

CORONADO NATIONAL FOREST

PELONCILLO MOUNTAINS

ECOSYSTEM MANAGEMENT AREA

Transportation Analysis Plan



October 2011

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References

- Coronado National Forest, Forest Level Roads Analysis Report, January 13, 2003. Prepared by Melissa D. Shafiqullah, P.E.

Introduction

Travel planning in the Forest Service was traditionally split between the engineering program for road management and the recreation program for trails management. A recently revised federal regulation now combines the analysis of the motorized use of trails and roads under the travel analysis process. This process is intended to identify opportunities for the Coronado National Forest transportation system to meet current or future management objectives, and to provide information that allows integration of ecological, social, and economic concerns into future decisions. This report is tailored to local situations and site conditions as identified by forest staffs and collaborated with public input. The outcome of this analysis is a set of recommendations for the forest transportation system. A thorough Travel Analysis supports subsequent National Environmental Policy Act (NEPA) process, allowing individual projects to be more site-specific and focused, while still addressing cumulative impacts.

On January 12, 2001, the Forest Service issued the final National Forest System Road Management Rule. This rule revised regulations concerning the management, use, and maintenance of the National Forest Transportation System. The final rule is intended to help ensure that additions to the National Forest System road network are essential for resource management and use; that construction, reconstruction, and maintenance of roads minimize adverse environmental impacts; that unneeded roads are decommissioned; and that restoration of ecological processes is initiated.

This Ecosystem Management Area level Transportation Analysis Plan (TAP) addresses existing open National Forest System Roads (NFSR) as well as non-system roads located in the Peloncillo Mountains Ecosystem Management Area. This Transportation Analysis is not a NEPA document but supports NEPA Planning. It is an integrated ecological, social, and economic approach to transportation planning, addressing both existing and future roads. 36 CFR 212.5 requires that the forest identify the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System lands.

The Transportation Analysis process is described in Report FS-643, *Roads Analysis: Informing Decisions About Managing the National Forest Transportation System*. The Transportation Analysis requirements for Forest, Area, Watershed and Project Scale are described in *FSM 7700 - Transportation System: Chapter 7710 - Transportation Atlas, Records, and Analysis*; also see Interim Directives that may be policy at the time of the report. Below is the link to the complete FSM 7700 - Transportation System.
<http://fsweb.wo.fs.fed.us/directives/fsm/7700/7710.rtf>

Objectives

The objective of this analysis is to provide the Forest Service Line Officer with critical information to ensure that existing and future road systems are safe and responsive to public needs and desires, are affordable and efficiently managed, have minimal negative ecological

effects on the land, are in balance with available funding for needed management actions, and are consistent with road management objectives FSM 7712.5. This analysis will not change or modify any existing NEPA decisions, but information generated by this analysis might cause the line officer to reconsider, and perhaps at some future date revise previous NEPA decisions.

Transportation Analysis Overview

This analysis is intended to identify changes to the national forest transportation system that may be needed to meet current or future management objectives, and to provide information that allows integration of ecological, social, and economic concerns into future decisions about areas. The process is intended to complement, rather than replace or preempt, other planning and decision processes.

Six Step Process

The analysis process is a six-step progression, regardless of scale, customized to local situations; landscape and site conditions coupled with public issues, forest plan land allocations, and management constraints. The process provides a set of possible road-related issues and analysis questions. Only those relevant questions and any additional suggestions on information needs and research findings that might apply to the project need to be addressed. The six steps are:

- Step 1. Setting up the Analysis
- Step 2. Describing the Situation
- Step 3. Identifying Issues
- Step 4. Assessing Benefits, Problems and Risks
- Step 5. Describing Opportunities and Setting Priorities
- Step 6. Reporting

The amount of time and effort spent on each step differs by the complexity of the issues, specific situations and available information particular to the project. Details about these steps can be found in FS-643 titled *Roads Analysis: Informing Decisions about Managing the National Forest Transportation System*.

Transportation Analysis Products

This report is a product of the analysis process and documents the information and analyses used to identify opportunities and priorities for future national forest road and motorized trail systems (where applicable). Included in this report is a transportation map displaying the existing/recommended road system and where applicable the existing/recommended motorized trail system and the needs and/or recommendations for each. This report will:

- Identify needed and unneeded roads;
- Identify road related social, environmental and public safety risks;
- Identify site-specific priorities and opportunities for road improvements and decommissioning;
- Identify areas of special sensitivity or any unique resource values.

This report will help managers address questions on road access related to ecosystem health and sustainability, commodity extraction, recreation, social and cultural values, and administrative uses.

This report may help to inform future management decisions on the merits and risks of building new roads; relocating, upgrading, or decommissioning existing roads; managing traffic; and enhancing, reducing, or discontinuing road maintenance. This analysis is based upon:

- Use of the best available scientific information;
- Economics;
- Social and economic costs and benefits of roads; and
- Contribution of existing and proposed roads to management objectives.
- Input from resource specialists

Step 1 – Setting Up the Analysis

Purpose, Scope and Objectives:

The purpose of the project is to identify the minimum road system needed to administer and utilize National Forest System (NFS) resources within budget constraints. This TAP will support the Forest Plan.

The scope of this analysis includes the area bounded by the Peloncillo Ecosystem Management Area on the Douglas Ranger District. This is an Ecosystem Management Area level TAP with boundaries indicated on the map in Appendix F. A complete inventory of user-created routes is not required in order to complete a TAP. However, new routes are continually being created during the inventory process and therefore this report will only reflect user-created routes as of the date of this report. Some user-created routes are well located, provide excellent opportunities for outdoor recreation by motorized and non-motorized users alike, and would enhance the system of designated routes and areas. Other user-created routes are poorly located and cause unacceptable environmental impacts. The Coronado National Forest is committed to working with user groups and others to identify such routes and consider them on a site-specific basis. (36 CFR 212.2) This analysis will include recommendations where appropriate to add user-created routes to the forest transportation system or recommend prohibition or restriction of motor vehicle use on identified system roads.

The objective of this Transportation Analysis is to provide critical information for a minimum road system that is safe and responsive to public needs and desires, is affordable, conforms to the Coronado National Forest Plan, is efficiently managed, has minimal negative ecological effects on the land, and is sustainable with available funding for needed management actions. All existing system roads, additional motorized travel routes and proposed roads within the project area, as well as access roads to the Forest Boundary are

included in this Transportation Analysis Plan. This analysis provides a comprehensive look at the network of NFS roads and motorized NFS trails as well as all other user-created roads located in the EMA and will be used during the NEPA process. The TAP is intended to be a broad scale comprehensive look at the transportation network. The main objectives of the TAP are:

- Balance the need for access while minimizing risks by examining important ecological, social, and economic issues related to roads and trails;
- Furnish maps, tables, and narratives that display transportation management opportunities and strategies that address future access needs, and environmental concerns;
- Identify the need for changes by comparing the current road and motorized trail system and areas to the desired condition;
- Make recommendations to inform travel management decisions in subsequent NEPA documents.

This document provides information for the Forest Plan Revision and the Travel Management Rule as it relates to the Coronado National Forest. This analysis will look at the options concerning access issues and needs, proliferation of non-system roads, un-needed roads, user-created routes, mixed use, and OHV use where applicable.

Analysis Plan

The following items were specifically investigated in this analysis:

- Verify current road conditions and drivability.
- Verify accuracy of road locations on maps.
- ID Team and Line Officer identify preliminary access and resource issues, concerns and opportunities.
- Identify additional issues, concerns and opportunities through internal resource staffs.
- Recommend changes to the existing road system based on the findings of this roads analysis.

Information Needs

Information needs were identified and the IDT worked to gather as much information as available about the following items:

- Accurate location and condition of all system roads and motorized trails within the project area. A complete inventory of all unauthorized (user-created) routes is not required but the IDT felt it provided valuable information about what the public and other agencies were doing on the forest.
- Assessment of opportunities, problems and risks for all roads and motorized trails in the project area.
- Public access and recreational needs and desires in the area including access to private landowners.
- Areas of special sensitivity, resource values, or both.
- Best management practices for the area.
- Current forest plan and management direction for the area.
- Agency objectives and priorities.

- Interrelationship with other governmental jurisdictions for roads and motorized trails.
- Public and user group values and concerns.

Potential Key Issues, Concerns, and Opportunities

The following items were considered in this analysis:

- Mineral access
- Access to grazing allotments and improvements
- Special Uses
- OHV Recreation Use
- Cultural resources and Archaeological sites within the study area
- Motorized Trail and Vehicles route sharing
- Private property blocking federal land access
- Excessive roads in the study area

Step 2- Describing the Situation

Regional Setting

The Peloncillo Mountains Ecosystem Management Area (EMA) is located within the Basin and Range physiographic province (Fenneman 1931) in southwestern Arizona and is one of the most remote portions of the Coronado National Forest. Access is limited to primitive roads, primarily Geronimo Trail (NFSR 63), and there are no developed recreation sites. Large unroaded areas are valued for their solitude and unconfined recreation opportunities. The relatively narrow range of elevation (from 4,593 to 6,624 feet) supports a surprising diversity of wildlife, most notable for reptile and amphibian species. Although mostly xeric, Cloverdale Cienega is one of the Peloncillos rare aquatic features. The EMA's 87,985 acres straddle the Arizona-New Mexico border, with 81% arranged in New Mexico. Situated southeast of the Chiricahua Mountains and just north of the U.S.-Mexican border, this southern portion of the Peloncillo range was occupied for millennia by farmers and foragers who had trading and cultural ties with neighboring groups, and was within the heartland of Chiricahua Apache territory.

The following communities are located in proximity:

- Douglas
- Bisbee
- Portal
- Cloverdale
- Pirtleville
- Rodeo
- Animas

The Interdisciplinary Team (Appendix C) convened and examined the existing transportation system in relation to current forest plan direction. This required a description of the road system; its location, ownership, condition, and current forest plan direction. A description of the physical, biological, social, cultural, economic and political aspects of the analysis area was discussed and generated by the team.

A map of the area's transportation system was developed to facilitate this description. (See Appendix F).

The products of this step are:

- A map or other descriptions of the existing road system defined by the current forest plan, and
- Basic data needed to address transportation analysis issues and concerns.

The following table provides existing data such as length of road within the Forest Boundary, current maintenance level and route status as listed in the INFRA database. The table also provides data on user-created routes that were GPS'd using a Trimble GeoXT handheld unit. The table provides data above and beyond what is required by a TAP. The information provided in the table was also used to generate existing densities for the EMA.

Existing Direction for Roads and Motorized Trails

Travel analysis is focused on identifying needed changes to the forest transportation system; identifying the existing direction is an important first step. In general terms, the existing direction includes the National Forest System roads, trails and areas currently managed for motor vehicle use. Restrictions, prohibitions, and closures on motor vehicle use are also part of the existing direction on the forest.

Existing direction from laws and regulations, official directives, forest plans, forest orders, and forest wide or project specific roads decisions, determine the motorized routes and areas open to public motorized travel. This information about a unit's managed system is often documented in road and motorized trail management objectives, maps, Recreation Opportunity Guides, tabular databases, and other sources.

Open Authorized Road (OA)

Existing roads open to the public for motorized use are forest system roads, which are currently in the Forest's INFRA database with attributes reflecting an existing, National Forest System Road under the jurisdiction of the Forest Service with an operational maintenance level between 2 and 5.

Closed Authorized Road (CA)

Closed roads have been closed to vehicle traffic for at least a year but are necessary for future activities. If there is a future need for the road but no immediate need, then it is placed in the system as a closed (ML1) road. They appear in the INFRA database with an operational maintenance level of 1. If there is no compelling administrative or public need for the road in the long-term, then it should be decommissioned.

Unauthorized Road

An unauthorized road is not included in a forest transportation atlas or database. These roads are usually established by various users over time. They were not planned, designed, or constructed by the Forest Service.

Decommissioned Road (D)

Decommissioned roads have some type of physical closure at their entrance or may be completely obliterated. They appear in the INFRA database with a route status of decommissioned. In order to return a decommissioned road to service as a system road, the NEPA process must be followed even when no physical work is required to allow motorized traffic back on the road.

Table 2.1 – Existing Transportation System

Table 2.1 EXISTING SYSTEM		Road Classifications					Peloncillo EMA	
Road Number	NFSR - OA: Open Authorized (Miles)	NFSR - Maintenance Level 1 (Miles)	Non-NFSR- Unauthorized Roads (Miles)	Route Status Previously Decommissioned (Miles)	OHV Routes (Miles)	New Proposed Routes (Miles)	Operational Maintenance Level	Description
63	12.03						3	Geronimo Trail - 34.70 miles long w/ 22.67 miles off FS
63-0.63L-1			0.21					Dispersed CG -
63-36.18R-1			0.54					Nonsystem Rd - leads to tank
63- DispCG 1			0.04					Dispersed CG -
63- DispCG 2			0.05					Dispersed CG -
63- DispCG 3			0.08					Dispersed CG - Shooting area
63- Pvt Rd			0.00					Off Forest - Private drive; 0.064 mi
63- spur 1			1.51					Nonsystem Rd -
63- spur 2			0.74					Nonsystem Rd -
63- spur 3			1.84					Nonsystem Rd -
63- spur 4			0.38					Nonsystem Rd -
63-Tank spur			0.11					Nonsystem Rd -
338			0.00					Off Forest - Not Analyzed
338- pvt			0.00					Off Forest - Not Analyzed

Table 2.1 EXISTING SYSTEM		Road Classifications							Peloncillo EMA	
Road Number	NFSR - OA: Open Authorized (Miles)	NFSR - Maintenance Level 1 (Miles)	Non-NFSR- Unauthorized Roads (Miles)	Route Status Previously Decommissioned (Miles)	OHV Routes (Miles)	New Proposed Routes (Miles)	Operational Maintenance Level	Description		
702	3.59						2	Skeleton Canyon - 12.05 mi long w/ 8.46 mi off Forest.		
702 A	1.98						2	Bow Tank - 2.50 miles long w/ 0.52 mi off forest.		
702 A- 4312			0.20					Nonsystem Rd - 0.43 mi long w/ 0.23 mi off forest.		
703	2.08						2	South Fork -		
704	6.16						2	Deer Creek - 15.75 mi long w/ 9.59 mi off Forest.		
704-14.51R-1			0.43					Nonsystem Rd - 0.75 mi long w/ 0.32 mi off forest		
704 A	0.89						2	Un-named		
705	2.33						2	Dutchman -		
706	0.73						2	Clanton Tank -		
707	5.67						2	Cloverdale - 7.08 mi long w/ 1.41 mi off forest		
708	2.29						2	Bunk Robertson Saddle - 3.14 mi long w/ 0.85 mi off forest		
4310	0.16						2	Geronimo Tank -		
4312			0.00				2	Whitmire - Entire road is on private land 1.51 mi long		
4313	0.10						2	North Deer - 1.78 mi long w/ 1.68 mi off Forest		
4313-1.69L-1			1.00					Nonsystem Rd -		
4324	7.72						2	Eicks - 8.09 mi long w/ 0.37 mi on Private		
4324-0.04R-1			0.15					Dispersed CG		

Table 2.1 EXISTING SYSTEM		Road Classifications							Peloncillo EMA	
Road Number	NFSR - OA: Open Authorized (Miles)	NFSR - Maintenance Level 1 (Miles)	Non-NFSR- Unauthorized Roads (Miles)	Route Status Previously Decommissioned (Miles)	OHV Routes (Miles)	New Proposed Routes (Miles)	Operational Maintenance Level	Description		
4324-0.76L-1			0.33					Nonsystem Rd -		
4324-4.69L-1			0.82					Nonsystem Rd - Range allotment use		
4324-4.90R-1			0.19					Nonsystem Rd -		
4325	2.46						2	Black CCC -		
4326	0.69						2	Lasher -		
4326-old	0.30							Lasher - old alignment		
4326 A	0.55						2	Un-named		
4327	0.78						2	Corral - historically continued up ridge; closed by Sky Island Alliance; Game & Fish		
4327-0.22R-1			0.05					Dispersed CG -		
4327-4866						1.18		Proposed route connecting 4327 and 4866 around private		
4329	1.85						2	Heritage - 2.84 mi long w/ 0.99 mi off forest		
4330	0.24						2	Irishman - 0.83 mi long w/ 0.59 mi off forest		
4331		1.25					1	Bowers - 8.89 mi long w/ 7.64 mi off forest		
4332		1.35					1	Juniper Basin - 3.38 mi long w/ 2.03 mi off forest		
4333	2.53						2	Buckhorn -		
4334	0.39						2	Crescent Tank - 3.61 mi long w/ 3.22 mi off forest		

Table 2.1 EXISTING SYSTEM		Road Classifications							Peloncillo EMA	
Road Number	NFSR - OA: Open Authorized (Miles)	NFSR - Maintenance Level 1 (Miles)	Non-NFSR- Unauthorized Roads (Miles)	Route Status Previously Decommissioned (Miles)	OHV Routes (Miles)	New Proposed Routes (Miles)	Operational Maintenance Level	Description		
4335	1.88						2	Robinson - 6.19 mi long w/ 4.31 mi off forest		
4335 A	0.74						2	Robin - 1.41 mi long w/ 0.67 mi off forest		
4336	1.09							Sanford Tank - Range allotment use		
4337				0.76				Cordy Cowan Tank - previously decommissioned road		
4339		0.47					1	Coldwell - 0.54 mi long w/ 0.07 mi on Private		
4340	0.57						2	Cowan - 0.96 mi long w/ 0.39 mi off forest		
4342	0.58						2	Howard - 4.08 mi long w/ 3.50 mi off forest; all in IRA		
4342-4.10R-1			0.66					Nonsystem Rd - Range allotment use (in IRA)		
4342-4.10L-1			0.34					Nonsystem Rd - Range allotment use (in IRA)		
4345	1.39						2	Silver Tip - 1.39 mi long w/ 0.81 in IRA		
4347				0.36			D	Un-named - previously decommissioned road		
4821				0.37			D	Slover - previously decommissioned road		
4866	0.75						2	Ridge -		
TOTALS	62.52	3.07	9.67	1.49	0.00	1.18				

Table 2.1. Legend

* Road Classifications:

NFSR OA = Open Authorized Road on the Forest Road System
Non-NFSR = Unauthorized Road, not on the Forest Road System
NFSR ML1 = Closed Road on the Forest Road System
D = Decommissioned or obliterated road

Maintenance Level Descriptions:

1 = Basic custodial care (closed)	5 = High degree of user comfort
2 = High clearance vehicles	C = Convert use
3 = Suitable for passenger cars	D = Decommission
4 = Moderate degree of user comfort	

Maintenance levels only apply to roads under Forest Service jurisdiction. For unauthorized roads, the maintenance levels are recommended; they would not be implemented until the recommendations are adopted.

- *Operational Mtc. Level = How the road is maintained on-the-ground.*
- *Objective Mtc. Level = Maintenance level the road would be maintained to if funding permitted. Reconstruction may be required before the road could be maintained to this level.*

Decommissioning Methods:

- a. Reestablish former drainage patterns, stabilize slopes, and restore vegetation.
- b. Block the entrance to a road, install water bars and/or outslope. Entrance treatment can include earthen barriers or hide with brush or woody debris.
- c. Remove culverts, reestablish drainage-ways, remove unstable fills, pull back road shoulders, and scatter slash on the roadbed.
- d. Completely eliminate the roadbed by restoring natural contours and slopes.
- e. Gate and closure order to eliminate all human uses.
- f. Abandon and monitor for motorized use.
- g. Other methods designed to meet the specific conditions associated with the unneeded roads.

Table 2.2 - Existing Road Classifications

Road Classification	Existing Miles of Road
NFSR OA = Open Authorized (ML2-ML5)	62.52
Non-NFSR = Closed Authorized (ML1)	3.07
Unauthorized (Non-system)	9.67
OHV	0.00
Total Miles, All Existing Roads	75.26
Previously decommissioned roads not counted in total miles	1.49

Step 3- Identifying Issues

The following issues are addressed in this analysis and described in more detail in Step 4:

- Mineral access
- Private land access
- Special Uses
- Range Management
- OHV Recreation Use
- Archaeological sites within the study area
- Trail and Vehicles route sharing
- Private property blocking federal land access
- Excessive roads in the study area
- Dispersed camping and user created routes
- Fire Protection and Safety

The purpose of this step is to:

- Describe resource concerns and issues
- Identify the key questions and issues affecting road-related management

The products of this step are:

- A summary of key road-related issues, including their origin and basis, and
- A description of the status of the current data

The interdisciplinary team met in September 2008 and again in February 2010 and identified preliminary issues. A review of the questions in FS-643 titled *Roads Analysis: Informing*

Decisions about Managing the National Forest Transportation System was also used in order to identify any issues not previously made aware for this project.

Answers to the following questions helped the IDT to identify the most important road-related issues in the analysis area.

- What are the primary public issues and concerns related to roads and access?
- What are the primary management concerns (internal issues) related to roads and access?
- What are the primary legal constraints on roads and roads management?
- What additional information will be needed to better understand and define the key issues?
- What resources and skills are available to complete an effective analysis?

Road Maintenance

The Forest Service objective for system roads is to operate and maintain National Forest System Roads (NFSR) roads in a manner that meets road management objectives (RMOs) and that provides for:

1. Safe and efficient travel;
2. Access for the administration, utilization, and protection of its lands; and
3. Protection of the environment, adjacent resources, and public investment.

The Forest Service (FS) is responsible for maintenance of NFSRs resulting from traffic associated with:

- a. Administration of FS lands,
- b. Noncommercial uses and activities,
- c. Incidental noncommercial use related to ownership or occupancy of isolated parcels of private land served by an NFS road,
- d. Commercial road use that is not subject to cost recovery, and
- e. Incidental public use.

The amount and frequency of maintenance is subject to: availability of funding, obligations, agreements, and protecting the FS's investment.

Road Maintenance Levels

Maintenance levels are defined by the Forest Service Handbook (FSH) 7709.58 as the level of service provided by and maintenance required for, a specific road. The maintenance level must be consistent with RMOs, and maintenance criteria.

The maintenance level is determined by the Line Officer by considering the following factors:

- Resource program needs
- Environmental and resource protection requirements
- Visual quality objectives
- Recreation spectrum classes

- Road investment protection requirements
- Service life and current operational status
- User safety
- Volume, type, class, and composition of traffic.

The RMO identifies the current maintenance level or operational maintenance level and desired maintenance level or objective maintenance level for each road. The operational and objective maintenance level may or may not be the same for a road depending on the current needs, road condition, budget constraints, and environmental concerns and those forecasted for the future.

The following are the five maintenance levels classified by the FSH 7709.58:

Road Maintenance Level 5 (ML5) – roads that provide a high degree of user comfort and convenience. These roads are normally double-lane, paved facilities, some may be aggregate surfaced and dust abated. These roads are subject to the Highway Safety Act (HSA) and Manual of Uniform Traffic Control Devices (MUTCD). These roads have the following characteristics:

- Highest traffic volume and speeds
- Typically connect to State and county roads
- Usually arterial and collector roads
- Drainage addressed by use of culverts.

Road Maintenance Level 4 (ML4) – roads that provide a moderate degree of user comfort and convenience at moderate travel speeds. Most are double-lane and aggregate surfaced. These roads are also subject to the HSA and MUTCD and have the following characteristics:

- Moderate traffic volume and speeds
- May connect to county roads
- Usually a collector road
- Drainage addressed by use of culverts

Road Maintenance Level 3 (ML3) – roads that are open and maintained for travel by prudent drivers in a standard passenger car. User comfort and convenience are low priorities. These roads are typically low speed, single lane with turnouts, and spot surfacing. These roads are also subject to the HSA and MUTCD and have the following characteristics:

- Moderate to low traffic volume
- Typically connect to arterial and collector road, and/or are collector roads
- Combination of grade dips and culverts provide drainage
- Potholing or washboarding may occur.

Road Maintenance Level 2 (ML2) – roads are open for use by high-clearance vehicles; passenger car traffic is not a consideration. Traffic is normally minor, usually consisting of one or a combination of administrative, permitted, dispersed recreation, or other specialized uses.

The following characterize these roads:

- Low traffic volume and speed
- Typically local roads
- Typically connect collector or other local roads
- Grade dips are the preferred drainage treatment

- Surface smoothness is not a consideration
- Not subject to HSA

Road Maintenance Level 1 (ML1) – roads that are closed to vehicular traffic intermittently for periods that exceed 1 year. Basic custodial maintenance is performed to protect adjacent resources and enable the road to facilitate future management activities. Planned road deterioration may occur at this level; may be open and suitable for non-motorized uses. Roads in this category may be of any type, class or construction standard, and may be managed at any other maintenance level during the time they are open for traffic. ML1 roads have the following attributes:

- Vehicular traffic is eliminated, including administrative traffic
- Entrance is physically blocked or disguised
- No maintenance other than a condition survey may be required so long as no potential exists for resource damage
- Not subject to HSA

Annual Maintenance is the performance of one or more work activities needed to preserve or protect a roadway including surface, shoulders, roadside, structures and such traffic-control devices as are necessary for its safe and efficient use to the standard provided through construction, the most recent reconstruction, or other condition as agreed.

Unpaved roads require much more frequent maintenance than paved roads, especially after wet periods and when accommodating increased traffic. Wheel motion shoves material to the outside (as well as in-between travelled lanes), leading to rutting, channelizing of water, reduced water-runoff to ditch line, and eventual road damage if unchecked. As long as the process is interrupted early enough simple re-grading is sufficient for several years, with material being pushed back into shape.

Another problem with well-used higher-speed unpaved roads is washboarding — the formation of corrugations across the surface at right angles to the direction of travel. They can become severe enough to cause vibration in vehicles so that bolts loosen or cracks form in components. Grading removes the corrugations. Good quality surface materials can help prevent corrugations from re-forming.

Deferred maintenance is the practice of postponing needed maintenance activities such as grading for one or more maintenance cycles in order to save money and/or labor. The failure to perform needed repairs leads to road deterioration and ultimately road impairment. Sustained deferred maintenance may result in higher eventual maintenance costs, road failure, and in some cases, road safety implications.

The accounting standard-setter for the U.S. Government defines deferred maintenance in this way, *“Deferred maintenance” is maintenance that was not performed when it should have been or was scheduled to be and which, therefore, is put off or delayed for a future period. For purposes of this standard, maintenance is described as the act of keeping fixed assets in acceptable condition. It includes preventive maintenance, normal repairs, replacement of parts and structural components, and other activities needed to preserve the asset so that it continues*

to provide acceptable services and achieves its expected life. Maintenance excludes activities aimed at expanding the capacity of an asset or otherwise upgrading it to serve needs different from, or significantly greater than, those originally intended.

An example of deferred maintenance for a system road is not performing recommended routine maintenance or repairs as recommended in road condition surveys: the road will not remain at its recommended standard or serviceability and will be more likely to degrade and become damaged over time.

Maintenance competes for funding with other programs and is often deferred because appropriations are insufficient or were redirected to other priorities or projects. Deferred maintenance is not routinely reported, however awareness of the implications of deferred road maintenance exists in the Forest Service.

Operating a road system and attempting balance between resource protection and public wishes is a challenging task. This travel analysis helps to fulfill two major requirements of 36 CFR 212, Subpart A – *Administration of the Forest Transportation System* and Subpart B- *Designation of Roads, Trails, and Areas for Motor Vehicle Use*:

- **212.5** Road System Management - Identify the minimum road system.
- **212.55 & 212.56** - Identify and subsequently designate a system of roads, motorized trails, and areas for motor vehicle use.

In so far as feasible there is a need to get more financially in balance with road maintenance funding versus road maintenance needs. The forest's authorized road network will continue to degrade and have access impacts as well as environmental impacts as long as needs exceed funded maintenance efforts. Decreasing Forest maintenance costs and increasing road maintenance funding should continue to be our overall goal. Reducing costs, balancing resource needs and meeting access needs are major components of our operation and maintenance efforts. Strategies that reduce road maintenance costs include:

- Lower road maintenance levels (e.g. ML3 to ML2).
- Decrease mileage by closing or decommissioning system roads (abandonment or obliteration).
- Transfer jurisdiction (ownership) or maintenance responsibilities to other maintenance entities (including private land owners and home owner associations) as appropriate.
- Convert open and/or closed roads to motorized trails recognizing this will increase trail maintenance costs (class 1, 2, or 3 which is basically a minimally maintained, natural surfaced trail).
- Reduce mileage of paved roads.
- Work cooperatively with other public road agencies and associations for material and equipment/labor sharing opportunities.
- A combination of the above strategies.

The Coronado National Forest **Annual Road Maintenance Plan** provides a list of roads that will receive maintenance during the current fiscal year. Roads on each District receiving

maintenance are prioritized by District Ranger and staff and known critical road safety needs receive the highest priority. The entire Coronado National Forest has approximately 1715 miles of ML 2 roads, approximately 289 miles of ML 3 roads, about 24 miles of ML 4 roads, and about 4 miles of ML 5 roads. Therefore there are a total of about 2100 miles of National Forest System Roads on this forest.

Forest wide Operational Maintenance Level Miles:

District	ML 1 (miles)	ML 2 (miles)	ML 3 (miles)	ML 4 (miles)	ML 5 (miles)
Douglas	12.94	285.024	76.834	1.402	0.00
Nogales	2.91	458.355	69.466	1.450	0.00
Sierra Vista	18.02	633.353	83.599	0.063	3.93
Safford	18.89	207.157	12.118	0.775	0.00
Santa Catalina	15.94	130.8985	47.0944	19.9194	0.00
Forest Total	68.70	1714.7875	289.1114	23.6094	3.93
*Percent receiving annual maintenance	0%	8.28%	60.9%	8.47%	0%

*Based on FY2010 Road Accomplishments

As noted in the table above, not all roads receive maintenance every year. In 2010, a total of 320 miles out of 2100 miles of roads were maintained, which represents about 15.24% of the total forest total miles. This is about average for a typical year on the Coronado with a 3 man road crew. Based on the FY2010 road accomplishment report, only 142 miles of ML 2 roads or 8.3% of all forest ML 2 road miles received maintenance. Also during FY2010, 176 miles of ML 3 road received maintenance which represents approximately 61% of all ML 3 roads. Since very few ML4 and ML 5 roads receive maintenance only 8.5 % ML 4 roads and 0% ML 5 roads received maintenance in FY 2010. The lion's share of the annual road maintenance is concentrated on maintenance level 3 roads.

The Coronado has conducted required annual road condition surveys since 1999 to determine the maintenance and associated funding needed to maintain roads to the required safety standards and assigned maintenance levels. Condition surveys describe the features of the road (e.g. surfacing material, ditches, culverts, signs, etc.) and their current condition. Deferred and annual maintenance costs for those roads are then calculated using a regional standard cost guide.

Maintenance Level 2 Roads

The only standards for a ML 2 road are for route marker signing. Most high road density areas are attributable to ML 2 roads. In most cases nonsystem roads are contributing to the road density in the EMA and are good candidates for decommissioning in order to reduce that density.

Maintenance Level 3, 4, 5 Roads

The Highway Safety Act requires maintenance level 3-5 roads to meet the standards for directional, regulatory, and warning signs. Clearing for sight distance and safety is not occurring as often as needed due to limited funding. Therefore with limited funding, the focus must be on

high-priority roads which are identified in the Annual Maintenance Plan which is approved by the line officer. High priority roads are often maintenance level 3-5 roads and almost always have higher traffic volumes than maintenance level 2 roads.

Although the initial remedy may be to decommission roads to provide a sustainable system, the expense of decommissioning would need to include both the planning cost of conducting the appropriate environmental analysis as well as the physical implementation cost of achieving the desired objective. Such costs may include provision for new road construction, or adoption of a non-system road to access a portion of the area served by a decommission-candidate road.

Shared or exchanged road maintenance is occurring primarily on maintenance level 3-5 roads, but could be increased overall. Road maintenance agreements with surrounding counties in which the Forest has roads have expired but are still in place. Agreements with other governments and entities need to be investigated in the future. Counties are also attempting to shed road maintenance costs and responsibilities for similar reasons. Efficiencies which serve all public road agencies are actively sought.

Legal public motorized access on or to system roads is lacking in many locations, often on roads which are currently being used by the public. Closure of such access is often sudden, difficult and time consuming to resolve—if possible at all—and fully within the rights of private property owners who own lands needed for such access. Resolving access problems often consumes funding otherwise used for road maintenance. Conversely, unequivocal lack of legal public access with no probable solution is an opportunity to decommission authorized roads and thereby save maintenance funds for roads which provide the public with legal access to their public land. Such decommissioning actions can also be an inducement for private landowners who might otherwise close public access routes across their land to cooperatively work toward a mutually acceptable legal motorized public access route across and/or adjacent to their land in order to retain designated system roads further inside the National Forest behind their property.

Road Maintenance Frequency

The quantity and frequency of maintenance is subject to: availability of funding, obligations under agreements, and protecting the FS’s investment. In accordance with the maintenance levels described above the following table displays the cyclic activities required to properly maintain roads:

Activity	As Needed		Annually		
	ML 1	ML 2	ML 3	ML 4	ML 5
Maintain traveled way for protection of investment, resource values, and to provide some degree of user comfort			Low	Moderate	High
Maintain road prism to provide for passage of high clearance vehicles		X			
Maintain shoulder for structural integrity of roadway and drainage		X	X	X	X

Activity	As Needed		Annually		
	ML 1	ML 2	ML 3	ML 4	ML 5
functionality					
Keep drainage structures/features functional and prevent unacceptable resource damage	X	X	X	X	X
Vegetation removal to provide for sight distance			X	X	X
Vegetation removal for access and to control resource damage		X			
Alleviate erosion or sedimentation on or from roadway	X				
Remove roadside hazard trees			X	X	X
Maintain structures to provide for passage of planned traffic and preserve structure and to protect natural resources		X	X	X	X
Install/maintain warning, regulatory, and guide signs and other traffic devices to provide for existing traffic			X	X	X

Road Maintenance Costs

The Forest Service maintains NFS roads and NFS trails in accordance with their management objectives and the availability of funds. Volunteers and cooperators maintain many trails. The agency collects fees for use of some developed recreational facilities, most of which are retained and spent at the site where they are collected. Unfortunately, resources are still limited, and the Forest Service has a substantial backlog of maintenance needs, even before adding many user created routes to the system. In some cases, an extended lack of maintenance can lead to deterioration of a road or trail to the point that it must be closed to address user safety or to prevent severe environmental damage. The Forest Service actively tries to avoid closures by encouraging volunteer agreements and cooperative relationships with user groups. The availability of resources for administration and maintenance of routes should not be the only consideration in developing travel management proposals (FSM 7715.5 para 1c). Volunteers and cooperators can supplement agency resources for maintenance and monitoring, and their contributions should be considered in assessing the availability of resources.

Federally appropriated funds used for road operation and maintenance on the Coronado National Forest (CNF) have ranged from about \$750,000 to \$1,100,000 per year over the last five years, with the average funding being approximately \$850,000 per year.

Besides the on-the-ground performance of maintenance related work, all road systems have fixed costs associated with management of the systems. Management includes:

- Oversight of the road system.
- Establishing and maintaining road management systems required by law (e.g., pavement management, bridge management, safety management, sign management, and congestion management).
- Collecting and maintaining data about the road system (e.g., conducting road condition surveys, gathering traffic count and vehicle accident information, etc).
- Providing information services (e.g., maps, road condition reporting, etc).
- Out-year project planning (e.g., specialist surveys/reports, agreements with other entities, etc).
- Office support (contracting officers, utilities, equipment, etc.)

Over the last five years, fixed costs accounted for approximately **30 percent** of the appropriated funds leaving the other 70 percent for on-the-ground maintenance. The table below lists the existing forest-wide average annual maintenance cost per mile per maintenance level for roads on the CNF. The costs were calculated based on an average road maintenance budget of \$850,000 per year.

Road maintenance costs for entire Forest

Operational Maintenance Level	Annual Cost per Mile	AVG Miles Maintained	Annual Cost
5*	\$ 0	0	\$ 0
4	\$4250	2	\$ 8,500
3	\$2656	176	\$467,456
2	\$2634	142	\$374,028
1*	\$ 0	0	\$ 0
Totals		320	\$849,984

*The Coronado rarely performs maintenance on ML 5 and ML 1 roads and has no average maintenance costs available.

Step 4- Assessing Benefits, Problems and Risks of the Existing Road System

The purpose of this step is to:

- Assess the benefits, problems and risks of the current road system and whether the objectives of the Forest Plan are being met

The products of this step are:

- A synthesis of the benefits, problems and risks of the current road system,
- An assessment of the ability of the road system to meet management objectives

Roads analysis is a science-based process and the interdisciplinary team (Appendix C) used and interpreted relevant scientific literature to identify issues which may cause potential impacts. Any assumptions made during the analysis, and limitations of the information on which the analysis is based will be described.

Specific questions were used to assess benefits, problems, and risks. Benefits are the potential uses and socioeconomic gains provided by roads and related access. Problems are conditions for certain environmental, social, and economic attributes that managers deem to be unacceptable. Risks are likely future losses in environmental, social, and economic attributes if the road system remains unchanged. The questions were used as a checklist to scan the range of possible benefits, problems, and risks and to screen them for those relevant to roads in the area under consideration.

The relevant questions were then used to guide more in-depth assessment and link to the science base for each of the identified benefits, problems, and risks. These questions were not intended to be prescriptive, but were used to assist the interdisciplinary team in developing questions and approaches appropriate to each analysis area. Which questions are appropriate for a particular analysis area and which warrant deep or cursory treatment will depend on the particular area and the issues being addressed. Some question may need to be addressed at several scales. Addressing these and other road-related questions was done with maps, GIS, statistical summaries, or other information that contributed to understanding the benefits, needs, risks, and effects of the roads. These indicators did not answer questions directly but assisted in discerning and quantifying important interactions.

Lands

- *How does the road system connect large blocks of land in other ownership to public roads (ad hoc communities, subdivisions, inholdings, and so on)?*
- *How does the road system affect managing roads with shared ownership or with limited jurisdiction? (Federal Revised Statute 2477, cost-share, prescriptive rights, FLPMA easements, FRTA easements, DOT easements)?*
- *How does the road system connect to public roads and provide primary access to communities?*
- *How does the road system affect managing special-use permit sites (concessionaires, communications sites, utility corridors, and so on)?*
- *What are people's perceived needs and values for access?*

The Peloncillo Mountains Ecosystem Management Area (EMA) is located in both Cochise County, Arizona (19% of the EMA) and Hidalgo County, New Mexico (81% of the EMA) near the incorporated and unincorporated communities of Apache, Douglas, and Portal, Arizona, and Animas, Lordsburg, Rodeo, and New Mexico. The ±87,985 acres EMA is somewhat remote and

rural in nature, with large unroaded areas, very limited permanent legal public access, and no developed recreation sites.

Public access to the Peloncillo EMA has become increasingly restricted over the last several decades. Long established public access routes into and through the EMA, where a legal right (written or unwritten title) of public access may not exist, have been blocked from public use by private landowners.

In addition, Arizona and New Mexico State Trust lands are not "public lands" as are BLM and NFS lands. State Trust lands are managed for the benefit of trust beneficiaries. Trust management responsibilities include requiring a permit, lease, or right-of-way and charging a fee for use of trust lands including public access to NFS and other public lands as well as State Trust lands. Exceptions to this requirement are licensed hunters and fishers, actively pursuing game or fish, in-season, and certain archaeological activities permitted by the State Museums.

Public access issues often become controversial, particularly when dealing with differing opinions towards public access and appropriate uses of National Forest System (NFS) and other public lands, and generate issues far more complex and controversial than in the past. The Forest Land and Resource Management Plan (LRMP) provides direction to "ensure public access to various parts of the Forest on state, county, or permanent Forest Service roads" and "obtain necessary public access for all permanent roads and trails within the National Forest boundary".

However, many landowners are very hesitant to grant right-of-way for perpetual public access across their private lands for a variety of reasons including: impacts from off-highway vehicle use and undocumented aliens, litter and vandalism, privacy issues, perceived potential liability (Arizona Revised Statute 33-1551 and New Mexico Statute 17-4-7 limits a private landowner's liability in regards to recreational access), fair market value of the easement, and in many cases, a desire for exclusive use and control of the adjacent NFS lands.

How does the road system connect to public roads and provide primary access to communities?

The Peloncillo EMA is generally bounded on the west by State Highway 80 (Arizona—Rural Major Collector), on the east by the Animas Valley Road, a Hidalgo County Road (New Mexico—unpaved ± 20 miles south of Animas, NM), formally known as State Highway 338, on the north by the State Highway 9 (New Mexico—connects State Highway 80 to the Animas Valley Road), and on the south by International Boundary with Mexico. The Animas Valley Road, a Hidalgo County road, connects the Animas Valley and Cloverdale area to State Highway 9 and 338 at Animas, New Mexico. State Highway 338 connects to Interstate-10 west of Road Forks, New Mexico. State Highway 9 connects the upper Animas Valley to State Highway 80.

Except for the Geronimo Trail (Road 63), access from the roads above in both Arizona and New Mexico to the EMA is generally limited to Maintenance Level 2 type roads that may require 4-wheel drive or a high clearance vehicle to traverse. The Geronimo Trail [Road 63—shared ownership and maintenance with Cochise County and Hidalgo County) divides the EMA (north—south), is the major arterial and primary access road from Douglas Arizona into and

through the EMA (east—west) to the Animas Valley and Cloverdale, New Mexico area. The Geronimo Trail (Road 63) also provides either the sole or primary access to the non-federal (private and state trust) land scattered within and adjoining the EMA.

It is also important to understand, that in addition to the numerous forest roads where a legal right (written or unwritten title) of public access may not exist across private and state trust lands, there are county roads essential to getting public land users from the state highways to the EMA and the forest's transportation system (roads and trails) where a legal right of public access may not exist either. State-wide, an increasing numbers of county-maintained roads (were written title may or may not exist) have either been blocked or have had private landowners threaten to block, gate and lock them. A single landowner, with a minimal amount of private land (5 acres or less), can challenge a road's ownership status, close the road to public use, and block or control access to thousands of acres of public and state trust lands.

These roads were constructed by and/or maintained for decades by their respective counties at the public's expense and long considered public roads by the public. Many have provided public access through and to private, State Trust, and Federal lands as far back as the late 1800s. To further complicate the public access situation, it is also very difficult for public road agencies (local, county, and state) to assert prescriptive rights for a county-maintained road in Arizona. Since territorial days, the Arizona Courts have consistently held that no public highway or road can be created by prescription and all public highways must be established in strict compliance with the provision of Arizona statute.

In addition, because of limited budgets and staffing, Counties are becoming very reluctant to enter the legal arena to assert any ownership interest to closed roads or exercise their power of eminent domain to restore traditional access routes (even though they either constructed and/or maintained them for decades at the public expense). Especially if the public use is access to public lands and they can divest themselves of maintenance responsibilities. Local politicians are also reluctant to engage public access issues because they perceive a majority of the public land users affected by blocked access are not their local constituents.

The Skeleton Canyon Road (Road 702) at the northwestern side of the Peloncillo EMA is an example of the legal access situation described above. Skeleton Canyon Road was constructed by, then maintained for many decades by Cochise County and had long been considered a public county road until 2004. In 2004, the ownership status of the Skeleton Canyon Road (Road 702) from Highway 80 to the NFS lands in Skeleton Canyon was challenged and closed to public use by private landowners. The Cochise County Board of Supervisors, at the request of the private landowners, unanimously approved a resolution authorizing deleting the Skeleton Canyon Road from the Cochise County maintained road system on December 14, 2004.

Closing the Skeleton Canyon Road and the resulting stalemate between private landowners, Cochise County, the Arizona Game and Fish Department (AGFD), and Forest Service is emblematic of the many public access problems in southeastern Arizona and southwestern New Mexico. Continued public access to NFS lands via the existing Skeleton Canyon Road is of great importance because opportunities to develop a new access route into the Skeleton Canyon

area on the Peloncillo Mountain's west side are very limited or nonexistent due to the area's checkerboard ownership, topography, and unit's roadless area designations.

Recent trends indicate the ownership of many more traditional access routes (both county and Forest Service) will be challenged, then blocked, gated, and locked from both administrative and public use.

How does the road system connect large blocks of land in other ownership to public roads (ad hoc communities, subdivisions, inholdings, etc.)?

It is Forest Service policy to provide access across NFS land to private land that is adequate to secure the owners thereof reasonable use and enjoyment of their land without unnecessarily reducing the management options of the Forest Service or damaging NFS lands or resources. Access needs to private inholdings are addressed on an individual basis as requests are received (application for special or road use authorization).

The application for special or road use authorization is then analyzed through the NEPA process to determine possible environmental effects and the level of reasonable access required. If access is being provided by a public road agency such as the county or state, then the Forest Service is not obligated to provide any additional access over NFS lands.

A vast majority of the land adjacent and adjoining the EMA in Arizona is state trust land, with smaller blocks of private and BLM lands intermingled. In New Mexico, a vast majority of the land adjacent and adjoining the EMA is private land, with smaller blocks of state trust BLM lands intermingled. Although, there is no private land within the EMA in Arizona, there are several rectangular parcels (checkerboard) of private land of various sizes scattered within of the EMA in New Mexico.

As stated previously, the Geronimo Trail (Road 63) is the major arterial and primary access road from the Douglas, Arizona area into and through the EMA to the Animas Valley and Cloverdale, New Mexico area. The Animas Valley Road, another Hidalgo County road, connects the Animas Valley and Cloverdale area to State Highway 9 and 338 at Animas, New Mexico. Access to the private land within the EMA in New Mexico is either from the Geronimo Trail (Road 63) or a private road outside the EMA connected to the Geronimo Trail (Road 63).

How does the road system affect managing roads with shared ownership or with limited jurisdiction (Federal Revised Statute 2477, cost-share, prescriptive rights, FLPMA easements, FRTA easements, DOT easements)?

There are currently no roads within the EMA authorized under the authority of a FLPMA, FRTA, or DOT easement or cost-share agreement. Portion of the Geronimo Trail (Road 63) in New Mexico appear to be a RS 2477 road. This analysis also recognizes that Cochise and Hidalgo Counties may have established valid outstanding rights (both known and unknown to the Forest Service at this time) to occupy and use other National Forest lands and roads. These outstanding access rights were granted by the United States prior to the establishment of the National Forest (RS 2477).

The Forest works closely with the holder of these outstanding rights to preserve their access rights while protecting the natural resources and ensuring the underlying or/and adjoining NFS lands do not suffer unnecessary degradation as a result of any actions by the holder. Although the holder may exercise those rights without obtaining a special use authorization, unless the document creating the rights provides for an additional authorization, such rights are limited to the rights existing at the time of acquisition, and the holder cannot enlarge or expand them without a special-use authorization.

Valid outstanding rights are also subject to some federal regulation. Activities within a valid outstanding right-of-way, which may potentially affect the servient estate (NFS lands), are subject to the National Environmental Policy Act (Tenth Circuit Court of Appeals ruling in *Sierra Club v. Hodel*, 848 F.2d 1068).

How does the road system affect managing special-use permit sites (concessionaires, communications sites, utility corridors, and so on)?

Many of the roads in this analysis are also needed to access special-use authorizations permitting various types of activities within the EMA. In addition to power and phone lines, the roads are utilized by numerous commercial outfitter/guides under permit who use the road system for various permitted activities (hunting, ecological, tours, etc) and could be affected if and when roads are closed or decommissioned. Closure and decommissioning of any authorized and unauthorized roads will remain an important issue to special-use permit holders as well as private landowners and public land users. It is important to understand the Forest Service doesn't necessarily build, retain or close roads because of special use activities.

The Coronado National Forest has been closed to cross-county motorized travel since 1986, except for 300 feet from the designated system for dispersed camping. Special-use authorizations holders who have cross-country motorized access needs (off the designated system and/or off routes which are under authorization to them) will be required to request in writing what the specifics of their cross-country travel needs are, and obtain written approval for that motorized cross-country travel. Generally, cross-country motorized travel will only be authorized in the cases of utility companies needing to access their facilities or by contractors during boundary management activities.

Also, as stated above, there are numerous county and forest roads to and through the EMA where a legal right (written or unwritten title) of public access may not exist across private land and may be closed or controlled by a private landowner at any time and without notice affecting the permit holder's ability to access the permit site.

What are people's perceived needs and values for access?

As stated previously, there are many important long established roads through private lands both within and adjoining the EMA that are currently open and relied on by the public where a legal right of public access (written or unwritten title) may not exist and may be closed at any time and without notice. Although it is a private landowner's right and prerogative to block and control

access across their private land where no legal right of public access exists, the public believes the Forest Service as well as other agencies (County, State, and Federal) also has a responsibility to provide reasonable public access to NFS and other public lands to best serve the interests of all public land users, not just a privileged few.

Public land users have become extremely frustrated with government agencies (County, State, and Federal) failure to restore public access where traditional access points or routes to public (BLM and NFS) lands have been blocked, gated, and locked by a private landowner. Many public land user and landowner conflicts as well as creation of wildcat (user-created) roads are due to attempts by public land users to access NFS lands via private, state trust, and other public (NFS) lands after a traditional access route has been blocked from public use by adjoining or adjacent private landowners.

There is nothing more frustrating to public land users than the inability to access NFS lands and other public lands via a traditional access route that has been blocked by an adjoining landowner, especially where they perceive the landowner has a private exclusive use of the public land. This is particularly true when the blocked road had been maintained for decades and/or built by a county at the public's expense and they believe the landowner is benefiting economically by blocking and controlling access to NFS land.

As public land users multiply and squeeze through the remaining access points and routes, there is a "domino effect" of more locked gates and blocked access further restricting public access and limiting dispersed recreational opportunities. The public land essentially becomes National Forest "back yards" for the adjoining landowners and their guests, providing little benefit to the general public, while escalating the public's perception of private exclusive use of those lands.

Therefore, it is recommended when long established access routes (local, county, and forest roads) through private or other non-federal lands adjacent to, adjoining, or within the CNF shown as open authorized in INFRA and on the Motor Vehicle Use Maps (MVUM) that are closed or controlled by private landowners and unavailable for use by the general public where no documented right-of-public access exists be changed to open authorized restricted (OAR) in INFRA and removed from MVUM until open for use by the general public. Use of roads not shown on the MVUM will be limited to Forest Service administrative purposes or when specifically authorized under the terms of a permit. Ancillary uses of roads not shown on the MVUM outside the terms of a permit will not be allowed.

Road Number	Comment/Recommendation
Geronimo Trail (Road 63)	<p>Road 63 (shared ownership and maintenance with Cochise County and Hidalgo County) is the major arterial and primary access road from Douglas, Arizona into and through the EMA to the Animas Valley and Cloverdale area in New Mexico. Road 63 (Geronimo Trail) also provides primary access to the non-federal (private and state trust) land scattered within and adjoining the EMA.</p> <p>Recommendation: No change from open authorized.</p>

Road Number	Comment/Recommendation
Road 63-spur 1	<p>Road 63-spur 1 is an important administrative access route to range improvements on the eastern side of the EMA and is currently closed to public use by private landowners.</p> <p>Recommendation: <u>Add to Forest Road System as OA; ML2 for range improvement and future public access.</u> In addition, Road 63- spur 1 is one of several existing roads that may be used to restore public access around the private land in Foster Draw from Road 4324 (Eicks Road). Refer to Eicks Road Reroute below.</p>
Road 63-spur 3	<p>Road 63- spur 3 is an important administrative access route to range improvements on the eastern side of the EMA and is currently closed to public use by private landowners.</p> <p>Recommendation: <u>Add to Forest Road System as OA; ML2 for range improvement and future public access.</u> In addition, Road 63-spur 3 is one of several existing roads that may be used to restore public access around the private land in Foster Draw from Road 4324 (Eicks Road). Refer to Eicks Road Reroute below.</p>
Road 63-spur 4	<p>Road 63-spur 4 is an important administrative access route to range improvements on the eastern side of the EMA and is currently closed to public use by private landowners.</p> <p>Recommendation: <u>Add to Forest Road System as OA; ML2 for range improvement and future public access.</u> In addition, Road 63-spur 3 is one of several existing roads that may be used to restore public access around the private land in Foster Draw from Road 4324 (Eicks Road). Refer to Eicks Road Reroute below.</p>
Skeleton Canyon Rd (Road 702)	<p>Road 702 (Skeleton Canyon Road) is an important public land user and administrative access route from State Highway 80 to NFS lands in the Skeleton Canyon Creek Area, ± 8.35 miles traverses non-federal (private and state) lands (± 3.6 miles is on the Forest) and is closed to public use by private landowners.</p> <p>Recommendation: No change from open authorized. Refer to Skeleton Canyon Rd Reroute below.</p>
Skeleton Canyon Rd Reroute	<p>The current landowners along Road 702 (Skeleton Canyon Road) are unwilling to grant right-of-way easements for perpetual public access across their private lands for the existing roadway from Highway 80 to the NFS lands in Skeleton Canyon. Therefore, Road 702 (Skeleton Canyon Road) remains closed to the general public.</p> <p>Recommendation: <u>Because private landowners are unwilling to grant right-of-way easements for the existing roadway to restore public access into Skeleton Canyon, it is recommended a route into to Skeleton Canyon from the existing road system on state trust lands near Starvation Canyon to the west be located and analyzed (NEPA).</u></p> <p>If a decision is made to reconstruct and construct a route from the Geronimo Trail (Road 63) to Skeleton Canyon, a State Land Department right-of-way easement will be needed for the existing roadway from the Geronimo Trail</p>

Road Number	Comment/Recommendation
	<p>(Road 63) and the route located from the Starvation Canyon area across state trust land to the National Forest.</p> <p>If reconstructed and constructed the route will be added to the forest road system as ML2 open authorized.</p>
Bow Tank Rd (Road 702A)	<p>Road 702A (Bow Tank Road) is an important public land user and administrative access route from Road 4312 (Whitmire Road). However, because Road 4312 (Whitmire Road) is located entirely on private land and closed to public use by the private landowners, Road 702A (Bow Tank Road) is also closed to public use.</p> <p>Recommendation: No change from open authorized. Road 702A (Bow Tank Road) is one of several existing roads that may be used to restore public access around private land from Road 63 (Geronimo Trail) to Whitmire Canyon, Walnut Creek, and Dutchman Canyons area. Refer to Whitmire Canyon Rd Reroute below.</p>
South Fork Rd (Road 703)	<p>Road 703 (South Fork Road) is an important public land user and administrative access route to NFS lands in South Fork from Road 702 (Skeleton Canyon Road). However, because the Skeleton Canyon Road (Road 702) is gated and locked at Highway 80 and closed to public use, Road 703 (South Fork Road) is also closed to public use by private landowners.</p> <p>Recommendation: No change from open authorized. Refer to Skeleton Canyon Road Reroute above.</p>
Deer Creek Rd (Road 704)	<p>Road 704 (Deer Creek Rd) is an important public land user and administrative access route to NFS lands in North and South Deer Creek from Road 702 (Skeleton Canyon Road) on the west side of the EMA. However, because the Skeleton Canyon Road (Road 702) is gated and locked at Highway 80 and closed to public use, Road 704 (Deer Creek Rd) is also closed to public use by private landowners.</p> <p>Road 704 (Deer Creek Rd) is also an important public land user and administrative access route to NFS lands in South Deer Creek on the east side of the EMA. However, because the road system from Road 63 (Geronimo Trail) is gated, locked, and closed to public use, the east end of Road 704 (Deer Creek Rd) is also closed to public use by private landowners.</p> <p>Recommendation: No change from open authorized. Refer to Skeleton Canyon Road Reroute above and Deer Creek Reroute below.</p>
Deer Creek Rd Reroute	<p>The current landowners along Road 702 (Skeleton Canyon Road) and Road 704 (Deer Creek Road) are unwilling to grant right-of-way easements for perpetual public access across their private lands for the existing roadways. Therefore, Road 704 (Deer Creek Road) remains closed to the general public.</p> <p>Recommendation: Because private landowners are unwilling to grant right-of-way easements for the portions of Road 702 (Skeleton Canyon Road) and Road 704 (Deer Creek Road) across their private land to restore public access into Deer Creek, <u>it is recommended a route into to Deer Creek from Skeleton Canyon be located and analyzed (NEPA).</u></p>

Road Number	Comment/Recommendation
	<p>If a decision is made to construct a route from Road 702 (Skeleton Canyon Road) to Road 704 (Deer Creek Road) to restore public access, a State Land Department right-of-way easement may be needed for the route located from Road 702 (Skeleton Canyon Road) to Road 704 (Deer Creek Road).</p> <p>If reconstructed and constructed the route will be added to the forest road system as ML2 open authorized.</p>
704-14.51R-1	<p>Road 704-14.51R-1 is an important administrative access route to NFS lands from Road 702A (Bow Tank Road) and Road 705 (Dutchman Road). However, Road 704-14.51R-1 is closed to public use by private landowners.</p> <p>Recommendation: <u>Add to Forest Road System as OAR; ML2.</u> Road 704-14.51R-1 is one of several existing roads that may be used to restore public access around private land from Road 63 (Geronimo Trail) to Whitmire Canyon, Walnut Creek, and Dutchman Canyon area. Refer to Whitmire Canyon Rd Reroute below.</p>
Dutchman Road (Road 705)	<p>Road 705 (Dutchman Road) is an important public land user and administrative access route to NFS lands from Road 702A (Bow Tank Road). However, because Road 4312 (Whitmire Road) is entirely on private land and closed to public use by private landowners, Road 702A (Bow Tank Road) and Road 705 (Dutchman Road) are also closed to public use.</p> <p>Recommendation: No change from open authorized. Road 705 (Dutchman Road) is one of several existing roads that may be used to restore public access around private land from Road 63 (Geronimo Trail) to Whitmire Canyon, Walnut Creek, and Dutchman Canyon area. Refer to Whitmire Canyon Rd Reroute below.</p>
Whitmire Road (Road 4312)	<p>Road 4312 (Whitmire Road) is an important public land user and administrative access route to NFS lands from Road 63 (Geronimo Trail) into the Whitmire Canyon, Walnut Creek, and Dutchman Canyon area. However, Road 4312 (Whitmire Road) is located entirely on private land and closed to public use by private landowners.</p> <p>Recommendation: <u>Because Road 4312 (Whitmire Road) is located entirely on private land and closed to public use, it is recommended it be removed from the forest road system.</u> Refer to Whitmire Canyon Rd Reroute below.</p>
Whitmire Canyon Rd Reroute (4327-4866)	<p>The current landowners in the Whitmire Canyon, Walnut Creek, and Dutchman Canyon area on the east side of the EMA are unwilling to grant right-of-way easements for perpetual public access for the system of existing roads across their private land. Therefore, access to the NFS lands in the Whitmire Canyon, Walnut Creek, and Dutchman Canyon area remains closed to the general public.</p> <p>Recommendation: <u>Because private landowners are unwilling to grant right-of-way easements for the existing road system across their private land to restore public access into the Whitmire Canyon, Walnut Creek, and Dutchman Canyon area, it is recommended a route around the private land entirely on NFS lands from Road 63 (Geronimo Trail) to Whitmire Canyon, Walnut Creek, and Dutchman Canyon area using portions of the existing road system be located and analyzed (NEPA).</u></p>

Road Number	Comment/Recommendation
	<p>If a decision is made to reconstruct and construct a route from Road 63 (Geronimo Trail) to Whitmire Canyon, Walnut Creek, and Dutchman Canyon area around the private land to restore public access, the route will be added to the forest road system as ML2 open authorized. During an analysis to restore public access it may also be determined that portions of the existing road system in the Whitmire Canyon, Walnut Creek, and Dutchman Canyon area are no longer needed and can be decommissioned.</p>
Eicks Road (Road 4324)	<p>Road 4324 (Eicks Road) is an important public land user and administrative access route to NFS lands from Road 63 (Geronimo Trail) to the Foster Draw area. Road 4324 (Eicks Road) is currently gated and locked at the private land in Foster Draw.</p> <p>Recommendation: Decommission 4324 from private land south to end of road. In addition, Road 4324 (Eicks Road) is one of several existing roads that may be used to restore public access around the private land in Foster Draw.</p> <p>Note: Although INFRA indicates Road 4324 (Eicks Road) continues south from the private land in Foster Draw, it does not actually exist on the ground south of the private land. Refer to Eicks Road Reroute below.</p>
Eicks Road Reroute	<p>The current landowner in the Foster Draw area on the east side of the EMA is unwilling to grant a right-of-way easement for perpetual public access for the existing road across their private land. Therefore, access to the NFS lands south of the private land in the Foster Draw area remains closed to the general public.</p> <p>Recommendation: <u>It is recommended a route around the private land to restore public access into the Foster Draw area from Road 4324 (Eicks Road) to Road 63-spur 1 be located and analyzed (NEPA).</u></p> <p>If a decision is made to reconstruct and construct a route around the private land to restore public access into the Foster Draw area, the route will be added to the forest road system as Road 4324 (Eicks Road) open authorized (OA) ML2. In addition, during analysis to restore public access to the Foster Draw area, it may also be determined portions of the existing road system are no longer needed and can be decommissioned.</p> <p>Check Inventoried Roadless Area Boundary</p>
4324-4.69L-1	<p>Road 4324-4.69L-1 is an important public land user and administrative access route to NFS lands from Road 63 (Geronimo Trail) to Road 4324 (Eicks Road).</p> <p>Recommendation: <u>Add to Forest Road System as OA; ML2.</u></p> <p>In addition, Road 4324-4.69L-1 is one of several existing roads that may be used to restore public access around the private land in Foster Draw from Road 4324 (Eicks Road). Refer to Eicks Road Reroute above.</p>
Corral Road (Road 4327)	<p>Road 4327 (Corral Road) is an important public land user and administrative access route to NFS lands from Road 63 (Geronimo Trail).</p>

Road Number	Comment/Recommendation
	<p>Recommendation: No change from open authorized. Road 4327 (Corral Road) is one of several existing roads that may be used to restore public access around private land from the Road 63 (Geronimo Trail) to Whitmire Canyon, Walnut Creek, and Dutchman Canyon area. Refer to Whitmire Canyon Road Reroute above.</p>
Heritage Rd (Road 4329)	<p>Road 4329 (Heritage Road) is an important public land user and administrative access route to NFS lands from Road 704 (Deer Creek Rd). However, because the road system from at both ends of Road 704 (Deer Creek Rd) has been closed to public use by private landowners, Road 4329 (Heritage Road) is also closed to public use by private landowners.</p> <p>Recommendation: Change to open authorized restricted. Refer to Skeleton Canyon Road and Deer Creek Reroutes above.</p>
Ridge Rd (Road 4866)	<p>Road 4866 (Ridge Road) is an important public land user and administrative access route to NFS lands from Road 702A (Bow Tank Road).</p> <p>Recommendation: No change from open authorized. Road 4866 (Ridge Road) is one of several existing roads that may be used to restore public access around private land from the Road 63 (Geronimo Trail) to Whitmire Canyon, Walnut Creek, and Dutchman Canyon area. Refer to Whitmire Canyon Rd Reroute above.</p>

FUTURE CONSIDERATIONS

The current public access situation to and within the EMA will continue to deteriorate, solutions will become quite expensive and complicated, while the use of NFS lands will increase. Private landowner will continue to challenge the ownership status of important roads long considered public roads (both county and forest), close them to public use, then block or control access to thousands of acres of public land, including roads into and through the Peloncillo EMA. As stated previously, recent trends indicate many more traditional access routes (both county and forest) will be closed to public use.

The continued loss of traditional forest access routes may require construction of new roads, relocation of portions of existing roads that have been closed to public use by private landowners, or recommissioning of decommissioned roads to meet both administrative and public access needs. New, relocated, and or reconstructed roads may also be needed for future activities not currently planned for. Therefore, access needs identified in the current or future Forest Land and Resource Management Plans (LRMP) or in this analysis may not be fully met by the existing EMA transportation system.

Soil, Water, Air, and Forestry

- *How and where does the road system modify the surface and subsurface hydrology of the area?*
- *How and where does the road system generate surface erosion?*
- *How and where do road-stream crossings influence local stream channels and water quality?*
- *How and where does the road system create potential for pollutants, such as chemical spills, oils, or herbicides to enter surface waters?*
- *How and where is the road system 'hydrologically connected' to the stream system?*
- *How do the connections affect water quality and quantity (such as delivery of sediments, elevated peak flows)?*
- *What downstream beneficial uses of water exist in the area?*
- *What changes in uses and demand are expected over time?*
- *How are they affected or put at risk by road-derived pollutants?*
- *How and where does the road system affect wetlands?*
- *How does the road system alter physical channel dynamics, including isolation of floodplains; constraints on channel migration; and the movement of large wood, fine organic matter, and sediment?*
- *How does the road system affect riparian plant communities?*

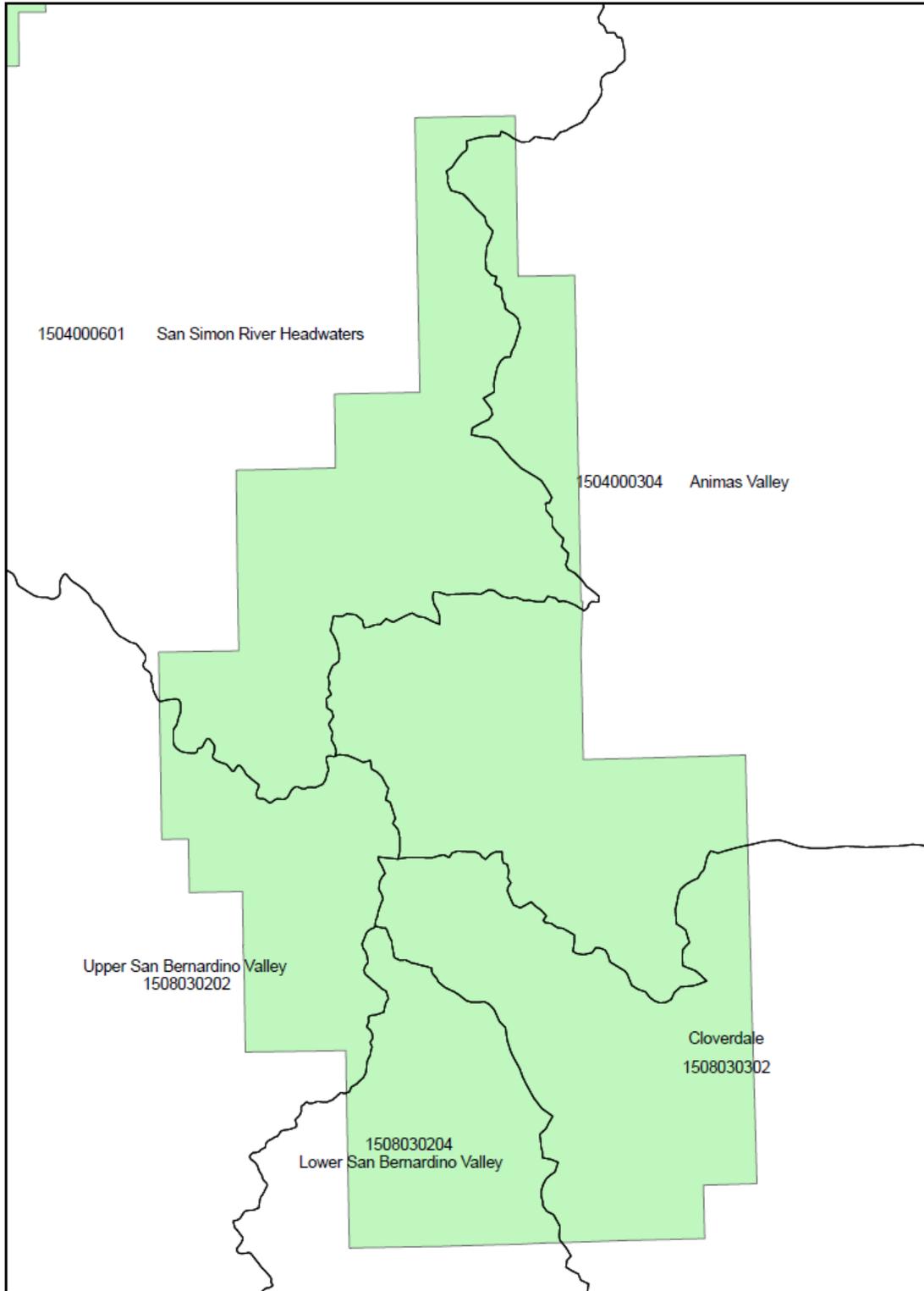
These questions are restated in the text below within the sections that provide the answers.

General

Roads in the Peloncillo Ecosystem Management Area (EMA) include parts of the following watersheds (See Figure 1): San Simon River Headwaters (HUC 1504000601), Upper San Bernardino Valley (HUC 1508030202), Lower San Bernardino Valley (HUC 1508030204), Animas Valley (HUC 1504000304), Cloverdale Creek (HUC 1508030302)

Figure 4.1. Peloncillo Watersheds

Peloncillo Watersheds



0 1 2 4 Miles



Roads affect soil, water, and air by accelerating erosion, diverting water, providing access for various polluting agents, and creating dust. The roads in these watersheds are having these affects, but have not been identified as causing significant negative effects on water quality at the sample points, or air quality at any monitoring location. However, local effects on soil, water (including riparian areas), and air may be important. Roads affect forestry resources by providing access for management of fuels and forest products. Following is the background information about the area.

Large areas of this EMA are not roaded or are accessible only by the poorest of roads. This is due in large part to the steep nature of the central portion of the EMA. No routes are found that traverse the range from north to south. Only the Geronimo Trail traverses the range from east to west.

Soil

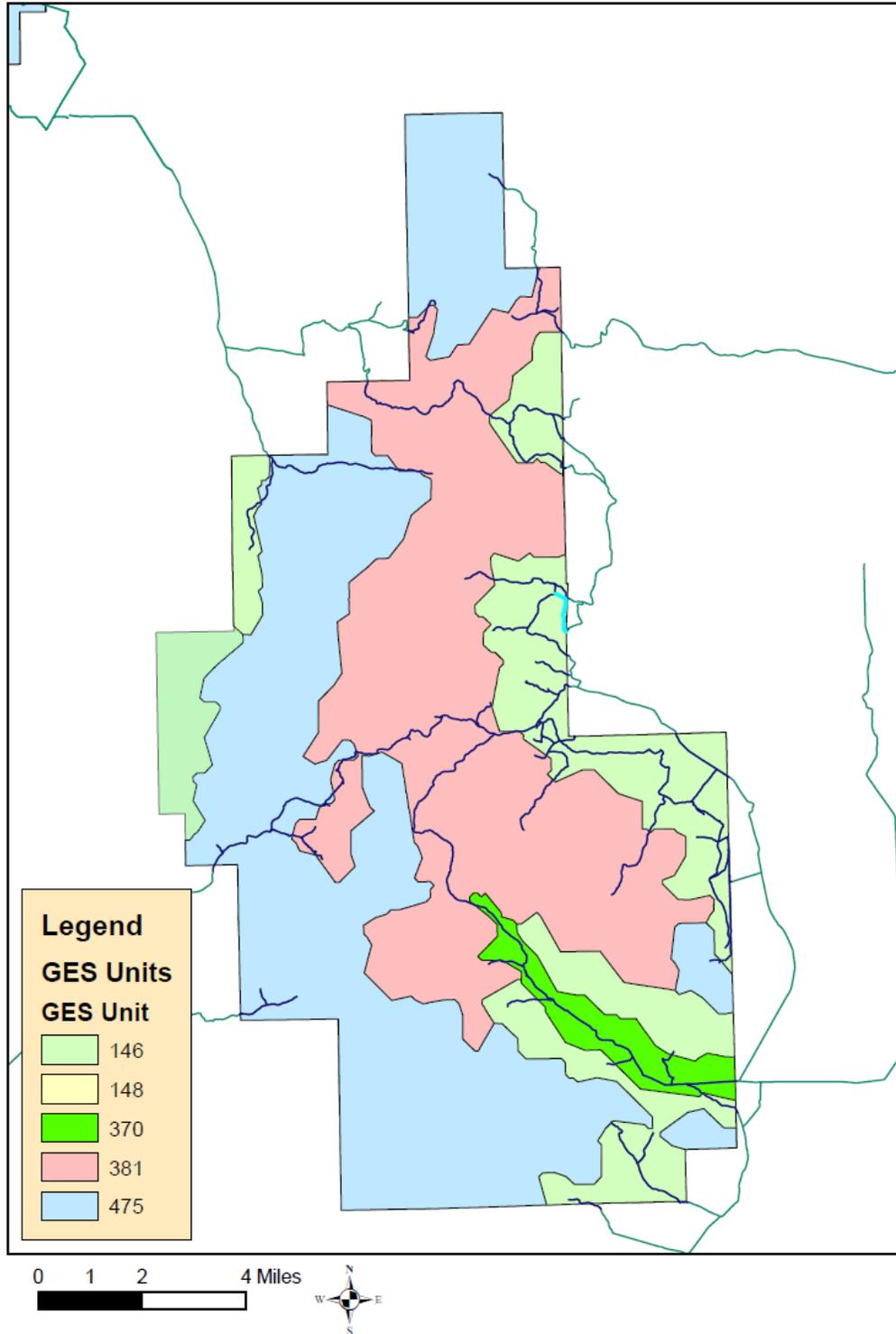
A General Ecosystem Survey (GES) was completed by the Forest Service in 1991 and covers the entire Chiricahua EMA (USDA, 1991). In the GES report, the soils are found to occur in three of the four possible GES climatic classes due to wide range in elevation and aspect. These classes are Low Sun Mild (LSM) in the low elevation grasslands, chaparral, or shrublands, High Sun Mild (HSM) in the mid elevation woodlands, and Low Sun Cold (LSC) in the high elevation coniferous forests. These classes describe when the majority of the mean annual precipitation occurs and whether or not the winters are mild or cold. Low Sun indicates the majority of the annual precipitation occurs between September 30 and April 1; High Sun indicates the majority occurs between April 1 and September 30. The different GES Units found within the EMA are shown below in Table 4.1.

Table 4.1. Peloncillo General Ecosystem Survey Units

GES Unit	Landform	Elevation	Soil Name	Average Gradient %	Surface Texture/ Modifier	Soil Depth	Parent Material	Climate Class	Erosion Hazard
144	Elevated Plains and Hills	1700–2100 m	Vertic Haplustalfs, Typic Haplustalfs, and Vertic Ustochrepts	0% to 40%	Clay Loam	Deep	Basalt	HSM	Slight to Severe
146	Elevated Plains	1300-2100 m	Typic Haplustalfs and Typic Argiustolls	0% to 40%	Gravelly Loam	Deep	Alluvium	HSM	Slight to Moderate
370	Valley Plains	1700-2700 m	Fluventic Ustochrepts, Typic Ustifluvents, Typic Ustochrepts, and Riverwash	0% to 15%	Extremely Gravelly Sandy Loam	Deep	Alluvium	HSM	Slight
381	Elevated Plains and Escarpments	1700–2200 m	Lithic Ustorthents and Rhyolite rock outcrop	0% to 40%	Extremely Gravelly to Cobbly Sandy Loam	Shallow	Rhyolite	HSM	Slight
475	Hills, Mountains and Escarpments	1300-2200 m	Lithic Ustochrepts, Typic Ustochrepts, and Granite/rhyolite rock outcrop	40% to 80%	Extremely Cobbly Sandy Loam	Shallow	Granite, Rhyolite	HSM	Moderate

Figure 4.2. Peloncillo General Ecosystem Survey Units

Peloncillo General Ecosystem Survey Units



- *How and where does the road system generate surface erosion?*

The IDT recommends that the unauthorized roads listed in Table 4.2 which are in locations that are generally very steep and/or highly erodible and are not needed be decommissioned.

Table 4.2. Unauthorized Roads Located on Soils that are Generally Steep or Highly Erodible to be Decommissioned

Road Number	GES Unit	Erosion Hazard	Slope
4313-1.69L-1	381, 475	slight to moderate	0 - 15%, 15 - 40%
4324-0.76L-1	146	slight to moderate	0 - 15%, 15 - 40%

The IDT also recommends that the National Forest System Roads listed in Table 4.3 which are in locations that are generally steep or highly erodible and are not needed be decommissioned.

Table 4.3. National Forest System Roads Located on Soils that are Generally Steep or Highly Erodible to be Decommissioned

Road Number	GES Unit	Erosion Hazard	Slope
704 A	146	slight to moderate	0 - 15%
4324	146	slight to moderate	0 - 15%, 15 - 40%
4326-old	146, 381	slight to moderate	0 - 15%, 15 - 40%
4330	146	slight to moderate	0 - 15%
4339	146, 370	slight to moderate	0 - 15%

The IDT also recommends that the National Forest System Roads listed in Table 4.4 in locations that are highly erodible be classified and added to the system but restricted to permittees, Forest Service, or Border Patrol because it is needed for access to the EMA and the soil issues can be mitigated.

Table 4.4. National Forest System Roads Located on Soils that are Generally Steep or Highly Erodible to be Classified Maintenance Level 1

Road to be Assigned ML 1	GES Unit	Erosion Hazard	SLOPE in %
4340	146, 370	slight to moderate	0 - 15%

The IDT also recommends that the unauthorized road listed in Table 4.5 in locations that are highly erodible be classified and added to the system but restricted to permittees, Forest Service, or Border Patrol because it is needed for access to the EMA and the soil issues can be mitigated.

Table 4.5. Roads Recommended to be Added to the System, OA; ML 2

Road to be added to the System	GES Unit	Erosion Hazard	SLOPE in %
63- spur 1	146	slight to moderate	0 - 15%
63- spur 2	146	slight to moderate	0 - 15%
63- spur 3	146, 475	slight to moderate	0 - 15%
63- spur 4	475	slight to moderate	0 - 15%, 15 - 40%
704-14.51R-1	146	slight to moderate	0 - 15%, 15 - 40%

The IDT also recommends that the National Forest System Road listed in Table 4.6 in locations that are highly erodible remain on the system but restricted to permittees, Forest Service, or Border Patrol because it is needed for access to the EMA and the soil issues can be mitigated.

Table 4.6. Roads Recommended to Remain on the System, but with Restricted Access

Road to be Part of the System but with Restricted Access	GES Unit	Erosion Hazard	SLOPE in %
4329	146	slight to moderate	0 - 15%
4335 A	146,370	slight to moderate	0 - 15%

The IDT also recommends that unauthorized roads listed in Table 4.7 in locations that are highly erodable be classified and left open because they are needed for access to the EMA and the erosion issues can be mitigated.

Table 4.7. Roads Recommended to be Added to the System

Road to be Added to the System	GES Unit	Erosion Hazard	SLOPE in %
63-0.63L-1	475	slight to moderate	0 - 15%, 15 - 40%
4324-0.04R-1	146	slight to moderate	0 - 15%
4324-4.69L-1	146	slight to moderate	0 - 15%

Water

- *What downstream beneficial uses of water exist in the area?*
- *What changes in uses and demand are expected over time?*
- *How are they affected or put at risk by road-derived pollutants?*
- *How do the connections affect water quality and quantity (such as delivery of sediments, elevated peak flows)?*

Arizona Department of Environmental Quality (ADEQ) and New Mexico Environment Department (NMED) assess water quality for streams and natural channels throughout the States.

All assessments are made comparing water quality requirements for specific uses expected of the watercourse with data from water samples collected. No streams within the EMA have been assessed. No road closures or relocations are recommended due to water quality issues.

- *How and where does the road system modify the surface and subsurface hydrology of the area?*
- *How and where do road-stream crossings influence local stream channels and water quality?*
- *How and where does the road system create potential for pollutants, such as chemical spills, oils, or herbicides to enter surface waters?*
- *How and where is the road system ‘hydrologically connected’ to the stream system?*
- *How and where does the road system affect wetlands?*
- *How does the road system alter physical channel dynamics, including isolation of floodplains; constraints on channel migration; and the movement of large wood, fine organic matter, and sediment?*
- *How does the road system affect riparian plant communities?*

Riparian areas are extremely important everywhere on the Coronado National Forest, and they occupy only about 1% of the watersheds in the Peloncillo EMA. Roads can alter riparian areas by physically occupying the area, diverting water, providing access to people and vehicles that in turn destroy riparian vegetation, and by generating erosion that degrades the site.

The IDT recommendation is that the unauthorized and system roads listed in Table 4.8 located in or near watercourses should be decommissioned to protect the channels.

Table 4.8. Roads Near Channels Recommended to be Decommissioned

Road Number	Channel Name
4324	Foster Draw, Clanton Draw
4313-1.69L-1	North Deer Creek
704 A	Walnut Creek

The IDT recommendation is that the unauthorized and system roads listed in Table 4.9 located in or near watercourses should be added to or left on the system but restricted to permittees, Forest Service, or Border Patrol because it is needed for access to the EMA and the channel and riparian issues can be mitigated.

Table 4.9. Roads Near Channels Recommended to have Restricted Access (**OAR**)

Road Number	Channel Name
4335 A	Cloverdale Creek

The IDT also recommends that unauthorized roads listed in Table 4.10 located in or near watercourses be classified and left open because they are needed for access to the EMA and the

channel and riparian issues can be mitigated. When the opportunities present themselves, the Forest Service should consider relocating roads out of riparian areas.

Table 4.10. Roads Recommended to be Added to the System (OA)

Road Number	Channel Name
4324-0.04R-1	Clanton Draw
63-0.63L-1	Hog Canyon, Cottonwood Creek
63-Tank spur	Cottonwood Creek
704-14.51R-1	Walnut Creek

Air

None of the Peloncillo EMA watersheds are located in a Class I air quality area. None of the Peloncillo EMA is located in a non-attainment area for air quality. In general, dust from roads is an air pollutant and should be minimized where possible. No roads are proposed for closure for air quality purposes at this time.

Forestry

The Peloncillo EMA has provided limited firewood-gathering opportunities for personal use fuelwood permit holders. Even though no other forest products are readily available in this EMA, fuels management and other forest management activities use access by roads. No new roads are proposed, and no roads are proposed for closure for forest management purposes at this time.

Reference

2008. 2006-2008 Status of Ambient Surface Water Quality in Arizona.

<http://www.azdeq.gov/environ/water/assessment/assess.html>

Arizona Department of Environmental Quality. 2010. Air Quality Plans: Nonattainment Areas and Attainment Areas with Maintenance Plans.

<http://www.azdeq.gov/environ/air/plan/notmeet.html>

New Mexico Environment Department. <http://www.nmenv.state.nm.us/>

Recreation

- *Is there now or will there be in the future excess supply or excess demand for roaded/unroaded recreation opportunities?*
- *Is developing new roads into unroaded areas, decommissioning existing roads, or changing maintenance of existing roads causing significant changes in the quantity, quality or type of roaded/unroaded recreation opportunities?*
- *What are the adverse effects of noise and other disturbances caused by constructing, using and maintaining roads on the quantity, quality, or type of roaded/unroaded recreation opportunities?*
- *Who participates in roaded/unroaded recreation in the areas affected by road constructing, maintaining, or decommissioning.*
- *What are these participant's attachments to the area, how strong are their feelings and are alternative opportunities and locations available.*

Recreation Uses and Opportunities

Recreational uses in this area include hiking, hunting, camping, mountain biking, off-highway vehicle use, equestrian use, prospecting, rock collecting, bird watching and sightseeing. Dispersed recreational use is mostly by unorganized groups, individuals, and permitted users, such as hunting guides and hunters. Large tracts of designated roadless areas encompass the majority of the EMA. There are no developed campgrounds in the Peloncillo EMA and there is extremely limited road access for visitors to the area.

The 2007 National Visitor Use Monitoring survey (Table 4.11) for the Coronado National Forest does not represent specific areas of the forest as the results are combined from survey points throughout the forest. It does, however give a general idea of the recreation interests of forest visitors as a whole. The following are percentages of survey respondents who reported participating in particular recreation activities: Complete survey results are available on-line at <http://www.fs.fed.us/recreation/programs/nvum> (National Visitor Use Monitoring Program).

Table 4.11 Activity participation on the Coronado National Forest (National Visitor Use Monitoring FY2007 data)

Activity	% of visitors who participated in this activity ^a	% who said it was their primary activity ^b	Average hours spent in primary activity ^c
Camping in developed sites	6.4	3.5	29.9
Primitive camping	3.1	0.7	22.7
Backpacking	0.9	0.1	73.9
Resort Use	0.5	0.0	30.0
Picnicking	12.8	3.3	3.4
Viewing wildlife, birds, fish, etc	65.9	4.5	2.8
Viewing natural features (scenery)	68.2	11.2	2.5
Visiting historic/prehistoric sites	8.5	0.6	2.4
Visiting a nature center	17.2	0.8	1.7
Nature Study	15.7	0.0	.
Relaxing	45.9	5.3	7.7
Fishing	3.8	2.5	6.6
Hunting	3.2	3.1	12.4
OHV use	4.5	1.1	3.7
Driving for pleasure	23.7	5.9	2.8
Snowmobile travel	0.0	0.0	.
Motorized water travel	0.0	0.0	.
Other motorized activities	0.5	0.3	1.1
Hiking or walking	75.6	52.2	2.7
Horseback riding	0.1	0.0	2.5
Bicycling	1.9	1.1	4.6
Non-motorized water travel	0.5	0.0	.
Downhill skiing or snowboarding	0.0	0.0	.
X-C skiing, snow shoeing	0.0	0.0	.
Other non-motor activity (swim, etc.)	0.7	0.1	8.3
Gathering forest products mushrooms, berries, firewood	2.7	0.2	3.0
Motorized trail Activity	3.2	1.3	2.1

Alternate locations for outdoor recreation activities include the Chiricahua and Dragoon EMAs to the west, which are closer to Tucson, not as remote, and receive higher use.

This EMA receives high hunting use and lies completely within Game Management Unit 30A within Arizona (2009-10 Arizona Hunting and Trapping Regulations, Arizona Game and Fish Department, AGFD). Permit availability for the 2009-2010 general deer hunt, is as follows:

Antlered mule deer – 10/30/09 to 11/05/09 – 350 permits,
11/13/09 to 11/19/09 – 350 permits;

Antlered whitetailed deer – 10/23/09 to 10/29/09 – 225 permits,
11/06/09 to 11/12/09 – 225 permits,
11/27/09 to 12/03/09 – 225 permits,
12/11/09 to 12/31/09 – 40 permits
(1,415 total permits for the general hunt).

There are many other hunts including muzzleloader and archery deer, javelina, quail, dove and juniors' only hunts. The tremendous influx of hunters in the fall creates a sudden increase in demand for motorized access to remote areas, and for dispersed camping locations that are accessed by NFS roads. If areas accessible by roads were fewer and hunters did not have the ability to adequately disperse, hunting pressure would be disproportionately distributed through the EMA. There are some unauthorized roads that have been recommended by the AGFD as important for hunting and dispersed camping access and they support the retention of most existing forest system roads.

The portion of the Peloncillos in New Mexico is located within Game Management Unit 27 (2009-2010 New Mexico Big Game and Trapper Rules and Information, New Mexico Dept. of Game and Fish, NMDGF) Permit availability for the 2009-2010 general deer hunt is as follows:

Antlered mule deer- 11/07/09 to 11/11/09- 25 permits,
11/14/09 to 11/18/09- 25 permits;
Antlered whitetailed deer- 11/07/09 to 11/11/09- 25 permits,
11/14/09 to 11/18/09- 25 permits
(100 total permits for the general hunt).

Off-Highway Vehicle Management

The increasing popularity of off-highway vehicles (OHVs), particularly all terrain vehicles (ATVs), means places to ride and drive are more and more in demand. The Peloncillo EMA receives a significant increase in traffic from this type of use, but the majority of traffic is confined by terrain to existing roads and trails. The impacts here are not extreme as compared to other areas of the Forest, such as the east side of the Santa Rita EMA, Redington Pass in the Santa Catalina EMA or Providencia Canyon in the Huachuca EMA. As the more popular parts of the Coronado NF continue to receive more recreation use and become more crowded, it is likely OHV use will spread to the Peloncillo area. Locally, due to the prevalence of private gates being locked around the Forest boundary and available State land surrounding the Peloncillo EMA, pressure for access to meet community recreation needs is increasing and development of illegal access points may become more prevalent. Use by Border Patrol vehicles is also contributing to an increase in off-road use.

The rough terrain of the Peloncillo EMA makes it unsuitable for the development and maintenance of high density road networks that would support high OHV use. The existing primitive routes lead to trailheads, stock tanks, and areas where dispersed camping and hunting may occur.

Roads classified as unauthorized currently provide more areas for motorists to ride or drive; some of these are dead-end routes and do not substantially enhance the motorized recreation experience, while others provide access to trails and other recreation. Non-system roads that are classified as “unauthorized” in the transportation analysis may have been formed through legal, permitted uses such as range improvement projects or fuel wood cutting, and in some cases the roads then became useful roads for forest access. Some “unauthorized” roads are historic roads that were never added to the road system. These non-system roads have been used as though they were part of the road system, some for many years. Many non-system roads in this EMA have been identified as highly desirable for continued recreation and hunter access.

The noise and dust from OHVs, Border Patrol, and other vehicles can disturb visitors such as hikers, hunters, bird watchers and campers. Currently, most noise impacts are experienced within the Geronimo Trail road corridor. During some weekends and holidays, use of ATVs and frequency of traffic in general may detract from the experiences of people who seek quiet places to enjoy nature and escape the noise and bustle of the city.

Dispersed Motorized Camping

The Forest Land and Resource Management Plan (pp. 27, 28) provides for motorized dispersed camping as follows: “Vehicles may pull off roads or trails up to 300 feet for parking or camping.” Along many roads, parking and camping spots are limited by terrain, vegetation and rockiness. Frequently used motorized dispersed campsites, where evidence of camping such as fire rings can be seen, are usually readily identifiable. Some dispersed campsites are occupied only during hunting season and may not be obvious at other times of the year. The demand for opportunities for motorized dispersed camping continues to grow. The forest road system is used to access these dispersed campsites. If the 300 foot dispersed camping corridor were to be eliminated on some roads the only way access with vehicles could be allowed to campsites is by the designation of spur roads.

Responses to Specific Road Comments

While not officially Forest System roads, some non-system roads classified as unauthorized are currently being used by both the Forest Service and other agencies for administrative purposes and by the public. AGFD and Douglas Ranger District personnel have recommended that some of these be evaluated for addition to the forest road system based on their value for purposes such as hunter and general recreation access, contingent upon appropriate environmental and social analysis.

Those recommended for addition to or to keep in the forest roads system as open-authorized (OA) Maintenance Level 2 roads (open to the public) are as follows:

63-DispCG3	63-Tank Spur
63-0.63L-1	702
702 A	703
704	705
706	4324-0.04R-1
4324-4.69L-1	4325
4326	4326 A
4327	4331
4332	4333
4342	4345

It is recommended that NFS roads 704 A and 4330 as well as non-system road 4313-1.69L-1 be **decommissioned**, as they are no longer needed for recreation or administrative uses. In some cases, the roads have already disappeared on the ground, and others lead to areas already attainable by other roads.

The following system road is recommended to be changed to **ML1**: 4340.

Range Management

- *How does the road system affect access to range allotments?*

The Peloncillo Ecosystem Management Area contains approximately 88,083 acres and with 12 grazing allotments. Nearly every allotment has structural range improvements that have been constructed for the purpose of improving range management and the flexibility and functionality of the individual ranching operations. Most of these improvements need to be maintained on a regular basis, and the roads that service these improvements are crucial to the activity of ranching on these allotments. Many of these roads were developed in the past to either install or service certain range improvements, and have developed into a significant portion of the EMA transportation system. These roads are not only used by the permittees of the individual allotments, but in many cases are used by the public to access a great deal of the EMA where access is increasingly being locked off by private land accesses.

Properly managed livestock grazing is a sustainable and legitimate use of National Forest System lands. The roads described in the following pages are also used by the Forest Service to administer the grazing permits. Due to the remote nature and rough topography of the Peloncillo mountain range, these roads are crucial to access important areas of the allotments. Grazing activities must be aggressively monitored throughout the grazing season to ensure resource protection and compliance with the grazing permit, NEPA decisions, ESA section 7 consultations, and annual operating instructions to permittees.

Activities or reasons that these roads are needed for range management purposes include, but are not limited to the following:

- Access to range improvements (fences, corrals, cattleguards, pipelines, water delivery systems, earthen tanks) which must be checked, maintained, and repaired on a regular basis.
- The anticipated need for construction of new structural and non-structural range improvements identified through adaptive management and the NEPA process related to grazing authorizations and the development of AMPs.
- The past and current level of cross-country travel as demonstrated over the past 10 – 20 years for general range management and permit compliance purposes.
- The type and complexity of grazing management and frequency of livestock movements for range management purposes.
- The type of fences needing to be maintained (e.g., electric fences as opposed to traditional barbed wire fences).
- The need for checking the functionality of fences and the logistics involved in the transport of repair materials to fence line locations.
- The need and logistics for repair and maintenance of wildlife and other types of enclosures which are the responsibility of the grazing permit holder.
- The need for placing or staging supplements in strategic locations for livestock and grazing management purposes.
- The need to check gates potentially left open by other national forest users (e.g., recreationists and hunters).
- The need to attend to sick or injured livestock.

Though many of the roads within the Peloncillo EMA provide access for multiple uses, some only access certain range improvements or other areas of interest that only pertain to the grazing permittee. Those roads that are either locked off from the public due to private land access or that access areas only needed for permit activities should be authorized on a restricted basis to those that need access.

Changes from historic patterns of travel should not impair management of the allotment or substantially impact the operator's economic viability. Permittee access to manage allotments would be provided through a combination of the designated forest system roads and other access needs identified in their Term Grazing Permit. If not currently described in a Term Grazing Permit, access needs other than the designated system will be spelled out as a special provision in Part 3 of the Term Grazing Permit (either in the Allotment Management Plan (AMP), or directly as a special provision of the permit in Part 3) as presently being practiced. Since travel activities associated with Term Grazing Permits are on-going with a long history, additional NEPA and a formal decision would not be required.

The following table provides a list of recommendations for system roads to be left "as is" or **No Change (NC)** and non-system roads to be added to the system as either **Open Authorized (OA)** or **Open Authorized Restricted (OAR)**; maintenance level 2 (except where noted). These roads are currently being used to administer or implement grazing on National Forest lands.

Road Number	NC	OA	OAR	ML 1	Decom	Reasons/Recommendations
63-spur 1		x				Needed to access range improvements; permit administration
63-spur 2		x				Needed to access range improvements; permit administration
63-spur 3		x				Needed to access range improvements; permit administration
63-spur 4		x				Goes to Nurse Tank, Pumping station
63-0.63L-1		x				Goes to State Line Tank. Needed to access tank for future improvement maintenance.
63-tank spur		x				Needed to access range improvements; permit administration
702	x					Needed to access several allotments; range improvements; permit administration
702 A	x					Needed to access range improvements; permit administration
703	x					Needed to access range improvements; permit administration
704	x					Needed to access several allotments; range improvements; permit administration
704-14.51 R-1		x				Needed to access range improvements; permit administration; re-route as 704 A
705	x					Needed to access range improvements; permit administration
706				x		Needed to access Clanton Tank, recommend ML1
708	x					Needed to access range improvements; permit administration
4310	x					Needed to access range improvements; permit administration
4312	x					Needed to access range improvements; permit administration
4313	x					Needed to access range improvements; permit administration
4324					x	Needed to access range improvements; permit administration. Decommission

Road Number	NC	OA	OAR	ML 1	Decom	Reasons/Recommendations
						section south of private land, and rename 63-spur 1 as 4324
4324-4.69L-1		x				Add as OA; needed to access range improvements, road access around private land
4324-4.90R-1						Within 300 feet of existing road, treat as dispersed camping area
4325	x					Needed to access range improvements; permit administration
4326	x					Existing alignment needed to access range improvements; permit administration
4326A	x					Needed to access range improvements; permit administration
4327	x					Needed to access range improvements; permit administration
4329	x					Needed to access range improvements; permit administration
4331	x					Needed to access entire allotment; range improvements; permit administration. Only access to permittee's house.
4332	x					Needed to access range improvements; permit administration
4333	x					Needed to access range improvements; permit administration
4334	x					Needed to access range improvements; permit administration
4335	x					Needed to access range improvements; permit administration
4335-5.46L-1			x			Needed to access range improvements; permit administration
4335-5.46L-2			x			Needed to access range improvements; permit administration
4335 A			x			Needed to access range improvements; permit administration
4336	x					
4340				x		Access to Cowan Tank, recommend ML1
4342	x					Needed to access range improvements;

Road Number	NC	OA	OAR	ML 1	Decom	Reasons/Recommendations
						permit administration
4342-4.10R-1		x				Needed to access range improvements; permit administration
4342-4.10L-1		x				Needed to access range improvements; permit administration
4345	x					Needed to access range improvements; permit administration
4347	x					Needed to access range improvements; permit administration
4821	x					Needed to access range improvements; permit administration

Biology

- What ecological attributes, particularly those unique to the region, would be affected by “roading” of currently “unroaded” areas?
- To what degree do the presence, type, and location of roads increase the introduction and spread of exotic plant and animal species, insects, diseases, and parasites?
- What are the potential effects of such introductions to plant and animal species and ecosystem function in the area?
- To what degree do the presence, type, and location of roads contribute to the control of insects, diseases, and parasites?
- How does the road system affect ecological disturbance regimes in the area?
- What are the adverse effects of noise caused by developing, using, and maintaining roads?
- What are the direct effects of the road system on terrestrial species habitat?
- How does the road system facilitate human activities that affect habitat?
- How does the road system affect legal and illegal human activities (including trapping, hunting, poaching, harassment, road kill, or illegal kill levels)? What are the effects on wildlife species?
- How does the road system directly affect unique communities or special features in the area?
- Do areas planned for road entry, closure, or decommissioning have unique physical or biological characteristics, such as unique natural features and threatened or endangered species?
- How and where does the road system facilitate the introduction of non-native aquatic species?
- To what extent does the road system overlap with areas of exceptionally high aquatic diversity or productivity, or areas containing rare or unique aquatic species or species of interest?
- What are the traditional uses of animal and plant species within the area of analysis?

- How and where does the road system restrict the migration and movement of aquatic organisms?
- What aquatic species are affected and to what extent?

1. What ecological attributes, particularly those unique to the region, would be affected by the roading of current unroaded areas?

The Peloncillo Mountain Range on the Douglas Ranger District rises from semi-desert grasslands at approximately 3,000 ft to approximately 6,600 ft in the north Peloncillos. The elevational gradient results in a diversity of plant and animal species that form a variety of biotic communities in the mountain range. These biotic communities include Desert scrub, Semi-desert Grassland, Madrean Evergreen Oak Woodland, Interior Chaparral with Chihuahan pine stringers in some drainages.

Within these biotic communities a large variety of vegetation associations provide habitat for a huge array of wildlife species. Of particular concern to land managers are species included on the Federal List of threatened and Endangered species, the Regional Forester's Sensitive Species List (Revised 2007), and the List of Management Indicator Species (MIS) found in the Coronado National Forest Land Resource management. The table below includes the list of special status species that are known to occur or could potentially occur in the Galiuro Mountains.

The Peloncillo EMA is located in Cochise County, Arizona and Hidalgo County, New Mexico. Southern Arizona is a destination for winter visitors and year-round recreation due to its mild climate and, to a large extent, because of the availability of a high quality wildland experience on the Coronado National Forest.

The Peloncillo Mountains currently have areas of restricted access, due to road closures on private lands adjacent to the Forest. The main access point is from Douglas east across Geronimo Trail, which roughly bisects the range. There are no recreational residence/summerhome areas. Two Wilderness Study Areas (Bunk Robinson and Whitmire) exist in the Area. The primary uses of this mountain range are hiking/horseback riding and hunting, with some visitors taking advantage of bird watching and other sight-seeing opportunities.

The potential effects of roads to certain special status species of the Peloncillo EMA are described below in the table. Federally Listed Species such as the Mexican Gray Wolf, Northern Aplomado Falcon and Jaguarundi are not discussed because potential effects are remote since there are no known recent records of occurrence on the Forest. A few Forest Service sensitive species are discussed in detail where there are particular concerns related to road construction. For the remainder of Sensitive species, there is a general discussion of potential impacts that are common to whole groups of species. The same is true of MIS species discussions.

The Peloncillos are one of many rural mountain ranges in Southern Arizona. Traffic in and around this mountain range tends to be fairly low, with an influx of use during the hunting seasons. Illegal immigrant activity is high in this remote, rugged range.

Generally, road systems can contribute to the presence of urbanization effects that can affect far greater areas than just the road sites themselves; it can also result in changes in wildlife and plant communities of a variety of taxa (unit used in the science of biological classification).

Urbanization affects forest dwelling bird communities by favoring certain species while selecting against others (Marzluff 1997). Similar effects may be expected for other taxa especially small mammals (Marzluff *ibid*). The presence of domestic pets such as dogs (which is common at many of the campgrounds) can increase nest failure in many bird species and may affect changes in distribution of small mammal and reptile species. The increase of both native and non-native predators can cause increased reproductive failure in the vicinity of the urban areas. While these effects are currently minimized due to few access points to this EMA, there is a potential for increasing effects as visitor numbers rise. Even low-density camping areas can affect the adjacent plant communities through trampling, soil compaction, and brush removal.

In addition to mortalities due to road-building and the ensuing traffic using the road, continual modification of the physical environment occurs long after a road is opened. Factors such as soil compaction, increased surface temperature, and decreased moisture content may seem innocuous, but most people have seen the potential for animals, reptiles especially, to be drawn to the residual warmth held by roads. Dust continually raised by driving along dirt roads may settle onto plants adjacent to the road, blocking photosynthesis; this same dust can then be introduced into water systems as sediment and contaminants to ecosystems (Trombulak and Russell 2000).

The majority of the Peloncillo Mountains are unsuitable for road building due to steep terrain and existing wilderness designation. The majority of roads entering this EMA end within 2 miles of the Forest Boundary, as the slope increases sharply or inventoried roadless area designation takes precedence beyond this point. Additional roads in these areas would tend to produce the undesirable effects seen along the developed highway corridors.

Table 4.12 Threatened, Endangered, Proposed and Sensitive Animal and Plant Species known or suspected to occur on the Peloncillo Mountains, Douglas Ranger District:

Common Name	Scientific Name	Status
Lesser Long-nosed Bat	<i>Leptonycteris yerbabuena</i> ¹	Endangered
Mexican Long-nosed Bat	<i>L. nivalis</i>	Endangered
Jaguar	<i>Panthera onca</i>	Endangered
New Mexico Ridge-nosed Rattlesnake	<i>Crotalus willardi obscurus</i>	Threatened
Chiricahua Leopard Frog	<i>Rana chiricahuensis</i>	Threatened

Lesser Long-nosed Bat/Mexican Long-nosed Bat - Endangered.

It is possible that this species could roost in the Peloncillo EMA, but no known roosting sites have been positively identified. These bats are likely to forage in the area, particularly in the southern end of this mountain range. In this area, the bats feed mainly on agave. Apart from direct disturbance of roost sites, potential effects to this taxon are associated with the loss of food plants. The majority of sites that provide quality foraging habitat for the species are not accessible by Forest roads. Creation of additional

¹ = *Leptonycteris curasoae yerbabuena*. *Leptonycteris curasoae* is now generally considered a separate species, and does not occur in the United States of America. (Wilson and Reeder 2005)

roads in these areas could impact the food plants for this species, leading to adverse effects to the species. While unlikely, creation of roads near roosting areas could disturb breeding and roosting activities.

Jaguar- Endangered.

The natural history of the Jaguar can be referred to in the 1998 BA and 2002 BO. Jaguars are rare in the United States. At least three individuals are known to occur in the United States, at least two of which are considered residents, as they have been photographed numerous times during the past several years (Emil McCain, pers. comm.). All of these animals are in SW New Mexico and SE Arizona, between the Animas Mountains of SW New Mexico and Baboquivari Mountains of SE Arizona. There is currently no indication there is a breeding population in the US, because no females or cubs have been reported. The nearest known breeding population is about 130 miles south of the border in Sonora. In New Mexico, a Jaguar was confirmed in the Peloncillos in 1996. More recently, a Jaguar was confirmed in the Animas Mountains (just east of the Peloncillo Mountains) in February 2006. Thus, the Jaguar should be considered present, at least intermittently, in the Peloncillos.

New Mexico Ridge-nosed Rattlesnake-Threatened.

Natural history information on this species can be found in the recovery plan, the 2002 BA, the 2002 BO, and the 2005 BA and BO. It is endemic to three small, isolated mountain ranges: the Peloncillos, Animas, and San Luis. It is very rarely encountered in the Peloncillo Mountains, requiring 30 or more person-days to locate a single individual. An analysis of its habitat, based on plant associations of known occurrences, was conducted by Holycross and Smith (2001). Their product is a useful map showing potential habitat ranked by likelihood of occurrence, but was aimed at fire and fuel reduction projects. All of the six allotments have what Holycross and Smith (2001) have ranked as class 3-4 sites, meaning canyons and draws likely or probably supporting NMRR. However, the only known localities are on the Maverick and Walnut Canyon allotments (according to the map). Also, some key habitat elements, such as steep, rocky intermittent streams, are lacking from most of the land base of these allotments. There is no framework for effects determinations (USFS 2004) for the NMRR. The 2002 BA presents may affect, likely to adversely affect determinations for all grazing allotments in the Peloncillos, and the 2002 BO concurs.

Chiricahua Leopard Frog – Threatened.

The Peloncillos are in RU 3 (Chiricahua Mountains-Malpai Borderlands-Sierra Madre). Within RU3, they are in the Peloncillo Mountains/Animas and San Bernardino Valleys MA. In the 2002 BA, there is a statement that CLF had not been documented within the past 10 years. However, CLF are extant in the Peloncillos. As of spring/summer 2007, they had been documented in Cloverdale Creek and the adjacent cienega, as well as the house pond and overflow at the headwaters. They had been documented using metal stock tanks on roads adjacent to Cloverdale Creek. Farther downstream they are known from Cloverdale Spring and the associated pond. I visited these sites on 26 and 27 June 2007, but did not see any CLF, except at the ranch house overflow. However, T. Hare (pers. comm., 27 June 2007) informed me that these localities are indeed occupied. These localities should be considered populations of one of the very few remaining (for the entire species) metapopulations. Except for a portion of Cloverdale Creek and a portion of the cienega, these localities are on private in-holdings. The Forest Service holdings are on the Robertson allotment. The CLF is also known from State Line Tank on the Geronimo allotment, just inside the New Mexico border of Arizona.

Table 4.13 Sensitive Animal and Plant Species known to or suspected to occur on the Peloncillo Mountains, Douglas Ranger District:

Forest Service Sensitive Species			
<u>AMPHIBIANS</u>	<i>Rana yavapaiensis</i>	Lowland leopard frog	SEN
<u>BIRDS</u>	<i>Falco peregrinus anatum</i>	American peregrine falcon	SEN
	<i>Accipiter gentilis apache</i>	Apache northern goshawk	SEN
	<i>Buteogallus anthracinus</i>	Common black hawk	SEN
	<i>Meleagris gallopavo mexicana</i>	Gould's wild turkey	SEN, MIS
	<i>Otus trichopsis</i>	Whiskered screech owl	SEN
	<i>Cynanthus latirostris</i>	Broad-billed hummingbird	SEN
	<i>Hylocharis leucotis</i>	White-eared hummingbird	SEN
	<i>Calypte costae</i>	Costa's hummingbird	SEN
	<i>Camptostoma imberbe</i>	Northern beardless tyrannulet	SEN
<u>INSECTS</u>	<i>Ophiogomphus arizonicus</i>	Arizona snaketail	SEN
	<i>Atrytonopsis cestus</i>	Cestus skipper	SEN
	<i>Piruna polingii</i>	Four-spotted skipperling	SEN
<u>REPTILES</u>	<i>Aspidoscelis burti stictogrammus</i>	Giant spotted whiptail	SEN
	<i>Heloderma suspectum suspectum</i>	Reticulate Gila monster	SEN
	<i>Gopherus agassizii</i> (Sonoran Population)	Sonoran Desert tortoise	SEN
<u>PLANTS</u>	<i>Salvia amissa</i>	Galiuro sage	SEN
	<i>Potentilla albiflora</i>	White-flowered cinquefoil	SEN
	<i>Physalis latiphysa</i>	Broadleaf ground cherry	SEN
	<i>Heuchera glomerulata</i>	Arizona alum root	SEN
	<i>Erigeron heliographis</i>	Heliograph Peak Fleabane	SEN
	<i>Castilleja nervata</i>	Trans-Pecos Indian Paintbrush	SEN
	<i>Carex ultra</i>	Cochise Sedge	SEN
	<i>Penstemon discolor</i>	Catalina beardtongue	SEN
	<i>Carex chihuahuensis</i>	Chihuahuan sedge	SEN
	<i>Abutilon parishii</i>	Pima indian mallow	SEN
	<i>Hieracium rusbyi</i>	Rusby hawkweed	SEN

FS Sensitive Species General Discussion - Construction and maintenance of roads in currently un-roaded areas has the potential to impact a variety of species in similar ways. Bird species are

impacted most by fragmentation of habitat, disturbance during breeding season, and changes in habitat due to introduction of non-native plants and altered fire regimes. Increased encroachment on un-roaded areas results in impacts related to urbanization described at the beginning of this section. Plant species are also affected through direct disturbance of individuals from road construction or creation of wildcat roads. Additional effects to plant species can result from increased illegal collection of rare species and the introduction of non-native competitors that degrade habitat quality or alter natural fire regimes. Similarly, insect species are also potentially impacted by the introduction of non-native plants along travel corridors. Most frequently, non-native plants compete with and exclude native plant species that function as host plants for insects during some part of their complex life cycles.

Table 4.14 Management Indicator Species*

	Group	Species
1	Cavity Nesters	Elegant trogon Sulphur-bellied flycatcher Other primary and secondary cavity nesters
2	Riparian Species	Gray hawk Blue-throated hummingbird Elegant trogon Rose-throated becard Thick-billed kingbird Sulphur-bellied flycatcher Northern Beardless tyrannulet Bell's vireo Black bear
3	Species Needing Diversity	White-tailed deer Merriam's turkey Elegant trogon Sulphur-bellied flycatcher Buff-breasted flycatcher Black bear
4	Species Needing Herbaceous Cover	White-tailed deer Montezuma quail Pronghorn antelope Desert massassauga Baird's sparrow
5	Species Needing Dense Canopy	Bell's vireo Northern beardless tyrannulet Gray hawk
6	Game Species	White-tailed deer Montezuma quail Pronghorn antelope Black bear
7	Special Interest Species	Montezuma quail Gray hawk Blue-throated hummingbird Elegant trogon Rose-throated becard Thick-billed kingbird Sulphur-bellied flycatcher Buff-breasted flycatcher

	Group	Species
		Northern beardless tyrannulet Five-striped sparrow
8	Threatened and Endangered Species	Desert bighorn sheep Gray hawk Peregrine falcon Blue-throated hummingbird Coppery-tailed (Elegant) trogon Rose-throated becard Thick-billed kingbird Sulphur-bellied flycatcher Buff-breasted flycatcher Northern beardless tyrannulet Bell's vireo Baird's sparrow Five-striped sparrow Mexican stoneroller Arizona (Apache) trout Gila topminnow Gila chub Sonora chub Desert massassauga Twin-spotted rattlesnake Arizona ridge-nosed rattlesnake Huachuca (Sonora) tiger salamander Tarahumara frog Western barking frog Spikedace Arizona treefrog Mt. Graham spruce (red) squirrel Gould's turkey

*Management Indicator Species, or MIS, are organized into groups that represent their dependence on various habitat characteristics or their importance to humans. Groups 1 through 6 in the table above can all be impacted through the alteration of habitat from the introduction of non-native plants or directly by the loss of key habitat components such as the loss of dead trees that provide nesting cavities for group 1 species, for instance. *Note: Not all species in the above table occur on this EMA; however, the various characteristics under which the indicators are grouped are still important to the overall analysis of impacts.*

2. To what degree do the presence, type, and location of roads increase the introduction and spread of exotic plant and animal species, insects, diseases, and parasites?

Roads provide corridors for the introduction and spread of non-native species. The Peloncillo EMA is somewhat threatened by this because it is fairly close to Tucson, and the number of visitors is increasing annually. More visitors from Tucson and Phoenix are also learning about the beauty that can be found in this range. Developed areas are immense sources of non-native plants that are used as ornamental landscaping. Additionally, other governmental agencies in the region have used many of the invasive species as erosion control or as landscaping along roadways.

Lehmann lovegrass (*Eragrostis lehmanniana*) and Boers lovegrass (*E. chloromelas*), introduced into the southwest in the early 1930s, has invaded low-elevation (3000 to 4500 feet) grasslands around the base of the nearby ranges. While roads may have been a factor in its spread (highway rights of way were seeded with Lehmann lovegrass), there is no feasible control for non-native lovegrass.

Non-native organisms have been a major factor implicated in declines of native amphibians and fish throughout western North America. Eradication of non-native amphibians and fish species, such as green sunfish (*Lepomis cyanellus*), has been a focus of the Coronado National Forest in recent years. While state and federal agencies no longer intentionally introduce bullfrogs or green sunfish in Arizona, well-intentioned private individuals who are unaware of the repercussions of their actions still move bullfrogs and sunfish about. Existing roads accessing springs and riparian areas may facilitate the spread of bullfrogs and other non-native organisms.

3. What are the potential effects of such introductions to plant and animal species and ecosystem function in the area?

Not all non-native species are a problem, but some aggressively out-compete native species. Lehmann lovegrass dominates some low-elevation grassland areas, affecting both the presence of native grasses and wildlife species and the natural fire regime. This species produces abundant herbage that, when dry, may provide fuel for wildfires. There is also some concern that lovegrass seeds and foliage are not as valuable as food sources as native grasses would be. The potential impacts from bullfrog introduction include potential for large quantities of predation on other vertebrate and invertebrate species that are native to the area, including the Chiricahua leopard frog, which was determined by the USDI Fish and Wildlife Service to be a Threatened species.

4. To what degree do the presence, type, and location of roads contribute to the control of insects, diseases, and parasites?

The road system may provide portions of fire lines that can be used during the implementation of prescribed fires, which can help manage the problems listed above. More remote portions of the range are best accessed by trail on foot or horseback.

5. How does the road system affect ecological disturbance regimes in the area?

The primary ecological disturbances in the Peloncillo EMA are drought, wildfire, and flood. Roads have no effect on drought but may increase the incidence of wildfire by providing access to areas of dense fuel and leading to camping areas where campfires may be allowed to escape from fire rings. Flooding in the Peloncillo EMA occasionally occurs during years of heavy monsoon rains or El Niño winters, and has been known to cause severe damage to Forest and non-Forest roads.

6. What are the adverse effects of noise caused by developing, using, and maintaining roads?

Current maintenance effects are currently those that are directly road-related, such as temporary increases in dust and noise levels, as well as reduced wildlife crossings. However, if visitor numbers continue to increase, there will likely be increased effects, including, trampling effects at campgrounds, hunting, and use of OHV's off roads and trails. Border Patrol use has increased substantially in the Peloncillos.

If the area were developed further, as would likely to occur when surrounding ranchland and State Trust Lands are sold to developers, then increasing urbanization effects may be seen along roads and along Forest boundary lands. Urbanization affects forest dwelling bird communities by favoring certain species while selecting against others (Block and Finch 1997). Similar effects may be expected for other taxa especially small mammals (Block and Finch *ibid*). The presence of house pets such as dogs increases nest failure in many bird species and may affect changes in distribution of small mammal and reptile species. The increase of both native and non-native predators can cause increased reproductive failure in the vicinity of the urban areas. Even low-density urban areas such as summer home areas can affect the adjacent plant communities through trampling, soil compaction, and brush removal. These changes can favor one species over another due to disturbance tolerance or loss of suitable foraging or breeding habitat. As an example, the cliff chipmunk generally benefits from increased urbanization and human presence.

7. What are the direct effects of the road system on terrestrial species habitat?

Roads can fragment habitat and disrupt wildlife migration corridors. In addition to fragmenting the habitat and reducing habitat availability, high road density can translate to a higher incidence of vehicle-caused mortality.

The roads analysis has taken potential for habitat damage into consideration throughout the Peloncillo EMA, and a small number of roads have been selected for removal in order to prevent damage that could harm existing improvements that benefit wildlife and domestic species.

8. How does the road system facilitate human activities that affect habitat?

Roads within the Peloncillo EMA provide access for hunters, hikers, and other recreationists. In some areas, people travel through Forest to areas where fishing may occur (Geronimo Tank). Along the way, there is potential for stock tanks to receive influxes of live bait, such as green sunfish, that can prey on native vertebrate and invertebrate species.

9. How does the road system affect legal and illegal human activities (including trapping, hunting, poaching, harassment, road kill, or illegal kill levels)? What are the effects on wildlife species?

See discussion under #6 above.

10. How does the road system directly affect unique communities or special features in the area?

See above.

11. Do areas planned for road constructing, closure, or decommissioning have unique physical or biological characteristics, such as unique features and threatened or endangered species?

Not within the scope of this project. Roads are not planned for construction on this EMA under this project. Any future projects that would involve such potential would be consulted upon individually in order to minimize and/or mitigate effects.

12. How and where does the road system facilitate the introduction of non-native aquatic species?

See above.

13. How and where does the road system overlap with areas of exceptionally high aquatic diversity or productivity or areas containing rare or unique aquatic species or species of interest?

As mentioned earlier in this report, the majority of roads do not penetrate deep into Forest land on this EMA; there are no areas of exceptionally high aquatic species diversity or productivity crossed or accessed by Forest roads.

14. What are the traditional uses of animal and plant species within the area of analysis?

Wildlife viewing, hunting, camping, and hiking are the primary uses. There are thirteen grazing allotments within this EMA, with some degree of use at all elevations.

15. How and where does the road system restrict the migration and movement of aquatic organisms?

Currently, no barriers to fish movement seem to exist as a by-product of road presence.

16. What aquatic species are affected and to what extent?

None.

17. For roads receiving specific wildlife-related comments from the public, what response is given?

Forest Roads 702, 705 and 4327 should all be kept open (OA) to access wildlife related locations (i.e, Gould's turkey roost, wildlife waters) for maintenance.

Cultural Resource Issues

Guidelines for conducting a Transportation Analysis suggest addressing three questions pertinent to heritage resources:

- How does the road system affect access to paleontological, archaeological, and historical sites?
- How does the road system affect cultural and traditional uses (such as plant gathering, and access to traditional and cultural sites) and American Indian treaty rights?
- How are roads that are historic sites affected by road management?

As of March 2010, a total of 61 cultural-resource sites had been recorded within the Peloncillo Mountains EMA and entered into the Forest's geographic information system (GIS) database. The majority of these sites are Native American habitations and artifact scatters, though a small number of historic-period sites have been recorded, including ranches and Forest Service administrative facilities. Only a small portion of one site -- a prehistoric village site in Cloverdale Valley -- has been listed on the National Register of Historic Places; most of this site is on private land.

Guidelines for conducting a Travel Analysis are given in the Forest Service publication *Roads Analysis: Informing Decisions about Managing the National Forest Transportation System* (Misc. Rep. FS-643, 1999). That report suggests three questions pertinent to cultural uses and heritage resources:

- *How does the road system affect access to paleontological, archaeological, and historical sites?*
- *How does the road system affect cultural and traditional uses (such as plant gathering, and access to traditional and cultural sites) and American Indian treaty rights?*
- *How are roads that are historic sites affected by road management?*

Each of these questions will be addressed in turn:

- *How does the road system affect access to paleontological, archaeological, and historical sites?*

At a general level, the road system provides access to all of the sites in the Peloncillo Mountains Ecosystem Management Area. Access provided by the road system in the area can affect paleontological, archaeological and historical sites both positively and negatively. The primary positive affect of road system is the access provided for authorized visitation and site maintenance of a small number of sites. Without road access, many sites would be rarely visited by either the public or Forest Service personnel. It would be much more difficult to monitor sites and ascertain whether any damage is occurring. On the other hand, road access exposes sites to damage by unauthorized artifact collectors and vandalism.

No known paleontological sites in the Peloncillo Mountains EMA rely on Forest roads for access.

- *How does the road system affect cultural and traditional uses (such as plant gathering, and access to traditional and cultural sites) and American Indian treaty rights?*

As with heritage-resource sites, in a general sense, the road system provides to all areas of traditional and cultural use. No traditional-use areas have been specifically identified in the three mountain ranges of the Peloncillo Mountains EMA. Until the late 1800s, the mountains were part of the homeland of the Chiricahua Apaches. The forced removal of Chiricahua Apaches from Arizona in 1886 and their subsequent prisoner-of-war status in Florida, Alabama, and Oklahoma brought an abrupt and long-lasting halt to use of the mountain ranges by the Chiricahua Apaches. Skeleton Canyon, the location of Geronimo's surrender to the US Army in 1886, is a location that is considered to be of historic significance by the descendants of the Chiricahua Apaches, now members of the Mescalero Apache Tribe in New Mexico and the Ft. Sill Apache Tribe in Oklahoma. Presently, access to Skeleton Canyon and NFSR 702, is restricted by an off-Forest land owner. In previous consultations, representatives of Ft. Sill and Mescalero have expressed concern about the reduced access to the Forest lands from surrounding private lands, including to the Skeleton Canyon and to the Peloncillo Mountains. Neither the Chiricahua Apache descendants nor any other Native American tribes with traditional ties to the Peloncillo Mountains EMA has any recognized treaty rights pertaining to Forest-administered lands.

- *How are roads that are historic sites affected by road management?*

No sites in the Peloncillo Mountains EMA have been assigned cultural-resource site numbers in recognition of being historic sites. A small number of are considered candidates for recognition as historic sites but have not been recorded and evaluated. These include the Geronimo Trail (NFSR 63), built by a depression-era construction project involving local counties and the Coronado NF, and the Skeleton Canyon Road, the first Forest Service-funded road built in the mountains. Only the west end of the Skeleton Canyon route, built in the 1910s, is still passable to vehicular traffic (NFSR 702). It is recommended that no effort to make the impassable portion of the road passable be made before the effects to historic values of the road are evaluated. Routine maintenance of the Geronimo Trail does not affect the qualities that make it of historic interest. Preservation and protection of surviving historic road features is considered important to maintaining their historic values.

Fire Protection & Safety

The Peloncillo Mountains Ecosystem Management Area (EMA) is located in both Cochise County, Arizona (19% of the EMA) and Hidalgo County, New Mexico (81% of the EMA) near the incorporated and unincorporated communities of Apache, Douglas, and Portal, Arizona, and Animas, Lordsburg, Rodeo, New Mexico. The ±87,985 acres EMA is somewhat remote and rural in nature, with large unroaded areas, very limited permanent legal public access, and no developed recreation sites.

The goal of transportation analysis is to retain those roads necessary to meet the multiple use management objectives of the analysis area and retain the ability to access the area for fire suppression and use of roads as a possible control feature for planning purposes. The retention of roads is especially important in the wildland urban interface, not only as possible holding and control features, they may also be important to public and firefighter safety because of their use as ingress and egress routes to and from private property. Road access is a major issue for all emergency resources. Most roads on the Douglas Ranger District do not provide access to large fire trucks. Firefighters are challenged by narrow roads and limited access. Most Forest Service engines lack the clearance for most maintenance level 2 roads, although these existing roads may provide adequate control lines for burnout operations. Roads that access trailheads should be kept. Existing roads that also provide accesses to desirable recreational areas are also necessary. The major problem for this area is the lack of permanent legal access to get to the existing roads on the forest lands, which in some cases have been locked off by adjacent private land owners.

All roads will be analyzed for possible uses that meet management objectives and may include access to range improvements, dispersed camp sites, access to private land and other recreational sites. There are legitimate reasons behind decisions to close roads in the analysis area. These include, but are not limited to, the following reasons:

- An excessive number of roads have emerged and must be reduced to meet management objectives.
- There are more roads than funding to manage them.
- Some roads are creating soil and water issues due to severe erosion problems.
- Where more than one road arrives at the same destination, only one is needed.
- Unnecessary dead end spur roads with no purpose will be targeted for closure and obliteration.
- Crossover or shortcut roads must also be eliminated.
- Wildcat roads, or roads created by illegal off road activity that result in resource damage and will be closed.
- Roads that now exist and are not system roads will be considered for retention if their existence is necessary to meet management objectives.

The following table provides a list of recommendations for roads that currently exist on the ground. System roads that are not mentioned are recommended to remain in the system as open authorized (OA). Currently existing non-system roads that may be recommended for retention and added to the system are considered to be the minimum roads system for the EMA and may be listed as open authorized (OA) or open authorized restricted (OAR). All are maintenance level 2 unless otherwise noted.

Road Number	Recommendation	Notes
63- Disp CG 3	OA	Needed for dispersed camping access.
63- spur 1	OA	Access to range improvements. No public access. No trespassing sign. OA.

Road Number	Recommendation	Notes
63- spur 2	OA	4324 road that this connects to does not exist? Not showing much on imagery. Recommend OA for range improvement access.
63- spur 3	OA	Recommend OA for range improvement access.
63- spur 4	OA	Recommend OA for range improvement access. Exists all the way to storage tank.
63-Tank spur	OA	Needed for dispersed camping and hunting access. Recommend OA.
63 – 36.18R-1	OA	OA for range improvement access
63-0.63L-1	OA	OA for dispersed camping, hunting access.
704-14.51R-1	OA	Actually main access to 705. No public access. Admin access with permission. At least half off forest. Could be re-route for 704A which is not as good a road. Add as reroute for 704A; OA for FS admin access.
704 A	Decommission	Decommission and use 704-14.51R-1 as reroute.
707	OA/ML1	In IRA and WSA. Most does not exist on ground. Reverted to trail. Convert to ML1. (if in IRA and WSA should probably reevaluate this). Well-used campsite just south of 63. Within 300 ft corridor. On south end keep the part that goes across small section of private land. OA to Maverick Spring.
708	OA	The road is valuable as an access point and control feature for wildfires and Rx burns. It may be invaluable for future starts for suppression purposes and help control fire before they get to WUI areas threatened by our usual southwesterly winds.
4313	OAR	Change to OAR for range and administrative access. No public access.
4313-1.69L-1	Decommission	In roadless area. Soils concern. Decommission.
4324	See Notes	Public can get to north end. Could use 63-spurs to reroute around private land? South end does not exist on ground. Decommission from private land south.
4324-0.04R-1	OA	OA for dispersed camping access.
4324-0.76L-1	Decommission	Eroding

Road Number	Recommendation	Notes
4324-4.69L-1	OA	Pipeline. OA for alternative access around locked private land for hunting and dispersed camping access. The road also provides a control feature that can be used for a future wildfire and provide safety for Gualt Ranch
4324-4.90R-1		Within 300 foot dispersed camping corridor.
4326	Decommission	Recommend to Decommission 0.30 mi of old road alignment
4329	OAR	Change to OAR for range and administrative access. No public access. Change name.
4330	Decommission	Concur with decommission. Redundant.
4334	No change	No public access and needed for range improvement access
4335	No change	North 1.1 mile does not exist on ground. No public access.
4335-5.46L-1	OAR	Goes to range improvements. IRA -Do not add to system because in IRA but access is needed to range improvements. Authorized motorized access to improvements in range permit.
4335-5.46L-2	OAR	Goes to range improvements. IRA -Do not add to system because in IRA but access is needed to range improvements. Authorized motorized access to improvements in range permit.
4335 A	OAR	Locked by Hadleys. No access. OAR.
4336	No change	
4339	Decommission	Concur with decommission. Not needed.
4340	ML1	Road fenced off and has grown over. Change to ML1. May provide future access around private land. This road can also be used as a control feature and provide protection for the Robinson Ranch in a wildfire.
4342-4.10L-1	OA	Permittee needs access to range improvements. Authorized motorized access in permit.
4342-4.10R-1	OA	In IRA. Permittee needs access to range improvements. Authorized motorized access in permit.

Minerals

The objective is to assure that the Coronado National Forest provides adequate access for commercial mineral prospecting, and exploration while minimizing damage to natural resources in the areas with these activities as well as meeting forest wide transportation requirements and standards.

At present, there are no active or potentially active mineral projects within the Peloncillo EMA and there has been very little historic mineral activity in that area, Therefore, there is no need to keep a road inventory for mineral purposes alone if it does not serve any other Forest needs or purposes. All mineral projects on Forest lands must be operating under an approved plan of operations. An approved plan of operations would provide for access across Forest system roads designated as open and available, and may grant use of restricted routes under the terms of the approved plan. User-created or other non-system routes, maintenance level 1 roads, and temporary, low standard temporary access routes constructed for the proposed project may be considered for use under an approved plan if that use is compatible with other Forest objectives provided that the operator assumes responsibility for final closure and reclamation if that is desired by the Forest.

None of the proposed changes to the forest road system in this report will adversely impact mineral related activity in the Peloncillo EMA.

Step 5- Describing Opportunities and Setting Priorities

The purpose of this step is to:

- Describe the minimum road system
- Describe modifications to the existing road system that would achieve desirable or acceptable conditions

The Products of this step are:

- A map of the current and proposed road system

The Minimum Road System

36 CFR 2.2.5 (b) a portion of the Travel Management Rule states:

“...b) Road system—(1) Identification of road system. For each national forest, national grassland, experimental forest, and any other units of the National Forest System (Sec. 212.1), the responsible Official must identify the minimum road system (MRS) needed for safe and efficient travel and for administration, utilization, and protection of National Forest System lands. In determining the minimum road system, the responsible Official must incorporate a science-based travel analysis at the appropriate scale and, to the degree practicable, involve a broad spectrum of interested and affected citizens, other

state and federal agencies, and tribal governments. The minimum system is the road system determined to be needed to meet resource and other management objectives adopted in the relevant land and resource management plan (36 CFR part 219), to meet applicable statutory and regulatory requirements, to reflect long-term funding expectations, to ensure that the identified system minimizes adverse environmental impacts associated with road construction, reconstruction, decommissioning, and maintenance.”

This step compares the current condition to a desired future condition to help identify the opportunities and need for change. This step provides the information to develop the Forest’s strategic intent for road management; that is, to balance the need for decommissioning or retaining unauthorized and authorized roads with the need to minimize risk to public safety and damage to natural resources. Before implementing any proposed actions the Forest will complete the NEPA process. During the NEPA process, however, roads may be added or deleted from the recommended system.

Another consideration in developing the minimum road system is maintenance. However, some maintenance level 2 roads only need routine maintenance every few years rather than annually. Creating a road system to match the available funds by simply closing roads will not result in a road system that meets the access needs for public or for administrative purposes.

The IDT analyzed the extent and current condition of roads on national forest system lands within the project area. The IDT recommended the minimum road system for this EMA using the direction in 36 CFR 212.5 (b). The recommendations and issues associated with the identified roads and motorized trails on this EMA are described in the table below.

Table 5.1 – Recommended Minimum Transportation System

Table 5.1		PROPOSED RECOMMENDATIONS									Peloncillo EMA
Road Number	No Change	NFSR - OA: Open Authorized (Miles)	NFSR - OAR: Restricted Use (Miles)	NFSR - Maintenance Level 1 (Miles)	Decommission (Miles) - System Road	Decommission (Miles) - Non-system Rd	Proposed New Construction	Convert to OHV Trail	Convert to Non-Motorized Trail	Is located Within 300 Ft corridor	DESCRIPTION
63	X										Geronimo Trail - no change
63-0.63L-1		0.21									Dispersed CG - Recommend to add as NFSR; ML2
63-36.18R-1		0.54									Nonsystem Rd - Recommend to add as NFSR; ML2 for range improvement access and public use
63- DispCG 1										X	Nonsystem Rd - located in 300 ft corridor
63- DispCG 2										X	Nonsystem Rd - located in 300 ft corridor
63- DispCG 3		0.08									Dispersed CG - Recommend to add as NFSR; ML2
63- Pvt Rd											Off Forest - Not Analyzed
63-spur 1		1.51									Nonsystem Rd - Recommend to add as NFSR; ML2 for range improvement access
63-spur 2		0.74									Nonsystem Rd - Recommend to add as NFSR; ML2 for range improvement access
63-spur 3		1.84									Nonsystem Rd - Recommend to add as NFSR; ML2 for range improvement access

Table 5.1		PROPOSED RECOMMENDATIONS									Peloncillo EMA
Road Number	No Change	NFSR - OA: Open Authorized (Miles)	NFSR - OAR: Restricted Use (Miles)	NFSR - Maintenance Level 1 (Miles)	Decommission (Miles) - System Road	Decommission (Miles) - Non-system Rd	Proposed New Construction	Convert to OHV Trail	Convert to Non-Motorized Trail	Is located Within 300 Ft corridor	DESCRIPTION
63-spur 4		0.38									Nonsystem Rd - Recommend to add as NFSR; ML2 for range improvement access
63-Tank spur		0.11									Nonsystem Rd - Recommend to add as NFSR; ML2 for range improvement access
338											Off Forest - Not Analyzed
338-pvt											Off Forest - Not Analyzed
702	X										Skeleton Canyon - no change
702 A	X										Bow Tank - no change
702 A- 4312						0.20					Nonsystem Rd - Recommend to Decommission
703	X										South Fork - no change
704	X										Deer Creek - no change
704-14.51R-1		0.43									Nonsystem Rd - Recommend to add as NFSR; ML2
704 A					0.89						Un-named - Recommend to Decommission
705	X										Dutchman - no change
706	X										Clanton Tank - no change

Table 5.1		PROPOSED RECOMMENDATIONS									Peloncillo EMA
Road Number	No Change	NFSR - OA: Open Authorized (Miles)	NFSR - OAR: Restricted Use (Miles)	NFSR - Maintenance Level 1 (Miles)	Decommission (Miles) - System Road	Decommission (Miles) - Non-system Rd	Proposed New Construction	Convert to OHV Trail	Convert to Non-Motorized Trail	Is located Within 300 Ft corridor	DESCRIPTION
707				4.80							Cloverdale - Recommend to change designation of 4.80 mi to ML1
708	X										Bunk Robertson Saddle -
4310	X										Geronimo Tank - no change
4312											Whitmire - On Private Not Analyzed
4313	X										North Deer - no change
4313-1.69L-1						1.00					Nonsystem Rd - Recommend to Decommission
4324					2.43						Eicks - Recommend to Decommission 2.43 miles; remainder to remain OA
4324-0.04R-1		0.15									Dispersed CG - Recommend to add as NFSR; ML2
4324-0.76L-1						0.33					Nonsystem Rd - Recommend to Decommission
4324-4.69L-1		0.82									Nonsystem Rd - Recommend to add as NFSR; ML2
4324-4.90R-1										X	Nonsystem Rd - located in 300 ft corridor
4325	X										Black CCC - no change
4326	X										Lasher - no change

Table 5.1		PROPOSED RECOMMENDATIONS									Peloncillo EMA
Road Number	No Change	NFSR - OA: Open Authorized (Miles)	NFSR - OAR: Restricted Use (Miles)	NFSR - Maintenance Level 1 (Miles)	Decommission (Miles) - System Road	Decommission (Miles) - Non-system Rd	Proposed New Construction	Convert to OHV Trail	Convert to Non-Motorized Trail	Is located Within 300 Ft corridor	DESCRIPTION
4326-old					0.30						Lasher - Recommend to Decommission 0.30 mi of old road alignment
4326 A	X										Un-named - no change
4327	X										Corral - historically continued up ridge; previously closed by Sky Island Alliance; Game & Fish recommend to extend road to route 4866
4327-0.22R-1										X	Nonsystem Rd - located in 300 ft corridor
4327-4866							1.18				Proposed new construction around private land
4329	X										Herrige - no change
4330					0.24						Irishman - Recommend to Decommission
4331	X										Bowers - no change
4332	X										Juniper Basin - existing ML 1 road; no change
4333	X										Buckhorn - no change
4334	X										Crescent Tank - no change
4335	X										Robinson - no change
4335 A			0.74								Robin - Recommend change designation to OAR; ML2

Table 5.1		PROPOSED RECOMMENDATIONS									Peloncillo EMA
Road Number	No Change	NFSR - OA: Open Authorized (Miles)	NFSR - OAR: Restricted Use (Miles)	NFSR - Maintenance Level 1 (Miles)	Decommission (Miles) - System Road	Decommission (Miles) - Non-system Rd	Proposed New Construction	Convert to OHV Trail	Convert to Non-Motorized Trail	Is located Within 300 Ft corridor	DESCRIPTION
4336	X										Sanford Tank - no change
4337	X										Cordy Cowan Tank - previously decommissioned road
4339					0.47						Coldwell - Recommend to Decommission segment on FS
4340				0.57							Cowan - Recommend to change designation to ML1
4342	X										Howard - no change
4342-4.10R-1		0.66									Nonsystem Rd - Recommend to add as NFSR (ML 2) for public and Border Patrol use
4342-4.10L-1		0.34									Nonsystem Rd - Recommend to add as NFSR (ML 2) for public and Border Patrol use
4345	X										Silver Tip - no change
4347	X										Un-named - previously decommissioned road
4821	X										Slover - previously decommissioned road
4866	X										Ridge - no change
TOTALS		7.81	3.90	5.37	4.33	1.53	1.18	0.00	0.00		

Step 6- Reporting

The Purpose of this step is to report the key findings of the analysis.

The products of this step are:

- A written report for this EMA and a Transportation Atlas showing existing routes and recommendations for the minimum road system.

Report

This report is available to the public, if requested and will become part of the EMA file. A map depicting all recommendations is in Appendix F.

Key Findings and Recommendations

The key findings and recommendations of this analysis which are based on Interdisciplinary Team (IDT) discussion, specialist expertise, and public input, include:

Open Authorized (OA)

The following roads are recommended to be added to the system as NFSR (OA) maintenance level 2 roads. It is recommended to add **7.81** miles of roads to the system.

Road Number	NFSR - OA: Open Authorized (Miles)
63-0.63L-1	0.21
63-36.18R-1	0.54
63- DispCG 3	0.08
63- spur 1	1.51
63- spur 2	0.74
63- spur 3	1.84
63- spur 4	0.38
63- Tank spur	0.11
704-14.51R-1	0.43
4324-0.04R-1	0.15
4324-4.69L-1	0.82
4342-4.10R-1	0.66
4342-4.10L-1	0.34
TOTALS	7.81

Open Authorized and Restricted (OAR)

The following roads are recommended to have the designation changed to Open Authorized and Restricted (OAR) roads. The roads shall be restricted to use by only government officials or Special Use Permittees.

System Road Number	OAR- Restricted Use (Miles)
4335 A	0.74
TOTALS	3.90

Maintenance Level 1 (ML 1)

The following roads are recommended to have the designation changed to Maintenance Level 1 (ML 1). These roads have future use but currently are not being used. No public funding will be expended for maintenance on these roads.

Road Number	Maintenance Level 1 (Miles)
707	4.80
4340	0.57
TOTALS	5.37

Decommission

The following roads are recommended to be **decommissioned**. There are **3.86** miles of (ML 2-5) system roads recommended to be decommissioned, **0.47** miles of ML 1 roads, and 1.53 miles of unauthorized roads to be decommissioned.

Road Number	Decommission (Miles) - ML 2-5 System Road	Decommission (Miles) - ML 1 System Road	Decommission (Miles) - Non-system Rd
702 A- 4312			0.20
704 A	0.89		
4313-1.69L-1			1.00
4324	2.43		
4324-0.76L-1			0.33
4326-old	0.30		
4330	0.24		
4339		0.47	
TOTALS	3.86	0.47	1.53

Proposed New Routes

Approximately **1.18** miles of new construction are proposed for access around private land. The proposed route will connect forest system road 4327 to 4866 around private land.

Appendix A: Definitions

Road Definitions (36 CFR 212.1)

Authorized Road - Roads wholly or partially within or adjacent to National Forest system lands that are determined to be needed for long-term motor vehicle access, including state roads, county roads, privately owned roads, national forest system roads and other roads authorized by the Forest Service.

Unauthorized Road - Road on national forest system lands that are not managed as part of the forest transportation system, such as unplanned roads, abandoned travelways and off-road vehicle tracks that have not been designated and managed as a trail and those roads that were once under permit or other authorization and were not decommissioned upon the termination of the authorization.

Temporary Roads - Roads authorized by contract, permit, lease, other written authorization or emergency operation not intended to be a part of the forest transportation system and not necessary for long-term resource management.

Road Decommissioning - Activities that result in the stabilization and restoration of unneeded roads to a more natural state or conversion to other non-road uses.

Road Reconstruction - Activities that result in improvement or realignment of an existing authorized road as defined below:

Road Improvement - Activity that results in an increase of an existing road's traffic service level, expansion of its capacity or a change in its original design function.

Road Realignment - Activity that results in a new location of an existing road or portions of an existing road and treatment of the old roadway.

Access Rights: A privilege or right of a person or entity to pass over or use another person's or entity's travel way. (36 CFR 212.1, FSM 5460.5 - Rights of Way Acquisition)

Arterial Road: An NFS road that provides service to large land areas and usually connects with other arterial roads or public highways (7705 – DEFINITIONS).

Collector Road: An NFS road that serves smaller areas than an arterial road and that usually connects arterial roads to local roads or terminal facilities (FSM 7705 – DEFINITIONS).

Forest Road or Trail: A road or trail wholly or partly within or adjacent to and serving the NFS that the Forest Service determines is necessary for the protection, administration, and utilization of the NFS and the use and development of its resources (36 CFR 212.1 – FSM 7705 – DEFINITIONS).

Local Road: An NFS road that connects a terminal facility with collector roads, arterial roads, or public highways and that usually serves a single purpose involving intermittent use (FSM 7705 – DEFINITIONS).

National Forest System Road: A forest road other than a road which has been authorized by a legally documented right-of-way held by a state, county, or local public road authority (FSM 7705 – DEFINITIONS – 36 CFR 212.1).

Public Road: A road under the jurisdiction of and maintained by a public road authority and open to public travel (23 U.S.C. 101(a) – (FSM 7705 – DEFINITIONS)).

Private Road: A road under private ownership authorized by an easement granted to a private party or a road that provides access pursuant to a reserved or outstanding right (FSM 7705 – DEFINITIONS).

Route: A road or trail (FSM 7705 – DEFINITIONS).

Appendix B: Best Management Practices

Federal agency compliance with pollution control is addressed through section 313 of the Clean Water Act, Executive Order 12580 (January 23, 1987), National Non-point Source Policy (December 12, 1984), USDA Non-point Source Water Quality Policy (December 5, 1986) and the Environmental Protection Agency (EPA) in their guidance "Non-point Source Controls and Water Quality Standards" (August 19, 1987). In order to comply with State and local non-point pollution controls the Forest Service will apply Best Management Practices (BMPs) to all possible non-point sources which may result from management activities proposed in any future decision document. These BMPs are described in the Region 3 Soil and Water Conservation Handbook 2509.22.

Best Management Practices are the primary mechanism for achievement of water quality standards (EPA 1987). This appendix describes the Forest Service BMP process in detail and lists the key Soil and Water Conservation Practices that may be employed when in the implementation of a selected action is determined in a Record of Decision.

Best Management Practices include but are not limited to structural and non-structural controls, operations, and maintenance procedures. BMPs can be applied before, during, or after pollution producing activities to reduce or eliminate the introduction of pollutants into receiving waters (40 CFR 130.2, EPA Water Quality Regulation). Usually, BMPs are applied as a system of practices rather than a single practice. BMPs are selected on the basis of site-specific conditions that reflect natural background conditions and political, economic, and technical feasibility.

BMP IMPLEMENTATION PROCESS

In cooperation with the State, the Forest Service's primary strategy for the control of non-point source pollution is based on the implementation of preventative practices (i.e., BMPs). The BMPs for this project have been designed and selected to protect the identified beneficial uses of the watershed.

The Forest Service non-point source management system consists of the following steps:

1. **BMP SELECTION AND DESIGN** - Water quality goals are identified in the Forest Plan. These goals meet or exceed applicable legal requirements including State water quality regulations, the Clean Water Act, and the National Forest Management Act. Environmental assessments for projects are tiered to Forest Plans using the National Environmental Policy Act (NEPA) process. The appropriate BMPs are selected for each project by an interdisciplinary team. In each new location, there is flexibility to design different BMPs depending on local conditions and values and downstream beneficial uses of water. The BMP selection and design are dictated by the proposed action, water quality objectives, soils, topography, geology, vegetation, and climate. Environmental impacts and water quality protection options are evaluated, and alternative mixes of practices considered. Final collections of practices are selected that not only protect water

quality but meet other resource needs. The final sets of selected practices constitute the BMPs for the project.

2. BMP APPLICATION - The BMPs are translated into contract provisions, special use permit requirements, project plan specifications, and so forth. This ensures that the operator or person responsible for applying the BMP actually is required to do so. Site-specific BMP prescriptions are taken from plan-to-ground by a combination of project layout and resource specialists (e.g., hydrology, soils, etc.). This is when final adjustments to fit BMP prescriptions to the site are made.
3. BMP MONITORING - When an activity begins (e.g., road building, mining, timber harvesting, etc.), engineering representatives, resource specialists, and others ensure that BMPs are implemented according to plan. BMP implementation monitoring is done before, during, and after resource activity implementation. This monitoring answers the question: "Did we do what we said we would do?" Once BMPs have been implemented, further monitoring is done to evaluate if the BMPs are effective in meeting management objectives and protecting beneficial uses. If monitoring indicates that water quality standards are not being met or that beneficial uses are not being protected, corrective action will consider the following:
 - o Is the BMP technically sound? Is it really best or is there a better practice which is technically sound and feasible to implement?
 - o Was the BMP applied entirely as designed? Was it only partially implemented? Were personnel, equipment, funds, or training lacking which resulted in inadequate or incomplete implementation?
 - o Do the parameters and criteria that constitute water quality standards adequately reflect human induced changes to water quality and beneficial uses?
4. FEEDBACK - Feedback on the results of BMP evaluation is both short- and long-term in nature. Where corrective action is needed, immediate response will be undertaken. This action may include modification of the BMP, modification of the activity, ceasing the activity, or possibly modification of the State water quality standard. Cumulative effects over the long-term may also lead to the need for possible corrective actions.

All roads will be maintained using Best Management Practices to reduce watershed impacts.

1. Use Best Management Practices with specific practices identified and implemented for specific sites.
2. Control sediment, particularly resulting from soil movement caused by roads.

Under both Alternative B and C, improved road miles through reconstruction and maintenance would be accomplished utilizing Best Management Practices to bring these miles to minimum Forest standards. Best management practices are a practice or a combination of practices that is determined by a State (or designated area-wide planning agency) after problem assessment, examination of alternative practices and appropriate public participation to be the most effective, practicable (including technological, economic, and institutional considerations) means of preventing or reducing the amount of pollution generated by non-point sources to a level

compatible with Federal and State water quality goals and standards. Non-point source pollutants are generally carried over, or through, the soil and ground cover via stream flow processes.

Soil and Water Conservation Practices in the form of Best Management Practices (BMPs) will be implemented and monitored as directed in the Forest Plan. Through the use of BMPs the adverse effect of planned activities will be mitigated.

The following BMPs are applicable to all action alternatives:

Erosion Control Plan. Minimize erosion and sedimentation through effective planning prior to initiation of construction activities and through effective contract administration during construction.

Timing of Construction Activities. Schedule operations during periods when the probabilities for rain and runoff are low. Equipment shall not be operated when ground conditions are such that unacceptable soil compaction or displacement results. Erosion control work must be kept current when construction occurs outside of the normal operating season.

Road Slope Stabilization. Prevent on-site soil loss from exposed cut slopes, fill slopes, and spoil disposal areas. The level of stabilization effort needed must be determined on a case-by-case basis. Surface stabilization measures shall be periodically inspected, as necessary, to determine effectiveness. In some cases, additional work may be needed to ensure that the vegetative and/or mechanical surface stabilization measures continue to function as intended.

Dispersion of Subsurface Drainage from Cut and Fill Slopes. Minimize the possibilities of cut or fill slope failure and the subsequent production of sediment. Dispersal of collected water should be accomplished in an area capable of withstanding increased flows.

Control of Road Drainage. Minimize the erosive effects of concentrated water flows caused by road drainage features.

Timely Erosion Control Measures on Incomplete Roads and Stream Crossing Projects. Minimize erosion and sedimentation from road construction sites where final drainage structures have not been completed. Apply protective measures to all areas of disturbed, erosion-prone, unprotected ground that is not to be further disturbed in the present year. When conditions permit operations outside of the Normal Operating Season, erosion control measures must be kept current with ground disturbance to the extent that the affected area can be rapidly "closed" if weather conditions deteriorate. Do not abandon areas for the winter with remedial measures incomplete.

Construction of Stable Embankments (Fills). Construct embankments with materials and methods which minimize the possibility of failure and subsequent water quality degradation.

Control of Side Cast Material. Minimize sediment production from side cast material during road construction, reconstruction, or maintenance. Side casting is not an acceptable construction alternative in areas where it will adversely affect water quality. Prior to commencing

construction or maintenance activities, waste areas should be located where excess material can be deposited and stabilized.

Servicing and Refueling of Equipment. Prevent pollutants such as fuels, lubricants, bitumens, raw sewage, wash water, and other harmful materials from being discharged into or near rivers, streams, and impoundments, or into natural or man-made channels leading thereto. Selecting service and refueling areas well away from wet areas and surface water, and by using berms around such sites to contain spills. Spill prevention, containment, and countermeasures (SPCC) plans are required if the volume of fuel exceeds 660 gallons in a single container or if total storage at a site exceeds 1320 gallons. Any SPCC needs to be reviewed and certified by a registered professional engineer.

Controlling In-Channel Excavation. Minimize sedimentation and turbidity resulting from excavation for in-channel structures, so as to comply with state and Federal water quality standards.

Disposal of Right-of-Way and Roadside Debris. Construction debris and other newly generated roadside slash developed along roads near streams shall not be deposited in stream channels (including ephemeral and intermittent).

Maintenance of Roads. Maintain roads in a manner that provides for water quality protection by minimizing rutting, failures, side casting, and blockage of drainage facilities (all of which can cause sedimentation and erosion).

Road Surface Treatment to Prevent Loss of Materials. Minimize sediment production and erosion from road surface materials to comply with state and Federal water quality standards. Road surface treatments are prescribed based on traffic levels, road design standards, soils, and geology.

Decommissioning of Roads. Reduce sediment generated from unneeded roads, roads that run in streambeds and roads that are located in streamside zones by closing them to vehicle use and restoring them to productivity.

APPENDIX C – INTERDISCIPLINARY TEAM

SO- SUPERVISOR'S OFFICE		
Curiel,	Eli	Engineering, Editor & ID Core Team Leader
Gillespie	William	Cultural Resources
Lefevre,	Bob	Soils, Water, Air & Forestry
McKay	George	Forest Lands Program Manager
White	Laura	Travel Management Coordinator
Ahern	Richard	Minerals Program Manager

D1- DOUGLAS RANGER DISTRICT		
Morales	Ruben	Fire Management Officer
Harris	Joe	Range/Watershed Staff
Klingler	Glenn	Wildlife Biologist
Arvizu	Armando	Recreation Manager
Martinez	Larry	Engine 11 Foreman
Bennett	Duane	Zone Special Uses
Callard	Christopher	Field GPS Tech

Arizona Game & Fish Department		

APPENDIX D – Interdisciplinary Team Discussion Notes

The notes in this section are included in an effort to provide a brief summary of why the TAP recommendations for changes to the road system were made. They do not replace the discussion in under Step 4 of the TAP document. While discussing the recommendations, the Interdisciplinary Team (IDT) reviewed comments that were collected during public meetings and from letters and e-mails submitted by many interest groups, individuals and other agencies. These comments were used to identify issues that needed to be weighed, along with many other factors, in the formation of the recommendations.

The TAP is a living document and therefore will be updated regularly. Line officers and IDTs will continue to consult the TAP as they are planning future projects. Since the TAP contains only recommendations, future projects will continue to receive public input that pertains to the Forest transportation system and may recommend decisions which are not consistent with the initial recommendations of the TAP. Modifications to the TAP's recommendations as a result of final decisions will be incorporated, after the appropriate NEPA procedures have been completed.

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Road Identification	Interdisciplinary Team Discussion Notes
63	No change.
63- DispCG 1	Within 300 ft. motorized dispersed camping corridor
63- DispCG 2	Within 300 ft. motorized dispersed camping corridor
63- DispCG 3	Valuable for dispersed camping access.
63- Pvt Rd	Off Forest - Not Analyzed
63- spur 1	Access to range improvements. No public access but could be used in future for bypass route to restore public access. No trespassing sign. OAR.
63- spur 2	Recommend OAR for range improvement access.
63- spur 3	Access to range improvements. No public access but could be used in future for bypass route to restore public access. No trespassing sign. OAR.
63- spur 4	Access to range improvements. No public access but could be used in future for bypass route to restore public access. No trespassing sign. OAR.
63- Tank spur	Needed for dispersed camping and hunting access. Recommend OA.
63-0.63L-1	Needed for dispersed camping and hunting access. Recommend OA.
338	Off Forest - Not Analyzed
338- pvt	Off Forest - Not Analyzed
702	No connection to 705. Goes through Inventoried Roadless Area (IRA) but existed prior to that designation.
702 A	Possibly reroute around private land to maintain needed public and administrative access. In IRA, Ridgenose rattlesnake habitat.
703	Needed for future route to restore lost public access and for range improvement access.
704	Needed for fire and range access. No public access currently but could be used in future to restore lost public access.
704-14.51R-1	Actually main access to 705. No public access but could be used in future to restore lost public access. Currently administrative access with permission. At least half off forest. Add as reroute for 704A. OAR for FS admin access.
704 A	Decommission and use 704-14.51R-1 as reroute.
705	Needed for future possible restoration of public, range, administrative access. Goulds Turkey monitoring site.
706	Needed for recreation, hunting, range, administrative access.

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707	In IRA and Wilderness Study Area (WSA). Most does not exist on ground. Reverted to trail. Convert to ML1 or non-motorized trail. Well-used campsite just south of 63. Within 300 ft corridor. On south end keep the part that goes across small section of pvt land. OA to Maverick Spring.
708	Extends well beyond where it is showing as trail in Infra. Can drive a truck all the way to just past where trail forks. Propose converting this to road and adding to 708. Within IRA boundary. Has always been there but was incorrect in system.
4310	No change.
4312	Road all on private.
4313	Change to OAR for range and administrative access. No public access.
4313-1.69L-1	In roadless area. Soils concern. Decommission.
4324	Public can get to north end. Could use 63-spurs to reroute around private land to restore public access. South end does not exist on ground. Decommission from private land south.
4324-0.04R-1	Important for dispersed camping access.
4324-0.76L-1	Recommend decommission. Eroding
4324-4.69L-1	Pipeline. Recommend OA for alternative public access around locked private land for hunting and dispersed camping access.
4324-4.90R-1	Within 300 foot dispersed camping corridor.
4325	No change.
4326	Recommend to Decommission 0.30 mi of old road alignment
4326 A	No change.
4327	Historically continued up ridge. Closed in 2000 or 2001. People are driving around closure. Wildlife water at the end. Possible bypass around locked private land. NM Ridgenose rattlesnake habitat. Any connection north would need to avoid IRA. AGFD recommends extending road to route to 4866 to restore historic access.
4327-0.22R-1	Within 300 foot dispersed motorized camping corridor. Don't need to add.
4329	Change to OAR for range and administrative access. No public access. May be useful in future for restoring public access. Change name.
4330	Decommission. Redundant.
4331	Need for administrative, range and public access.
4332	Need for administrative, range and public access.
4333	Need for administrative, range and public access.
4334	No change.
4335	North 1.1 mile does not exist on ground. No public access.

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4335-5.46L-1	Goes to range improvements but in IRA Do not add to NFS. Authorize access to range improvements in permit.
4335-5.46L-2	Goes to range improvements but in IRA Do not add to NFS. Authorize access to range improvements in permit.
4335 A	Locked by Hadleys. No access. OAR.
4336	No change
4339	Decommission. Not needed.
4340	Road fenced off and has grown over. Change to ML1. May provide future access around private land.
4342	Open to public.
4342-4.10R-1	Goes to range improvements but in IRA. Authorize access to range improvements in permit.
4342-4.10L-1	Goes to range improvements but in IRA. Authorize access to range improvements in permit.
4345	Need for access to range improvements, public recreation and hunting access.
4347	Need for access to range improvements, public recreation and hunting access.
4821	Not very evident in imagery. Need to check with permittee before recommending change in status. (currently ML1)
4866	No change. May be useful in future for restoring public access.

APPENDIX E – FSM 7700

APPENDIX F – FOREST TRANSPORTATION ATLAS