DEIS in the sections and appendix that addresses related laws and regulations.</p>	<p>Add additional laws, regulation, and agency directives into the DEIS and plan appendix: (1) National Forest Management Act, (2) Forest and Rangeland Renewable Resources Planning Act, (3) Multiple Use Sustained Yield Act of 1960, U.S Forest Service 219 Planning Rule: Coordination with Other Public Planning Efforts, (4) Forest Service Manual (FSM) 1921.63(a), (5) FSM 1950.2, (6) FSM 1970, (7) Integrated Resource Management Process-the Road to Ecosystem Management (USFS Region 3, 4 edition, appendix A), (8) National Environmental Policy Act, (9) Joint Planning (40 CFR §1506.2 (b)); Cooperating Agencies (40 CFR§1501.6); (10) President's Council on Environmental Quality Directive to Federal Agencies regarding Cooperating Agency, Feb. 2002, (11) 40 CFR §1501.7; 40 CFR §1503.1, (12) Regulatory Flexibility Act, (13)</p>	XXXX	<p>Include these laws, regulation and agency directives into the DEIS in the sections and appendix that addresses related laws and regulations. Additionally, comply with coordination requirements for the DEIS; specify how the Agency coordinated.</p>	<p>Include and comply with coordination requirements</p>

Proper Consideration of Small Entities in Agency Rulemaking - Presidential Executive Order 13272, (14) Intergovernmental Cooperation Act, (15) Intergovernmental Review of Federal Programs- Presidential Executive Order 12372, (16) Facilitation of Cooperative Conservation- Presidential Executive Order 13352, (17) Environmental Justice- Presidential Executive Order 12898 §302(d), (18) Outdoor Recreation Act, (19) National Trails System Act, (20) Presidential Executive Order 13195: Trails for America in the 21st. Century, (21) Arizona Coordination Act, (22) Apache County Board of Supervisors Resolution in Feb. 2010 notified Apache- Sitgreaves National Forest: The need to coordinate the Agency Forest Plan process, and (23) Catron County Ordinance 002-93: Catron County Environmental Planning & Review Process; and, Catron County Resolution 002-2010: County Board of Supervisors Asserting Legal Standing and Formally Invoking Coordination with All Federal and State Agencies Maintaining Jurisdiction Over Lands And/Or Resources Located Within The County of Catron, New Mexico

AZGFD-Edit	Plan, Programmatic Agreements, page 255: Add to the list of agreements: Memorandum of Understanding between the Apache-Sitgreaves National Forests, Arizona Game and Fish Commission, U.S. Fish and Wildlife Service, Arizona Trout Unlimited, Federation of Fly Fishers, and Wildlife Conservation Council for the restoration of native trout on the Apache National Forest.	Modify Appendix D (proposed plan p. 255). Add to the list of agreements: Memorandum of Understanding between the Apache-Sitgreaves National Forests, Arizona Game and Fish Commission, U.S. Fish and Wildlife Service, Arizona Trout Unlimited, Federation of Fly Fishers, and Wildlife Conservation Council for the restoration of native trout on the Apache National Forest.		Plan, Programmatic Agreements, page 255: Add to the list of agreements: Memorandum of Understanding between the Apache-Sitgreaves National Forests, Arizona Game and Fish Commission, U.S. Fish and Wildlife Service, Arizona Trout Unlimited, Federation of Fly Fishers, and Wildlife Conservation Council for the restoration of native trout on the Apache National Forest.
Glossary - add or clarify	It should explicitly define use in the EIS of the terms, "sustainable," "appropriate," "restore," and "resilience." We discuss below reasons why reliance on an arbitrarily defined reference conditions is not inherently "sustainable," nor would it promote "resilience," given ongoing climate change and the impossibility of achieving or sustaining pre-settlement conditions.	Provide or clarify definitions for the following: native species, functioning ecosystem, herbivory, livestock grazing, scenic integrity, sustainable, resilience, and restoration.	XXXX	It should explicitly define use in the EIS of the terms, "sustainable," "appropriate," "restore," and "resilience." We discuss below reasons why reliance on an arbitrarily defined reference conditions is not inherently "sustainable," nor would it promote "resilience," given ongoing climate change and the impossibility of achieving or sustaining pre-settlement conditions.
Glossary - add or clarify	Restoration is an appropriate management objective for the national forests, and we recommend application of the Society for Ecological Restoration's definition of "restoration" as "the process of assisting the recovery of an ecosystem that has been degraded, damaged, or destroyed" (SER 2004: 3).	Provide or clarify definitions for the following: native species, functioning ecosystem, herbivory, livestock grazing, scenic integrity, sustainable, resilience, and restoration.	XXXX	Restoration is an appropriate management objective for the national forests, and we recommend application of the Society for Ecological Restoration's definition of "restoration" as "the process of assisting the recovery of an ecosystem that has been degraded, damaged, or destroyed" (SER 2004: 3).
Glossary - add or clarify	"Native species" is not defined in the glossary.	Provide or clarify definitions for the following: native species, functioning ecosystem, herbivory, livestock	XXXX	"Native species" is not defined in the glossary.

Errors and Omissions in Definitions and Terminology

Errors and Omissions in Definitions and Terminology

Errors and Omissions in

		grazing, scenic integrity, sustainable, resilience, and restoration.		
Glossary - add or clarify	A "functioning ecosystem is "an ecosystem that contains all components and processes necessary to maintain resilience over time." (Glossary). What "components" does this refer to? When we say "functioning" or "properly functioning", don't we really mean that the system is desirable from the standpoint of sustaining the values PEOPLE desire? Why not say that instead of trying to couch the desired vegetation in terms apparently divorced from human needs and values?	Provide or clarify definitions for the following: native species, functioning ecosystem, herbivory, livestock grazing, scenic integrity, sustainable, resilience, and restoration.	XXXX	A "functioning ecosystem is "an ecosystem that contains all components and processes necessary to maintain resilience over time." (Glossary). What "components" does this refer to?
Glossary - add or clarify	Issue: Glossary terms are incorrect, misleading or incomplete. Herbivory is defined as "loss of vegetation due to consumption by another organism." It could just as well be called the "gain" of vegetation by another organism. Herbivory actually means the act of consumption of vegetation by an herbivore, or an animal that eats plants.	Provide or clarify definitions for the following: native species, functioning ecosystem, herbivory, livestock grazing, scenic integrity, sustainable, resilience, and restoration.	XXXX	Issue: Glossary terms are incorrect, misleading or incomplete. Herbivory is defined as "loss of vegetation due to consumption by another organism." It could just as well be called the "gain" of vegetation by another organism. Herbivory actually means the act of consumption of vegetation by an herbivore, or an animal that eats plants.

Definitions and Terminology  
Errors and Omissions in Definitions and Terminology

Errors and Omissions in Definitions and Terminology  
PC 3600-1 The Forest Service should revise and clarify the incorrect, misleading, or incomplete glossary terms as follows: 1. Unique – the term is used repeatedly in this document with different meanings example: "unique riparian vegetation types" (p. 5) "unique species", referring to plant and animal species claimed to be found only on the A-S NF. (p.5) "unique waters", referring to designation by ASDWR to certain streams. "Communities, populations, and individual plant and animal species are uniquely adapted to and dependent on ecosystem

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diversity." , implying a high degree of evolutionary organization (p11). 2. Ecotone - Ecotone was a term used by Clements and other ecologists who espoused the concept that plant communities were comparable to organisms or quasi organisms with emergent properties. The transitions from one community to another were called ecotones. If one adopts the "continuum" or "individualistic" concept (e.g Gleason) plant species abundance is seen to vary in response to environmental gradients, thus "ecotones" are only zones of rapid change as opposed to more gradual change where environmental conditions are relatively constant. Thus, the definition used in this plan (a community sharing species of adjacent communities) would apply to any plant community, and thus has no meaning. 3. Herbivory - is defined as "loss of vegetation due to consumption by another organism." It actually means the act of consumption of vegetation by an herbivore, or an animal that eats plants. 4. Livestock Grazing - is defined as "foraging by permitted livestock" which implies that foraging that is not "permitted" is not grazing. 5. Resiliency - the concept of resiliency is somewhat

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controversial, but generally means a system that has the capacity to change in response to some stress and to recover from that stress. Resilience is different from stability - which is resistance to change. These concepts seem to be somewhat confused in this document. 6. Scenic integrity - This definition is confusing. In one place it says high scenic integrity is the "state of naturalness" or "without disturbance created by humans." In another, it says the highest scenic integrity ratings are given to those landscapes that have little or no deviation from the landscape character valued by constituents for its aesthetic quality, which could mean that scenic integrity is in the eye of the beholder. There is no reason to believe that the "historic condition" is the only landscape character that can be appropriately valued by "constituents".

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Glossary - add or clarify	Issue: Glossary terms are incorrect, misleading or incomplete. Scenic integrity - This definition is confusing. In	Provide or clarify definitions for the following: native species, functioning ecosystem, herbivory, livestock	XXXX	Issue: Glossary terms are incorrect, misleading or incomplete. Scenic integrity - This definition is confusing. In

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Definitions and Terminology

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Glossary - add or clarify	<p>There are concerns about the term "restoration" because it is unclear what that term means. "Restore" means to return something to its previous condition, and that is implied in these alternatives. One can only interpret this to mean that all three alternatives have the same goal, and that they only differ in the type and intensity of management that will be used to achieve it. The common goal is to re-establish to the extent possible the presumed "historic condition" that existed before Anglo-American settlement. Apparently, the assumptions are: that those conditions are known, that they can be achieved, and they are desirable given the present needs of the people of Arizona. We think all3 assumptions are highly questionable.</p>	<p>Provide or clarify definitions for the following: native species, functioning ecosystem, herbivory, livestock grazing, scenic integrity, sustainable, resilience, and restoration.</p>	XXXX	
Glossary - add or clarify	<p>It is unclear what it means to say that forest vegetation types "may not be sustainable".</p>	<p>Provide or clarify definitions for the following: native species, functioning ecosystem, herbivory, livestock grazing, scenic integrity, sustainable, resilience, and restoration.</p>	XXXX	
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		sustainable, resilience, and restoration.					
CA Bobcat	Please vote yes on A.B. 1213 (Bloom), the Bobcat Protection Act of 2013, which would ban trapping and commercial sale of bobcats in California. California's native wildlife should not be exploited and harmed for personal commercial gain.	Please vote yes on A.B. 1213 (Bloom), the Bobcat Protection Act of 2013, which would ban trapping and commercial sale of bobcats in California. California's native wildlife should not be exploited and harmed for personal commercial gain.					