Ltr#0001

From: Sanford Cohen
To: FS-prescott-forest-plan-comments
Subject: comments
Date: Tuesday, August 14, 2012 9:58:51 AM

The following comments are being submitted on behalf of the 248 members of the Prescott Open Trails Association.

Since the focus of our group is recreational access to Prescott National Forest lands, we will limit the scope of our comments to issues affecting those subjects. We generally agree with the goals and objectives of the PNF Draft Plan with regard to maintaining the quality of the overall landscape and its resources.

However, we are concerned that the Draft Plan is "silent" regarding its goals for adding routes to recreational access. Specifically, it does not address the social and economic impacts on recreational access of its potential and projected management actions contemplated in the aftermath should this Plan be adopted.

We would like to see language that places a priority on identifying areas of actual and potential connectivity between segments of the PNF and also to the communities that surround and inhabit the PNF. In light of the fact that the State of Arizona has adopted one of the most user-friendly enhancements to recreational access via the OHV decal, we would have expected the PNF to make projects utilizing the funding from this valuable resource a priority for future planning.

While staging areas and trailheads are of benefit to recreation, it is more than offset by the desire to obliterate or relocate roads either as a management tool or in conjunction with watershed management, a practice that can evoke strong anti-access feelings from segments of the public that, if left to their own devices, would prohibit all but the most able bodied citizens to access streams and rivers within the PNF. The Draft Plan appears to address far more of the issues of concern to this small minority of people and not as much for those who recreational access is their primary use of the Forest.

Prescott Open Trails Association members utilize the PNF for a variety of recreational purposes. We believe that the Draft Plan should include more in-depth language regarding the goals and objectives for the roads and trails inventory. What is the desired amount of roads and trails inventory? What percentage should be targeted as motorized, mechanized, multiple use or non-motorized? The Plan makes no such statement. Nor does it even address the direction or desired results of such an inventory.

Respectfully Submitted,

Sanford Cohen, President
Prescott Open Trails Association
sanford9@cableone.net
P.O. Box 2365
Prescott, AZ 86302
928-445-8289

Ltr#0002

From: Douglas Kearney
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS
Date: Saturday, August 25, 2012 11:09:49 AM

To Whom it may concern,

I am requesting that the target shooting be prohibited in the Prescott National Forest except for designated areas. I live on Yeager Mine Rd off of Forest Service Road 151 and there are 8 areas within one mile of my house that the public uses as target shooting areas(Yeager Mine, adjacent stream area and numerous areas under the high voltage power lines. I am appalled at the lack of respect the majority of the shooters have for the natural environment. The paper targets, shells, paint cans, computers, glass bottles and numerous other items used to shoot at are left at all of the areas above . I understand the USFS needs to balance uses, however I am assaulted daily by the noise from target shooters in all directions. I am consistently picking up trash left by the shooters at the areas closest to my house. The latest assault on my peaceful enjoyment of the forest is a product called Tannerite. This product produces a explosion when attached to a target . People using Tannerite have been creating explosions that are strong enough to rattle the windows in my house from a ½ mile away.

If you would be so kind as to let me know when the hearing occur I would like to speak against target shooting in the Prescott National Forest

Thank You
Douglas Kearney- Network Development
American Tower Corporation
PO Box 2467
Prescott, AZ 86302
Telephone 714-875-6972
Douglas.Kearney@Americantower.com

Ltr#0003

From:	jean public
To:	FS-prescott-forest-plan-comments; president@whitehouse.gov; info@earthjustice.org
Cc:	speakerboehner@mail.house.gov; info@emagazine.com; INFO@taxpayer.net; media@cagw.org
Subject:	public comment on deis
Date:	Friday, September 28, 2012 6:56:06 AM

1. ban all hunting and trapping
2. ban all prescribed burning
3. ban alluse of toxic chemials entirely - it just kills earth and life
4. no new roads.
5. stop all logging, mining and other anti environmental effects in this forest which are done for greed and which represent poor management of this site. every natural thing in this landscape represents a net benefit to people and life on earth. your destruction of those things is a net loss to life and people.
6. protect all animals, birds, and every species of life in this site.
7. ban all livestock grazing. these cattle ranchers pay cheap cheap cheap rates to destroy the land that belongs to 300 million of us. we want them banned from public land. let they pay rates to use private land. using a million acres for these cheap sobs is aggravating since they pollute like mad and cause climate change. we need to stop using land for this inefficient method of growing food. put the damn cattle ranchers out of business now. they are the biggest leaches of the public in this country. the biggest. they pay nothing for using our land. its time these profit focused people stop leaching on the general public - they are the biggest welfare group i nthis nation. jean public - this ocmment is for the public record

Ltr#004

From:	Jean Public
To:	FS-prescott-forest-plan-comments; info@emagazine.com
Cc:	today@nbc.com; letters@newsweek.com; president@whitehouse.gov; speakerboehner@mail.house.gov; info@theteaparty.org
Subject:	comment on draft lrmp for prescott coconino and yavapai counties
Date:	Monday, October 01, 2012 8:00:41 AM

pg 18 - fine particulate matter causes lung cancer, heart attacks, strokes, pneumonia, allergies and asthma. because of the huge health effects, prescribed burning is not an alternative to use. it is disastrous in causing negative expensive health effects for people in every state east of you. they travel, they are light. THEY ARE NOT SMOKE!!!

money for burning is sometimes why we have burning. get all financial lucre out of decisions like this.

pg 79 - and 82 - proof of payment to the bonding company for $20 million of coverages for mine activity should be provided to the us public through this agency before any mine starts any operation. the owners of this property want coverage from the beginning guaranteed for clean up by the mine owners. the public is tired of getting the bill when the mine company goes into bankruptcy. if the mine profiteers cant provide coverage, tell them no deal. all steps must be taken by this agency before any mining company takesa first dig to prevent and stop taxpayers getting the bill for any clean up. these profiteers are manipulators lookign to get the profits and leave the crap for taxpayers to pay for. your agency needs to have competent lawyers that stop that. you need to put a provision in that nobody gets a lease to mine withouit making sure upfront there is a $20 million fund for clean up available no matter if the mining company goes bankrupt or anythinjg happens to th elessee. any company that pulls a fast one on bankruptcy has to make its executives and all responsible for mining pay the fines out of their own money too if the bill is over $20 million for clean up. their own assets should be reachable for clean up.

pg 83 - this whole plan appears to be a setup for profiteeers, not protection for the us public owners of this land.

pg 117 - the local meetings forgot that this land is owned by 300 million people, not just locals surrounding some sites in az.
this comment is for the public record. jean public

Ltr#0005

From:	Bruce McKeeman
To:	FS-prescott-forest-plan-comments
Subject:	Comments on the Revised Forest Plan and DEIS
Date:	Friday, October 05, 2012 4:22:02 PM
Attachments:	Comments on PNF Mgt plan and EIS.doc

Attached are my comments on the revised Prescott NF Management Plan and DEIS.

Bruce D. McKeeman
Prescott, AZ

Prescott National Forest
Attn: Plan Revision
344 South Cortez Street
Prescott, AZ 86303

I have been a resident of Prescott for 7 years and had a career in public land management for 36 years. I frequently utilize the resources of the Prescott National Forest for recreation, primarily hiking, and scenic enjoyment.

As is typical in land management plans, there are elements of each alternative, other than the "no action" option, that are preferable when compared with the other options. Overall, Option C provides the best alternative for management activities and resource protection. I request the PNF to choose Alternative C to guide the Forest in implementing its management plan.

These are my comments on the proposed options of the plan. I will follow these comments with my comments on the EIS.

Chapter 1, page 5: Needs #3: Provide sustainable recreation opportunities that … avoid over crowding and user conflicts … . There are a number of user conflicts that are not being addressed in terms of trail use. The trails in the forest are primarily single track, multiple use trails. Many of these trails were constructed prior to improvements to mountain bikes and they do not meet the existing trail standards for multiple use single track trails. The USFS should consider restricting mountain bikes from the trails that are more heavily utilized by equestrians. The potential for serious injury is greater between mountain bikers and equestrians than between mountain bikers and hikers, although any user can be seriously injured by mountain bikers. Public safety should be the number one concern!

The primary issue is the speed with which some mountain bikers ride the trails. They are not riding with due care or consideration for the safety of other users and since the trails are not multi-track trails, there is very limited space to pass or avoid an impact.

The PNF should consider implementing a plan similar to the Travel Management Plan that is in place for motorized vehicles and apply it to mountain bikes. The trails should be closed to mountain bikes unless posted open.

Chapter 2, Forest-wide Desired Conditions. The desired conditions are admirable and appropriate for the issues found within the forest. Page 43 states that there are approximately 800 miles of motorized and non-motorized trails within the PNF. I know that the designation is split approximately in half between the two designations, however, the top recreational uses of the PNF are hiking and

walking with viewing the scenery and driving for pleasure following the hiking and walking categories. The 2008 survey did not show mountain biking as a high level of use among those surveyed.

Page 44 – Desired Conditions for Rec-1: The stated desired conditions are appropriate for the PNF. The emphasis on protecting resource integrity and providing use without damaging resources has the correct emphasis.

The first couple of bullet points address "opportunities for recreation respond to changes in demographics and demographic interests". Although Forest Service managers are required to provide multi-use opportunities, everyone must be aware that not all places are appropriate for all types of uses. You hint at that philosophy in the second bullet, however, it primarily refers to facilities and not to types of activities. It should be more directly stated that the PNF will provide varied recreational opportunities as appropriate to protection of resources and safety of users. The change in demographics should not be the driving force to consider types of activities.

Within the stated desired conditions are statements about "infrequent conflicts; and awareness of and compliance with forest regulations". These are excellent desired conditions. The challenge is how to obtain the desired condition.

Page 45 – DC-Rec-2 Trails: The stated desired conditions are appropriate for the PNF. Although these are desired conditions – i.e. goals – the means to obtain the desired conditions are what is important. Today, the PNF is a long way from meeting these conditions. Conflicts between user groups continue to escalate and are certainly not being resolved.

There are also trailheads where both motorized and non-motorized trails leave from the same location. This potentially leads to motorized recreationalists using non-motorized designated trails and increases the conflict.

Since most States require bicycles that are using designated roadways follow the traffic regulations, PNF, and the USFS for that matter, should require that bicycles on the designated motorized roads should also have to obey the traffic laws and possess the necessary equipment to make them road legal.

Chapter 3 – Objectives. Page 56, Objective 9: Reducing backlog maintenance is always a goal and depending on staff and funding it is sometimes obtainable. An important statement in the background and rationale section is the need for a comprehensive trail plan. This is a **critical** need and should be addressed as soon as possible, if not sooner.

In addition to addressing backlog maintenance, the objective should also state that the trails will be brought up to USFS trail standards. With most of the trails designated as multiuse, they need to be multi-track and not single track. If the PNF is going to continue the trail system as a single track, then restrictions on users will need to be implemented to avoid the escalating conflicts and safety concerns.

Page 56, Objective 10: The development of any shooting range needs to address the issue of lead contamination of the ground water. The focus and emphasis on resource protection should include this element of target shooting. With a designated target range, the other "informal" target areas need to be closed. In other words, indiscriminate target shooting should not be allowed and only shooting in designated areas, that are properly designed, should be the objective. The current shooting sites at Amber Mine, FT 38 by Upper Pasture, and along the Contreras Road need to be eliminated.

Page 56, Objective 11: This objective could also assist in reducing conflicts among trail users.

Page 57, Objective 14: There is no mention of how the PNF intends to increase communication or obtain feedback. There needs to be an "interactive reporting system" on the website where visitors can notify PNF of their experiences – good or bad – and be able provide a means of communicating with the management staff. With limited field personnel, this will greatly increase the ability of the staff to become aware of issues and for the public to express their views.

Page 58, Objective 17: I wholeheartedly agree with the objectives in this section. It is far more critical to address backlog maintenance and improve the condition and safety of existing trails before building new ones. The development of a comprehensive trail plan for the PNF is an important aspect of this objective. With limited staff and funds, maintaining what you have, and bringing the trails up to national standards is critical.

In the interim, it may be wise to consider limiting the use of mountain bikes on some of the non-motorized trails to improve safe use and reduce user conflicts.

As a side note, it is interesting given this objective, that the mountain bike users and the current staff were eager to build new mountain bike trails in the Granite Mountain Basin without considering the safety and conflicts that continue on the trails in that area.

Page 63, Objective 29: The value of open space to the Prescott community is just as valuable as it is in the Verde Valley. Just because the current political representatives do not support open space is no reason to ignore its value to the Prescott Community.

Chapter 4 – Standards and Guidelines.

Page 74 – REC-3: This guideline needs to state that customer services should be available … provided they do not adversely impact or affect resources.

Page 74 – REC-5: This guideline should state that it applies to both motorized and non-motorized travel routes.

Chapter 5 – Management Area Direction.

The desired conditions for the various Management Areas are well stated.

Page 101, Guidelines, PBMA-4: This guideline needs to include a statement that ground water contamination from lead is an included reason to restrict areas for target shooting.

Chapter 6 – Monitoring and Evaluation.

Page 114 – Diverse Recreational Opportunities:

Using National Visitor Use Surveys every 5 years to evaluate visor conflicts is not appropriate. The level of current conflicts and injuries requires an annual evaluation of issues and conflicts, at least until the level drops to a statistically insignificant level. An evaluation every 5 years is too extended to deal with visitor use conflicts that need to be addressed on an annual basis.

My experience with National Visitor Satisfaction Surveys shows that they are meaningless, even at indicating trends. As part of our GPRA goals and reporting, we conducted visitor surveys annually and although the public response was adequate, the phrasing of the questions was the most critical aspect of the surveys and since we were utilizing these on a national – one size fits all – basis, the applicability to a specific area was limited. If PNF can design and implement their own survey that is germane to the Forest and its issues, it might be valid. A bigger issue is reaching the recreation and visiting public to obtain a valid sample. A 5 year sample is not sufficient to determine conflict and safety problems.

The PNF might be better off developing a web based reporting and survey system to address satisfaction and conflict reports.

Chapter 8 – Additional Plan Direction.

Page 126 – Administrative Corrections. The plan should be changed so that administrative plan corrections are published IN BOTH the PNF website AND the local paper of record. It should not be a one or the other. If the plan is not changed and notification remains as one or the other, than the corrections should be printed in the local paper of record. By only listing the information on the website, you place the burden on the visitor to find the information instead of making it generally known to the public.

Comments on the EIS.

Chapter 1.

Page 5, Need for Change 3:

The desire for recreational target shooting should also indicate that limitations should be implemented for potential lead contamination of the water table.

Potential resource impacts … need to add the need to mark wilderness boundaries where there is evidence of non-motorized, i.e. mountain bike incursions.

Chapter 2 – Alternatives.
Alternative B, Page 19: Target shooting partnership, needs to address adverse impact from lead contamination. Any developed shooting area must be designed to contain the lead and prevent water resource contamination.

Recreation impacts: There are on-going incursions into the wilderness, both designated and potential wilderness areas, of non-motorized mountain bikes. These need to be stated as a reason to improve signing for adverse use.

Alternative C, page 21 & page 22 Need for Change 3: The description states that there would be less emphasis on recommendation for potential wilderness. The Forest Service is required to manage and protect all potential wilderness areas as if it was wilderness until Congress makes a determination as to its eligibility for wilderness designation. It is disingenuous to make the public think the PNF would not manage potential areas as wilderness by stating there would be less emphasis on the designation. The fact that you propose to formally designate potential areas in the other alternatives does not relieve you of the responsibility for proper management of these areas under this alternative, Forest Service Policy or the Wilderness Act.

Chapter 3 – Affected Environment and Environmental Consequences.
Recreation Use on the PNF, page 111: The paragraph on sport shooting identifies the issue of lead contamination in addition to public safety issues. It claims the designated target shooting range would close in the Prescott Basin Management Area at the end of its permit in 2014 and that no new range is planned for the PBMA, although, there is the possibility of opening a new range elsewhere on the PNF. Any new range must include proper development to capture lead and prevent contamination of ground water. It would be advisable for the PNF to move toward a policy or regulation of shooting only in designated areas – i.e. properly designed and constructed shooting ranges and at the same time, prohibiting open shooting on the rest of the forest with the exception of participating in legal hunting seasons. All sighting of weapons and target shooting should only be allowed in designated ranges and locations.

Improvement to Trails, Alternative A, Page 115: There is a statement that conflicts among user groups would not be addressed in Alternative A and the conflicts may be uncommon, but the perception is that conflicts are common. As they say, perception is reality. Since the PNF does not have a reporting system or mechanism to document conflicts or visitor concerns, how would you know whether or not conflicts are uncommon or more common as visitors perceive them to be in their daily usage of the forest?

Improvement to Trails, Alternative B&C, Page 116: Within these alternatives, you discuss the proposal to more clearly sign the trails and identify the appropriate usage as a means to reduce conflicts and trail deterioration. These are well intentioned processes to start to address the real world conflicts that are currently impacting the trails and user groups. There are a number of users that routinely ignore the trail designations, particularly the current yield policy concerning which group should yield to which other group. More signs and public education will help, but the reality is that there are users that will ignore these policies and efforts and it will require enforcement of these designations. One method that would assist in proper application of the rules would be to change the yield policy to a regulation, codified in 36 CFR, that would be enforceable by both the County Sheriff and the PNF Law Enforcement employees.

Improvement to Trails, Alternative D, Page 117: The development of new trails and the decommissioning of trails that cannot be maintained to a minimum safety standard requires more information and discussion. The primary information that the public needs is what standard is being utilized to make these determinations. Does PNF have its own standards or are you referring to National Trail Designs and Standards. Are these USFS standards that are applicable nation-wide or local trail designs and standards that have been developed locally? Are you referring to multi-use, single track trail design or

multi-use, multi track trail standards? What constitutes a safety flaw or problem? Many of the trails in the PNF are not designed for the multiple non-motorized uses of mountain bikes and equestrians. This is a significant safety issue which needs to be addressed through trail design, standards, and trail use designations.

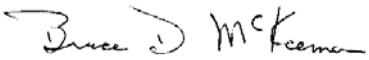
Dispersed Recreation, Alternative B&C, Page 119: This is the first place in discussing wilderness boundaries and issues with illegal access that mountain bikes are mentioned along with motorized recreation vehicles. The issue of mountain bikes accessing wilderness boundaries needs to be included in all the discussions on intrusions into wilderness throughout the Plan and DEIS.

Recommended Wilderness, Alternative C, page 122:

The description states that there would be less emphasis on recommendation for potential wilderness and that some actions to more quickly improve forest health could preclude wilderness designation. The Forest Service is required to manage and protect all potential wilderness areas as if it was wilderness until Congress makes a determination as to its eligibility for wilderness designation. It is disingenuous to make the public think the PNF would not manage potential areas as wilderness by stating there would be less emphasis on the designation. The fact that you propose to formally designate potential areas in the other alternatives does not relieve you of the responsibility for proper management of these areas under this alternative, Forest Service Policy or the Wilderness Act.

Overall, Option C provides the best alternative for management activities and resource protection. I request the PNF to choose Alternative C to guide the Forest in implementing its management plan.

Sincerely,



Bruce D. McKeeman
2359 Desert Willow Drive
Prescott, AZ 86301

Ltr#0006

From: David Lloyd
To: FS-prescott-forest-plan-comments
Subject: Prescott National Forest Revision Plans -- Comments
Date: Thursday, October 18, 2012 8:55:12 AM

Dear Prescott National Forest (PNF) Managers:

Thank you for allowing the public to comment on forest revisions and plans PNF has proposed. I appreciate the privilege to make my opinion known. I also appreciate everything our land managers do to ensure a healthy forest while also allowing all users the opportunity to recreate in whichever legal manner they choose.

I would like to comment on one particular matter concerning the revisions. I am an avid mountain biker and have been for 20 years. Bicycling our country's magnificent public lands is an unparalleled way to experience our nation's beauty and diversity. The vast majority of mountain bikers are not the armored stuntmen and downhillers one sees on ESPN's X-games, but casual, cross-country cyclists who just want a bit of exercise in the quiet and peace of the outdoors. Further, mountain biking is one of the fastest growing outside activities, is seeing increasing popularity with our country's youth, and, studies have shown, cause much less impact to our public lands than off road vehicles and horses; in fact, these studies have shown a bicycle's impact to be really no greater than a hiker's.

The concern I have are the PNF's proposals to create and designate more wilderness. As you may know, current law prohibits bicyclists recreating in wilderness areas, inexplicably lumping bicycles with motorized vehicles. Already, more and more public lands are being closed to bicyclists with little to no justification. I am concerned that more wilderness designations in the PNF would severely restrict a bicyclist's ability to adequately enjoy the wonderful forest that surrounds Prescott and other nearby communities. I understand the desire and sometime need to ensure a pristine environment of certain remote areas but being overzealous in this attempt, thereby precluding use by certain groups, is not the answer.

Please do not take action that would significantly restrict a growing, low-impact user group's (ie bicyclists) ability to enjoy our forests.

Thank you for your hard work and understanding.

Sincerely,

David Lloyd, MD
Prescott, AZ

Ltr#0007

From: Matt Holdsworth
To: FS-prescott-forest-plan-comments
Subject: Fwd: Prescott National Forest Revision Plans -- Comments
Date: Thursday, October 18, 2012 4:13:32 PM

Dear Prescott National Forest (PNF) Managers:

Thank you for allowing the public to comment on forest revisions and plans PNF has proposed. I appreciate the privilege to make my opinion known. I also appreciate everything our land managers do to ensure a healthy forest while also allowing all users the opportunity to recreate in whichever legal manner they choose.

I would like to comment on one particular matter concerning the revisions. I am an avid mountain biker and have been for 20 years. Bicycling our country's magnificent public lands is an unparalleled way to experience our nation's beauty and diversity. The vast majority of mountain bikers are not the armored stuntmen and downhillers one sees on ESPN's X-games, but casual, cross-country cyclists who just want a bit of exercise in the quiet and peace of the outdoors. Further, mountain biking is one of the fastest growing outside activities, is seeing increasing popularity with our country's youth, and, studies have shown, cause much less impact to our public lands than off road vehicles and horses; in fact, these studies have shown a bicycle's impact to be really no greater than a hiker's.

The concern I have are the PNF's proposals to create and designate more wilderness. As you may know, current law prohibits bicyclists recreating in wilderness areas, inexplicably lumping bicycles with motorized vehicles. Already, more and more public lands are being closed to bicyclists with little to no justification. I am concerned that more wilderness designations in the PNF would severely restrict a bicyclist's ability to adequately enjoy the wonderful forest that surrounds Prescott and other nearby communities. I understand the desire and sometime need to ensure a pristine environment of certain remote areas but being overzealous in this attempt, thereby precluding use by certain groups, is not the answer.

Please do not take action that would significantly restrict a growing, low-impact user group's (ie bicyclists) ability to enjoy our forests.

Thank you for your hard work and understanding.

Sincerely,

Matt Holdsworth CPA

Ltr#0008

From: Brian Kleinman
To: FS-prescott-forest-plan-comments
Subject: PNF land to wilderness designation
Date: Friday, October 19, 2012 8:54:00 AM

Dear Prescott National Forest Managers,

My name is Brian Kleinman. I am a local dental specialist and 30-year resident of Prescott. I am also a cyclist. I would like to add my voice to the many others in opposition of the designating more PNF land as wilderness. As you know this designation would limit access to these lands to cyclists. The bigger issue is that bicycles should not be designated as mechanized travel and lumped into the same category as motorcycles and ATVs. This is something that needs to change at the federal level, but in the mean time, it would be a travesty to loose access to these lands for cyclists.
Cyclists represent a very important user group for the Prescott area. With the rising popularity of mountain biking in Prescott (ie the Whiskey 50) I believe that Prescott is becoming a destination for mountain biking know world wide. This could significantly influence the Prescott economy. I believe any actions that would stop this growth are ill advised.
Thank you for all the hard work you do. Prescott is and always has been my home. Some of the things I love most about Prescott are the many outdoor activities available in our area. There is no better setting than the Prescott National Forest, no doubt due to your hard work.
Thank you for considering my opinion,
Brian Kleinman

Ltr#0009

From: Oliver Daniren
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS
Date: Saturday, October 20, 2012 8:00:58 AM

Betty Mathews, I would like to add my comment on the Land Management Plan concerning one particular subject with witch I have personal experience. Please, please include in your new plan much stricter regulation of the use of ATV's on National Forest lands. The users of these vehicles seem bent on crisscrossing any and all parts of the forest land until there is no quiet and dust free space left and all trails are roads. All the foot paths I've habitually walked are now double tracks wide enough for an ATV and this even when there is a perfectly good Forest Service road near by and going to the same place. I have seen many places where the riders will cut across unspoiled land, crushing the shrubs and cacti in the way, just to cut a few yards off and existing route and where they will run up or down a steep and rocky hillside apparently just to see if they can do it without regard to how much vegetation is destroyed in the process. The arid land we live on here is easily rutted and the thin topsoil destroyed by motorized vehicles, and such scars are effectively permanent. I would suggest that ATV's not be allowed off existing numbered Forest Service roads except in designated special areas or "ATV parks". Thank you.

Oliver Daniren

Ltr#0010

From:	Karen Austermiller
To:	FS-prescott-forest-plan-comments
Subject:	PNF Draft Plan and DEIS comments
Date:	Saturday, October 20, 2012 9:02:36 AM

As a horseback rider and occasional camper, I appreciate wilderness areas and the unique experience they provide. In reading the options, I believe Alternative D provides a fairly balanced approach to the desired improvements over the outdated existing plan (A).

Along with more wilderness acreage, I believe that the addition of trails, trailheads, dispersed campsites of Plan D could be orchestrated in a manner to gather additional volunteer help from the people who will ultimately benefit from their use - thus extending the PNF's available budget to address other areas of the plan.

regards,
Karen Austermiller
Prescott

Ltr#0011

From: chrisdunn@commspeed.net
To: FS-prescott-forest-plan-comments
Subject: Forest Plan Comments
Date: Monday, October 22, 2012 9:07:52 PM

I recently attended two of the three forest plan meetings and would like to submit some comments/suggestions with this email.

First, I want to thank everybody for his or her participation in the process. I do feel that the PNF is doing a very good job of balancing multiple use and forest health. I feel very lucky to live in this area with all of the opportunities the forest provides.

Of the alternatives presented I prefer alternative C for the following reasons.

1. I believe its focus on forest health and management is the right way to go. Keeping the forest healthy is the most important thing the forest service does and will benefit all users not just a select few.

2. Although I am a frequent wilderness user myself I do not think the proposed wilderness areas in Alt. B and D are necessary. Many of them are additions to existing wilderness areas (which isn't necessarily a bad thing) but the proposed additions are not really in need of additional protection and are de facto wilderness anyway in terms of current use. Further, designating them as official wilderness will actually restrict the forest service's actions for managing and protecting the lands and restrict recreation opportunities in the future. With the new MVUM these lands are already closed to motorized travel. Wilderness designation would restrict even mountain bike travel or rescue options in emergency situations.

3. Alt. D is my least preferred and is erroneously referred to as a recreation centered proposal. It actually restricts recreation more than any of the plans with the 116,000 acres of proposed wilderness that will become off limits to any mechanized travel. There are currently trails used by mountain bike riders in some of these areas that would be impacted as well. Some of these areas are not really even suitable for wilderness because there are roads right in the middle of them that are cherry stemmed out of the official wilderness. That is really an end run around the intent of the Wilderness Act. Arnold Mesa Wilderness in particular comes to mind. Patchworks of tiny wilderness areas, many with roads in the middle or along the boundary, are hardly in the spirit of true wilderness. I do not support the addition of these new wilderness areas.

4. I do think the forest needs to become more recreation oriented. It is a shift in emphasis that has already happened in many other forests and with the expanding population of AZ will become more important here. I like that Alt. C does have some language about reducing the trails maintenance backlog but I believe it could use more. More trail maintenance seems to fit right in with restoring forest health since with increasing recreation use this will become more of an issue of resource management. By improving access to and the conditions of existing trails use could be dispersed which would reduce erosion on trails that are currently heavily used.

5. One suggestion that I'd like to make that is not in any proposal is to see some language relating to increasing the trails/areas open to OHV use.

I applaud the PNF for making a reasonable effort to accommodate motorized trail users with the recent MVUM. I believe the PNF has the best balance of any of the AZ forests that have completed the process so far. Unfortunately, with the release of the MVUM responsible OHV users lost many miles of existing unofficial trails (mostly single track motorcycle trails.) There are several areas of the forest where these trails have been used for decades but are now closed. Some of the trails were user built in the last 20 years while others were probably in existence for more than 50. With OHV use increasing I believe the responsible thing to do to protect the forest is to provide more legal OHV trails rather than fewer. Providing new legal trails or adding some traditional but currently non-system trails to the MVUM will reduce the proliferation of non-sustainable user built trails. It will also help to disperse use to less visited parts of the forest and reduce user conflicts.

6. Although it was not mentioned in the alternatives and is probably not in the scope of this forest plan I would like to make a comment that I think should at least be in the background of the plan and future forest actions. I am aware that trail user conflicts are increasing in the Prescott Basin. Mostly these seem to be hiker or horse vs. mountain bike conflicts. I think that any user of the trails in the Prescott Basin should expect to encounter lots of other trail users and be prepared for these encounters. As a hiker, motorcycle rider, and mountain biker I know that if I choose to be on those trails I should adjust my expectations for solitude and modify my actions to accommodate other trail users. I am willing to go slower than I'd like, get off the trail to allow others to pass and deal with stinky horse manure and chopped up trails when in the Prescott Basin. If I want a wilderness experience I can choose to hike in a wilderness area but I can't ride my bike or motorcycle there. Equestrians and hikers need to understand that they can recreate over the entire forest even off trails while mountain bikes are not allowed in wilderness and motorcycles and other OHVs are restricted even more. I think the PNF needs to be aware that the users doing the most complaining about trail user conflicts are the ones who have the least restrictions and the greatest ability to choose an area without conflicts.

7. Another suggestion I'd like to see added to the plan is to improve public access to public lands where private land owners have blocked historical access. Mint Wash off Sharps and Stazenski Rds., Tank Creek Mesa/Sycamore Canyon and Fair Oaks/Spider Ranch areas come to mind.

8. As mentioned in the Chino Valley meeting I think it is very important to have an established shooting range in the forest near Prescott. I am an avid shooter and hunter and am glad that we are allowed to shoot safely in most areas of the forest but with the understandable closing of the current shooting range due to development a large number of shooters will be displaced and disperse into the forests around town. This could create new safety and noise problems. I don't think shooting in the forest should be restricted unless clear safety issues arise. Providing an official shooting range to concentrate the use in a safe area could prevent many of those issues.

Thank you for considering my comments.

Chris Dunn
Chino Valley, AZ

Ltr#0011

Ltr#0012

From: ryan brown
To: FS-prescott-forest-plan-comments
Subject: comments - Prescott national forest revisions
Date: Wednesday, October 24, 2012 9:24:42 PM

Dear Prescott National Forest,

Thank you for allowing the public to comment on forest revisions and plans PNF has proposed. I appreciate the privilege to make my opinion known. I also appreciate everything our land managers do to ensure a healthy forest while also allowing all users the opportunity to recreate in whichever legal manner they choose.

I would like to comment on one particular matter concerning the revisions. I am a novice mountain biker and have just introduced to the sport in the past few years. Bicycling our country's magnificent public lands is an unparalleled way to experience our nation's beauty and diversity. The vast majority of mountain bikers are not the armored stuntmen and downhillers one sees on ESPN's X-games, but casual, cross-country cyclists who just want a bit of exercise in the quiet and peace of the outdoors. Further, mountain biking is one of the fastest growing outside activities, is seeing increasing popularity with our country's youth, and, studies have shown, cause much less impact to our public lands than off road vehicles and horses; in fact, these studies have shown a bicycle's impact to be really no greater than a hiker's.

The concern I have are the PNF's proposals to create and designate more wilderness. As you may know, current law prohibits bicyclists recreating in wilderness areas, inexplicably lumping bicycles with motorized vehicles. Already, more and more public lands are being closed to bicyclists with little to no justification. I am concerned that more wilderness designations in the PNF would severely restrict a bicyclist's ability to adequately enjoy the wonderful forest that surrounds Prescott and other nearby communities. I understand the desire and sometime need to ensure a pristine environment of certain remote areas but being overzealous in this attempt, thereby precluding use by certain groups, is not the answer.

Please do not take action that would significantly restrict a growing, low-impact user group's (i.e. bicyclists) ability to enjoy our forests.

Thank you for your hard work and understanding.

Sincerely,

Ryan Brown DDS

From: Rasmussen, Mary C -FS
To: FS-prescott-forest-plan-comments
Subject: FW: Proposed PNF Plan
Date: Thursday, October 25, 2012 8:38:07 AM

Comments received at my inbox for Draft Forest Plan from Nigel Reynolds

From: NIgel Reynolds [mailto:nigelaz@commspeed.net]
Sent: Wednesday, October 24, 2012 1:22 PM
To: Rasmussen, Mary C -FS
Cc: NIgel Reynolds; Mathews, Betty A -FS; Williams, Jason A -FS; Potter, Thomas -FS; Baxter, Dorothy L -FS; Jim Pessin; Carol Stafford; Cathy Schultz; Joyce Mackin; George Sheats; Ron Smith
Subject: Proposed PNF Plan

Mary,

I attended the PNF meeting on Tues Oct 16 about the PNF Plan and my comments are given below. I am on the Board of the Yavapai Trails Association, so I am copying this e-mail to other Board members for their information – they may provide additional comments. I believe the PNF received a letter from YTA earlier this week addressing trail safety issues and opposing the separation of trails between the thee different non-motorized trail users.

I think that one of the major users of PNF recreation are non-motorized users of all sorts: hikers, mountain bikers and equestrians. My comments focus on those important users.

Page 57, Objective 14
Under this objective, second bullet, the Website is mentioned. Here are some ideas to improve the website.
The PNF website has an enormous list of the many PNF trails if you go to Recreation/Hiking/Day hikes. This list is not user friendly. Here are some suggestions:
1. The list is divided into the three ranger districts but to find out about these three Districts you have search the Menu on the Home page and choose "About the Forest" to find a map showing the districts. Simple suggestion: Put a link to this map above the trails list saying something like: To see a map of the three ranger districts, click here.
2. This map of the districts is not easy to use. It should show some major roads so the user can get an idea of where the district boundaries are.
3. It would be helpful if the list included "Users" after the trail name, perhaps in a separate column with a brief explanation at the start of the list. This would state either Motorized or Non-motorized (abbreviate to MOT or non-MOT) and also the word Wilderness so users would know if mountain bikes are allowed. Some people prefer to hike (or ride) on non-motorized trails, and this info would allow them to make a quick choice.
4. I have looked at the trail lists under Day Hiking and Mountain Biking, and they are inconsistent. Alto Pit trails are listed for hikers but not mountain bikers – why? I did a very quick check of the trails list for Horse Riding and it lists the Box Culvert trail – however the description says this trail is primarily used by Off Highway vehicles. Is this what equestrians want?? No mention of box culverts in the description – are they suitable for equestrians?
5. If I know the number of a trail but not its name, the lists are not helpful. Perhaps give users the option of sorting the trails list by number, ignoring districts.
6. To help users, summary maps of trails in the three districts are needed. For example, the CNF has a map of trails in the Red Rock Ranger District so users can see where the trails are, and how they link together. I think such maps should also include a coordinate system (e.g., A-Z for vertical axis, and 1-100 for horizontal). The coordinate of each trail (e.g., B23) could then be added to the trail lists after the trail name so users could easily see where the trail is. I did discuss website maps with Tom Potter at the meeting, and I think he has some good ideas.
7. Near the beginning of each trail description, there is an "At a glance" table. One item needed in this table is Users, which would define who is allowed to use this trail. For example: **all users, motorized and non-motorized**, or **Hikers and Equestrians only** (wilderness), or **Hikers only** (Thumb Butte). This would be an easy way for users to know if they are allowed on this trail, and what other users are allowed also.

8. The PNF has ROGs available on paper at their offices for many trails. These ROGs should also be available online.

Page 58, Objective 17
Under this objective, third bullet, user conflicts are mentioned. I would like to reemphasize the points made in YTA's recent letter. Non-motorized multiuse trails should NOT be restricted to specific users unless there is a very good reason (e.g., Thumb Butte trail).

Page 60, Objective 21
This objective talks about obliterating unauthorized routes. I think the PNF needs to carefully consider why these unauthorized routes exist BEFORE obliterating them. If they serve a purpose (e.g., make a loop between two official trails, allow access from a neighborhood), then they should be left and perhaps incorporated into the official forest trails. This same comment applies to former forest roads – convert them to non-motorized trails instead of obliterating them if this is an option. I do understand that the PNF has limited resources to do all this, but trails are important to many people, so perhaps priorities should be shifted to reflect this. I think Jason Williams has a monumental task, and more staff to support trails is needed.

Regards, Nigel Reynolds

Ltr#0014

From: deworfolk@aolcom
To: FS-prescott-forest-plan-comments
Subject: Proposed revised forest plan
Date: Thursday, October 25, 2012 6:51:10 PM

Hello,

As a dedicated and grateful user of the Prescott National Forest, I am very pleased with the proposed revised forest plan, and urge its adoption.

Don Worfolk
2120 W. Quail Springs Ranch Rd.
Cottonwood, AZ 86326

Ltr#0015

From:	Biscan, Dana
To:	FS-prescott-forest-plan-comments
Cc:	"John Munderloh"; Muccillo, Ed
Subject:	Draft Forest Plan and Draft EIS
Date:	Friday, October 26, 2012 10:34:49 AM
Attachments:	Forest Service Plan Comment Letter 10-25-2012.pdf

Hello,

I have attached a letter summarizing the comments of the Upper Verde River Watershed Protection Coalition (UVRWPC) regarding the Forest Plan. Please verify receipt.

Thank you

Dana Biscan, P.E., LEED AP
Project Manager
Burgess & Niple, Inc.
1500 N. Priest Dr, Ste. 101
Tempe, AZ 85281
P: 602-244-8100 ext. 5348
F: 602-244-1915
www.burgessniple.com

Note:
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Ltr#0015

Upper
Verde
River
Watershed
Protection
Coalition

October 25, 2012

Prescott National Forest
Attention: Plan Revision
344 South Cortez Street
Prescott, AZ 86303-4316

RE: Comments on the Prescott Forest Plan

Dear Forest Supervisor Mathews:

The Upper Verde River Watershed Protection Coalition (Coalition) has reviewed the Draft Prescott National Forest Plan. The Coalition, whose members include Yavapai County, City of Prescott, Town of Prescott Valley, and the Yavapai-Prescott Indian Tribe has a vested interest in the health of the Upper Verde River Watershed. Working together to protect the Upper Verde River, the Coalition is committed to balancing the reasonable water needs of the residents of the Upper Verde River Watershed Area with protection of the base flow of the Upper Verde River to the maximum possible extent, and achieving safe-yield within the Prescott Active Management Area (AMA), by developing BMPs (best management practices) that incorporate science-based planning, utilization and conservation of all water resources within the Upper Verde River Watershed Area, and provide financial and staff resources to support the protection activities of the Coalition. The following summarizes the comments of the Coalition.

- The Coalition appreciates the Plan's focus on Watershed Restoration and generally agrees with the direction of the plan.
    - The plan appropriately identifies watershed management as a priority.
    - The plan focuses on surface water quality and quantity but is minimally focused on groundwater resources and groundwater recharge. The Coalition would like to see additional focus on groundwater resources. Groundwater resources support springs and provide the dry-season flow in steams that support riparian areas. The Coalition is working on cutting-edge research in Mountain Block/Mountain Front recharge.
    - The Coalition supports identification of measurable objectives, and the monitoring and evaluation strategy as outlined in the plan. It is appropriate that the plan is adaptive and amendable based on evaluation of new information.

- The Coalition would like to partner with the Forest Service on any number of Watershed Restoration projects.
    - The Coalition may be especially helpful in areas where watershed-related projects overlap multiple landowners or jurisdictions.

- The Coalition has been working with Prescott National Forest Staff on a project to develop a watershed restoration plan in the Upper Verde Region. This region also encompasses private and State Trust Lands

Upper Verde River Watershed Protection Coalition

that are located between the upland Prescott National Forest Lands and the upper Verde River. The Coalition would like to continue working with Prescott National Forest Staff to develop this plan and complete a map of the watershed conditions and improvement areas. The Plan identifies several areas for potential designation as a new wilderness area. The Coalition feels that additional wilderness areas should not be designated until there is a clear understanding of their condition relative to proper watershed functioning. If the area proposed for wilderness designation is not functioning properly, it should be managed to meet desired conditions without wilderness-designation restrictions on management methods. A regular maintenance program should also be developed for these areas, such as making sure the area is capable of supporting natural low-intensity fire regimes.

Thank you for the opportunity to provide input on the plan. We sincerely hope to work with the Forest Service toward watershed health in the Upper Verde area. The Coalition has recently embarked on a collaborative approach to management of the Upper Verde River Watershed; a project funded by the US Bureau of Reclamation, and invites the Prescott National Forest to continue its work with the Coalition.

Sincerely,

Lora Lee Nye

Lora Lee Nye, Chairman
Upper Verde River Watershed Protection Coalition
c/o Dana Biscan, PE, Assistant Program Administrator
Burgess & Niple
1500 North Priest Drive, Suite 101
Tempe, AZ 85281
Phone: 602.244.8100 ext. 5348
Fax: 602.244.1915
dana.biscan@burgessniple.com

From:	Brown, Christopher J -FS
To:	FS-prescott-forest-plan-comments
Subject:	Draft Forest Plan and Draft EIS - Moeller Comments
Date:	Monday, October 29, 2012 10:16:49 AM
Attachments:	2012_1015_MoellerComments.pdf

Christopher 'Jake' Brown
Natural Resource Planner

Prescott National Forest
344 South Cortez Street
Prescott, AZ 86303

phone: 928.443.8218
email: christopherjbrown@fs.fed.us

Meeting comments from Chino Valley, AZ meeting held on Monday, Oct 15, 2012

cVV

Alternatives Comment Form

PNF Forest Plan Revision
Oct, 2012 Public Meetings

Topic/Key Word: diverse recreation

Please include my comment as "official comment" ✓ *YES*

If you want to establish standing for Appeal purposes, you will need to provide:

Your Name: Suzanne Moeller

Email or postal address: suemoeller@cableone.net

Alternative (please circle): B (C) D

I **agree** with this alternative because:

provides more recreation use

Alternative (please circle): B C (D)

I have **concerns** with this alternative because:

more dispersed sites will be more difficult to monitor and maintain

~~Develope~~ Developed site provide tables, restroom & trash units

Name: Suzanne Moeller

Email: suemoeller@cableone.net

Include as "official comment": Yes

Topic / Key Word: diverse recreation

Alternative: C

Agree: provides more recreation use

Alternative: D

Concerns: more dispersed sites will be more difficult to monitor and maintain.

Developed site provide tables, restrooms & trash units

Ltr#0018

From: Brown, Christopher J -FS
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS - Molen Comments
Date: Monday, October 29, 2012 10:17:08 AM
Attachments: 2012_1015_MolenComments.pdf

Christopher 'Jake' Brown
Natural Resource Planner

Prescott National Forest
344 South Cortez Street
Prescott, AZ 86303

phone: 928.443.8218
email: christopherjbrown@fs.fed.us

Ltr#0018

Meeting comments from Chino Valley, AZ meeting held on Monday, Oct 15, 2012

<VV

Alternatives Comment Form

PNF Forest Plan Revision
Oct, 2012 Public Meetings

Topic/Key Word: Trails

Please include my comment as "official comment" __YES

If you want to establish standing for Appeal purposes, you will need to provide:
Your Name: Celia Vander Molen
Email or postal address: PO Box 240 86323
Celia@Sketch-la.com

Alternative (please circle): B C D

I **agree** with this alternative because:

Improvement/focus on trails & Recreation

Alternative (please circle): B C D

I have **concerns** with this alternative because:

Name: Celia Vander Molen

Postal: PO Box 240 86323

Email: Celia@Sketch-la.com

Include as "official comment": (not indicated)

Topic / Key Word: Trails

Alternative: D

Agree: Im (illegible) / focus on trails & recreation

Alternative: (none circled)

Concerns: (none given)

From:	Brown, Christopher J -FS
To:	FS-prescott-forest-plan-comments
Subject:	Draft Forest Plan and Draft EIS - Schultz Comments
Date:	Monday, October 29, 2012 10:17:25 AM
Attachments:	2012_1015_SchultzComments.pdf

Christopher 'Jake' Brown
Natural Resource Planner

Prescott National Forest
344 South Cortez Street
Prescott, AZ 86303

phone: 928.443.8218
email: christopherjbrown@fs.fed.us

CVX

Alternatives Comment Form
PNF Forest Plan Revision
Oct, 2012 Public Meetings

Topic/Key Word: WATER/FISH/WILDLIFE

Please include my comment as "official comment" __YES

If you want to establish standing for Appeal purposes, you will need to provide:
Your Name: CATHY SCHULTZ
Email or postal address: hoofnhorse@hotmail.com

Alternative (please circle): B (C) D

I **agree** with this alternative because:

preserves forest more

Alternative (please circle): B C (D)

I have **concerns** with this alternative because:

No perspective on where humans will be impacting forest

CVX

Alternatives Comment Form
PNF Forest Plan Revision
Oct, 2012 Public Meetings

Topic/Key Word: REC/OpSp/Sc

Please include my comment as "official comment" X YES

If you want to establish standing for Appeal purposes, you will need to provide:
Your Name: CATHY SCHULTZ
Email or postal address: hoofnhorse@hotmail.com

Alternative (please circle): B (C) D

I **agree** with this alternative because:

preserves forest more

Alternative (please circle): B C (D)

I have **concerns** with this alternative because:

no perspective on where humans will be impacting forest

Meeting comments from Chino Valley, AZ meeting held on Monday, Oct 15, 2012

Name: Cathy Schultz Email: hoofnhorse@hotmail.com

Include as "official comment": (not indicated)

Topic / Key Word: Water / Fish / Wildlife

Alternative: C

Agree: preserves forest more

Alternative: D

Concerns: No perspective on where humans will be impacting forest

Name: Cathy Schultz Email: hoofnhorse@hotmail.com

Include as "official comment": Yes

Topic / Key Word: Rec / OpSp / Sc

Alternative: C

Agree: preserves forest more

Alternative: D

Concerns: No perspective on where humans will be impacting forest

From:	Brown, Christopher J -FS
To:	FS-prescott-forest-plan-comments
Subject:	Draft Forest Plan and Draft EIS - Anonymous Comments
Date:	Monday, October 29, 2012 10:18:29 AM
Attachments:	2012_1016_Anon1Comments.pdf

Christopher 'Jake' Brown
Natural Resource Planner

Prescott National Forest
344 South Cortez Street
Prescott, AZ 86303

phone: 928.443.8218
email: christopherjbrown@fs.fed.us

Meeting comments from Prescott, AZ meeting held on Tuesday, Oct 16, 2012

Alternatives Comment Form

PNF Forest Plan Revision
Oct, 2012 Public Meetings

Topic/Key Word: Open Space & Scenery

Please include my comment as "official comment" __*YES*

If you want to establish standing for Appeal purposes, you will need to provide:
Your Name: _____
Email or postal address: _____

Alternative (please circle): (B) C D

I **agree** with this alternative because:

more actions are proposed to handle different problems / objectives

Include expansion of migration corridors for all habitats - use Alternative C numbers

Alternative (please circle): B C D

I have **concerns** with this alternative because:

Im concerned that the Forest Service back up and (illegible) at every level of management for protection of Ecosystems & Habitat - by definition this includes Resiliency

Name: (none given) Email: (none given)

Include as "official comment": (not indicated)

Topic / Key Word: Open Space & Scenery

Alternative: B

Agree: more actions are proposed to handle different problems / objections

Include expansion of migration corridors for all habitats: use Alternative C numbers

Alternative: (none circled)

Concerns: Im concerned that the Forest Service back up and (illegible) at every level of management (illegible) Protection of Ecosystems & Habitat – by definition this includes Resiliency

From:	Brown, Christopher J -FS
To:	FS-prescott-forest-plan-comments
Subject:	Draft Forest Plan and Draft EIS - Anonymous Comments
Date:	Monday, October 29, 2012 10:19:39 AM
Attachments:	2012_1016_Anon2Comments.pdf

Christopher 'Jake' Brown
Natural Resource Planner

Prescott National Forest
344 South Cortez Street
Prescott, AZ 86303

phone: 928.443.8218
email: christopherjbrown@fs.fed.us

Meeting comments from Prescott, AZ meeting held on Tuesday, Oct 16, 2012

Alternatives Comment Form

PNF Forest Plan Revision
Oct, 2012 Public Meetings

Topic/Key Word: _____

Please include my comment as "official comment" __*YES*

If you want to establish standing for Appeal purposes, you will need to provide:
Your Name: _____
Email or postal address: _____
_____

Alternative (please circle): B C D

I **agree** with this alternative because:
Improve trail systems. This will help improve the overall proper use of the forest.

Alternative (please circle): B C D

I have **concerns** with this alternative because:
There is little to no trail improvement. the use of ATV and motorcycle use is limited.

"sorry about the handwriting my knee isn't a good desk" :)

Name: (none given) Email: (none given)

Include as "official comment": (not indicated)

Topic / Key Word: (none given)

Alternative: B D

Agree: Improve trail systems. This will help improve the overall proper use of the forest.

Alternative: C

Concerns: There is little to no trail improvement. The use of ATV and motorcycle use is limited.

"sorry about the handwriting my knee isn't a good desk" ☺

Ltr#0022

From: Brown, Christopher J -FS
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS - Anonymous Comments
Date: Monday, October 29, 2012 10:20:28 AM
Attachments: 2012_1016_Anon3Comments.pdf

Christopher 'Jake' Brown
Natural Resource Planner

Prescott National Forest
344 South Cortez Street
Prescott, AZ 86303

phone: 928.443.8218
email: christopherjbrown@fs.fed.us

Ltr#0022

Meeting comments from Prescott, AZ meeting held on Tuesday, Oct 16, 2012

Alternatives Comment Form

PNF Forest Plan Revision
Oct, 2012 Public Meetings

Topic/Key Word: RECREATION TRAILS

Please include my comment as "official comment" ✓ *YES*

If you want to establish standing for Appeal purposes, you will need to provide:

Your Name: _____

Email or postal address: _____

_____

Alternative (please circle): B C (D)

I **agree** with this alternative because:

MORE TRAILS !

Alternative (please circle): B (C) D

I have **concerns** with this alternative because:

REDUCED TRAIL ~~MAINTENANCE~~ MAINTENANCE

Name: (none given)

Email: (none given)

Include as "official comment": Yes

Topic / Key Word: Recreation Trails

Alternative: D

Agree: More Trails !

Alternative: C

Concerns: Reduced Trail Maintenance

Ltr#0023

From: Brown, Christopher J -FS
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS - Anonymous Comments
Date: Monday, October 29, 2012 10:20:41 AM
Attachments: 2012_1016_Anon4Comments.pdf

Christopher 'Jake' Brown
Natural Resource Planner

Prescott National Forest
344 South Cortez Street
Prescott, AZ 86303

phone: 928.443.8218
email: christopherjbrown@fs.fed.us

Ltr#0023

Meeting comments from Prescott, AZ meeting held on Tuesday, Oct 16, 2012

Alternatives Comment Form

PNF Forest Plan Revision
Oct, 2012 Public Meetings

Topic/Key Word: RV USE

Please include my comment as "official comment" __YES

If you want to establish standing for Appeal purposes, you will need to provide:

Your Name: _____

Email or postal address: _____

_____

Alternative (please circle): B (C) D

I **agree** with this alternative because:

I LIKE "A" BEST

Alternative (please circle): (B) C (D)

I have **concerns** with this alternative because:

TO MANY MORE ACTIONS + RESTRICTIONS

Name: (none given) Email: (none given)

Include as "official comment": (not indicated)

Topic / Key Word: RV Use

Alternative: C

Agree: I Like "A" Best

Alternative: B D

Concerns: To Many More Actions & Restrictions

Ltr#0024

From: Brown, Christopher J -FS
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS - Bishop Comments
Date: Monday, October 29, 2012 10:21:03 AM
Attachments: 2012_1016_BishopComments.pdf

Christopher 'Jake' Brown
Natural Resource Planner

Prescott National Forest
344 South Cortez Street
Prescott, AZ 86303

phone: 928.443.8218
email: christopherjbrown@fs.fed.us

Meeting comments from Prescott, AZ meeting held on Tuesday, Oct 16, 2012

Alternatives Comment Form

PNF Forest Plan Revision
Oct, 2012 Public Meetings

Topic/Key Word: Multi-use trails
non-motor
Hike Bike Horse

Please include my comment as "official comment" YES

If you want to establish standing for Appeal purposes, you will need to provide:
Your Name: BRIAN BISHOP
Email or postal address: bribish@yahoo.com

Alternative (please circle): B C D

I **agree** with this alternative because:

Please increase multi-use non-motorized trails in forest area.
+ encourage people to quit smoking!
No horse dung on trails
no headphones for hike + bike – too dangerous

Alternative (please circle): B C D

I have **concerns** with this alternative because:

enjoy trails – is good!

Name: Brian Bishop Email: bribish@yahoo.com

Include as "official comment": Yes

Topic / Key Word: Multi-use trails; non-motor; Hike; Bike; Horse

Alternative: D

Agree: Please increase multi-use non-motorized trails in forest area.

& encourage people to quit smoking!

No horse dung on trails

No headphones for hike & bike – too dangerous

Alternative: (none circled)

Concerns: enjoy trails – is good!

Ltr#0025

From: Brown, Christopher J -FS
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS - Carlson Comments
Date: Monday, October 29, 2012 10:21:40 AM
Attachments: 2012_1016_CarlsonComments.pdf

Christopher 'Jake' Brown
Natural Resource Planner

Prescott National Forest
344 South Cortez Street
Prescott, AZ 86303

phone: 928.443.8218
email: christopherjbrown@fs.fed.us

Ltr#0025

Meeting comments from Prescott, AZ meeting held on Tuesday, Oct 16, 2012

Alternatives Comment Form

PNF Forest Plan Revision
Oct, 2012 Public Meetings

Topic/Key Word: _____

Please include my comment as "official comment" (YES)

If you want to establish standing for Appeal purposes, you will need to provide:

Your Name: Tim Carlson

Email or postal address: clanofcarlsons@cableone.net

Alternative (please circle): (B) C D

I **agree** with this alternative because:

It has the most action to maintain the forrest, the chaparral needs to be maintained.

I like the Contiguous wilderness as opposed to the new areas.

I Like all the recreation maintenance

Alternative (please circle): B C (D)

I have **concerns** with this alternative because:

I dont like the Ash Creek wilderness. It is not necessary & wont be used.

Name: Tim Carlson

Email: clanofcarlsons@cableone.net

Include as "official comment": Yes

Topic / Key Word: (none given)

Alternative: B

Agree: It has the most action to maintain the forest, the chaparral needs to be maintained.

I like the contiguous wilderness as opposed to the new areas.

I like all the recreation maintenance

Alternative: D

Concerns: I don't like the Ash Creek Wilderness.

It is not necessary & wont be used

Ltr#0026

From: Brown, Christopher J -FS
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS - Jones Comments
Date: Monday, October 29, 2012 10:21:59 AM
Attachments: 2012_1016_JonesComments.pdf

Christopher 'Jake' Brown
Natural Resource Planner

Prescott National Forest
344 South Cortez Street
Prescott, AZ 86303

phone: 928.443.8218
email: christopherjbrown@fs.fed.us

Meeting comments from Prescott, AZ meeting held on Tuesday, Oct 16, 2012

Alternatives Comment Form

PNF Forest Plan Revision
Oct, 2012 Public Meetings

Topic/Key Word: ALTERNATIVES

Please include my comment as "official comment" __YES

If you want to establish standing for Appeal purposes, you will need to provide:

Your Name: KEN JONES

Email or postal address: 2543 HILLTOP RD
PRESCOTT 86301

Alternative (please circle): B (C) D

I **agree** with this alternative because:

LESS FOREST MAINT.
" HUMAN INTERVENTION

Alternative (please circle): (B) C (D)

I have **concerns** with this alternative because:

TOO MUCH CLOSURE OF LAND

Name: Ken Jones

Postal: 2543 Hilltop Rd Prescott 86301

Include as "official comment": (not indicated)

Topic / Key Word: Alternatives

Alternative: C

Agree: Less Forest Maint.

" Human Intervention

Alternative: B D

Concerns: Too Much Closure of Land

Ltr#0027

From: Brown, Christopher J -FS
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS - Kearney Comments
Date: Monday, October 29, 2012 10:22:23 AM
Attachments: 2012_1016_KearneyComments.pdf

Christopher 'Jake' Brown
Natural Resource Planner

Prescott National Forest
344 South Cortez Street
Prescott, AZ 86303

phone: 928.443.8218
email: christopherjbrown@fs.fed.us

Ltr#0027

Meeting comments from Prescott, AZ meeting held on Tuesday, Oct 16, 2012

Alternatives Comment Form

PNF Forest Plan Revision
Oct, 2012 Public Meetings

Topic/Key Word: Wilderness area

Please include my comment as "official comment" YES

If you want to establish standing for Appeal purposes, you will need to provide:
Your Name: Douglas Kearney
Email or postal address: douglas.kearney@americantower.com

Alternative (please circle): B C D

I **agree** with this alternative because:

Because it expands the wilderness areas

Alternative (please circle): B C D

I have **concerns** with this alternative because:

Name: Douglas Kearney

Email: douglas.kearney@americantower.com

Include as "official comment": Yes

Topic / Key Word: Wilderness area

Alternative: D

Agree: Because it expands the wilderness areas

Alternative: (none circled)

Concerns: (none given)

Ltr#0028

From: Brown, Christopher J -FS
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS - Sheats Comments
Date: Monday, October 29, 2012 10:22:48 AM
Attachments: 2012_1016_SheatsComments.pdf

Christopher 'Jake' Brown
Natural Resource Planner

Prescott National Forest
344 South Cortez Street
Prescott, AZ 86303

phone: 928.443.8218
email: christopherjbrown@fs.fed.us

Ltr#0028

Alternatives Comment Form
PNF Forest Plan Revision
Oct, 2012 Public Meetings

Topic/Key Word: Watershed

Please include my comment as "official comment" __YES

If you want to establish standing for Appeal purposes, you will need to provide:
Your Name: George Sheets
Email or postal address: gsheets@aol.com

Alternative (please circle): B C D

I **agree** with this alternative because:

Alternative (please circle): B C D

I have **concerns** with this alternative because:

With the large amount of land the forest service manages, a partnership should be created with private or public entities to collect and deliver more water. This water needs to be retained and then directly delivered into our water reservoirs and collection/re-charge systems. Macro-rainwater harvesting vs evaporation.

Alternatives Comment Form
PNF Forest Plan Revision
Oct, 2012 Public Meetings

Topic/Key Word: Connectivity

Please include my comment as "official comment" __YES

If you want to establish standing for Appeal purposes, you will need to provide:
Your Name: George Sheets
Email or postal address:

Alternative (please circle): B C D

I **agree** with this alternative because:

Alternative (please circle): B C D

I have **concerns** with this alternative because:

Corridors should be added to also connect the humans across tribal, city, county, etc jurisdictions. The Major PNF Corridors (Bradshaw Chino, etc) need wildlife and human movement pathways. Can PNF help with Yavapai Tribe Connection into Prescott. Chino Peak wildlife PNF Corr

Meeting comments from Prescott, AZ meeting held on Tuesday, Oct 16, 2012

Name: George Sheats Email:gsheats@aol.com

Include as "official comment": (not indicated)

Topic / Key Word: Watershed

Alternative: (none circled)

Agree: With the large amount of land the forest service manages, a partnership should be created with private or public entities to collect and deliver more water. This water needs to be retained and then directly delivered into our water reservoirs and collection / re-charge systems. Macro rainwater harvesting vs evaporation.

Alternative: (none circled)

Concerns: (none given)

Name: George Sheats Email: (none given)

Include as "official comment": (not indicated)

Topic / Key Word: Connectivity

Alternative: (none circled)

Agree: Corridors should be added to also connect the humans across the tribal, city, county, etc jurisdictions. The Major PNF Corridors (Bradshaw, Chino, etc) need wildlife and human movement pathways. Can PNF help with Peavine Tribe Connection into Prescott Chino Perkinsville PNF etc

Alternative: (none circled)

Concerns: (none given)

From:	Brown, Christopher J -FS
To:	FS-prescott-forest-plan-comments
Subject:	Draft Forest Plan and Draft EIS - Sitton Comments
Date:	Monday, October 29, 2012 10:23:05 AM
Attachments:	2012_1016_SittonComments.pdf

Christopher 'Jake' Brown
Natural Resource Planner

Prescott National Forest
344 South Cortez Street
Prescott, AZ 86303

phone: 928.443.8218
email: christopherjbrown@fs.fed.us

Meeting comments from Prescott, AZ meeting held on Tuesday, Oct 16, 2012

P

Alternatives Comment Form

PNF Forest Plan Revision
Oct, 2012 Public Meetings

Topic/Key Word: _____

Please include my comment as "official comment" ✓ *YES*

If you want to establish standing for Appeal purposes, you will need to provide:
Your Name: Harold R. Sitton
Email or postal address: POB 188
Yarnell, AZ 85362
haroldsitton@gmail.com

Alternative (please circle): B (C) D

I **agree** with this alternative because:

A healthy forest is first and fundamental to all forest uses. Without that, we will have no forest.

Alternative (please circle): B C D

I have **concerns** with this alternative because:

Name: Harold R. Sitton

Postal: POB 188 Yarnell, AZ 85362

Email: haroldsitton@gmail.com

Include as "official comment": Yes

Topic / Key Word: Wilderness area

Alternative: C

Agree: A healthy forest is first and fundamental to all forest uses. Without that, we will have no forest.

Alternative: (none circled)

Concerns: (none given)

Ltr#0030

From: Brown, Christopher J -FS
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS - EPA Comments
Date: Monday, October 29, 2012 10:25:52 AM
Attachments: 2012_1009_EPAComments.pdf

Christopher 'Jake' Brown
Natural Resource Planner

Prescott National Forest
344 South Cortez Street
Prescott, AZ 86303

phone: 928.443.8218
email: christopherjbrown@fs.fed.us

Ltr#0030

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

October 9, 2012

Corbin Newman
Regional Forester
333 Broadway Blvd., SE
Albuquerque, NM 87102

Subject: Draft Environmental Impact Statement for the Prescott National Forest Land and Resource Management Plan, Coconino and Yavapai Counties, Arizona. (CEQ# 20120274)

Dear Mr. Newman:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the Prescott National Forest Land and Resource Management Plan (Project) pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

Based on our review of the DEIS, we have rated all action alternatives (B, C, D) and the document as LO-1, Lack of Objections – Adequate (see enclosed EPA Rating Definitions). The EPA commends the Forest Service for its commitment to vegetation restoration and adaptive management strategies for climate change as proposed in the Project. We recognize the need for the use of mechanical thinning and prescribed fire and wildfire to achieve long-term restoration objectives. We also commend the Forest Service for committing, in the proposed alternative, to wilderness designations and private land acquisition to preserve open space and enhance the human environment. We would also like to acknowledge the thorough description, throughout the DEIS, of the possible effects of climate change in regards to ecosystem resilience and the need for adaptation to climate change, and the commitment, through the proposed alternative, to mitigate these effects.

We support the ongoing consultation with the State Historic Preservation Officer, (SHPO) and encourage the Forest Service to include Tribal Historic Preservation Officers (THPO) in consultation, as appropriate.

EPA appreciates the opportunity to review this DEIS. We also appreciate the Forest Service's coordination with us during our review via phone to discussion the project. When the FEIS is released, please send one hard copy and one CD to the address above (mail code: CED-2). If you have any questions, please contact me at (415) 972-3521, or have your staff contact James Munson, the lead reviewer for this project. James can be reached at (415) 972-3800 or munson.james@epa.gov.

Please note that as of October 1, 2012, EPA Headquarters no longer accepts paper copies or CDs of EISs for official filing purposes. Submissions on or after October 1, 2012, must be made through the EPA's new electronic EIS submittal tool: e-NEPA. To begin using e-NEPA, you must first register with the EPA's electronic reporting site - https://cdx.epa.gov/epa_home.asp. Electronic submission does not change requirements for distribution of EISs for public review and comment, and lead agencies should still provide one hard copy of each Draft and Final EIS released for public circulation to the EPA Region 9 office in San Francisco (Mail Code: CED-2).

Sincerely,

Kathleen Martyn Goforth, Manager
Environmental Review Office

Enclosure:

Summary of the EPA Rating System

Cc:

Mary C. Rasmussen, Forest Planner
344 South Cortez Street
Prescott, AZ 86303

Ltr#0030

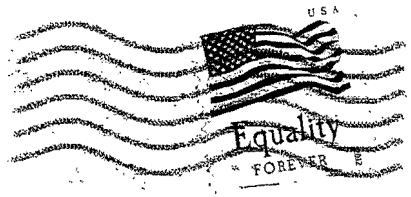
UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
75 HAWTHORNE STREET
SAN FRANCISCO, CALIFORNIA 94105-3901

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, $300

AN EQUAL OPPORTUNITY EMPLOYER

SAN FRANCISCO CA 941

10 OCT 2012 PM 6 L



CED-2

Mary C. Rasmussen, Forest Planner
344 South Cortez Street
Prescott, AZ 86303

RECEIVED
OCT 15 2012
PRESCOTT NATION FOREST

86303+4358

From:	Brown, Christopher J -FS
To:	FS-prescott-forest-plan-comments
Subject:	Draft Forest Plan and Draft EIS - Plumb Comments
Date:	Monday, October 29, 2012 10:26:18 AM
Attachments:	2012_1023_PlumbATRComments.pdf

Christopher 'Jake' Brown
Natural Resource Planner

Prescott National Forest
344 South Cortez Street
Prescott, AZ 86303

phone: 928.443.8218
email: christopherjbrown@fs.fed.us

I believe Alternative C is the most reasonable way to proceed with your Forest Management Plan because the forest needs more work done on it and the 80-90% reduction in maintenance back log needs to be completed with more trail maintenance and signage.

I have no problem with expanding the existing wilderness some but if you need to put your resources to restore the forest in lieu of more wilderness this is acceptable.

Plus using fire to improve Ponderosa Pine Conditions so we do not repeat our beetle kill history is really needed.

Also more maintenance on existing multi use trails especially the trails on Towers Mountain, Battle Flat and the Wagoner area. Wagoner Trail, Blind Indian and The Bradshaw trail.

Chris Plumb
3550 S. Senator Hwy #8
Prescott, AZ. 86303
928-776-8735
Arizona Trail Riders

I believe Alternative C is the most reasonable way to proceed with your Forest Management Plan because the forest needs more work done on it and the 80 – 90 % reduction in maintenance back log needs to be completed with more trail maintenance and signage.

I have no problem with expanding the existing wilderness some but if you need to put your resources to restore the forest in lieu of more wilderness this is acceptable.

Plus using fire to improve Ponderosa Pine Conditions so we do not repeat our bettle (sic) kill history is really needed.

Also more maintenance on existing multi use trails especially the trails on Towers Mountain, Battle Flat and the Wagoner area. Wagoner Trail, Blind Indian and The Bradshaw Trail.

Chris Plumb
3550 S. Senator Hwy #8
Prescott, AZ. 86303
928-776-8735
Arizona Trail Riders

Chris Plumb
3550 S Senator Hwy Unit 8
Prescott, AZ 86303-8428

Motorcycle Hall of Fame Museum Supporter

PHOENIX AZ 852

23 OCT 2012 PM 11 L

forever

Prescott National Forest
Attention: Plan Revision
344 South Cortez Street
Prescott, AZ, 86303-4316

RECEIVED
OCT 23 2012
PRESCOTT NATION FOREST

86303439899

Ltr#0032

From: Sam Southam
To: FS-prescott-forest-plan-comments
Date: Tuesday, October 30, 2012 7:48:26 AM

Dear Prescott National Forest (PNF) Managers:

Thank you for allowing the public to comment on forest revisions and plans PNF has proposed. I appreciate the privilege to make my opinion known. I also appreciate everything our land managers do to ensure a healthy forest while also allowing all users the opportunity to recreate in whichever legal manner they choose.

I would like to comment on one particular matter concerning the revisions. I am an avid mountain biker and have been for 20 years. Bicycling our country's magnificent public lands is an unparalleled way to experience our nation's beauty and diversity. The vast majority of mountain bikers are not the armored stuntmen and downhillers one sees on ESPN's X-games, but casual, cross-country cyclists who just want a bit of exercise in the quiet and peace of the outdoors. Further, mountain biking is one of the fastest growing outside activities, is seeing increasing popularity with our country's youth, and, studies have shown, cause much less impact to our public lands than off road vehicles and horses; in fact, these studies have shown a bicycle's impact to be really no greater than a hiker's.

The concern I have are the PNF's proposals to create and designate more wilderness. As you may know, current law prohibits bicyclists recreating in wilderness areas, inexplicably lumping bicycles with motorized vehicles. Already, more and more public lands are being closed to bicyclists with little to no justification. I am concerned that more wilderness designations in the PNF would severely restrict a bicyclist's ability to adequately enjoy the wonderful forest that surrounds Prescott and other nearby communities. Please do not take action that would significantly restrict a growing, low-impact user group's (ie bicyclists) ability to enjoy our forests.

Thank you for yourunderstanding.

Sincerely,

Sam Southam

Ltr#0033

From: Matthew McNairy
To: FS-prescott-forest-plan-comments
Date: Tuesday, October 30, 2012 4:39:00 PM

Dear Prescott National Forest Management,
I would like to comment on your plans for the Prescott National Forest. I recently made a trip to Prescott to go mountain biking and enjoyed the forest, trails, and the town. I plan to go back next year. I appreciate the access available to bikers in Prescott and admire the work that has been done to allow bikers to use the trails responsibly. I live in Utah and have biked throughout the western United States. I have been biking for over 10 years. I have been a hiker and backpacker for many more years. I understand the impact trail users can have on the environment and always try to protect our valuable natural resources. I have found that most mountain bikers are like me. They enjoy our wilderness areas and want to preserve them for all to enjoy. I encourage you to continue to allow bikers access to the Prescott National Forest.
Thank you,
Matt McNairy
Orem, UT

Ltr#0034

From:	Brown, Christopher J -FS
To:	FS-prescott-forest-plan-comments
Subject:	Draft Forest Plan and Draft EIS - YTA Comments
Date:	Monday, October 29, 2012 10:26:42 AM
Attachments:	2012_1012_YTAComments.pdf

Christopher 'Jake' Brown
Natural Resource Planner

Prescott National Forest
344 South Cortez Street
Prescott, AZ 86303

phone: 928.443.8218
email: christopherjbrown@fs.fed.us

October 12, 2012

Prescott National Forest
344 South Cortez St.
Prescott, AZ 86303

RE: Prescott National Forest Land Management Draft Plan Revision

Yavapai Trails Association is opposed to any separation of users on non-motorized trails. There are designated trails for motorized and non-motorized and that is appropriate. It is not appropriate to begin separating trails for all the different non-motorized users. This will result in fewer trails for all. Cooperation, not separation, is the solution to safer trails.

As a result of recent conflict between bikes and horses, members from different hiking, equestrian and biking organizations, including Yavapai Trails Association, have joined together to form the Trail Safety Coalition. The goal is to work with Prescott National Forest to create safer trails open to all. Much has been done to accomplish this goal. Signs have been placed on high use trails, visibility has been increased and education is ongoing.

Yavapai Trails Association believes the non-motorized community needs to work together with Prescott National Forest to create safer, multiple use non-motorized trails. Shared use trails build a trail community by increasing the need for all users to cooperate to preserve and protect a common resource.

Thank you,

George Sheats

George Sheats, President
Yavapai Trails Association Board

Ltr#0034

YAVAPAI TRAILS
ASSOCIATION
P.O. Box 403, Prescott, AZ 86302

Prescott National Forest
Attention: Plan Revision
Comments

Ltr#0034

MAPS
MINGUS AREA PRESERVATION SOCIETY

October 31, 2012

Mary C. Rasmussen
Forest Planner
Prescott National Forest, Attention Plan Revision
344 S. Cortez St.
Prescott, AZ 86303

RE: Comments, Draft Forest Plan and Draft EIS

Dear Ms. Rasmussen:

After careful review of the Prescott National Forest's proposed plan and draft EIS, I am writing on behalf of the membership of MAPS (the Mingus Area Preservation Society, a 501 (c) (3) incorporated nonprofit environmental organization) to express our strong support for alternative B in the EIS, the proposed revised Forest Plan, draft 5.

We conclude the proposed revised plan is clearly the best combination of benefits and effective management strategies for the Forest and for our Verde Valley region. Our analysis and comments mostly pertain to the Verde District of the PNF, the region in which most (not all) of our members reside, and the region with which we are most familiar.

Our comments are divided into two main sections. First, we would like to comment generally on what we like and why in the proposed revised plan. Second, we would like to provide some specific suggestions to improve certain items in the proposed plan and draft EIS.

I. General Comments. We think it is important to recognize some of the key issues in our region that are effectively addressed in the proposed revised forest plan.

1. First, and possibly most important, the process used to create the plan was inclusive, collaborative, open, and responsive to local communities in the Verde Valley. This has not always been the case with the PNF, so we see this as a major accomplishment that strengthens the overall plan. We particularly appreciate that PNF staff has attended meetings with various local and regional

planning groups going back at least a decade, and utilized adopted city, regional, and county plans in formulating the proposed revised forest plan.

2. The plan recognizes the irreplaceable benefits PNF managed lands provide in the Verde Valley region for open space and scenic values. Prior to this, recognition of these characteristics and values was not always the case in the PNF, so we see this as a major improvement that strengthens the proposed plan over previous versions.

3. The plan recognizes the key role the PNF has in protecting critical watersheds upon which the people of the Verde Valley are almost entirely dependent for drinking water. The plan additionally recognizes and protects a free-flowing Verde River, and helps restore native fish species.

4. The plan provides for up to 10 opportunities to acquire new land in the Verde District. This is significant, beneficial, and important for our region. These acquisitions have the potential to enhance open space between communities, protect scenic vistas from development, and provide public accessibility of land along the Verde River.

5. The plan recognizes the importance of maintaining existing PNF lands as urban separators in the Verde, particularly near Camp Verde, so that our local communities do not grow together into one indistinguishable sprawl. This provision in the plan complements and supports adopted local and regional land use plans, and enhances openness and scenic values considered highly desirable by local communities. Additionally, this provision protects existing wildlife corridors between the Verde River and the Black Hills.

6. The plan recommends the Black Canyon IRA for wilderness status, and maintains wilderness character of the IRA until that status is enacted. Wilderness for Black Canyon is strongly supported by our members and by the local communities. We strongly support Black Canyon as wilderness first and foremost because of the significant value of permanently protecting in a primitive state some of the most remarkable, pristine, and unique land and habitats in the PNF. In addition, Black Canyon is critical to the Verde Valley region as viewshed, watershed, and open space. We also believe wilderness classification will be very beneficial economically for the people of our region, because the enhanced protection and recognized status as wilderness will potentially increase visitation and tourism.

7. The plan recognizes and protects the scenic integrity of the Grief Hill IRA. We support recognition of Grief Hill's importance and value to the region and the PNF as a roadless open space worthy of protection.

8. The plan recognizes and protects air quality and historic sites. Both of these attributes are considered highly important to the people of our region and add to our quality of life.

In summary, we support the proposed revised plan because it provides the best combination of public benefits, environmental stewardship, and multiple uses of forest land.

II Comments on specific elements of the plan We have several specific suggestions, starting with the EIS.

1. Black Canyon Potential Wilderness analysis, recreation alternative D. In the EIS, on page 227, analysis of potential wilderness areas, the underlying premise justifying exclusion of Black Canyon as recommended wilderness in alternative D we believe is flawed.

The premise is that wilderness would preclude mountain biking in a "prime area" adjacent to towns and communities in the Verde Valley.

We suggest that the overall Black Canyon potential wilderness is far too rugged, steep, and heavily vegetated to be a "prime area" for mountain biking. Those ruggedness characteristics are all good reasons why the Black Canyon IRA has in fact remained roadless over the years.

On PNF land east of the existing IRA the terrain becomes less steep and is significantly more suitable for mountain biking. So we believe where the mountain biking opportunities are truly prime is actually outside of the potential wilderness boundaries. This area east of the existing IRA is also amenable to potential future trail connections between communities.

We also believe that in fact far more of the recreating public will benefit from the kind of accessible yet primitive recreation opportunities wilderness offers, as these opportunities are becoming increasingly scarce. In comparison, high quality mountain biking opportunities are already abundant in our region.

We therefore suggest including recommendation of Black Canyon as wilderness in alternative D. This also increases the socioeconomic benefits of Alternative D.

Regarding Draft 5 of the proposed revised plan, we have several specific comments.

1. In the Climate section beginning on page 16, we suggest including some balanced consideration of how the plan will adapt if the predicted trends do not

come to pass. In other words, if the climate modeling is wrong, can the plan compensate and how will it adjust?

2. On page 23, Watershed Desired Condition 4 specifically mentions Phoenix. Suggest also including specific mention of the communities in the Verde Valley who are also dependent upon PNF watersheds for drinking water. If there are no "approved agreements", this item may need to be moved elsewhere, but we believe this is a critically important desired condition that should be explicitly included somewhere.

3. For Desired Condition Open Space – 1, on page 46, consider adding "wilderness character" or similar language to the list of values. Specifically in the Verde, we want to protect the future capability of Black Canyon and Grief Hill as potential wilderness going forward. Adding this or similar language supports the Verde management area directives 4 and 5 as listed on page 105.

4. In the Objectives section, regarding Objectives 26 and 27 on page 62, we have a concern about the negative impact of clearing large areas of the forest to improve antelope habitat. While we support the general idea of improving sight lines and grasslands to benefit antelope, we suggest consideration also be given to retaining certain vegetation in these areas to benefit other species as well. For example, mature mesquites and junipers provide food, shade, and nesting material for a number of species. We suggest language in those objectives that describes careful selection of vegetation to be retained rather than a clearcutting approach, while simultaneously improving habitat for antelope.

5. In the Objectives section, regarding Obj-29 on page 63, the description emphasizes the Verde River specifically, which we support. In addition, consider adding "East face of Mingus Mountain" or the more generic "scenic viewsheds" or similar language to provide additional clarification and specificity for this item. This is supported by VV MA-3 on page 105.

6. In the Standards and Guidelines section, under Wilderness on page 75, suggest addition of a boldfaced standard in this section comparable to the standard W&S-2 for Wild and Scenic Rivers on page 76. The intent would be to use language that ensures the future eligibility and capability of identified potential wilderness areas (especially recommended wilderness areas) going forward.

7. In the Standards and Guidelines section, under Lands and Special Uses on page 77, in Guide Lands - 2, in addition to the land exchange criteria listed, suggest adding language specifying scenic values and open space; also consideration of private lands identified as desirable for acquisition or protection in adopted local, regional, and county general plans. More on this in item 11 below.

8. In Management Area Direction section, we suggest the historical context for the Verde Valley on pages 101-102 can be improved relevant to the PNF and this plan. We offer the following items for consideration:

A. The archaeological evidence indicates the Verde region was inhabited closer to 10,000 years ago (Clovis points found near Loy Butte).

B. Early EuroAmerican settlement in the 1860s in the Verde Valley involved ranching and farming activities. These homesteading pioneers developed historic ditches and irrigation canals along the Verde River that are still in use today. These ditches have legal water rights that supersede SRP's in Phoenix, and today are dependent on a free-flowing Verde River.

C. Mining was a significant industry in the Verde Valley beginning in the 1870s through the early 1950s. Today, extensive inholdings of private land based on old mining claims still exist on the east face of Mingus Mountain. These inholdings are surrounded by PNF land. Because they are within a prime scenic viewshed for the entire region, these private lands on the east face of Mingus are considered highly desirable for the PNF to acquire.

D. Today, the largest component of the Verde Valley economy is tourism (NAU study 2008). The 5 incorporated and numerous unincorporated communities within the Verde Valley each highly prize their unique small town character and quality of life, beautiful scenic vistas, and abundant open spaces between communities (local, regional, and county general plans). The PNF (and Coconino National Forest) provides an essential service in the region by managing public lands that function as wildlife corridors and open space separators between the communities, in addition to providing watershed, viewshed, diverse biohabitat, grazing, lumbering, recreation, and other beneficial uses.

9. In the Characteristics of the Verde Valley section on page 103, under the listing of IRAs, why is the Grief Hill IRA listed with "east portion" in parenthesis? Does the PNF distinguish between east and other unspecified sections? More information here might clarify, or simply delete the reference to the east portion.

10. In the Desired Conditions for the Verde Valley, DC-VV-MA-1 on page 104, we suggest the last sentence be revised for clarification. Suggest language similar to: "The land exchange process is open to the public, and there are opportunities for the public to provide input on land exchanges being considered."

11. In the Guidelines for the Verde Valley Management Area, regarding VV MA-3 land acquisition listed on page 105, in addition to identifying land between Cottonwood and Camp Verde, we suggest including language that specifies adding or retaining land along the Verde River and on the east face of Mingus

Mountain. These additional areas are supported by references on pages 151 (east face of Mingus), and 153 (Verde River).

For this item, we suggest utilizing the Open Space map produced by the Verde Valley Land Preservation Institute as one source of information on desirable lands to acquire. The VVLPI produced this map to show private lands in the region identified by the local communities in their adopted general plans as desirable for open space protection.

We also suggest consulting with the local communities to help identify priorities for these acquisitions, again using each community's most current adopted general plan (which under Arizona law must be approved by voters) for reliable information on community consensus. To assist future PNF land managers, this information may be appropriate to include in the guideline and other sections.

12. For the map "Special Areas" on page 147, should the Grief Hill and other IRAs be listed? If not here, then elsewhere?

Finally, we wish to express our thanks and appreciation to the staff of the PNF for producing these planning documents. PNF staff has done a good job of understanding and incorporating the needs of the local communities while wisely managing the public resource in a balanced manner.

For more information on our comments, or for any questions, please feel free to contact me.

Sincerely,

Steve Block, President
MAPS

From: Clint Brown
To: FS-prescott-forest-plan-comments
Subject: Prescott National Forest Draft Land Mangement Plan comments
Date: Saturday, November 03, 2012 10:09:59 AM

Dear Sir or Madam:

After attending the October meeting in Chino Valley to discuss plan alternatives and the process, I wish to submit the following comments for consideration in adoption of a new plan.

At the outset, I commend all of you with the Forest Service for the manner in which you attempt to balance the interests and concerns of various user groups, many of who hold quite contrasting views on the best manner and method by which to manage our national forest. I view the 1.3 million acre Prescott National Forest as one of our greatest resources, and the impact it has to my health, well being and quality of life here in Prescott cannot be understated. I spend an average of 135 days per year recreating in the PNF. Much of this time is spent from the seat of my motorcycle riding with my 12 year old daughter or friends. As a Prescott native, I treasure my time in the woods and desert highlands that make up the PNF. I also mountain bike an average of 1.5-2 times per week and find this regular escape is crucial to the balance I maintain in my life. My wife, daughter and I hike and kayak approximately 10-15 times per year in the PNF. I am an avid dry-camper as well, and have enjoyed camping all over the PNF both by tent and in my toyhauler camper over th years.

Consequently, I ask that continued access to motorized recreation of all types and dispersed camping be a priority in the final version of the plan that is ultimately adopted- particularly with respect to continued access to single-track motorcycle trails.

Of the plans presented, I believe alternative C is the best proposal due to its emphasis on improvement of forest health and management. However, I would like to see an increased emphasis on increasing the backlog of existing trails maintenance in a fashion similar to that contained in proposed alternative B. It is painful to watch some of my favorite multiple use roads and trails being lost to Mother Nature due to the inability and lack of resources of the PNF to maintain the existing trails inventory, including trails on the MVUM that were completely overgrown and unrideable to begin with. Once these overgrown trails are invariably lost to non-use, as many will be, I am afraid that resulting non-use will be further justification for the continued modification of the PNF Motor Vehicle Use Map (MVUM) to eliminate those roads and trails, thereby further eliminating access for the user-public.

The network of roads and trails we have in the PNF is an incredible resource that is quite unique to the PNF in the sheer quantity and quality of trails that have been maintained over the decades. The maintenance of this trails network should be a HIGH priority for the PNF.

I do not support the additional wilderness designations contained in alternatives B and D. I do not believe the PNF needs more wilderness or areas managed as de-facto wilderness as the PNF already contains wilderness in excess of ten percent of the entire forest area, and plenty of additional acreage that is currently off limits to

motorized and mechanized use. The remaining 90% of PNF lands do not contain the types of characteristics that make these lands appropriate for wilderness designations (they contain existing roads and trails with a long history of motorized use, and/or do not have significant cultural or historical characteristics which would mandate further wilderness protection). In addition, a formal wilderness designation will greatly hog-tie the hands of PNF officials in your management of these lands against disease and catastrophic fire. As is now abundantly clear, a "hands-off" approach to land management clearly does not work, and you need to have legal access to these lands by motorized and mechanized means to adequately manage them.

I do not understand why alternative D is being referred to as the "recreation alternative." Alternative D more than DOUBLES the size of existing wilderness in the PNF. Alternative D will also misdirect finite PNF resources to the construction and maintenance of new trail heads and trails in areas where they can only be enjoyed by a minority of forest users. Only ten percent (10%) of forest users seek out the "wilderness experience." The other 90% are motorized, mechanized, hikers and horseback riders who pursue their chosen form of recreation on non-wilderness lands without complaint or issue. Please do not adopt alternative D or anything approaching it.

With the release of the MVUM recently, many miles of formerly legal motorized trails were lost, particularly formerly legal motorized singletrack trails. I would like to see some effort incorporated into the adopted alternative to identify and add to the MVUM some of the trails that were lost with no apparent explanation as to why they were not included in the MVUM in the first place. Many of these trails have been in existence for many decades and have effectively met the demonstrated needs of the user public. While some were user-created trails, they also have developed into a wonderful trails network for motorized, mechanized, horse and foot traffic (the trails at 7-mile gulch come to mind).

With the exception of the serious issues that have developed in the Granite Basin area between mountain bikers and horseback riders (and admittedly spill into other areas with the combination of irresponsible mountain bikers and overly-anxious horseback riders), I submit that claims of "user-conflict" are largely bogus attempts by certain user groups (mainly horseback riders) to create issues where none actually exist. I would ask you to view claims of user-conflict with a healthy dose of suspicion. I state this as someone who has traveled many thousands of miles on back roads and trails in the Prescott National Forest. In those many years, I have NEVER had a negative experience with forest users from the seat of my motorcycle or mountain bike.

I would also like to see a greater emphasis by the PNF to re-open some of the traditional prescriptive access roads that pass through private sections of property, and which have been gated and locked up in the past few years by private land owners. While I understand the frustrations these landowners face due to the continued vandalism of a few bad apples, there is a legal tradition of public access that has been created which should not be so willingly abandoned by the forest service. Mint Wash, Spider Ranch and Tank Creek Mesa are examples where this has occurred.

Thank you for your time and consideration and your continued hard work to meet the needs of all users. I feel very blessed to live and work here in Prescott. Please

send me confirmation of your receipt of this e-mail.

Clint Brown
1804 Cedarwood Drive
Prescott, AZ 86303
azbrown@cableone.net

Ltr#0037

From: Brown, Christopher J -FS
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS - Godard Comments
Date: Monday, November 05, 2012 7:40:02 AM
Attachments: 2012_1023_GodardComments.pdf

Christopher 'Jake' Brown
Natural Resource Planner

Prescott National Forest
344 South Cortez Street
Prescott, AZ 86303

phone: 928.443.8218
email: christopherjbrown@fs.fed.us

Ltr#0037

October 23, 2012

Ms. Betty A. Mathews
Forest Supervisor
Prescott National Forest
344 S. Cortez Street
Prescott, AZ 86303

RE: Proposed Black Canyon Wilderness

Dear Ms. Mathews:

I am writing this letter to strongly object to the Prescott National Forest proposing to create the Black Canyon Wilderness, consisting of 9,617 acres, here in the Verde Valley. We don't need more wilderness areas in Arizona which restrict the use of mechanical equipment to maintain rangeland improvements.

The Black Canyon Wilderness is located in the Jerome Grazing Allotment. Our forest lands need to continue to be managed under the "multiple use concept," which includes grazing. Managed cattle grazing is healthy for the watershed; and ranching plays a very important role in the local economy in the Verde Valley. Ranchers helped settle the Verde Valley and Yavapai County, and we, including the Forest Service, need to support the important role that ranching plays in maintaining healthy rangeland.

Please delete the Black Canyon Wilderness from your proposed wilderness list regarding the new Forest Plan.

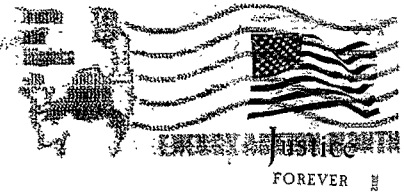
Sincerely,

Don Godard

Don Godard

Don Godard
P. O. Box 105
Cornville, AZ 86325

PHOENIX AZ 852
24 OCT 2012 PM 11 L



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PRESCOTT NATION FOREST

Ms. Betty A. Mathews
Forest Supervisor
Prescott National Forest
344 S. Cortez Street
Prescott. AZ 86303

86303439899

Ltr#0037

Ltr#0038

From: Brown, Christopher J -FS
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS - Boland Comments
Date: Monday, November 05, 2012 7:40:21 AM
Attachments: 2012_1030_BolandComments.pdf

Christopher 'Jake' Brown
Natural Resource Planner

Prescott National Forest
344 South Cortez Street
Prescott, AZ 86303

phone: 928.443.8218
email: christopherjbrown@fs.fed.us

Ltr#0038

October 30, 2012

Ms. Betty A. Mathews
Forest Supervisor
Prescott National Forest
344 S. Cortez Street
Prescott, AZ 86303

RE: Prescott National Forest Plan – Alternative B

Dear Ms. Mathews:

We are writing this letter objecting to the Prescott National Forest Plan proposed revised plan Alternative B to create the Black Canyon Wilderness in the Verde Valley and seven (7) other wilderness areas on the Prescott National Forest (PNF). The Prescott National Forest doesn't need more wilderness areas which restrict the use of mechanical equipment.

The Black Canyon Wilderness is located just south of Cottonwood. Our forest lands need to continue to be managed under the "multiple use concept," which includes grazing. Ranching plays a very important role in the economy in Yavapai County.

We ask that you delete the Black Canyon Wilderness from your proposed wilderness list in Alternative B regarding the new Forest Plan in the Prescott National Forest. We support Alternative C, which has no wilderness areas.

Sincerely,

Sarah Boland

Sincerely,

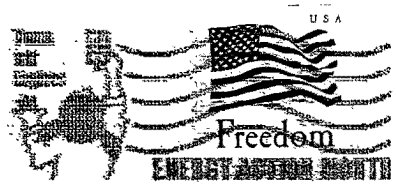
Marty Boland

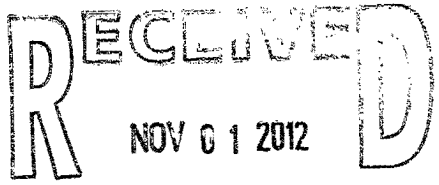
cc: Mary Rasmussen, PNF Planner

Sarah & Marty Boland
1569 Thompson Rd.
Cottonwood, AZ 86326

PHOENIX AZ 852

31 OCT 2012 PM 9 L





PRESCOTT NATION FOREST

Ms. Betty A. Mathews
Forest Supervisor
Prescott National Forest
344 S. Cortez Street
Prescott, AZ 86303

86303439899

Ltr#0038

Ltr#0039

From: Brown, Christopher J -FS
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS - Shanahan Comments
Date: Monday, November 05, 2012 7:40:52 AM
Attachments: 2012_1030_ShanahanComments.pdf

Christopher 'Jake' Brown
Natural Resource Planner

Prescott National Forest
344 South Cortez Street
Prescott, AZ 86303

phone: 928.443.8218
email: christopherjbrown@fs.fed.us

Ltr#0039

October 30, 2012

Ms. Betty A. Mathews
Forest Supervisor
Prescott National Forest
344 S. Cortez Street
Prescott, AZ 86303

Dear Ms. Mathews:

We are aware that the Prescott National Forest is coming to the final phase of the Forest Planning process. One of the alternatives (Alternative B) the Forest is recommending creates eight new wilderness areas. We are adamantly opposed to any more new wilderness areas.

We see that the Forest is recommending creating the Black Canyon Wilderness, located south of Cottonwood. This proposed wilderness area is located within a mile of residences and possesses no wilderness characteristics. It should not even be considered a wilderness area, because it isn't. Please delete it from consideration.

We support Alternative C, which emphasizes improving vegetation and the watersheds, and does not include any recommended wilderness areas on the Forest.

Very truly yours,

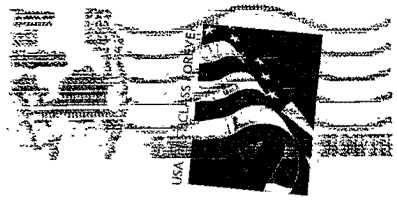
Kyle Shanahan

Holly Shanahan

Holly Shanahan

Shanahan
P. O. Box 713
Cornville, AZ 86325

PHOENIX AZ 850
31 OCT 2012 PM 2 L



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PRESCOTT NATION FOREST

Ms. Betty A. Mathews
Forest Supervisor
Prescott National Forest
344 S. Cortez Street
Prescott, AZ 86303

86303439899

Ltr#0039

Ltr#0040

From: Brown, Christopher J -FS
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS - East Comments
Date: Monday, November 05, 2012 7:41:10 AM
Attachments: 2012_1031_EastComments.pdf

Christopher 'Jake' Brown
Natural Resource Planner

Prescott National Forest
344 South Cortez Street
Prescott, AZ 86303

phone: 928.443.8218
email: christopherjbrown@fs.fed.us

Ltr#0040

October 31, 2012

Ms. Betty A. Mathews
Forest Supervisor
Prescott National Forest
344 S. Cortez Street
Prescott, AZ 86303

Dear Ms. Mathews:

We are against any efforts of the Prescott National Forest to propose more wilderness areas on the National Forest in the new Forest planning process. We are especially opposed to the agency proposing the 9,600+ acres Black Canyon Wilderness located between Cottonwood and Camp Verde. This area has historically been grazed for over 100 years and is a popular area for local residents to hunt, hike, and enjoy the outdoors. We are not in support of Alternative B, which lists eight (8) new wilderness areas. We support Alternative C (no wilderness areas proposed).

We don't need to "lock up" more forest lands as the radical environmentalists are proposing all over the West. We need to continue to encourage more production off of our forests, i.e., timber and grazing. The timber industry is gone; however, ranching is important to our nation's food supply. We need to continue to graze our forests to produce beef to feed our country.

Please…do not create more wilderness areas on the Prescott National Forest, and please don't designate Black Canyon as a wilderness area. This area is located just a short distance from residences and needs to be dropped off of the Forest Plan as a proposed wilderness.

Sincerely,

Randall L. East

Randy East

Sincerely,

Marsha G. East

Marsha East

cc: Mary Rasmussen, PNF Planner

Randy & Marsha East
P. O. Box 2194
Cottonwood, AZ 86326

PHOENIX AZ 852
31 OCT 2012 PM 8 L

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PRESCOTT NATION FOREST

Ms. Betty A. Mathews
Forest Supervisor
Prescott National Forest
344 S. Cortez Street
Prescott, AZ 86303

86303439893

Ltr#0040

Ltr#0041

From: Brown, Christopher J -FS
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS - Noble Comments
Date: Monday, November 05, 2012 7:41:28 AM
Attachments: 2012_1031_NobleComments.pdf

Christopher 'Jake' Brown
Natural Resource Planner

Prescott National Forest
344 South Cortez Street
Prescott, AZ 86303

phone: 928.443.8218
email: christopherjbrown@fs.fed.us

Ltr#0041

October 31, 2012

Ms. Betty A. Mathews
Forest Supervisor
Prescott National Forest
344 S. Cortez Street
Prescott, AZ 86303

RE: Proposed Black Canyon Wilderness

Dear Ms. Mathews:

We are writing this letter to oppose the efforts of Prescott National Forest (PNF) in proposing to create the Black Canyon Wilderness, located just immediately south of Cottonwood, as listed in Alternative B in the proposed new Forest Plan. This is a popular area, used by ranchers and recreationalists, utilizing ATV/OHV trails in the immediate area of this proposed wilderness.

This area is just a "rock throw" south of dozens of homes in the Godard Ranch Road/Quail Springs Road area. It does not meet any of the criteria that we commonly think of as wilderness area. How can the Forest Service even consider an area located so close to town and human activities to be a wilderness?

We strongly object to the proposed Black Canyon Wilderness identified in the new PNF Forest Planning process. Forest lands should continue to be managed under the multiple concept, including grazing and recreation (hunting/fishing/ATV travel) and not allow newly proposed wilderness areas to curtail these activities. We support the continued use of the Black Canyon area as it has been managed for the past 100 years -- that is, grazing, recreation, lands open to hunting, and open space. We support Alternative C (Ecosystem Restoration Emphasis), having no additional recommended wilderness areas on the Prescott National Forest.

Sincerely,

Doug Noble

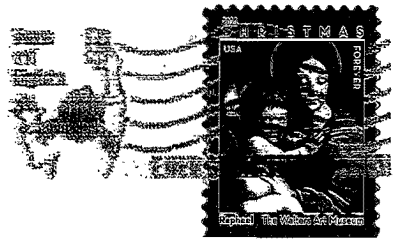
Dez Noble

cc: Mary Rasmussen, PNF Planner

Doug & Dez Noble
P. O. Box 1275
Cottonwood, AZ 86326

PHOENIX AZ 852

31 OCT 2012 PM 2 L



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Ms. Betty A. Mathews
Forest Supervisor
Prescott National Forest
344 S. Cortez Street
Prescott, AZ 86303

86303439893

Ltr#0041

Ltr#0042

From: Bob Utter
To: FS-prescott-forest-plan-comments
Subject: Against new Wilderness
Date: Thursday, November 15, 2012 11:31:21 AM

Just a vote against new Wilderness in Prescott NF. My decision is based on the exclusion of bicycles.

I really enjoy quiet, human powered activities (especially bicycles) and Wilderness would be great if it allowed bicycles.

I thought the intent of the Wilderness act was human powered recreation ? I think the founders of the act would have included bicycles.

thanks and please update the act to reflect the values (bicycles allowed) of the 21st century.

Bob Utter

Ltr#0043

From: Melvin Manrose
To: FS-prescott-forest-plan-comments
Subject: Draft Land and Resource Management Plan
Date: Tuesday, November 20, 2012 8:53:58 AM

All of the forest management plans involve road closures and limited access to areas. I feel that closing roads creates a larger fire hazard by limiting quick access for fire fighters and equipment. Fire is a necessary management tool, but logging should also be considered for forest health. Wildfire destroys wildlife habitat, drives out wildlife (or kills it), and destroys a beautiful view that takes decades to replace. Since many areas have more trees per acre than the forest land can support, timber should be harvested when possible to sustain the area rather than destroy it with a wildfire. This does not mean it should be clearcut, but thinned to a sustainable amount of timber. The Forest Service should once again allow timber sales to pay for improved forest habitat. As roads are closed down, the forest becomes less accessible to those people who are handicapped or unable to hike into areas they once enjoyed. Since it is "Our National Forest" I wish plans would be made that take "all people" into consideration.
Thank you,
Melvin Manrose

Ltr#0044

From: Brown, Christopher J -FS
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS - BLM Comments
Date: Tuesday, November 20, 2012 9:39:43 AM
Attachments: 2012_1120_BLMComments.pdf

Christopher 'Jake' Brown
Natural Resource Planner

Prescott National Forest
344 South Cortez Street
Prescott, AZ 86303

phone: 928.443.8218
email: christopherjbrown@fs.fed.us

Ltr#0044

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Phoenix District
Hassayampa Field Office
21605 North 7th Avenue
Phoenix, Arizona 85027
www.blm.gov/az/

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In Reply Refer To:
1610 (P010)

Ms. Betty Matthews
Forest Supervisor, Prescott National Forest
USDA Forest Service
344 South Cortez Street
Prescott, Arizona 86303

Dear Ms. Matthews:

The Bureau of Land Management (BLM) appreciates the opportunity to review and provide input on the draft Prescott National Forest LRMP Revision. With the amount of public interest in and use of the Forest and public lands in the area, it's imperative that our two agencies work together towards more seamless management of these lands. The Bradshaw and Verde Ranger Districts have a common boundary with the Hassayampa Field Office.

We have mutual issues where aligning our planning should prove beneficial. The issues include travel management in the southern Bradshaw Mountains and North Lake Pleasant area, growing recreational use of the Black Canyon National Recreation Trail and other recreation assets in the Black Canyon Corridor area. The BLM Agua Fria National Monument, managed by our office, is concerned with land tenure and management of land health and habitat in the Agua Fria Grasslands.

In 2010, the BLM completed the Bradshaw-Harquahala Resource Management Plan (RMP) for the Hassayampa Field Office area, and the Agua Fria National Monument RMP for the Monument. These plans benefitted from the years of coordination we received from the Forest Service, and we continue to seek and benefit from your input as we address projects and work on activity level plans for travel management, recreation, land restoration and habitat improvement. Our assessment of the draft LRMP is that it is a good plan, and we offer just a few comments, which are enclosed. Our comments are mostly related to travel, access, connectivity, and consistency along our shared boundaries. These comments are based upon the public land resource allocations and decisions contained within our RMPs. I'm confident that we can address these and other issues by continuing and increasing our communication and coordination between agencies.

If you need clarification of our comments or further information, please don't hesitate to contact Tom Bickauskas, a Natural Resource Specialist, who can answer any questions or direct you to others in our office as needed. Tom may be reached at 623-580-5502 or tbickaus@blm.gov.

Sincerely,

D. Remington Hawes

D. Remington Hawes
Field Manager

Enclosure

BLM Hassayampa Field Office - Comments on PNF Draft LRMP 11-8-12

Page		Comment
44	DC-Rec2 Trails	The second to last bullet could be more proactive and work in a seamless manner with BLM. Current text "Alternate access is available where changes in land ownership or increased development have eliminated historic access to the national forest.". Consider the following, which would be consistent with Hassayampa Field Office's Bradshaw-Harquahala RMP. Action TM-19 "Easements or rights-of-way across key private and State adminstered lands will be acquired to ensure long term network viability and public access. Easements or rights-of-way actions will be undertaken when: route system effectiveness is or would be adversely affected by outside actions; opportunity becomes available and the action is consistent with recreation settings and goals; recreation and resource disciplines need public and / or administrative access to sites; portal access is desired to support resource objectives of safety and sustainability.
92	Crown King Management Area	In the description of the area, Lake Pleasant Recreation Area is mentioned. This is good to recognize and while BLM does not manage a lot of the Crown King Trail (711), we recognize its importance to central Arizona history and backcountry driving experiences. There is a lot of recreation occuring along the common boundary west of Bumble Bee / Cleator which could be mentioned. Then in DC-CK MA-1, add the Bumble Bee and Cleator communties with Crown King as benefitting local economies (3rd bullet).
93	DC-CK MA-2	Last bullet refers to maintaining FR711 in a rough, high clearance manner. A group called the Bradshaw Foothills Coalition had approached the PNF about making an level 2 road connection possible from I-17 through the BLM Table Mesa Recreation Area. It would require widening Trail 233 near Lane Mtn and connecting it to BLM lands where the road is currently on the decommission list. BLM is ammenable to this concept if the PNF is interested in making this connection a desired condition.
93	DC-CK MA-2	BLM is interested in connecting non-motor/non-mechanized trails on the south end of Castle Creek Wilderness (ie trail 235, 236). Making connectivity of trails from BLM lands would be consistent with BLM's RMP (RR-77, WC-22)
147	Map 5 Special areas	Recommended wilderness area named Castle Creek Contiguous may be consistent with BLM's adjacent areas managed for wilderness character with modification. There is a caveat for a north-south motorized route in BLM's plan that would not be possible without management on the PNF side. RMP action WC-18 states "Maintain and enhance non-motorized and primitive recreation experiences, tied to open space and natural landscapes. The desired recreation setting is semi-primitive non-motorized. **Manage the motorized segment of the Black Canyon Trail, which crossed this allocation, as a semi-primitive motorized corridor.** This trail is multi-use, open to both motorized and non-motorized users".
147	Map 5 Special areas	It is not clear if the Castle Creek trail would be accessible if the Castle Creek Contiguous RWA is implemented. BLM is not planning a trailhead to access this trail from Bumble Bee, however, the primitive road going to the Castle Creek cabin site is likely to remain open when route designation occurs.
unknown	grazing	Comments from NEPA coordinator re: Livestock grazing phase out -- the plan indicates that the alternative considered to phase out livestock grazing is inconsistent with law. Is that sufficient to not consider reduced grazing? Are standards and guides (outlined in the appendices) being met? If so, rationale outlining as such might be warranted in the description for why the alternative was removed from detailed analysis.

Ltr#0044

UNITED STATES
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Bureau of Land Management
Phoenix District Office
21605 North 7th Avenue
Phoenix, Arizona 85027

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Ms. Betty Matthews
Forest Supervisor, Prescott National Forest
USDA Forest Service
344 South Cortez Street
Prescott, Arizona 86303

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86303-4399

Ltr#0045

From:	Suzanna McDougal
To:	FS-prescott-forest-plan-comments
Subject:	Draft Forest Plan and Draft EIS
Date:	Tuesday, November 20, 2012 6:47:59 PM

Suzanna McDougal
1150 Middlebrook Rd.
Prescott, AZ 86303
November 20, 2012

To Whom It May Concern:
What follows are my brief comments concerning the draft forest plan and draft EIS. Moving to AZ in 1997 after 30 years in Montana I became very aware of the shortage of water in comparison to W. Montana. Riparian areas are vital for birds (I'm an active birder) and wildlife.
I was shocked to see people of the Prescott area fencing in horses and other livestock in the riparian areas. Montana fences them out. This is a very important change that must occur with our extreme water shortage.
I've helped to monitor the Verde River a few times and it's important that you test the Verde for contaminants and maintain a record of the rate of flow.
Trees are so slow growing, non under 16" in diameter should be cut.
Thanks for considering my comments.
Suzanna McDougal

Ltr#0046

From:	Marla Smith
To:	FS-prescott-forest-plan-comments
Subject:	Forest Plan Revision
Date:	Wednesday, November 21, 2012 10:42:58 AM
Attachments:	Proposed Forest Revision Plan..docx

Ltr#0046

November 15, 2012

Draft Land and Resource Management Plan for the Prescott National Forest

I attended the Chino Valley public meeting in October and thought it was well-run, and very informative with brief comment periods.

I am a grazing permittee on the Chino Ranger District and located in the Williamson Valley South Management area.

I am a life-long resident of the Prescott area, and have been involved in this area for the past 60 years.

I believe the greatest threat in the Prescott National Forest is uncontrolled fire caused by years of fire suppression, which has resulted in the invasion of juniper and chaparral cover. This has resulted in decreased water yield and grassland habitat.

1. Ecosystem Resilience : I would recommend Alternative C.
2. Recreation: I would recommend Alternative C.
3. Watershed: I would recommend reducing woody species.
4. Aquatic and Terrestrial Habitats: I would recommend Alternative B.
5. Open Space and Scenic Views: I would recommend no change.
6. Recommended Wilderness: Strongly recommend Alternative C.

I also would like to see more emphasis on improving range habitat conditions through reduced juniper and chaparral cover. Credit given to permittees that implement livestock water improvements that also helps to sustain wildlife population where there is no existing water.

Thanks,

Lorrie Smith

14500 W. Fair Oaks Rd.

Prescott, AZ. 86305 928-899-1113

Ltr#0047

From:	Jim & Gayle Higgs
To:	FS-prescott-forest-plan-comments
Subject:	Draft Plan Comments
Date:	Wednesday, November 21, 2012 2:38:16 PM
Attachments:	Draft Plan Letter BCHAZ.doc

Please accept this comment letter for the Draft Plan Revision.

Gayle R. Higgs, President
Back Country Horsemen of AZ
P. O. Box 4866
Chino Valley, Arizona

November 20, 2012

Prescott National Forest
Attention: Plan Revision
344 South Cortez Street
Prescott, AZ 86303

Re: Draft Land and Resource Management Plan
For the Prescott National Forest

After carefully reading the draft plan, Back Country Horsemen of Arizona supports Alternate B with the following exceptions:

Recreation: **Objective 8**, is covered best in Alternate D, by adding 2 to 6 designated dispersed camping areas instead of the 1 to 4 in Alt. B. We need to meet the influx of forest users over the next 10 years.

Objective 11 is covered best in Alt. D by improving 10 to 25 trail heads instead of the 5 to 20 in Alt. B. Trucks and trailers are much bigger than they used to be and in the future we need to be proactive by offering the equestrian a place to park to enjoy our beautiful forest.

Objective 17, & 17A is covered best in Alt. D. Alt. B only improves 5 to 10 designated trails to meet described conditions and Alt. D implements 5 to 10 actions, 10 to 20 miles of new trail (completion of Almosta Trail Loops is a must)

Aquatic and Terrestrial Habitat: Alternate C needs to be used. It restores more habitat; 4 to 6 stream reaches and modifies 10 to 15 miles of fencing for Pronghorn migration.

Recommended Wilderness is best covered in Alternate D. With what is happening on the Yavapai Ranch we need to protect as much acreage as we can for future generations.

BCHAZ agrees with the emphasis on dispersed recreation, adding trails and improving trail heads and we are offering our experience in helping to build those and other improvements.

Gayle R. Higgs, President
Back Country Horsemen of Arizona
P.O. Box 4866
Chino Valley, AZ 86323

Ltr#0048

From: Doris Cellarius
To: FS-prescott-forest-plan-comments
Subject: Prescott National Forest Plan Comments
Date: Friday, November 23, 2012 2:56:04 PM

Prescott National Forest
Attention: Plan Revision
344 South Cortez Street
Prescott, AZ 86303-4316

Comments on the Draft Forest Plan and Draft Environmental Impact Statement
http://www.fs.usda.gov/detail/prescott/home/?cid=stelprdb5342004

I favor Alternative C because of its strong emphasis on watershed restoration, resilience and adaptation to climate change.

It is very important to continue looking at adaptive management as a basic strategy to dealing with all of the changes that accompany extreme weather events and worsening drought. Under Table 1 of Chapter 6 on Monitoring it is said that the resilience to climate change would be monitored only every 5 years. That is not enough. It should be done annually.

I am glad you are exploring opportunities to engage more volunteers in watershed restoration. I had hoped to see Prescott Creeks listed as one of the partners the FS works with in the area of enhancement of primary watersheds. I am wondering if it is possible to collaborate with them in seeking grant funds to carry out this work. Prescott Creeks has many trained volunteers who could assist in this kind of work. Similarly the Sierra Club Water Sentinels have trained volunteers who could help carry out activities like this. They have monitored the Verde for over 5 years but could be put to work in other parts of the forest's watersheds. The Water Sentinels have found nonylphenol ethoxlyates, sewage pollutants that can seriously harm fish reproduction, in the Verde. I encourage the FS to do additional monitoring of tributaries to find out the sources of this and other emerging contaminants. Restoration of riparian areas in these tributaries with native vegetation would maximize recharge of precipitation into the groundwater, the source of water in the Verde.

The mining regulations, such as the requirements for bonds for restoration, are good and I hope they can be enforced. I don't know if it is a local or national rule, but I do not think any potentially hazardous mining waste should be disposed of in riparian areas, even if there is no alternative.

Doris Cellarius

Ltr#0048

621 Park Avenue
Prescott AZ 86303

Ltr#0049

From: Gmookher
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS
Date: Saturday, November 24, 2012 10:16:17 AM

Leave these trails Open to mtb

Ltr#0050

From: Ian
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS
Date: Saturday, November 24, 2012 1:31:13 PM

I am a mountain biker concerned about the Black Canyon PWA as it affects my outdoor recreational opportunities. This area includes the Black Canyon Trail which is currently a legal and viable resource conducive to enjoyment through the low impact activity of mountain bike riding. As you know designation of this area as wilderness will preclude future use by cyclists and diminish it's recreational value.

Additionally the eastern portions of the Black Canyon PWA do not qualify for designation as wilderness in my opinion. There are several established roads in or near the PWA, and there's little opportunity for solitude as a result. Historically this area has been used for mining and motorized off road travel, so it retains little of the aesthetic quality associated with wilderness.

Please consider other means to manage the Black Canyon PWA that would maintain the existing non-motorized recreational opportunities currently allowed.

Best regards,
Ian Wickson
Sedona, AZ

Connected by DROID on Verizon Wireless

Ltr#0051

From: Beowulf
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS
Date: Sunday, November 25, 2012 9:53:39 AM

I am a outodoor recreational enthusiast, a National Park Pass holder, National Mountain Bike Patroller and a tax payer who opposes making Mingus Mountain and the Black Canyon Trail off limits to mountain bikers.

In Chapter 5 of Draft Land and Resource Management Plan for the Prescott National Forest; Black Canyon is being recommended as a Wilderness Area this would eliminate legal access to the already established Black Canyon Trail that covers over 60 miles of trail. As I understand bicycles are still considered mechanized and are not allowed in Wilderness Areas; I have seen far more damage from cattle on our public lands and watersheds than any bicyclist has ever created. I assume that cattle will not be allowed in Wilderness areas. I see the description for non-motorized trails includes bicycles but will there be non-motorized access into Wilderness? Will the Black Canyon Trail fall under the "suitable where allowed" category?

Is Jerome/PNFS attempting to limit access to already established Mtn bike trails on Mingus Mtn? Appendix C community landscape vision statements ..." *We envision the PNF actively working to minimize activities that pose a threat to wildlife and low-impact recreation (i.e., hiking and horseback riding). "*

Please help me understand the direction of this plan in regards to bicyclists accessing established trails on Mingus Mtn and Black Canyon City areas?

Sincerely,
John Lupo

Ltr#0052

From: Patrick Kell
To: FS-prescott-forest-plan-comments
Subject: Wilderness
Date: Monday, November 26, 2012 7:48:23 AM

Hello, I would like to voice my opinion on the current Wilderness proposal. I support Alternative C as my Number 1 Priority, which proposes no Wilderness. My Number 2 Priority would Alternative B, noting that the Black Canyon Parcel should be removed from this option. The Black Canyon Parcel is valuable to mountain bikers as non-motorized recreationalists, and should therefore not be included as Wilderness. Thanks, Patrick Kell

Ltr#0053

From: Brown, Christopher J -FS
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS - Yavapai Co. Comments
Date: Monday, November 26, 2012 2:17:47 PM
Attachments: 2012_1120_YavapaiCoComments.pdf

Christopher 'Jake' Brown
Natural Resource Planner

Prescott National Forest
344 South Cortez Street
Prescott, AZ 86303

phone: 928.443.8218
email: christopherjbrown@fs.fed.us

Ltr#0053

Yavapai County Development Services

Prescott Office
1120 Commerce Dr., Prescott, AZ 86305
(928) 771-3214 Fax: (928) 771-3432

Cottonwood Office
10 S. 6th Street, Cottonwood, AZ 86326
(928) 639-8151 Fax: (928) 639-8153

Addressing – Building Safety – Customer Service & Permitting – Environmental –Land Use – Planning

November 20, 2012

Prescott National Forest
Attention: Plan Revision
344 South Cortez Street
Prescott, AZ 86303

RE: Comments on Prescott National Forest Land and Resource Management Plan

To Regional Forester:

Yavapai County Staff is appreciative of the opportunity to review the draft plan prior to the comment period. It gave the County a chance to compare the PNF draft plan with our updated Comprehensive Plan.

Thank you for the opportunity to comment on the proposed forest management plan. The proposed revised plan (Alternative B) appears to be in general conformance with the updated Yavapai County Comprehensive Plan and adds to the implementation of the County Plan.

Please be advised that the above comments do not necessarily reflect the opinion of the Yavapai County Planning and Zoning Commission or the Board of Supervisors or other departments within Yavapai County.

Sincerely,

Tammy DeWitt

Tammy DeWitt, Senior Planner
Yavapai County Development Services
Planning and Land Use Unit

Yavapai County
Development Services
1120 Commerce Drive
Prescott, AZ 86305

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PRESCOTT NATION FOREST

Prescott National Forest
Attention: Plan Revision
344 South Cortez Street
Prescott, AZ 86303

8630384398 C014

Ltr#0053

Ltr#0054

From: John Shumaker
To: FS-prescott-forest-plan-comments
Subject: Prescott National Forest Draft Land Management Plan
Date: Monday, November 26, 2012 6:59:19 PM

Hello All,

I'd like to make a formal comment on the proposed management plan. I'm in support of Alternative C based on the exclusion of new wilderness area designations. The proposed wilderness areas in Alternatives B and D would result in fewer trails for the mountain bike community to ride. This would have the result of higher densities of mountain bikes on the current trail network.

My second recommendation is to adopt Alternative B, but only with the exclusion of the Black Canyon Proposed Wilderness on Mingus Mountain. This designation would directly affect the through travel of long distance mountain bike riders. I think that the Mingus Mountain area is one of the premiere areas to ride mountain bikes in the Prescott Basin. This wilderness designation would have a detrimental effect on only one user group, mountain bikes.

Thanks for the work you've put into these plans.

John Shumaker
116 Vista Drive
Prescott, AZ 86303
602-909-0449

Ltr#0055

From: Rasmussen, Mary C -FS
To: FS-prescott-forest-plan-comments
Subject: Donna Crisfield comment letter
Date: Tuesday, November 27, 2012 10:32:29 AM
Attachments: forest plan comments_D_Crisfield.pdf

Mary C. Rasmussen, Forest Planner
Prescott National Forest
Phone: 928.443.8265
Email: mcrasmussen@fs.fed.us

Ltr#0055

November 23, 2012

Prescott National Forest
Attn: Plan Revision
344 S. Cortez St.
Prescott, AZ 86303

Dear PNF:

As a former frequent user of the trails at Granite Mountain I would like to propose that at least one loop be dedicated to hikers and equestrians. My suggestion would be 345 and 347 with the connector trail between.

It is unfortunate that there is so much controversy over what is truly a safety issue. The difference of opinion seems to be whether you have had an accident or not. The bottom line is that fast moving bicycles and slow moving hikers and horses are a dangerous mix. Too many of my former horseman no longer feel safe using the Granite Mountain trails and are reluctant to become involved in what has become a very negative subject.

Sincerely,

Donna Crisfield

Donna Crisfield
P.O. BOX 579
Paulden, AZ 86334

Ltr#0056

From:	Andy
To:	Mathews, Betty A -FS
Cc:	Rasmussen, Mary C -FS; FS-prescott-forest-plan-comments; Newman, Corbin -FS
Subject:	Arizona Cattle Growers" Association Comments/re Prescott National Forest Draft Management Plan/EIS
Date:	Tuesday, November 27, 2012 1:47:35 PM
Attachments:	Ltr to Betty Mathews PNF Suprvsr re PNF Plan Revision.docx

---

Betty:

Please refer to the attached letter.

Regards,

Andy

Ltr#0056

ARIZONA CATTLE GROWERS' ASSOCIATION

1401 NORTH. 24th STREET, SUITE #4
PHOENIX, ARIZONA 85008 * (602) 267-1129
www.azcattlemensassoc.org

ACGA

November 21, 2012

VIA E-MAIL

Ms. Betty Mathews, Supervisor
Prescott National Forest
344 South Cortez Street
Prescott, A 86303

Re: Prescott National Forest Plan Revision

Dear Ms. Mathews:

I am writing this letter on behalf of those Arizona Cattle Growers' Association (ACGA) members who have grazing allotments on the Prescott National Forest (PNF). ACGA, together with the Yavapai Cattle Growers Association, have been involved in the planning process of the Prescott National Forest since the agency started that process several years ago. We do appreciate the opportunity to participate and provide input to this important Forest Planning process.

We have reviewed the four (4) alternatives in the Draft Environmental Impact Statement and have the following comments and suggestions, and request:

Our concern is that there is an alarming trend in Arizona regarding the setting aside public and federal lands with the continued diminishment of the "multiple use" concept. With less and less emphasis on the "multiple use" concept, this reduces Arizona's and Yavapai County's ability to provide for future job creation and the growth of the core natural resources industries (grazing, timber harvesting, and mining). These core industries – ranching and mining are historic and have played a major role in the development of Yavapai County, and still are the major economic drivers in Yavapai County. We need to make sure that you select a plan that embraces these core industries.

The Multiple Use designation on federal lands is defined under the 1976 Federal Land Policy and Management Act (FLPMA), and was enacted to ensure that the land was available for use by all sectors of the public. In Sec.102. [43 U.S.C. 1701] (a) it states:

> The Congress declares that it is the policy of the United States that (7) goals and objectives be established by law as guidelines for public land use planning, and that management be on the basis of multiple use and sustained yield unless otherwise specified by law; (2) the public lands be managed in a manner which recognizes the Nation's need for domestic sources of minerals, food, timber, and fiber from the public lands including implementation of the Mining and Minerals Policy Act of 1970 (84 Stat. 1876, 30 U.S.C. 21a) as it pertains to public lands.

In two (2) of the four alternatives, Alternatives B and D include the proposed designation of more wilderness areas on the PNF. The Prescott National Forest already has eight (8)

November 21, 2012

wilderness areas totaling 104,483 acres. As we all know, creating a wilderness area removes "tools" in the toolbox that is used to manage our productive rangelands. By using the best management practices available in range management today, the Agency, in cooperation with the grazing permittees, have for decades improved the quality of our rangelands and watersheds. By not being able to use mechanized equipment to maintain existing range improvements and not being able to develop additional range improvements in wilderness areas, eventually, over time leads to lower productivity of those lands, causing adverse impacts not only on the wildlife, but for the rancher who is raising beef cattle to feed our country and the world. There is nothing more sustainable than that range cow that grazes on USFS lands, which converts radiant energy into protein – beef that humans can consume to sustain life.

The U. S. Forest Service continues to dedicate more and more acreage to the "Roadless Area Program" throughout the State, plus encourages the additional designation of wilderness areas, further eliminating the Multiple Use designation under FLPMA. It is the stated mission of the U.S. Forest Service to "sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations." It also incorporated into the Agency's vision and guiding principle statements. Huge roadless areas and wilderness areas are contrary to the Forest Service mission, and impact the ability of industry to provide for the needs of present and future generations of Arizonans.

Request:
The Arizona Cattle Growers' Association respectfully asks that Prescott National Forest preserve and build upon the "multiple use" mandate that is identified under FLPMA. With that in mind, and after reviewing Alternatives A, B, C, and D, we are requesting that you select Alternative C, having an emphasis on vegetation and wildlife. This alternative focuses on range/watershed restoration treatments, which results in improved habitat for cattle and wildlife. In addition, there are no areas recommended for wilderness designation. As ranchers being the true stewards of the land and working together with the PNF, Alternative C best defines the "road map" to follow regarding the future of the Prescott National Forest. In addition, it supports the "multiple use" concept more than any other of the alternatives. We are looking forward to working with you to maintain the "multiple use" mandate of our public/federal lands which are a valuable resource for Arizona, its citizens, and our country's independence. Please keep us on your contact list regarding this matter.

Sincerely,

Andy Groseta
President

AG:cr

cc: Gary Mitchell, YCGA President
David Cook, Chair, ACGA Federal Lands Committee
Paul Groseta, Chair, ACGA Forest Committee
Patrick Bray, ACGA Exec. Vice President
Corbin Newman, Region 3 Forrester
Mary Rasmussen, PNF Planner

Ltr#0057

From: Dave Sewell
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS
Date: Tuesday, November 27, 2012 2:25:44 PM

Hello,

I have studied the proposed revisions thoroughly, and would like to indicate that as a 41 year resident of Prescott and the PNF (I grew up in Groom Creek), I would like to recommend that you choose option C and do not declare any more wilderness areas at this time.

The PNF should use the money and manpower to manage the forest and maintain what we have. For example to continue with controlled burns, and repair of riparian areas. We do not need any more wilderness areas.

The Black Canyon Area is a great example of one area that does NOT need to be declared wilderness. It is already a road free area, and is also planned to have the Black Canyon Trail go though it. This trail should be multi-use, non-motorized.

Mountain biking is a continually growing form of exercise and recreation in the U.S. and the world. Recognizing this and moving forward to embrace it is very important.

Please, please do not allow the Black Canyon Area to be designated a wilderness area.

Regards,

Dave Sewell
2187 Mark Ave.
Prescott, AZ 86301

Ltr#0058

From: May, Ann -FS
To: FS-prescott-forest-plan-comments
Subject: PNF Draft Plan and DEIS comments
Date: Tuesday, November 27, 2012 3:06:08 PM

Comments on the Forest Plan document:

1. I would like to see ROS and SIO listed in the glossary. They are defined elsewhere but it may not be easy to find. ROS is in the need for change concepts for understanding p. 13 and SIO on p 17 & 18. I propose the acronym and what it stands for be included in the Glossary and then the reference page to the full definition which is in the needs for change section. Putting these in the glossary would be helpful to people using the guidelines who run across the terms and are not familiar with them.
2. Objective 10 p. 56. Is the Forest Service still committed to this? Since this was written the plans for Game& Fish to develop a site fell through. Is it still reasonable in a 10 year timeframe?
3. Objective 5 p 55. In light of reduced budgets, reduced CIP dollars and frequency of CIP projects, plus the Forest decision to focus on dispersed not developed we might consider lowering number of dev rec areas from 2-5 to 1-3. Might be more realistic.
4. Rec Guide 8 on p. 74. Since those are the areas the public wants to use, be close to streams and rivers it would be helpful to have a minimum distance here. 100'? Or is that too detailed, leave as is and just contact soils and hydrology on a case by case basis?
5. Guide Wildland Fire-7 p72 has a link for Concern Level definition, should this be repeated in at least the first Guide Scenic-4 p 81 since they are separated by several pages or is it policy to only do it once in the document?

General comments on Alternatives:
Alternative D : While I like the increased trail and trailhead work in this option I think the additional wilderness areas are too much. I am more supportive of enlarging existing wilderness areas since ours are so small but feel creating new ones is too restrictive. Yes it protects areas but also the limits the number of recreational users who can enjoy it. Ash, Arnold and Fritsche do not have that much quality scenery. The new ROS map shows non-motorized for much of these areas which will allow them to retain much of their quality of experience but open to more users. As a mountain biker I do not like being excluded from areas when they become wilderness.
Alternative C: While good for the Forest does not address the growing population of recreationists.
Alternative B: is probably the best compromise for Recreation and Forest Health, possibly less Wilderness as discussed above.

Ann H. May
Forest Landscape Architect
Prescott National Forest
344 S. Cortez St
Prescott, AZ 86303
Office: 928-443-8017
Cell: 928-830-2721
Fax: 928-443-8008

Ltr#0059

From:	Paul Groseta
To:	FS-prescott-forest-plan-comments
Cc:	Rasmussen, Mary C -FS; Brown, Christopher J -FS; Mathews, Betty A -FS
Subject:	Comments on revision of the Draft Land Management Plan and Draft Environmental Impact Statement, Prescott National Forest
Date:	Tuesday, November 27, 2012 4:09:28 PM
Attachments:	PNF plan comments 11-27-12.pdf

Please find attached my comments on the revision of the Draft Land Management Plan and Draft Environmental Impact Statement for the Prescott National Forest.

Thanks,
Paul Groseta

Ltr#0059

Delivered via email to:
Prescott-forest-plan-comments@fs.fed.us
with cc to:
mcrasmussen@fs.fed.us, christopherjbrown@fs.fed.us and bamathews@fs.fed.us

November 27, 2012

Prescott National Forest
Attention: Plan Revision
344 S Cortez Street
Prescott, AZ 86303-4398

RE: Comments on revision of the Draft Land Management Plan and Draft Environmental Impact Statement, Prescott National Forest

Dear Prescott National Forest:

There are two items that need attention brought to them before commenting on Alternative B, The Proposed Revised Plan. They are the 2012 proposed Planning Rule and the PNF's deviance from the Congressionally mandated Forest mission and vision.

First, the proposed revised plan was completed using direction from the **2012 Planning Rule** (DLRMP Page 6, DEIS Pages 3, 78). While the proposed revised plan uses provisions of the 1982 Planning Rule, the proposed 2012 Planning Rule giving "direction" allows for reasonable caution to the PNF plan revision, and possibly even to the extent of the PNF plan revision not being valid or legal.

The new 2012 proposed planning rule is flawed in multiple respects and it violates the National Forest Management Act (NFMA), the Multiple-Use, Sustained-Yield Act (MUSYA) of 1960 and the Administrative Procedures Act (APA).

For example, the 2012 planning rule requires USFS to "maintain a viable population of each species of conservation concern within the plan area." But, the ill-defined term "viable population" does not appear in NFMA or any other statute. The USFS does not need to meddle in species status or situations, which are the responsibilities of the U.S. Fish and Wildlife Service, USDI, National Marine Fisheries, NOAA and respective States.

The general focus of the 2012 rule is on ecosystem services, sustainability, preservation and even "spiritual values" over multiple-use, which is a clear diversion from the statutes governing management of our national forests. The new rule also fails to reflect MUSYA and NFMA requirements governing active land management for multiple uses, including livestock grazing, timber management and recreation. The Forest Service's authorizing statutes (NFMA and MUSYA) provide that "the Secretary shall assure that (Forest Service) plans" provide for "multiple use and sustained yield" of products and services including "outdoor recreation, range, timber, watershed, wildlife and fish, and wilderness".

The proposed rule also emphasizes restoration of natural resources to make NFS lands more resilient to climate change. The climate change models employed in *Climate change 2007: The physical science basis* (Solomon et. al 2007), a report to the Intergovernmental Panel on Climate Change (IPCC), have been scientifically discredited. The proposed rule (and proposed forest plan) continues to site this IPCC report, which is ultimately allowing the USFS's conclusions on climate change to be based on speculation.

The second item is the issue with the stated **Prescott National Forest Mission and Vision** in the DLRMP and DEIS. As stated in the draft plan, "The nationwide mission of the Forest Service is to sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations. The overall goal of managing National Forest System lands is to sustain the multiple uses of its resources in perpetuity, while maintaining the long-term productivity of the land." (DLRMP page 3)

However, the Prescott NF's mission states it is to "effectively and efficiently manage National Forest System lands and resources to meet the needs and desires of the public, while enhancing the environment." And further the PNF vision is to "manage the cultural and natural resources of the Prescott NF to provide healthy watersheds, outdoor recreational opportunities, open space, scenery, and traditional uses that sustain the social and economic structure and stability of our communities." (DLRMP Page 3).

The PNF's mission and vision fails to state "multiple uses". The Prescott NF's mission and vision need to be updated to fall in line with NFMA and MUSYA and should include and state: The overall goal of managing Prescott NF lands is to sustain the multiple uses of its resources in perpetuity, while maintaining the long-term productivity of the land.

Alternative Plan – I am disappointed that the PNF plan revision is going under the Plan B Alternative. Plan C was the best alternative presented and has an emphasis on vegetation and wildlife. Plan B also suggests new wilderness areas, which wilderness areas take away from the multiple use concept for the forest and it also makes it a challenge for the agency to administer these areas with more restrictions. There is no need for any new wilderness areas on the Prescott National Forest. The State of Arizona already has enough wilderness areas that stretch into other Federal agencies, such as over a million acres of BLM wilderness, over a million and a quarter acres of Forest Wilderness, about a million and a half acres of Wildlife Refuge, about 175,000 acres of Primitive Area, in addition to thousands of acres of National Conservation Area and NPS National Monuments and Parks.

Native Fish - As stated throughout the DLRMP and DEIS in multiple chapters, as well as the Need for Change Statement 4 – Native Fish. Native fish, such as the Spikedace and Loach Minnow, would be thriving if not for the introduction of nonnative fish species. In the 1990s all cattle grazing on the Verde River and other rivers and streams were stopped on the USFS R3. This change in land use and management was completed illegally without a NEPA.

The best scientific and commercial information available pertaining to Spikedace and Loach Minnow presence is on the U Bar Ranch in southwestern New Mexico. The largest known populations of both of these species occur in the presence of livestock or within their close proximity below the returns of water to the Gila River from upstream diversions made for agricultural use. Obviously, the construction and use of water diversions on the U Bar Ranch has resulted in neither the reduction nor elimination of riffle habitat essential to Spikedace and Loach Minnow.

The USFS needs to implement controlled grazing on riparian areas now to ensure the survival of native fish. An abundance of recent scientific research relative to the benefits of controlled grazing exists (see citations to publications showing the benefits of controlled grazing, attached Exhibit A). The growing body of scientific literature and data supports the conclusion that controlled livestock grazing does or can provide substantial and positive benefit to native fishes and their habitat. Bayley and Li (2008), Kodric-Brown and Brown (2007), Jackson et al (2006), Saunders and Fausch (2007). Other publications warn of the consequences of ignoring geologic variation in evaluating grazing impacts relative to native warm water fishes and their habitats (Long and Medina, 2006), while yet another warns against making livestock exclusionary management decisions on the basis of the unfounded

assumption that livestock grazing has measurable and negative effects on native fishes and their habitats when, in fact, such assumption is unsupported by the existence of any scientific data (Rinne 2004).

Following is a Handout by John Rinne: Upper Verde River; Status of Information on Fishes, 1994-2006 (prepared Feb, 2007):

UPPER VERDE RIVER

STATUS OF INFORMATION ON FISHES, 1994-2006

John N. Rinne

RMRS

February, 2007

RMRS has been monitoring and studying fish assemblages and factors potentially affecting these assemblages in the upper 60 km of the Verde River since 1994. Information has been published in numerous outlets (Appendix A). Activities have included monitoring fishes and their habitats since flooding in winter 1992-93, mechanical removal of predators 1999-2003 and summer 2006, and spikedace monitoring. In spring 2007, there will be 14 years of data at seven fixed monitoring sites over the upper 60 km reach.

Important relationships and changes in fish assemblages have been documented and unfavorable trends in native fishes have a high probability of repeating themselves. These are:

1. Native fishes were abundant and dominated fish assemblages only for a short term post-flooding in 1994-96 and 2006-?

2. Spikedace were abundant only from 1994-1996, at the extreme upper end of sampling reach. The species has not been collected since 1997.

3. Nonnative fishes became dominant during the extended low flow, drought period (1996-2003); three species of native fishes (including the threatened spikedace) became markedly reduced ((70%) and have virtually disappeared in samples.

4. Pilot mechanical removal activities from 1999-2003 failed to accrue any benefit to native species. A modified removal approach was initiated in 2006, however, funding is currently inadequate to continue this program.

5. Nonnative species are markedly, and steadily increasing once again based on monitoring at the seven long term sites.

6. Flooding and the nature of the upper Verde River hydrograph has been the primary, positive factor to sustain native fishes.

7. Base, drought flows and attendant livestock grazing removal appears to be the primary activities that enhance nonnative fishes in the upper Verde.

In summary, in absence of significant flooding, continued base flows and livestock exclusion, native fishes will once again decline and in some cases disappear from the upper Verde River. By contrast, nonnatives species will increase and dominate the fish assemblage in the upper Verde. Spikedace re-appearance will have an increasingly lower probability.

Native warm water fishes, however, are not the only species shown to benefit by the practice of carefully controlled livestock grazing. Grassland birds (Bock & Bock et al., 1984), Southwestern willow flycatchers (Brodhead, Stoleson & Finch, 2007), Mearns Quail (Bristow & Ockenfels, 2000), Elk (Anderson & Scherzinger, 1975), Mule Deer (Smith et al, 1979) and terrestrial invertebrates (Saunders & Fausch, 2007), among other species, have also been shown to ecologically benefit from controlled livestock grazing.

Again I emphasize, based on the abundance of recent scientific research, the USFS needs to return controlled grazing on riparian areas, especially the Verde River, now to ensure the survival of native fish, and to be in compliance with the Prescott National Forest Plan (existing and proposed).

Climate Change: Climate change is stated throughout the DLRMP & DEIS, which is likely due to the 2012 proposed planning rule (see above comments regarding issues to the proposed 2012 planning rule, and in regards to its mentioning of climate change). References to *Climate change 2007: The physical science basis* (Solomon et. al 2007) occurs at DLRMP page 16. This report to the IPCC has been scientifically discredited. The PNF needs to stop referring to and utilizing this report in the current plan revision process.

Following is a quote from Observed Climate Change and the Negligible Global Effect of Greenhouse-gas Emission Limits in the State of Arizona, Science & Public Policy Institute:

> *"We analyze what the impacts on future climate change will be if Arizona ceased all of its greenhouse gas emissions, now and forever. What we find is eye-opening. Even a complete cessation of greenhouse emissions from Arizona will likely slow the future rate of global warming by less than three thousandths (<0.003) of a ºC per century. The estimated impact on sea level will be an equally meager five hundredths of a centimeter. These changes are scientifically and realistically meaningless.*
>
> *"Worse still, is that greenhouse gas emissions are increasing so rapidly in China that her new emissions will completely subsume the entirely of Arizona's emissions "savings" in less than two month's time! Clearly, the [Climate Change Advisory Group] CCAG's Plan of merely calling for incremental reductions in greenhouse gas emissions will fare even poorer. There is simply no climatic gain to be had from emissions reductions in Arizona. The CCAG must know this, but apparently doesn't want voters to."*

Following is a citation from Observed Climate Change and the Negligible Global Effect of Greenhouse-gas Emission Limits in the State of Arizona, Science & Public Policy Institute, in regards to Arizona Scientists Reject UN's Global Warming Claims:

> *At least 711 Arizona scientists agree in principle with our analysis, they having petitioned the Federal government that the UN's human-caused global warming hypothesis is "without scientific validity and that government action on the basis of this hypothesis would unnecessarily and counterproductively damage both human prosperity and the natural environment of the Earth." They are joined by over **31,072** Americans with university degrees in science – including **9,021** PhDs.*
> *The petition and entire list of US signers can be found here:*
> *http://www.petitionproject.org/index.html and names of the Arizona scientists who*

signed the petition can be viewed here:
http://petitionproject.org/gwdatabase/Signers_BY_State.html

Airshed: On page 16 of the PNF DLRMP it states "Two mandatory Class 1 Federal areas occur within or adjacent to the Prescott NF: Sycamore Canyon Wilderness (47,757 acres) and Pine Mountain Wilderness (20,061 acres). Baseline visibility data collected for these two areas (2001 to 2004) indicate increasing visibility and a trend toward the desired goal of 6.68 to 6.96 deciviews by the year 2064."

First, where are the baseline visibility data and/or reports? Second, how can this be projected 52 years into the future? And third, why is only the Sycamore and Pine Mountain wilderness areas mentioned? A Class 1 Federal area for a wilderness area is larger than 5,000 acres, all eight of the existing wilderness areas on the PNF are larger than 5,000 acres.

On page 20, one of the conditions state "Forest Service management activities do not contribute to diminished visibility or increased atmospheric deposition of pollutants, especially within the Sycamore Canyon Wilderness and Pine Mountain Wilderness."

With this PNF proposed revised plan (Alt B) emphasizing recreation and the growth of ORV use, the above mentioned condition seems not plausible by the PNF. Specifically, the Hayfield Draw Recreation Area has become a wild west atmosphere even with the recent fencing addition and public road closure. There is little enforcement to address "wildcat" off roading creating more unauthorized trails and roads. Ambient air quality, visibility and haze in Hayfield Draw is extremely poor due to the high off road use, and at times is so heavy causes unsafe motor vehicle travel on State Highway 260.

Damage to the land from ORV driving is extensive. ORV driving is one of the most destructive types of land use disturbing the top soil, vegetation and even local ecosystems (Adkinson, 1991; Kutiel et al., 2000; Wiedmer, 2002). Also, it creates noise, produces large amounts of exhaust-gases and emits significant quantities of soil dust, especially when the soil is dry (Goossens and Buck, 2009a). Surfaces disturbed may require decades or even centuries to become more or less restored, if recovery is at all possible (Wilshire and Nakata, 1976).

Thus, how does the PNF propose their management activities will "not contribute to diminished visibility or increased atmospheric deposition of pollutants, especially within the Sycamore Canyon Wilderness and Pine Mountain Wilderness"?

ORV use is an extensive use across all forests, not just PNF. However, PNF continues to allow and in-fact increase these uses. Several months ago I ran across a PNF employee on a dirt bike, he was in the process of flagging a new proposed ORV trail that he said could get a NEPA completed quickly. With a seemingly always pinched budget, lack of enforcement, along with the above mentioned science, why does the PNF keep pushing for more ORV use? In which, said use is inconsistent with and in deviation to the existing and draft LRMP in nearly all areas except recreation. In the aspect that fires as a management tool will exceed air standards, at least with controlled fire you will be improving the environment and not destroying it as with the case of ORV use.

Watershed: Again, on page 20 and 21 of watershed (and in need for change, watershed), mentioning of climate change exists. As mentioned above in climate, the IPCC report has been scientifically discredited, and "there is simply no climatic gain to be had from emissions reductions in Arizona" per the Observed Climate Change and the Negligible Global Effect of Greenhouse-gas Emission Limits in the State of Arizona from the Science & Public Policy Institute.

Also, nowhere in the desired conditions does it state that controlled livestock grazing does or can provide substantial and positive benefit to native fishes and their habitat, as mentioned previously.

Biological Resources: On page 24 under vegetation it states "The Forest Service carries out its responsibilities for stewardship under the concept of sustainable multiple-use management. It seeks to

meet the diverse needs of people while also protecting the terrestrial vegetation and associated resources of the 10 PNVTs found on the Prescott NF."

Why does the PNF continue to self interpret its directive from Congress? MUSYA provides the USFS with a specific Congressional directive establishing priorities for sustainable, multiple use of resources.

I am sure I have missed some other items to comment on, as it is exhaustive looking over the 337 page DEIS and the 173 page DRLMP. I hope that you will update the documents to be more reflective of the best available science and what the Prescott National Forest is Congressionally mandated to do.

Respectfully submitted,
Paul Groseta
Cottonwood, Arizona
pgroseta@gmail.com
Arizona Cattle Growers' Association – Federal Lands Committee, Forest Service chair

Exhibit A

Citations to Publications Showing Benefits of Controlled Grazing and Selected Publications Relating to Riparian Habitat, Native Fishes and Political Ecology

Anderson, E.W. and R.J. Scherzinger. 1975. Improving quality of winter forage for elk and by cattle grazing. *J. Range Management* 28-2-7.

Anderson, M.C. 2009. Livestock And Elk Grazing Effects On Stream Morphology, Brown Trout Population Dynamics, Movement, And Growth Rate, Valles Caldera National Preserve, New Mexico. Master of Science Thesis, New Mexico State University, Las Cruces, NM.

Bayley, P.B. and H.W. Li. 2008. Stream Fish Responses to Grazing Exclosures. *North American Journal of Fisheries Management* 28: 135-147.

Bock, C.E., J.H. Bock, W.R. Kenney and V.M. Hawthorne. 1984. Responses of birds, rodents and vegetation to livestock exclosure in a semidesert grassland site. *J. Range Management* 37: 239-243.

Bristow, K.D. and R.A. Ockenfels. 2000. Effects of human activity and habitat conditions on Mearns quail populations. *Arizona Game and Fish Dept. Res. Tech. Guidance Bull.* No. 4, Phoenix, AZ.

Brodhead, K.M., Stoleson, S.H. and D.M. Finch. 2007. Southwestern Willow Flycatchers (*Empidonax Trailli Extimus*) In A Grazed Landscape: Factors Influencing Brood Parasitism. *The Auk* 124(4): 1213-1228, 2007.

Curtin, C.G. 2005. Landscape-Level Impacts of Livestock on the Diversity of Desert Grassland: Preliminary Results From Long-Term Experimental Studies. *U.S. Forest Service Proceedings* RMRS-P-36.

Davies, K.W., Svejcar, T.J. and J.D. Bates. 2009. Interaction of historical and nonhistorical disturbances maintains native plant communities. *Ecological Applications:* 19(6): 1536-1545.

Donahue, D. 1999. The Western Range revisited: Removing livestock from public Lands to conserve nation biodiversity. *University of Oklahoma Press*, Norman, Oklahoma. 352 p.

Fleming, W., D. Galt and J.L. Holechek. 2001. 10 steps to evaluate rangeland and riparian health. *Rangelands* 23(6): 22-27.

Guretzky, J.A., K.J. Moore, C.L. Burras and E.C. Brummer. 2007. Plant species richness in relation to pasture position, management, and scale. *Agriculture, Ecosystems and Environment* 122 (2007) 387-391. 2

Holechek, J.L., M. Thomas, F. Molinar and D. Galt. 1999. Stocking desert rangelands: what we've learned. *Rangelands* 21(6): 8-12.

Holechek, J.L., T. Baker and J. Boren. 2004. Impacts of controlled grazing versus grazing exclusion on rangeland ecosystems: what we have learned. *Range Improvement Task Force Report No. 57*, 44pp. New Mexico State University, Las Cruces, NM.

Jackson, R.D., Allen-Diaz, B., Oates, L.G. and K.W. Tate. 2006. Spring-water Nitrate Increased with Removal of Livestock Grazing in a California Oak Savanna. *Ecosystems* 9: 254-267.

Knight, R.L. 2007. Ranchers as a keystone species in a West that works. *Rangelands* 29(5): 4-9.

Kodric-Brown, A. and J.H. Brown. 2007. Native fishes, exotic mammals, and the conservation of desert springs. *Front Ecol Environ* 5(10): 549-553.

Lewis, M. 2003. Cattle and conservation at Bharatpur: a case study in science and advocacy. *Conservation and Society* 1, 1.

Light, T. and M.P. Marchetti. 2007. Distinguishing between Invasions and Habitat Changes as Drivers of Diversity Loss among California's Freshwater Fishes. *Conservation Biology* Vol. 21, No. 2: 434-446.

Loeser, M.R.R., T.D. Sisk and T.E. Crews. 2006. Impact of grazing intensity during drought in an Arizona grassland. *Conservation Biology* Vol. 21, No. 1: 87-97.

Long, J.W. and A.L. Medina. 2006. Consequences of ignoring geologic variation in evaluating grazing impacts. *Rangeland Ecol. Manage.* 59: 373-382.

Maestas, J.D., R.L. Knight and W.C. Gilgert. 2003. Biodiversity across a rural land-use gradient. *Conservation Biology* 17(5): 1425-1434.

Manier, D.J. and N.T. Hobbs. 2007. Large herbivores in sagebrush steppe ecosystems: livestock and wild ungulates influence structure and function. *Oecologia* (2007) 152: 739-750.

Navarro, J., D. Galt, J. Holechek, J. McCormick and F. Molinar. 2002. Long-term impacts of livestock grazing on Chihuahuan Desert rangelands. *J. Range Management* 55: 400-405.

Nelson, T., J.L. Holechek, R. Valdez and M. Cardenas. 1997. Wildlife numbers on late and mid seral Chihuahuan desert rangeland. *J. Range Management* 50: 593-599. 3

Pitt, M.D. 1986. Assessment of spring defoliation to improve quality of bluebunch wheatgrass. *J. Range Management* 39: 175-181.

Rinne, J.N. 2004. Forest and fishes: effects of flows and foreigners on southwestern native fishes. Pages 119-124 in G.J. Scrimgeour, G. Eisler, B. McCulloch, U. Silins and M. Monita, Editors. Forest Land-Fish Conference II – Ecosystem Stewardship through Collaboration. Proc. Forest-Land-Fish Conf. II, April 26-28, 2004, Edmonton, Alberta.

Rinne, J.N. and D. Miller. 2006. Hydrology, geomorphology and management: implications for sustainability of native southwestern fishes. *Reviews in Fisheries Science*, 14: 91-110.

Rinne, J.N. and D. Miller. 2008. Riparian Habitat Restoration and Native Southwestern USA Fish Assemblages: A Tale of Two Rivers. *American Fisheries Society Symposium* 49: 867-878.

Rosenfeld, J. 2003. Assessing the habitat requirements of stream fishes: an overview and evaluation of different approaches. *Transactions of the American Fisheries Society* 132: 953-968.

Ruyle, G. 2003. Rangeland livestock production: developing the concept of sustainability on the Santa Rita Experimental Range. In: McClaran, M.P., P.F. Ffolliot, and C.B. Edminster, tech. coords. Santa Rita Experimental Range: 100 years (1903 to 2003) of accomplishments and contributions; conf. proc., 2003 October 30 – November 1; Tucson, AZ. Proc. RMRS-P-30, pp. 34-47. Ogden, UT: USDA Forest Service, Rocky Mountain Research Station.

Saunders, W.C. and K.D. Fausch. 2007. Improved Grazing Management Increases Terrestrial Invertebrate Inputs that Feed Trout in Wyoming Rangeland Streams. *Transactions of the American Fisheries Society* 136: 1216-1230.

Sheridan, T.E. 2001. Cows, Condos, and the Contested Commons: The Political Ecology of Ranching on the Arizona-Sonora Borderlands. *Human Organization,* Vol. 60, No. 2, 2001.

Smith, G., J.L. Holechek and M. Cardenas. 1996. Wildlife numbers on excellent and good condition Chihuahuan desert rangelands: an observation. *J. Range Management* 49: 489-493.

Smith, M.A., J.C. Malechek and K.O. Fulgham. 1979. Forage selection by mule deer on winter range grazed by sheep. *J. Range Management* 32: 40-46.

Sprinkle, J., M. Holder, C. Erickson, A. Medina, D. Robinett, G. Ruyle, J. Maynard, S. Tuttle, J. Hays, Jr., W. Meyer, S. Stratton, A. Rogstad, K. Eldridge, J. Harris, L. Howery and W. Sprinkle. 2007. Dutchwoman butte revisited: Examining 4 paradigms for livestock grazing exclusion. *Rangelands* 29(6): 21-34.

Webb, R.H., Leake, S.A. and R.M. Turner. 2007. *The Ribbon of Green: Change in Riparian Vegetation in the Southwestern United States.* The University of Arizona Press, Tucson. 462pp.

Willms, W.A., A. McClean, R. Tucker and R. Ritchey. 1979. Interactions between mule deer and cattle on big sagebrush range in British Columbia. *J. Range Management* 32: 299-304.

Wu, J., K. Skelton-Groth, W.G. Boggess, and R.M. Adams. 2003. Pacific Salmon Restoration: Trade-Offs Between Economic Efficiency and Political Acceptance. *Contemporary Economic Policy* Vol. 21, No. 1: 78-89.

Ltr#0060

From: kurt refsnider
To: FS-prescott-forest-plan-comments
Subject: Comments from Kurt Refsnider
Date: Tuesday, November 27, 2012 7:04:26 PM

Dear PNF –

I thank you for providing the opportunity to comment on this draft of the new Land and Resource Management Plan, as well as for hosting public Q&A meetings. As an avid outdoorsman, mountain biker, and hiker, I spend a tremendous amount of my free time (and working time!) on public lands, and I appreciate the challenges you face with any major management plans. I'm also on the Board of Directors for the Prescott Mountain Bike Alliance, and I'm a professor of Earth Science at Prescott College, two groups that could be significantly impacted by this draft plan. However, the comments below are purely my own.

My primary concerns in this plan all revolve around mountain bike access. I'm an advocate for "wilderness" areas where one can get away from motorized use, but I am not fond of designated Wilderness areas given the restrictions and enforcement on mechanized equipment. Obviously, bicycles are not permitted, not even if being carried in pieces strapped to one's backpack. I do many long bikepacking trips, and Wilderness areas provide huge obstacles (i.e., on the Arizona Trail, the Colorado Trail, the Continental Divide Trail, etc.) to anyone with a bike. I cannot even hike across carrying my bike should I want to, whereas I have done just that in the Grand Canyon. I also am a bit frustrated with the apparent selective enforcement of the mechanized equipment ban in Wilderness areas, as climbers regularly use mechanical aids, backpackers can pull carts, fisherman use mechanized reels, and skiers use mechanized bindings. These may be picky points, but when cyclists and a few other non-motorized user groups remain locked out of Wilderness areas, it is particularly frustrating. All that being said, I appreciate the fact that designated Wilderness areas act to remove land from any new mining claims and mineral exploration, thus preserving the character of the land.

The specific concerns that your proposal brings up in my mind are these:

1. If one of the goals of several of the Wilderness options is for increasing opportunities for improving non-motorized experience opportunities in particular areas of the PNF, why is the Wilderness designation being pursued? This can be done with other designations that still allow for cyclist to enjoy the same non-motorized experience (e.g., see the James Peak Special Use Area in the Front Range of Colorado). Cyclists deserve a non-motorized experience just as much as any other user groups, and given that we can cover more ground in a given amount of time than hikers and equestrians, there's even more need for long-distance, non-motorized areas for us to enjoy a similar experience.

2. Several of the Wilderness options mention the need for more opportunities for "extended backcountry wilderness experiences" as justification for designating more Wilderness areas. Why are mountain bikers not considered a group that needs more opportunities like these? I yearn for this more than anything else on public lands, putting together big rides through the most remote areas I can find. Again, Wilderness areas often stand in the way of this. Ironically, the designation of more Wilderness *limits* the options available for cyclists to have "extended backcountry wilderness experiences."

3. If some of these Wilderness areas are formally proposed, how will recreational activities be limited? I have spent time in proposed Wilderness areas elsewhere in the West that close them to bike access as soon as the proposal starts to climb the long ladder of the Wilderness designation process. Years after the process began, the areas are still not Wilderness, but bikes are still locked out. Your Wilderness FAQ section says that during this proposal process, the enforcement of Wilderness rules is at the discretion of the Forest Supervisor. I would like to know how our current Forest Supervisor would approach this issue, and what happens if a new Supervisor arrives mid-process and wants to change the enforcement.

4. One of the "needs for change" items listed in the plan (particularly Wilderness Alternative D) is the need to "provide sustainable and diverse recreation opportunities." There are no specifics for increasing these opportunities for cyclists. I only see areas where these opportunities will potentially be limited for cyclists given some of the different Wilderness options.

5. The proposed Black Canyon Wilderness, as well as the other atop Mingus Mountain (not including the one on Woodchute Mountain) are very troubling to me. The plan fails to mention it, but this would result in the closure of a very special trail (Black Canyon Trail and several linking trails on the summit) that is currently open to mountain biking. It's the easiest trail to reach the Mingus summit from the Verde Valley side. Strangely, it's also in a developing plan (between PNF and the Verde Valley Cycling Coalition) for linking a new trail network on the Mingus Summit with the Verde Valley. Why in the world would you be developing such a network, only to close an important chunk of it down to bikes by designating it Wilderness? This is not mentioned in the plan, though you *do* mention that this proposed Wilderness would not impact motorized users. Limiting mountain bike access in this particular area could have significant social/economic impacts on Clarkdale and Cottonwood, two towns that would stand to gain significant potential tourism if this planned trail network, including the Black Canyon Trail, is fully realized.

6. You mention the goal of building more trailheads in several of the

Alternatives. What is the goal of simply building trailheads? Will there be trails to go along with them? Or will they be along existing trails? If you simply build trailheads with no new trails, that accomplishes little. If you build trailheads and one new trail, that may result in "social trails" being constructed in the area so users can have loops instead of out-and-back options. Trailheads require trial networks, and this is not acknowledged anywhere in this plan.

Now, here are some specific suggestions:

1. Explicitly address your goals of increasing recreation opportunities for mountain bikes. Include something more in the way of specifics – locations you would like to develop more trails for bikes rather than just areas where bikes won't be able to go in the future. I realize these plans are generally vague, but the lack of discussion of mountain bike recreation is troubling.

2. Consider alternate designations instead of Wilderness. You can set the rules for Special Use areas – do so and limit motorized use in some areas so you can increase non-motorized recreation experiences, which you state is your primary goal in several of the Wilderness Alternatives. This can also be done more quickly than waiting for Congress to approve a Wilderness proposal.

3. I would be most in favor of Wilderness Alternative C of the provided options.

4. If more Wilderness areas are an important goal for reasons not mentioned, then choose Alternative B, but PLEASE do NOT include the areas atop Mingus Mountain as new Wilderness areas. OR, use the existing Black Canyon Trail as a Wilderness boundary so bike access will not be limited.

5. Institute a user experience monitoring system for trail users to report both positive and negative experiences. Your "monitoring" section in the plan is incredibly vague, but given a few recent incidents on the Prescott-area trails, a considerable amount of attention has been aimed at minimizing user conflict. But we have no baseline data on how widespread conflict actually is. In fact, it could be considerably less than on trails elsewhere in the region. We simply don't know! This lack of data is a serious problem.

Again, thank you for providing an opportunity to comment on these plans, and please feel free to contact me should you want to discuss any of these comments further. I look forward to seeing your responses to comments you receive in the coming months.

Sincerely,

Ltr#0060

Kurt Refsnider
PO Box 4342
Prescott, AZ 86302
928.920.3520
kurt.refsnider@gmail.com

Ltr#0061

From: caroline soong
To: FS-prescott-forest-plan-comments
Subject: Comments for Forest Plan Revision
Date: Tuesday, November 27, 2012 9:25:44 PM

Dear PNF,

As an avid mountain bike from the Prescott area I recently learned about possible changes to the Land and Resource Management Plan that will affect the Black Canyon Trail on Mingus Mountain. The Black Canyon Trail is a unique trail used by mountain bikers from the Verde Valley area. The trail is also a connector trail to other current and planned trails in the area, providing the least strenuous route up the east face of the mountain. By eliminating mountain bike access to the Black Canyon Trail, cyclists will lose an important link between the Verde Valley and trails on the summit. For this reason, I am opposed to any proposed Wilderness areas on that part of the Mountain. A decent compromise could, however, be to place the Wilderness boundary just south of the existing trail and south of planned multi-use trails on the summit itself.

My general support is for Wilderness Alternative C in this draft plan.

Sincerely,

Caroline Soong

Ltr#0062

From: Gary Kidd
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS
Date: Tuesday, November 27, 2012 9:49:34 PM

Additional standards need to be implemented in the Wildland fire sections pertaining to controlled burns. Twice this year and many times in years past the Prescott Basin has been inundated with environmentally/physically dangerous levels of smoke. Standards for proximity to the urban/wildalnd interface need to be promulgated andy included specifically in the forest management plan. Best practice standards including requiring air quality monitoring to ensure particulate and noxious substances are monitored and do not cause harm to the large population. This plan does not address the unique basin topography of the Prescott area, which forms a bowl unsuitable and unsafe for near proximity burning. Further, the plan needs to address,support and give preference to less medically hazardous means of fuel abatement and fire prevention, specifically emphasizing mechanical abatement and non-respiratorily hazardous means of fire prevention in preference of and with a clearer direction and understanding of the dangers to Prescott's elderly, children and those huge numbers of Prescott's population who have severe heart and respiratory conditions that are adversely impacted and even caused by the huge volumes of smoke that have inundated the City of Prescott and Prescott Valley due to the size of prescribed burns and the too near proximity to these urban interfaces recently and in past years. The many complaints of health issues have been ignored and thus need to be addressed and mitigated in this management plan. The plan needs to address this issue and thus impose limits and regulations designed to forestall the actual health issues specifically on the number of acres that these prescribed burns cause. Additionally, the plan needs to incorporate meaningful feedback and avenues to address these significant reoccurring health issues regularly inflicted on the populace of Prescott and its environs meaningfully. Evaluation of dangerous/harmful releases of smoke into the Prescott basin need to be done and a mechanism to do so, with medical professional and civilian input provided for and required should be referred to in this management plan. Additionally, alternative housing for those persons whose health will be most impacted need to be incorporated and other provisions, including provisions for medical care need to be included as part of any controlled burns which "significantly impact an individual's health or cause smoke damage to an individuals property. In other works, some means to prevent harm to the civilian population and to provide compensation for any losses (smoke damage to property or person, including medical expenses reasonably attributable to a controlled burn in proximity the the urban interface needs to be included as part of this plan. Standards for assistance to those with respiratory illnesses, cardiopulmonary diseases, etc should be specifically addressed to ensure that any harm caused by the prescribed burn discharges is addressed.

I would like to see specificity in all areas in the draft management plan addressing standards, procedures for deciding when and where a burn will be permitted, and ensuring the minimal health impact is a priority concern and actually addressed in this plan.

Air Quality Monitoring needs to be incorporated as to any fire within a twenty mile radius to any urban interface with a population of 1,000 or greater. Prescribed burns within that area should involve minimal acreages, at best.

Thank you for the opportunity to provide this comment at this time. It is my opinion and belief that additional work on best management practices with respect to prescribed burns is desperately needed in view of the huge numbers of people, including myself and my five year old son who are suffering respiratory and other health issues due to the prescribed burns. Such issues are not and should be specifically addressed in any forest management plan and certainly in this one.

Thank you for your consideration of this comment.

G. D. Kidd

Ltr#0063

From: Douglas Hiserodt
To: FS-prescott-forest-plan-comments
Subject: PNF Draft Plan and DEIS comments
Date: Wednesday, November 28, 2012 4:44:33 AM

Ive lived in the Prescott area for over 40 yrs and I have felt the forest service has done a great job managing the forest , with the exception of "prescribed burns" . Prescott sits in a basin , whenever the forest service does a prescribed burn the smoke settles into the basin in the evenings and at night . You can taste it , smell it and see it as the smoke diffuses the lights and streetlights . This smoke is harmful , and gets into drapes and furniture inside of homes , the ash lands on vehicles and properties. I have had to go in to the Dr for a respiratory infection and know of others who have had to as well . Children are being given health problems from this! Has the forest service ever witnessed a child gasping for breath in a hospital ? or How about an older person , one who has to stop their job and rush themselves to the hospital because of breathing problems ? Or an elderly person in a assisted facility ? The latest studies being conducted by the forest service (in Washington and Colorado) show that the alkaloids produced from burning of ponderosa pine and the type of brush found in our own Prescott national forest , are carcinogenic , harmful and in some cases deadly . Do you know how many people have died as a result of breathing in your toxic smoke? The particulates in the smoke is UNSAFE . I do not know the differences between the 1989 guideline , or the latest guideline only that , it is my thought if one set of guidelines protects human health better than the other , those are the ones that should be used .

I am not alone in my comments on this . I can only hope that many people speak up and demand that you stop this practice of burning , and find another way to thin the forest . There are other ways , people do it around their homes in the interface areas everyday clearing brush , without fire , you can do it in the national forest . Yes, its labor intensive and creates jobs (you got a problem with that ?) . It may not give firefighters practice at putting out fires they start , but it certainly will allow us all to breathe easier .

Why isnt the EPA involved with monitoring the air quality and issuing advisories to the public when the forest service burns ? Why does the forest service not concern itself with the health of the people who live in the areas they burn ? Why hasnt the forest service given people time to plan , to leave if they have to rather than face illness and costly medical expenses ? Yes , fire creates healthy forests , is there one shred of evidence that prescribed burns have stopped wildfire from happening or even slowed its path ? Not talking about a backfire that is set during the time of a wildfire I'm talking about a prescribed fire set up months before any wildfire .

The residents of this community are sick of this . The majority probably do not even know they can comment on it , I only stumbled on this from a friend who called .

Stop the prescribed burning around Prescott , it is unhealthy .

Thank you for allowing me to comment , Doug Hiserodt , Prescott Arizona

Ltr#0064

From:	billy broadfoot
To:	FS-prescott-forest-plan-comments
Subject:	Comments on Prescott National Forest draft land/resource management plan
Date:	Wednesday, November 28, 2012 6:38:51 AM

To the Prescott National Forest,
Hello, my name is William Broadfoot friends call me Billy.
I have lived, worked and played in Prescott for the past twenty years.
I love all the Prescott National Forest has to offer ie: Hiking, trail running and my biggest love Mountain Biking.
Wish I had more time,but I have to run off to work...so I'm copying the words of a friend and fellow outdoors man Kurt Refsnider
the letter below reflects my thoughts on this issue.....thanks for your time

"Dear PNF –

I thank you for providing the opportunity to comment on this draft of the new Land and Resource Management Plan, as well as for hosting public Q&A meetings. As an avid outdoorsman, mountain biker, and hiker, I spend a tremendous amount of my free time (and working time!) on public lands, and I appreciate the challenges you face with any major management plans. I'm also on the Board of Directors for the Prescott Mountain Bike Alliance, and I'm a professor of Earth Science at Prescott College, two groups that could be significantly impacted by this draft plan. However, the comments below are purely my own.

My primary concerns in this plan all revolve around mountain bike access. I'm an advocate for "wilderness" areas where one can get away from motorized use, but I am not fond of designated Wilderness areas given the restrictions and enforcement on mechanized equipment. Obviously, bicycles are not permitted, not even if being carried in pieces strapped to one's backpack. I do many long bikepacking trips, and Wilderness areas provide huge obstacles (i.e., on the Arizona Trail, the Colorado Trail, the Continental Divide Trail, etc.) to anyone with a bike. I cannot even hike across carrying my bike should I want to, whereas I have done just that in the Grand Canyon. I also am a bit frustrated with the apparent selective enforcement of the mechanized equipment ban in Wilderness areas, as climbers regularly use mechanical aids, backpackers can pull carts, fisherman use mechanized reels, and skiers use mechanized bindings. These may be picky points, but when cyclists and a few other non-motorized user groups remain locked out of Wilderness areas, it is particularly frustrating. All that being said, I appreciate the fact that designated Wilderness areas act to remove land from any new mining claims and mineral exploration, thus preserving the character of the land.

The specific concerns that your proposal brings up in my mind are these:

1. If one of the goals of several of the Wilderness options is for increasing opportunities for improving non-motorized experience opportunities in particular areas of the PNF, why is the Wilderness designation being pursued? This can be done with other designations that still allow for cyclist to enjoy the same non-motorized experience (e.g., see the James Peak Special Use Area in the Front Range of Colorado). Cyclists deserve a non-motorized experience just as much as any other user groups, and given that we can cover more ground in a given amount of time than hikers and equestrians, there's even more need for long-

distance, non-motorized areas for us to enjoy a similar experience.

2. Several of the Wilderness options mention the need for more opportunities for “extended backcountry wilderness experiences” as justification for designating more Wilderness areas. Why are mountain bikers not considered a group that needs more opportunities like these? I yearn for this more than anything else on public lands, putting together big rides through the most remote areas I can find. Again, Wilderness areas often stand in the way of this. Ironically, the designation of more Wilderness *limits* the options available for cyclists to have “extended backcountry wilderness experiences.”

3. If some of these Wilderness areas are formally proposed, how will recreational activities be limited? I have spent time in proposed Wilderness areas elsewhere in the West that close them to bike access as soon as the proposal starts to climb the long ladder of the Wilderness designation process. Years after the process began, the areas are still not Wilderness, but bikes are still locked out. Your Wilderness FAQ section says that during this proposal process, the enforcement of Wilderness rules is at the discretion of the Forest Supervisor. I would like to know how our current Forest Supervisor would approach this issue, and what happens if a new Supervisor arrives mid-process and wants to change the enforcement.
4. One of the “needs for change” items listed in the plan (particularly Wilderness Alternative D) is the need to “provide sustainable and diverse recreation opportunities.” There are no specifics for increasing these opportunities for cyclists. I only see areas where these opportunities will potentially be limited for cyclists given some of the different Wilderness options.
5. The proposed Black Canyon Wilderness, as well as the other atop Mingus Mountain (not including the one on Woodchute Mountain) are very troubling to me. The plan fails to mention it, but this would result in the closure of a very special trail (Black Canyon Trail and several linking trails on the summit) that is currently open to mountain biking. It’s the easiest trail to reach the Mingus summit from the Verde Valley side. Strangely, it’s also in a developing plan (between PNF and the Verde Valley Cycling Coalition) for linking a new trail network on the Mingus Summit with the Verde Valley. Why in the world would you be developing such a network, only to close an important chunk of it down to bikes by designating it Wilderness? This is not mentioned in the plan, though you *do* mention that this proposed Wilderness would not impact motorized users. Limiting mountain bike access in this particular area could have significant social/economic impacts on Clarkdale and Cottonwood, two towns that would stand to gain significant potential tourism if this planned trail network, including the Black Canyon Trail, is fully realized.
6. You mention the goal of building more trailheads in several of the Alternatives. What is the goal of simply building trailheads? Will there be trails to go along with them? Or will they be along existing trails? If you simply build trailheads with no new trails, that accomplishes little. If you build trailheads and one new trail, that may result in “social trails” being constructed in the area so users can have loops instead of out-and-back options. Trailheads require trial networks, and this is not acknowledged anywhere in this plan.

Now, here are some specific suggestions:

1. Explicitly address your goals of increasing recreation opportunities for mountain bikes. Include something more in the way of specifics – locations you would like to develop more trails for bikes rather than just areas where bikes won’t be able to go in the future. I realize these plans are generally vague, but the lack of discussion of mountain bike recreation is troubling.

2. Consider alternate designations instead of Wilderness. You can set the rules for Special Use areas – do so and limit motorized use in some areas so you can increase non-motorized recreation experiences, which you state is your primary goal in several of the Wilderness Alternatives. This can also be done more quickly than waiting for Congress to approve a Wilderness proposal.
3. I would be most in favor of Wilderness Alternative C of the provided options.
4. If more Wilderness areas are an important goal for reasons not mentioned, then choose Alternative B, but PLEASE do NOT include the areas atop Mingus Mountain as new Wilderness areas. OR, use the existing Black Canyon Trail as a Wilderness boundary so bike access will not be limited.
5. Institute a user experience monitoring system for trail users to report both positive and negative experiences. Your “monitoring” section in the plan is incredibly vague, but given a few recent incidents on the Prescott-area trails, a considerable amount of attention has been aimed at minimizing user conflict. But we have no baseline data on how widespread conflict actually is. In fact, it could be considerably less than on trails elsewhere in the region. We simply don’t know! This lack of data is a serious problem.
Again, thank you for providing an opportunity to comment on these plans, and please feel free to contact me should you want to discuss any of these comments further. I look forward to seeing your responses to comments you receive in the coming months.

Sincerely,

Kurt Refsnider"

Cheers to a Wonderful Day
William "Billy" Broadfoot
befoot@yahoo.com
http://befoot-woodworks.blogspot.com/
http://william-broadfoot.blogspot.com/

Ltr#0065

From: mike munroe
To: FS-prescott-forest-plan-comments
Subject: Forest Plan Revision
Date: Wednesday, November 28, 2012 7:06:54 AM

I am 70 years old and an Arizona native. I have been hiking and biking trails all over Arizona my entire life. Mountain biking has done more in the past few years to improve the quantity and quality of Arizona trails than all efforts put together since the CCC boys were at work way back in the 1930s. Don't forget mountain biking in your plans. In fact I think it should be foremost in them.

Mike Munroe
1191 Morning Glory Lane
Prescott, AZ 86305
928 533-2236

Ltr#0066

From: John
To: FS-prescott-forest-plan-comments
Subject: Comment on Objective #10 of draft PNF plan
Date: Wednesday, November 28, 2012 6:39:54 AM

Greetings, Thank You for the opportunity to comment on the Prescott National Forest draft plan.

I am writing specifically to ask for a change in Objective #10, as shown in the screen shot attached.

Please change the number from "one" to "three." Planning only for one shooting range in the next ten years is unrealistic in light of the wording in Objective #10. The objective states that a permit will not be reissued for the range west of Prescott.

Obviously, due to Prescott's population and political clout, the "one" range as currently indicated in the draft plan would be built near Prescott. Meanwhile, the draft for Objective #10 clearly states that residents of Jerome and Castle Hot Springs has raised concerns. Clearly, then, there is a need to increase the number from "one" to "three."

As you well know, simply having an arbitrary number in a final plan doesn't mean that three shooting ranges WILL be built. it means that is simply an objective within the next ten years. By stating that only "one" shooting range will be built in the ten year time frame, the plan becomes self-limiting in a way that the inclusion of "three" shooting ranges would not.

There has been efforts in the Verde Valley to attempt to get a shooting range on PNF lands for possibly as many as 20+ years. Nothing has come of those efforts. However, increased public interest in shooting sports may someday provide the necessary support for creation of a shooting range on PNF managed lands. By choosing an objective to create only "one" range in the next ten years, it seems likely that all such efforts would be focused on replacement of the existing Prescott range to the exclusion of all other areas.

This is a simple change to make and does not bind or commit the PNF to anything other than to broaden management latitude should sufficient public support and funding become available at some future date.

Thanks for the opportunity to comment.

John Parsons
PO BOX 144
Rimrock, AZ 86335
928-399-9652
happytrailsforever@gmail.com

be better matched to the amount and type of use.

Obj-10	Develop a partnership to create and operate 1 designated target shooting area during the 10 years following plan approval. (DC-Rec-1)

Ltr#0066

Background and Rationale

- The Prescott NF has a history of providing a designated target shooting opportunity operated by others through permit. Such a situation has been located west of Prescott for about 50 years, but with population expansion and developments near the range, this permit will not be reissued in the same location. Recreational target shooting is an activity that is desired by many.
- Uncontrolled recreational target shooting surfaced as a source of conflict in meetings in several locations. These conflicts include concerns for personal safety and the accumulation of trash as targets. The communities of Jerome and Castle Hot Springs referenced the need to control recreational target shooting in their community vision statements.

Ltr#0067

From: Richard Yetman Yetman
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS
Date: Wednesday, November 28, 2012 7:25:45 AM

I would like to add my support to Draft Plan Alternative D, to increase added Wilderness areas.

Richard Yetman
53 Yakashba Drive
Prescott 86305

Ltr#0068

From: esgoodwin@commspeed.net
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS
Date: Wednesday, November 28, 2012 7:59:22 AM

I support and want to vote for Plan D in the Prescott Forest Service plan.

Sandra Goodwin
13525 Eagle Drive
Dewey Arizona 896327

Ltr#0069

From: ronjandress@gmail.com
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS
Date: Wednesday, November 28, 2012 8:07:04 AM

Please use alternative A

I also want to say that my family and a large number of friends enjoy riding the trails on our ATV's and UTV's. We always ride responsibly, staying on the trail at all times.
Please don't close any more roads or trails!

From: Rob Hehlen
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS
Date: Wednesday, November 28, 2012 8:30:17 AM

Dear PNF,

Thank you for the opportunity to comment on the proposed forest plan. I have been involved in many ways with recreation on the PNF. I am a member of Yavapai Trails Association (past president), Prescott Mountain Bike Alliance (helped create), Open Space Alliance, Prescott Creeks, Prescott Alternate Transportation, Over the Hill Gang trail crew and have worked in the trails department of the PNF. I've designed and helped build nearly 20 miles of trails in the area including 396 Goldwater Lakes and 9415 Wolverton trails.

In looking at the plan and the alternatives I lean towards Alt D. My reason for this is the need for new trails in the PNF for all user groups. Trail recreation has exploded in the last 10 years due to ATV's, mountain bikes and just a larger population wanting to get out 'into the woods'. This is especially true in the Prescott Basin, but not limited to that area.

I believe the PNF has done some good in the area of creating new trails, but don't believe it has done enough. Because of this, the public has begun building their own trails. This is evident at Emmanuel Pines and the area west of Walker Rd near Seven Mile Gulch. In Alt. D, these two areas could be addressed as new developed recreation sites (EP similar to Granite Basin and WR like Alto Pit). Or trails could be developed under the new trails objective. Either way, if the forest plan doesn't include managing these two areas it's going to be a constant battle.

Add to your plan a commitment to develop a user created trail master plan for the forest. It could be done in smaller sections and then combined for a forest wide trails plan. This way a user group could come to the PNF with a top priority project off of the plan and get the ball rolling. As it is now, there isn't any vision of what the trails network should look like 20 years from now. Just throwing out mileage isn't the answer.

In Alt D., Objective 17B calls for decommissioning 5 miles of trails. This isn't near enough. While working for the PNF it was apparent there are many trails that are rarely, if ever, used. One option to decommissioning trails, however, is to reduce their classification to Class 1 trails. This would greatly reduce the maintenance needed on the trail system.

I saw no mention in the plan for working with partners to accomplish these objectives. When I worked for the PNF, we had a really good Adopt a Trail

program that at the time was maintaining 120 miles of trails. This program has been abandoned and it's sad. The forest plan should address this.

I don't know if the Forest Plan is the proper place for this, but the Forest Service should get out of the 19th century and stop building trails 100%with hand crews. It's slow, it's more dangerous for the volunteers (most of which are older retired folks) than operating a compact excavator every would be.

Wilderness:
Since I'm favoring Alt D, I have to comment on the large amounts of wilderness proposed. I'm in favor of them only if they don't take away existing trails (or proposed trail alignments) that are open to mountain bikes. If any of the wilderness areas do encompass these trails (such as the Black Canyon Trail), alter the wilderness boundary, so that the trail has a non wilderness easement through the wilderness area. There is a road that splits the Sycamore and Red Rock Wilderness areas. This would be similar.

Thank you for your hard work.
Rob Hehlen
PO Box 11434
Prescott, AZ 86304
928-771-8182

Ltr#0071

From: Greg Ooley
To: FS-prescott-forest-plan-comments
Subject: Please stop conducting prescribed burns
Date: Wednesday, November 28, 2012 8:34:16 AM

My child and I have acute allergic reactions to the smoke caused by the prescribed burns. I have missed the last three weeks of work due to the two recent/ongoing prescribed burns. This has really taken a toll on our family and happens to us multiple times per year.

I was told yesterday by a City official that the PNF has an agreement with the USFS whereby we are a training grounds for wildfire crews and that those commitments intensify the effects burns have on our community in two ways:

1. When winds shift, the PNF is reluctant to reschedule because they have training planned.
2. The PNF uses burns instead of mechanical removal of brush (i.e. the "brush crusher") as a way of exposing fire crew trainees to as many methods of fire fighting as possible.

I don't know what the solution is, but I do know that prescribed burns in this area are a new concept and that we managed to get by just fine without them for decades prior. **Please consider addressing this issue and finding ways to thin fuels that do not involve the wide-scale impact that wood smoke has on the residents of Prescott.**

Respectfully,

Greg Ooley
Prescott, AZ

Ltr#0072

From:	GARY LINDA MITCHELL
To:	FS-prescott-forest-plan-comments
Cc:	Rasmussen, Mary C -FS; Brown, Christopher J -FS; Mathews, Betty A -FS; Gretchen Groseta
Subject:	Yavapai Cattle Grower"s Association comments on the Prescott National Forest-plan revision
Date:	Wednesday, November 28, 2012 8:43:09 AM
Attachments:	YCGA comment letter to PNF plan revision 11-27-12.pdf White Paper 2009 from PNF-CNF Planning Meeting FINAL.pdf

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11-28-2012

To Whom It May Concern:

Attached are two comments for the Prescott National Forest Plan Revision from the Yavapai Cattle Growers Association. If you have any questions on these comments please contact me.

Respectfully submitted,

Gary D Mitchell
President
Yavapai Cattle Growers
Home: 928-634-2151
Cell: 928-301-5320
garlinranch@msn.com

Ltr#0072

November 27, 2012

DELIVERED VIA EMAIL TO:
Prescott-forest-plan-comments@fs.fed.us
AND CC TO:
mcrasmussen@fs.fed.us
christopherjbrown@fs.fed.us
bamathews@fs.fed.us

Prescott National Forest
Attention: Plan Revision
344 S Cortez Street
Prescott, AZ 86303-4398

RE: Yavapai Cattle Growers' Association comments on the Prescott National Forest – plan revision

To Whom It May Concern:

The Yavapai Cattle Growers' Association (YCGA) is pleased to submit the following comments for the Prescott National Forest's Forest Plan Revision. YCGA is concerned that the proposed revised plan is using direction from the 2012 Planning Rule. We believe that the 2012 is flawed in multiple respects as the general focus of the 2012 rule is on ecosystem services, sustainability, preservation and even "spiritual values" over multiple-use. Also, the proposed 2012 rule emphasizes restoration of natural resources to make USFS lands more resilient to climate change. The climate change report to the Intergovernmental Panel on Climate Change (IPCC) has been scientifically discredited. YCGA urges the PNF to use the best available science in regards to all matters with this proposed plan revision.

YCGA would have liked to see the proposed plan developed under Alternative C. We feel that Alternative C was the best alternative for the resource as it has an emphasis on vegetation and wildlife. Under Plan B there are suggestions for new wilderness areas. Wilderness areas take away from the multiple use concept and make it a challenge for the agency to present/administer these areas with more restrictions. This state already has enough wilderness areas with over a million acres of BLM wilderness, over a million and a quarter acres of Forest Wilderness, about a million and a half acres of Wildlife Refuge, about 175,000 acres of Primitive Area, in addition to thousands of acres of National Conservation Area and NPS National Monuments and Parks.

There are YCGA members that are directly tied to issues regarding native fish and grazing on riparian areas. Our members are still perplexed at how the PNF removed all cattle grazing on the Verde River (and other rivers and streams on the USFS R3) in the 1990s, this change in land use was completed without a NEPA. There is an abundance of recent scientific research showing the benefits of grazing on riparian areas. Why did the Spikedace and Loach Minnow disappear in the Verde River after grazing was removed? It is well known and accepted that the largest threat to the Spikedace and Loach Minnow is non-native fish that have been introduced by government agencies. The USFS needs to return

controlled grazing on riparian areas, especially the Verde River, to insure the survival of native fish and to be in compliance with the Prescott National Forest Plan (existing AND proposed).

The proposed revised plan seems to emphasize recreation, and the growth of ORV use. Given the USFS's pinched budget and lack of law enforcement, how will the PNF address enforcing lawful recreation? The existing threat to rangelands is extensive, with more recreation and ORV use the threat will only increase. We are aware of only two law enforcement agents that are shared between the Prescott and Coconino. That is over 3 million acres for two people, much too large of an area to correctly patrol.

Several years ago the Yavapai Cattle Growers made a "White Paper" that was created by grazing permittees from both the Prescott and Coconino National Forests. The white paper outlines that grazing promotes watershed health via hoof action that distributes plant litter, breaks up the soil and allows improved water infiltration while at the same time decreases runoff. Nutrients can then be recycled instead of oxidizing into the air. YCGA encourages the PNF to recognize managed grazing as a benefit for improving rangeland and watershed health. The "White Paper" is attached to these comments.

YCGA currently has 300+ members who are closely tied to ranching on not only Prescott NF lands, but BLM, state and private lands as well. Per the USDA-NASS, total 2011 cash receipts was $44,414,000 for livestock production in Yavapai County; in terms of cattle and calves in Yavapai County there was 45,000 head in 2012. Ranching is a major industry in Yavapai County! Management decisions on the Prescott NF has a direct effect not only on an individual ranch basis but county and state wide as well.

We appreciate this opportunity to provide comments for the PNF plan revision and look forward to working with the PNF into the future.

Respectfully submitted,

Gary Mitchell
Yavapai Cattle Growers' Association President

YCGA PNF Permittee Planning Meeting

WHITE PAPER

Ranchers are true stewards of the land and grazing is essential for healthy rangelands and watersheds. Managed grazing increases the plant vigor and growth and reduces fuel loads on Forest land areas and it increases biodiversity. Multiple use which includes grazing needs to be a high priority on the Prescott National Forest (PNF).

In the letter dated January 8, 2010, from Forest Supervisor Alan Quan regarding the PNF Land and Resource Management plan, he outlined the major focus areas of the Revised Forest Plan as follows: 1. Restore vegetation, structure, composition, and desired characteristics of fire to selected ecosystems, while responding to citizen concerns related to smoke emissions. 2. Retain or improve watershed integrity to provide desired water quality, quantity, and timing of delivery. 3. Provide sustainable and diverse recreation experiences that consider population demographic characteristics, reflect desires of local communities, avoid overcrowding and user conflicts and minimize resource damage. 4. Secondary needs for change: a. .Provide desired habitat for native fish species. b. Enhance the value of open space provided by the Prescott National Forest by defining the visual character within areas near or viewed by those in local communities

As permittees of the PNF and members of the Yavapai Cattle Growers we respectfully request that the PNF include continued grazing activity as a high priority in the plan revision process. To that end, we offer these suggestions for how permittees can work with PNF and the public to address these focus areas:

- Desired and future conditions addressing multiple use goals need to be defined and published.
- Monitoring goals and objectives should be based on sound science, conducted by trained range professionals familiar with local conditions in collaboration with permittees.
- Utilizing adaptive management PNF personnel can collaboratively work with the permittees using planned grazing, fire, mechanical and herbicidal treatments to achieve desired and future conditions.
- We encourage PNF to work cooperatively with other governmental agencies and avoid the pitfalls of single species management by a single agency.
- We encourage PNF to harvest their renewable resources thereby reducing fuel loads. Grazing and timber sales are sustainable tools that will reduce fire hazards and maintain a healthy forest without smoke emissions.
- Cattle can be managed to improve and sustain healthy grasslands and watersheds. Grazing is a natural occurrence in grasslands. Grazing animals and grasslands evolved together and need each other to be healthy and productive. Grazing stimulates plants and keeps them from becoming decadent.
- Managed grazing aids in the distribution of plant litter. Hoof action distributes plant litter, breaks up the soil and allows improved water infiltration while at the same time decreasing runoff. Nutrients can then be recycled instead of oxidizing into the air.
- Managed grazing promotes greater plant diversity and improves overall rangeland conditions.

- Viable ranching operations grazing PNF lands contribute significant attributes for recreational users by offering open space, maintaining less fragmented landscapes, improving wildlife habitat, and providing water sources for wildlife, birds, and insects.

- Viable ranching operations provide a low cost food resource by harvesting solar energy and converting it into protein. This creates jobs and generates wealth to support our local, state and national economies.

- While we encourage multiple uses on the PNF we also want to point out that there are unintended results of these uses. Recreation use is one of the primary uses of the PNF and the heavy combined impact of this use is leaving scars on the land. As permittees we are affected by all the impacts and are left to handle situations which we have not created. Some of the more obvious impacts which ranchers are concerned about are wildcat trails started by OHV hunters and casual users, trash, vandalism, thefts, damage to property and large areas of bare ground created by dispersed camping.

- When intense localized uses such as OHV trails, shooting ranges, or other large group recreational uses are proposed by PNF we would like to be consulted and have the impacts to our ranching operation seriously considered.

Once the desired future conditions have been identified, grazing should be a high priority within the multiple use plan used to achieve those conditions. Using planned grazing can compliment, mitigate and enhance the other uses of the PNF because the grazing permittees are active daily and have an economic interest in forest land health. The grazing permittees are eager to be included in an active management strategy.

In summary, planned grazing will 1) allow for restoration of vegetation; 2) modify and enhance diversity and composition of plants; 3) reduce quantities of some invasive species; 4) reduce the need for fire frequency; 5) reduce the intensity of fires; 6) enhance watershed integrity by reducing bare ground and increasing plant root density; 7) enhance watersheds to improve habitat for native fish, other aquatic species and all wildlife; 8) be a low cost tool to mitigate some of the negative effects of disbursed recreation; 9) will help keep grazing allotment permittees financially sound protecting watersheds, open space and decreasing land fragmentation; 10) harvest renewable solar energy and convert it into protein which generates wealth, and creates jobs to support our local, state and national economies.

Ltr#0073

From: Russ Taylor
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS
Date: Wednesday, November 28, 2012 9:23:02 AM

Hello: I read in today's *Daily Courier* that tomorrow is the last day to offer comments on the four Alternative Forest Management Plans – A, B, C & D. I went to the web site stated in the article and could not find the four Alternative Plans after much searching.

Based on my experience camping in the Kaibab Forest last month, where I was informed by Forest Law Enforcement that I could not take my travel trailer not more than 30 feet off the forest roads (!), I do not want to endorse any changes in the Prescott Forest Plan. Therefore I support Plan A – no action.

In the last 30 years there has been much progress made in protecting sensitive environmental areas, endangered species and so forth. Further expansion of "stay out" zones is not needed. I want a good portion of the national forest to be accessible for use by the public for recreation, hunting and enjoyment. I am not for people running ATVs recklessly through the forest but I do support "free camping" in camp sites that have been used by families for decades. In the whole scheme of things, these campsites are a very small portion of the total acreage of the forest and should continue to be available for use.

Russ Taylor
11421 Concho Canyon
Dewey, AZ 86327
Phone: 928 632 1190

Ltr#0074

From:	Rasmussen, Mary C -FS
To:	FS-prescott-forest-plan-comments
Subject:	FW: Draft Forest Plan Comments
Date:	Wednesday, November 28, 2012 10:01:50 AM
Attachments:	Draft_Forest_Plan_Comments_Thiel_11_28_2012.docx

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From: Thiel, Chris A -FS
Sent: Wednesday, November 28, 2012 9:45 AM
To: Rasmussen, Mary C -FS; Brown, Christopher J -FS
Cc: Walls, Nancy -FS; Jackson, Linda L -FS
Subject: Draft Forest Plan Comments

Attached are my comments on the draft Forest Plan that are due to be submitted by today.
Nothing like waiting until the last…

Draft Forest Plan Comments/Corrections submitted by Chris Thiel, RSWE Team Leader, 11/28/12

Page 10 - correction:

In the 4th sentence of the paragraph under the heading "Concepts for Understanding", there is a typographical error. The sentence reads "Within the Prescott NF, two 5th level hydrologic units (watersheds)…..

It should read "twenty-two 5th level hydrologic units." The number of 5th level watersheds is correctly stated on page 20, second sentence of the first paragraph below the table.

Page 23 – comment:

The last bullet in DC-Watershed – 3 states "Soil condition rating is at or trending toward satisfactory". I question whether this is an achievable desired condition. The EIS for the plan has a table (Table 26) on page 60 that shows the current soil condition ratings across the forest by plant community type. It identifies less than 1% of soils in the Great Basin grassland plant community as currently in satisfactory condition, and from 50-75% of the soils in the pinyon-juniper plant communities as being in less than satisfactory condition. The R-3 Soil Management Handbook, FSH 2509.18, p. 6, states that soils in unsatisfactory condition "have degraded to the point that, for most ecosystems, rest alone is not likely to allow them to recover their function in a reasonable period of time. Unless intensive restoration projects are implemented, decades or centuries may be required before soil functions are fully restored." Given the long timeframe that may be required for recovery of unsatisfactory soils, I question whether we can show that it is trending toward satisfactory during the life of this forest plan. Maybe it would be more realistic to have a desired condition statement like "Soils in less than satisfactory condition are treated with improved management techniques or restoration activities designed to recover soil functions." Even this may be difficult given that soil condition in the P-J type is being negatively impacted by the density of juniper, and we are proposing over 40,000 of new wilderness areas, of which some are in the P-J type. It will be unlikely that any restoration treatments will be implemented in the proposed wilderness areas. I understand that desired conditions can be long-term aspirations, but I think we should be able to deliver measurable results in a reasonable timeframe.

Page 39 – correction:

The Desired Condition table, first sentence ends with the words "dominate overstory plants." I think this should read instead "dominant overstory plants."

Page 84 – comment:

In the table displaying Range standards and guidelines, Guide-Range-3 states: "After occurrence of wildland fire or mechanical activity that removes most vegetation, a time period for recovery, establishment and regrowth of grasses and forbs should be determined and applied to meet site specific objectives." I think that "grasses and forbs" should be replaced with the word "vegetation". The chaparral vegetation that is prevalent on the forest will respond to fire and mechanical treatment by resprouting of the shrubs. There may be little or no growth of grasses and forbs. Sometimes there may

not be an adequate seed source present, or timing of precipitation may favor regrowth of shrubs over perennial grasses. The shrub component is often the main forage resource used by livestock in certain pastures. I think we should not put unrealistic expectations for recovery of a grass and forb component in those vegetation types that do not favor this type of vegetation in the potential natural plant community.

Ltr#0075

From:	Rasmussen, Mary C -FS
To:	FS-prescott-forest-plan-comments
Subject:	FW: Draft FP comments
Date:	Wednesday, November 28, 2012 10:08:22 AM
Attachments:	Forest_Plan_Comments_FH.docx

From: Wetzstein, Kurt -FS
Sent: Wednesday, November 28, 2012 7:58 AM
To: Rasmussen, Mary C -FS
Cc: DeBlois, Benjamin P -FS; Wetzstein, Jodi -FS
Subject: Draft FP comments

Comments attached, see you on the 11th.

Forest Plan Comments - Timber Shop

Chapter 2- Forest-wide Desired Conditions

Page 30- Desired Conditions for Piñon-Juniper Woodlands- Landscape Scale (10,000 acres or greater)

> "Tree density is variable and mid-to-old age groups of trees have greater than 40 percent canopy cover, shrubs are sparse, and herbaceous cover is low and discontinuous."
> -Is it a good idea to assign canopy cover numbers with a value (groups of trees) that has not been clearly defined?

Chapter 3. Objectives

Draft Land and Resource Management Plan for the Prescott NF 59
Obj-18
Implement 20 to 50 distinct projects that improve watershed conditions within high priority watersheds during the 10 years following plan approval. (DC-Ecosystem Resilience-1, DC-Watershed-1 to 6)

- *With such a large focus on watershed restoration, I think we would easily surpass 50 distinct projects within high priority watersheds – recommend raising that number substantially.*

Obj-20
Maintain, repair, or relocate 20 to 100 miles of National Forest System roads or trails that impact watershed integrity during the 10 years following plan approval. (DC-Ecosystem Resilience-1, DC-Watershed-1 to 6)

- *Only 100 miles? Since this figure includes regular maintenance, I think 100 miles is too low.*

Chapter 4- Standards and Guidelines

Guide-WL-3
For pronghorn antelope, the following should occur:
Within identified pronghorn habitat, juniper trees that have been cut down should be treated so that pieces lie no higher than 18 inches above the ground.

- *18 inches AGL may be difficult to implement, and it may raise per acre cost for contract work.*

Guide-WL-7

- *The verbage here is direction from GTR-217. What if new direction comes out? Why don't we just say that management will adhere to policy and best available science?*

Std-Wildland Fire 2
Fire shall not be used as a tool for management and wildfires shall be suppressed within the PNVT called Desert Communities (see map 1 in appendix A).

- *Fire shall not be used as a tool for mgmt.? I think you mean that only for Desert Communities, but it is a little unclear as presented.*

Guide-Wildland Fire 3

- *Remove shading from the map so we have the flexibility to manage fires in the Basin.*

Guide-Wildland Fire-7
Slash piles should not be placed in sensitive areas (which includes WL habitat) and should be located in places and burned at times that will minimize scorching of adjacent trees.

- *Does this mean we cannot thin/pile in MSO PAC's or Goshawk PFA's?*

Guide-Wildland Fire-10
Prescribed fires should be excluded from all developed recreation sites including a 100 to 300-foot no fire treatment buffer around sites using existing fire barriers when possible. Shrubs should be retained in these sites for screening purposes, such as between campsites.

- *Prescribed fire is a cost-effective tool that should not be excluded from developed rec. sites – Take Lynx/Hilltop CG's; we have burned them in the past with excellent results. Recommend removing this.*

Guide-Rec-11
Within developed campgrounds, tree cutting should be limited to those that are diseased or a safety hazard.

- *This does not make any sense, please remove it.*

General Comments:

Wilderness: The southwestern side of the proposed Black Canyon Wilderness captures a ridgeline that runs east from Brindle Pup. That ridgeline has a fuelbreak built several years ago, and is a critical location for suppression. Moving that portion of the wilderness perimeter to the north side of the ridge would allow us to maintain the fuelbreak into the future, and is only different by a few hundred acres. The fuelbreak is clearly visible in Google Earth, and would be an easy change to make.

Ltr#0076

From:	Gary Janchik
To:	FS-prescott-forest-plan-comments
Subject:	comments
Date:	Wednesday, November 28, 2012 10:32:40 AM

I was led to believe that you are accepting comments for the "Prescott Forest draft plan."

If so, I would strongly suggest that you **stop all prescribed burns in the future for the health of all bordering the forest**. No one should be chased out of their home in pursuit of air to breathe! I suggest that you utilize mechanical or other non-burning means to clear forest debris. Also, you should allow citizens FREE access to all dead trees in the forest; no permits required!

If a factory created the un-healthy air pollution that prescribed burns create for days in a row throughout the county, the EPA would shut them down.

Why doesn't the EPA monitor your burns?

Looking forward to your response,

Gary Janchik

PS: I live on acreage bordering the PNF and spend considerable time and money to create defensible space. Isn't that the responsibility of each landowner and not yours?

-

Ltr#0077

From: Rasmussen, Mary C -FS
To: FS-prescott-forest-plan-comments
Subject: FW: Resource Management Plan
Date: Wednesday, November 28, 2012 10:39:42 AM

From: Spike Hicks [mailto:spikehicks@cableone.net]
Sent: Wednesday, November 28, 2012 10:02 AM
To: Rasmussen, Mary C -FS
Cc: spikehicks@cableone.net
Subject: Resource Management Plan

Mary C. Rasmussen
Forest Planner

This is to advise you that we support Alternative D of the Draft Land and Resource Management Plan for the Prescott National Forest. We agree with emphasis on dispersed recreation, adding trails and improving trail heads. We also believe that the additional acreage devoted to expanding the wilderness areas will be more beneficial to the greatest number of forest users, particularly in light of the recent plans for increased development near Prescott National Forest lands.

Charles and Carol Hicks
(928) 778-1833

Ltr#0078

From: John Munderloh
To: FS-prescott-forest-plan-comments
Subject: Leave our Roads open
Date: Wednesday, November 28, 2012 10:52:10 AM

The Prescott National Forest plan intends to close historic roads to motor vehicle travel. This is act discriminates against working people, poor and disabled. The forest should remain open to all Americans, not just those that are wealthy enough to afford the time and equipment to hike the backcountry and those that are healthy enough to do it. The typical working class citizen has maybe one day a month that they can use to get away, and a 4x4 truck or SUV can be driven on most of the forest roads – meaning that us working people don't have to buy another vehicle (i.e. a quad) just to enjoy public lands

I have noticed that many of the forest roads that I have driven on with my family over the many past decades are now closed to us. Aren't these roads part of the public domain? Isn't the Forest Service supposed to provide equal opportunities for all classes of citizens? .

The US Forest Service has been spending taxpayer dollars to close roads to motor vehicle travel that have been open to the working class citizen for decades. Apparently, the Forest Service believes that closing the roads will reduce sediment runoff into streams during a storm. This is not the Northwest! Almost all sediment loading comes from all of the dry washes. A few dirt roads don't harm water quality, and closing them to working class, poor and disabled citizens does not make them go away! If any restrictions to motor travel should be initiated and enforced, it should be to restrict travel by quads and motorcycles, not pickups and SUVs. Prior to the introduction of quads, there were no concerns about motor vehicle travel on forest roads, so why restrict travel from trucks?

The roads are public infrastructure and should remain open to public use of all types, including motor vehicles.

Sincerely,

Bonnie J. McCoy

Ltr#0079

From: susie hehlen
To: FS-prescott-forest-plan-comments
Subject: Comments on the proposed forest plan
Date: Wednesday, November 28, 2012 10:57:51 AM
Attachments: Comments on the PNF forest plan.docx

November 28, 2012

Dear Prescott National Forest Planners,

Thank you for the opportunity to comment on the proposed forest plan and the alternatives. I was unfortunate to be out of town for all of the public meetings, but was able to attend the presentation to the Forest Stewardship group this autumn.

I have attended several of the Forest Stewardship meetings beginning from their first days, and I was able to participate in the beginnings of the Community Forest Trust. I volunteer with the Over The Hill Gang to build forest service trails on Thursday mornings. I am also an avid hiker and mountain biker and am on the board of directors of both the Prescott Outings Club (hiking) and the Prescott Mountain Bike Alliance. I have lead numerous hikes and bike rides for both groups. However, the comments here are solely my own.

My interest in the forest plan is related mostly to trails, although I have a strong desire for forest health as an overall goal for the reasons that I wish to leave our forests in as good shape as possible for the future and that recreation is more rewarding in a healthy forest.

After reading through the forest plan and the alternatives, I believe that Alternative C would be the most favorable choice for the following reasons.

> The first is that it promotes overall forest health for the reasons described above.
>
> The second is related to recreation. The Recreation objective on page 55 of the Draft Land and Resource Management Plan states "Provide sustainable and diverse recreation opportunities that consider population demographic characteristics, reflect desires of the local communities, avoid overcrowding and user conflicts, and minimize resource damage."
>
> One of the fastest growing recreational activities in Prescott is mountain biking, and Alternative C would allow the most non-motorized trails to be open to mountain bikes. I am concerned that the recommendation of potential wilderness areas of Alternatives B and D would impede biking corridors and trail development.
>
> Mountain biking is an important recreational use as it provides opportunities for healthy activity for a wide variety of people. Mountain biking is popular with families, children, teens, and grandparents as a wonderful way to keep fit and have fun with friends in the natural environment. Mountain biking also has a favorable

economic impact on an area, and on Prescott in particular. The economic benefit is evidenced by the revenues brought into our area from the Whiskey Off-Road event, but also in quieter ways as many people plan vacations with mountain biking opportunities in mind. Mountain biking, therefore, reflects the desires of the local community by contributing to the personal health of the population as well as the economic health of the Prescott area.

I believe that there is a substantial social need for trail development for both motorized and non-motorized uses. Part of the reason for living in Prescott is its accessibility to the PNF and recreation opportunities. Many local citizens use the trails several times a week. There is at the current time a surge of energy within the Prescott community for trail planning and development, and I believe that given a comprehensive plan there would be a great deal of volunteer energy toward trail construction. Additional trails, along with continuing the current efforts of the PNF and local users in the program of awareness and education, would directly reduce overcrowding and user conflict.

The development of trails adequate to meet the social needs of the community would minimize resource damage as it would reduce user-built trails that do not benefit from the resource-saving NEPA process and may not be built to sustainable standards.

Therefore, I believe that Alternative C would be the best choice to reach the desired conditions for Recreation, especially specific to trails.

That leads me to the comment that, in order to use the current interest in trails to the advantage of the PNF, a comprehensive trail plan should be actively developed that involves the public and is ready for implementation in a reasonable amount of time. At present there seems to be several separate entities within the PNF working on recreation plans and it is not easy for even me to keep up with various committees and meetings. The vehicle for this development needs to be easily accessible and streamlined for public involvement.

My final comment is that it would be very beneficial for the PNF to pro-actively partner with local user groups to harness the vision and energy that is currently in the community. I have personally seen the excitement of motorized and non-motorized trail users when they get to talk about the opportunity to have input in the development of new trails. This is the perfect time to capture the local energy and work together for some truly beneficial results.

Thank you for considering my comments. Please feel free to contact me if you would like to discuss any of these points. I very much appreciate the great effort made by the PNF to include the public in the development of this forest plan.

Respectfully submitted,

Susie Hehlen
928-830-9306
susiehehlen@gmail.com
1373 Dalke Point, Prescott AZ 86305
Mailing address: PO Box 11434, Prescott AZ 86304

Ltr#0080

From: Gordon, Peter A -FS
To: FS-prescott-forest-plan-comments
Subject: Internal feedback/partner feedback - managed fire exclusion map
Date: Wednesday, November 28, 2012 11:14:46 AM
Attachments: FeedbackMapB2ManagedFireExclusion.docx

Pete Gordon - Fire Staff Officer
Prescott National Forest
344 S. Cortez Street
Prescott, AZ 86303
o) 928-443-8220
c) 928-583-4079
f) 928-443-8208
eMail: pagordon@fs.fed.us

"Leadership is action, not position." - US Marine Corp

Prescott National Forest Service (PNF) – Draft LRMP
Strategic Fire Management Objectives – Map B(2)

PNF Fire Management is recommending removal of Map B from the Draft Land & Resource Management Plan (LRMP). The premise for this recommendation is that the map and associated standards and guidelines are an unnecessary constraint on the Line Officer/Agency Administrator's decision space. Policy, environmental constraints, ecological guidance, and protecting values at risk provide ample parameters within which decisions to manage natural ignitions can be made.

In response to the Forest Supervisor's request to have a dialogue with specific Fire Management partners (stakeholders), the following provides a synopsis of those conversations.

Stakeholders contacted:

- Yavapai County Department of Emergency Services
- Arizona Division of Forestry
- Prescott Fire Department
- Central Yavapai Fire District
- Groom Creek Fire District

With the exception of the Arizona Division of Forestry, the stakeholders supported the recommendation to remove Map B from the Draft LRMP. There was common support in "management discretion" and "professional expertise" in managing lightning fires on Forest lands. Time was taken to explain in brief, National Fire Policy and the Forest Service's ability to manage a naturally occurring fire for multiple objectives; often differing within a single fire incident. Additionally, explanation was provided in how such decisions are made and the likely scenarios in which they are considered. It was carefully explained, how tactics are employed on all incidents regardless of the management objective and how they are often the same choices of tactics. It was conveyed that these tactics, regardless of incident objectives are always based on least risk to the firefighters; least risk to the public; and preventing the greatest loss of values. It was made clear that the map inclusion or exclusion from the Draft LRMP has no effect on these tactics and how they are prioritized. Time was also devoted to explaining the misnomer of "let burn;" it was clearly articulated that the agency and the PNF never allows a fire to just burn. Examples were cited that demonstrated that whether an objective was to aggressively suppress a human caused fire in June or make use of the environmental benefits of a lightning fire in July, the fire is never just left to burn and in fact, both types of fires often see multiple tactics employed. Regardless of how likely or rare the opportunity may arise for the Prescott NF Line Officers to manage a natural ignition for multiple objectives, it was relayed that the Forest (and the agency) has numerous policies, guiding documents, and decision support tools that provide plenty of constraints and checks and balances for such decisions.

The Arizona Division of Forestry representative was rather quick in interrupting the conversation and explanation of what feedback was being sought. This individual's concern and perception was that such a map and constraint was "good business" since the Forest Service has "had so many let-burn fires causing havoc." When asked for examples or specific issues, the individual admitted to not having names of individual fires, but alluded to "numerous on the North Kaibab

Ranger District." The map was sent via email for this individual to consider and at his request, so he could confer with his supervisors.

Yavapai County Dept. of Emergency Services was very supportive and knowledgeable of the natural role of fire in all but one of the ecosystems within the PNF. Much discussion was had about specific decision scenarios and differentiating responsible decisions from irresponsible decisions. Time was taken to explain in detail many of the policies and decision support tools that aid Line Officer decisions regarding the "use of natural fire." The individual contacted did provide feedback and/or a suggestion that the Forest keep in mind the socio-economic impacts, if any that may accompany a decision to manage a natural fire for other than a protection objective. It was also recommended that having guidance on when and where such decisions might not be appropriate might be helpful if questions arose from the public or other County officials.

/s/ Peter Gordon

Pete Gordon
Fire, Fuels, & Aviation Staff Officer
Prescott National Forest

Ltr#0081

From:	Hernandez, Pedro
To:	FS-prescott-forest-plan-comments; Spangle, Steve; Shaughnessy, Michelle; RDTuggle@fws.gov
Cc:	Port, Patricia; Sanchez, Vanessa
Subject:	ER 12/604 Final Comment Letter
Date:	Wednesday, November 28, 2012 11:33:53 AM
Attachments:	ER 12_604 Final Comment Letter.pdf

Hi All,

Please find attached the Final Comment Letter for ER 12/604: *Draft Environmental Impact Statement for the United States Forest Service, Prescott National Forest Land and Resource Management Plan, Implementation, Yavapai and Coconino Counties, Arizona.*

Thank you,

Pedro Hernandez III
Environmental Intern, Region IX
United States Department of the Interior
Office of Environmental Policy & Compliance
333 Bush Street, Suite 515
San Francisco, CA 94104
415-296-3350

Ltr#0081

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Pacific Southwest Region
333 Bush Street, Suite 515
San Francisco, CA 94104

IN REPLY REFER TO:
ER# 12/604

Electronically Filed

28 November 2012

Mary C. Rasmussen, Forest Planner
Prescott National Forest
Attention: Plan Revision
344 South Cortez Street
Prescott, Arizona 86303

Subject: Review of the Draft Environmental Impact Statement for the United States Forest Service, Prescott National Forest Land and Resource Management Plan, Implementation, Yavapai and Coconino Counties, Arizona.

Dear Ms. Rasmussen:

The Department of the Interior has received and reviewed the subject documents and has the following comments to offer.

Comments on the Draft Land and Resource Management Plan (LRMP):

Morafka's Desert Tortoise

Both the draft LRMP and DEIS refer to the Morafka's desert tortoise (*Gopherus morafkai*). Please note that the Fish and Wildlife Service (FWS) uses the common name Sonoran desert tortoise (per discussion on page 77 of "Scientific and Standard English Names of Amphibians and Reptiles of North America North of Mexico, With Comments Regarding Confidence in Our Understanding" Seventh Edition (Crothers et al. 2012)).

We suggest the LRMP also refer to the species as Sonoran desert tortoise to avoid confusion.

Needs for Change - Aquatic Species

The draft LRMP states one of its main needs for change is to restore habitat for native fish and other aquatic species in watersheds on the Prescott National Forest (Prescott NF) and identifies

the State of Arizona as a partner in addressing control of non-native species. We agree with and fully support such efforts to restore habitat for native aquatic species. We would like to continue to work with the Prescott NF on the management of native aquatic species and their habitat, and encourage the Prescott NF to work in partnership with the FWS on these efforts.

Desired Conditions for Ponderosa Pine-Gambel Oak Forest

On the Prescott NF, Ponderosa pine-Gambel oak and mixed conifer forests provide habitat for the Mexican spotted owl. Although we support Prescott NF's efforts to manage for sustainable forest structure in both forest types, it is unclear from descriptions provided in the draft LRMP how the desired conditions would provide for nesting/roosting habitat for Mexican spotted owls.

Mixed conifer forests tend to occur along a precipitation and elevation continuum. Although the draft LRMP acknowledges this continuum, it combines all mixed conifer into the Ponderosa Pine-Gambel Oak Forest vegetation type. We acknowledge the mixed conifer vegetation type comprises only a small amount of the vegetation on the Prescott NF; however, we encourage Prescott NF to manage specifically for mixed conifer at the fine scale, not only where it occurred historically, but also where it may grow within its natural range on the Bradshaw and Verde Ranger Districts.

Therefore, we recommend the draft LRMP provide more information regarding how the characteristics of mixed conifer forest will be maintained.

Terrestrial Wildlife Standards and Guidelines

The DEIS acknowledges management of Mexican spotted owl habitat in pine-oak and mixed conifer forests, per the Recovery Plan, as well as protection of listed species during various activities. However, we recommend including more specific direction to work with the FWS towards recovery of Mexican spotted owls and other listed species on the Prescott NF, in order to incorporate section 7(a)(1) conservation responsibilities pursuant to the Endangered Species Act (ESA). Therefore, we recommend including such language under the "Standards and Guidelines" for Terrestrial Wildlife in Chapter 4 as well as within desired condition objectives.

We would like to continue to work with the Prescott NF on the management approach to both ponderosa pine and mixed conifer forest to more specifically identify objectives for the Mexican spotted owl within the LRMP and to meet recovery objectives for this species on the Prescott NF. Similarly, we would like to work with the Prescott NF on recovery activities for species associated with riparian and aquatic communities, and we recommend incorporating more proactive language in these standards and guidelines.

Comments on the Draft Environmental Impact Statement (DEIS):

Page 20, Diversity and viability of native fish, aquatic herps, and invertebrate species

The DEIS states the Prescott NF would work in cooperation with Arizona Game and Fish Department (AGFD) to restore native fish species to two or three stream reaches on the Forest.

We have worked with the Prescott NF and AGFD in the past to identify potential species and locations for repatriation projects. Therefore, we recommend including cooperation with the FWS in any such efforts.

Page 43, Ponderosa Pine-Gambel Oak PNVT

The DEIS states healthy pine forests provide important habitat for species such as northern goshawk and Mexican spotted owl, and that northern goshawk was chosen as a management indicator species. Please note northern goshawk is a habitat generalist whereas Mexican spotted owl is a habitat specialist. Management of pine-oak and mixed conifer habitat towards conditions favoring northern goshawk would not incorporate some of the specific habitat needs of the Mexican spotted owl. Therefore, we recommend including specific direction for Mexican spotted owl management in the LRMP and in site-specific project plans, where appropriate.

Page 68, Table 12

Portions of the Prescott NF along the Verde River and other waters provide important habitat for both nesting and roosting bald eagles. Therefore, we recommend including the bald eagle as a highlighted terrestrial species in the Birds – Guidelines for Wildlife row under "Coarse filter plan components … plus fine filter components are necessary to reduce viability to a level of no or low risk."

Pages 69-70, Mexican Spotted Owl and Critical Habitat

In the first paragraph of the "Habitats" section, we recommend noting that Mexican spotted owls also occur in mixed conifer habitat. We also recommend clarifying how much of the existing 26,448 acres of habitat on the Prescott NF is protected and restricted habitat and including more information regarding whether this habitat is nest/roost habitat or foraging habitat.

In the second paragraph of the "Habitats" section, we recommend identifying the critical habitat units as "Basin and Range West (BR-W) 2 and 3." We recommend clarifying the statement regarding critical habitat that occurs in Wildland Urban Interface (WUI) areas.

Only WUI project areas identified in the 2001 WUI Biological Opinion were excluded from critical habitat designation. According to our records and the WUI Biological Opinion, only two projects on the Prescott NF are listed as part of the WUI Biological Opinion (Boundary Project and Crown King-Ash Creek Project) (69 FR 53217; August 31, 2004).

We recommend clarifying this language to accurately reflect the areas excluded from the critical habitat designation.

In the "Risk Factors" section, we recommend the Prescott NF identify what they believe to be existing threats to the Mexican spotted owl on the Forest. In the current Recovery Plan, we list stand-replacing fire and forest management as the two greatest threats to the species range-wide, but this should be stepped down to those issues the Prescott NF determines are most likely to affect Mexican spotted owl recovery on the Prescott NF.

Pages 76-77, Migratory Birds and Eagles

The USFS is a signatory to the Memorandum of Understanding for Conservation of the Bald Eagle in Arizona. Therefore, we recommend including a brief description of the *Conservation Assessment and Strategy for the Bald Eagle in Arizona*, which is for the purpose of enhancing the breeding bald eagle population in Arizona. As mentioned above, the Prescott NF provides important breeding areas for the bald eagle, and we encourage continued participation in this partnership and implementation of the statewide conservation strategy.

Page 78, Management Indicator Species

The DEIS states healthy pine forests provide important habitat for species such as northern goshawk and Mexican spotted owl, and that northern goshawk was chosen as a management indicator species. Please note northern goshawk is a habitat generalist whereas Mexican spotted owl is a habitat specialist. Management of pine-oak and mixed conifer habitat towards conditions favoring northern goshawk would not incorporate some of the specific habitat needs of the Mexican spotted owl. Therefore, we recommend including specific direction for Mexican spotted owl management in the LRMP and in site-specific project plans, where appropriate.

Page 80, Table 17

The table states all alternatives are "not likely to result in adverse modification" of Mexican spotted owl critical habitat. Section 7(a)(2) of the ESA prohibits Federal agencies from destroying or adversely modifying critical habitat. In the biological assessment for this action, we recommend the Prescott NF clearly state whether their proposed action would be likely to adversely *affect* critical habitat.

Page 81, Mexican spotted owl

The DEIS states some tree habitat features will be negatively impacted over the short-term. We understand long-term benefits should result from the implementation of management in Mexican spotted owl habitat; negative impacts may also result in some short-term adverse effects to Mexican spotted owls and their habitat. In the biological assessment, we recommend clearly describing both the short and long-term effects to the species and its habitat from the proposed action.

Page 84, Eagles

In addition complying with the Bald and Golden Eagle Act, we recommend including implementation of the statewide conservation strategy for nesting bald eagles as a continuing action in this section.

Page 87, Mexican spotted owl

The last sentence states: “Regulatory requirements under ESA and NMFA apply; thereby ensuring adequate levels of MSO habitat.” We disagree compliance with ESA will necessarily protect adequate amounts of Mexican spotted owl habitat. Section 7(a)(2) of the ESA requires Federal agencies not jeopardize the continued existence of listed species, or destroy or adversely modify their critical habitat. Recovery plans are the primary documents to guide actions to recover species, and provide guidance to agencies and others on removing or reducing threats to these species.

Therefore, we recommend including a statement saying that activities will be managed in accordance with the current Mexican spotted Owl Recovery Plan, and the Prescott NF will implement actions to promote the species’ recovery, where appropriate.

Page 103, Riparian Areas, Seeps, and Springs

The DEIS states objectives to protect at least 25, and as many as 55, springs in ten years to benefit species by improving water availability and habitat conditions for migratory birds and aquatic/riparian dependent species. We encourage the Prescott NF to continue to inventory such waters to determine if other locations are suitable for additional protection or restoration.

Pages 126 and 128, Tables 34 and Table 35, Aquatic and Riparian Species

Although the narrow-headed garter snake is not currently protected under the ESA, we have information in our files suggesting protection may be warranted. On November 7, 2011, we solicited information from various agencies and the public requesting information on this species, further indicating a proposed rule to list the narrow-headed garter snake and Mexican garter snake under the ESA, may be published in the Federal Register in November 2012.

Although the narrow-headed garter snake is discussed later in the DEIS under “Regionally Sensitive Species,” we believe its consideration for protection under the ESA warrants a higher level of management scrutiny.

Because the two garter snake species occupy similar habitats, we recommend the Prescott NF consider effects to these species in the DEIS similarly and with the same level of management, especially in the “Environmental Consequences” section of the DEIS.

Page 129. Gila Topminnow

The second paragraph states Gila topminnow do not currently occur on the Prescott NF, but potential habitat exists. The DEIS further states, "Since this species does not occur in the analysis area, it will not be considered further." We recommend including the Gila topminnow in the analysis as it is likely that over the life of the LRMP, Gila topminnow will be introduced to potential habitats on the Prescott NF.

Pages 131-132, Loach Minnow and Critical Habitat and Spikedace and Critical Habitat

For the status of these two species, we recommend using the following more appropriate language to accurately describe their status in the Verde River: "Spikedace were last detected in the Verde River in 1999. Because of this species' small size and low numbers, it is difficult to detect; however, we believe that spikedace, while rare, may still persist in the uppermost reaches of the Verde River.

Spikedace have been translocated into Fossil Creek, a tributary to the Verde River in Gila County, Arizona, in 2007, and were subsequently augmented in 2008, 2011, and 2012. Loach minnow are considered to be extirpated from the Verde River, but have been translocated to Fossil Creek."

Page 134, Mexican Garter snake

We recommend using the most recent common and scientific names for this species: northern Mexican garter snake (*Thamnophis eques megalops*).

Page 138, Arizona Toad

We recommend using the most recent scientific name for the Arizona toad (*Anaxyrus microscaphus*). This species is no longer in the genus *Bufo*.

Page 138, Lowland Leopard Frog

We recommend using the most recent scientific name for the lowland leopard frog (*Lithobates yavapaiensis*). This species is no longer in the genus *Rana*.

Pages 140-152, Environmental Consequences

For the effects discussions on all fish, the DEIS states Alternative A will have the least effect due to the low emphasis on native fish restoration. We believe it is possible that, by not doing any native fish restoration work, this alternative would have a negative effect on the native fish, not the "least effect," as is described in Alternative A discussions. Therefore, we recommend the Prescott NF consider this possibility, and include this in Alternative A discussions.

Page 142, Razorback Sucker and Critical Habitat, Common to All Alternatives

The paragraph states the implementation of any alternative would lead to a "not likely to result in adverse modification" determination for razorback sucker critical habitat. In the biological assessment, the Prescott NF should make a determination of whether their proposed action would be likely to adversely *affect* critical habitat. Please refer to the comment for page 80 above. This same comment also applies to subsequent sections regarding critical habitat for southwestern willow flycatcher, spikedace, and loach minnow.

Pages 145-146, Spikedace, Loach Minnow, and Critical Habitat

We recommend separating the analysis of effects of the alternatives for these species. Although the Federal Register notice included theses species together in the listing and critical habitat designation, these species utilize different habitats. These habitat differences should be acknowledged in the discussions.

We are available to discuss these comments with the Prescott NF and further develop means to incorporate guidance from recovery plans and conservation agreements and strategies into the LRMP, and during planning for future actions.

We appreciate this opportunity to provide comments on the draft LRMP and DEIS, and we look forward to continuing our work with USFS. Please contact, Steve Spangle, Field Supervisor, Arizona Ecological Services Field Office, Phoenix, Arizona, at 602-242-0212.

Sincerely,

Patricia Sanderson Port

Patricia Sanderson Port
Regional Environmental Officer

Cc:
Director, OEPC
Loretta Sutton, OEPC staff contact
Regional Director, FWS, Albuquerque, NM

Ltr#0082

From:	Bob & Kristen Rothrock
To:	FS-prescott-forest-plan-comments
Subject:	Comment from VVLP
Date:	Wednesday, November 28, 2012 11:37:00 AM
Attachments:	PNF plan comments.doc

Our comments are attached and a hard copy is in the mail. Please let me know if it won't open. Thanks for the opportunity to comment.

Bob Rothrock

Ltr#0082

VERDE VALLEY LAND PRESERVATION

"…to preserve and enhance the natural open space setting of the Verde Valley."

Verde Valley Land Preservation welcomes the opportunity to comment on the Prescott National Forest Draft Land Management Plan and Environmental Impact Statement. To begin, we appreciate the effort of the PNF to gather citizen ideas and opinions for the plan. VVLP's mission is "to preserve and maintain the open space of the Verde Valley through a collaborative public process". We feel that our input into your collaborative process was given careful consideration. Thank you.

The draft presents four alternatives. We believe that Alternative B aligns best with our stated mission. For example, Objective 29 states the Forest will acquire riparian habitat and lands with open space value. VVLP has identified some of these areas and are in the process of landowner contact, which could result in other candidate parcels. We will welcome opportunities to assist the PNF in this objective. Alternative B also offers the most protection for scenic integrity and improved visual quality near communities. This is stated in the document "Comparison of the response to needs for change by alternative". Scenic integrity and visual quality are vital to our region as tourism is an economic driver.

Finally, we are pleased to see Black Canyon included as a recommended Wilderness Area in Alternative B. VVLP has already expressed support for this action in a previous letter. As wilderness it will preserve the natural habitat and watershed as well as maintain the Upper Verde Valley viewshed.

We hope you agree that Alternative B is the best choice. Thank you.

Bob Rothrock – President
Verde Valley Land Preservation

Ltr#0083

From: Jim Buchanan
To: FS-prescott-forest-plan-comments
Subject: PNF Draft Plan and DEIS comments
Date: Wednesday, November 28, 2012 12:14:21 PM

Please consider the following comments.

I have been a resident and user of the PNF for over 60 years and have experienced it as a “land of many uses” which I feel it should remain a land of many uses. I have also participated as a volunteer in many projects to assist the Forest Service in the management and maintenance of the forest. Growth in population and use create challenges and I understand that. The climate cycle has resulted in a great deal of dead or dying vegetation. Fire needs to be used more extensively to reduce fuels and improve the ecosystem. Forest users need to be educated more effectively about respecting and using our forest and public lands. Recreation opportunities for trails, riding and hiking need to be increased, not decreased. Access to trails and trailheads needs to be improved. Dispersed camping needs to be increased, not decreased, maintained at the current levels as a minimum. Campgrounds are nice but dispersed camping and recreation allow for individual experiences where the user is not forced into a crowd atmosphere. Users have a tremendous desire for experience away from the crowds. In an overregulated and grouped use environment the result seems to be that a very few users who are able to hike into the back country or wilderness are the only users who can have individual experiences. The forest is also more than just a view-shed although it appears there has been more emphasis on view-shed than is warranted. The Prescott National Forest is a land of many uses and the plan considered should address that effectively not be a tool to reduce and eliminate uses.

Submitted by:
James B “Jim” Buchanan
8250 N Buchanan Dr.
Prescott, AZ 86305
928-445-0072
jimbuchanan@cableone.net

Ltr#0084

From:	region3director@azwildlife.org
To:	FS-prescott-forest-plan-comments
Cc:	Tom Mackin; awf@azwildlife.org
Subject:	Prescott Draft Forest Plan comments
Date:	Wednesday, November 28, 2012 12:22:01 PM
Attachments:	Prescott NF Draft Plan.docx

Attached are comments on the draft Prescott National Forest Plan from the Arizona Wildlife Federation.

by Region 3 Director Loyd Barnett, in consultation with President Tom Mackin

Ltr#0084

Arizona Wildlife Federation
P.O. Box 51510
Mesa, AZ 85208
awf@azwildlife.org

Prescott National Forest
Attention: Plan Revision
344 S. Cortez St.
Prescott, AZ 86303-4316

Re: Draft Land and Resource Management Plan for the Prescott National Forest.

We appreciate the opportunity to review and comment on this Draft Plan which constitutes a revision of the current Prescott National Forest Plan.

The Arizona Wildlife Federation is interested in wildlife and wildlife habitat and our review and comments are focused on the portions of the EA related generally and specifically to these topics.

In the general approach you have emphasized ecosystem management, recognizing the effects of current and predicted climate change. There is an emphasis on developing and/or maintaining resiliency in order to withstand expected changes and disturbances – in addition to warmer conditions, more extremes of droughts, floods, risk of large fires, et al. We support an approach which has an emphasis on resiliency of ecosystems to both natural and human caused disturbances.

We support your emphasis on maintaining and improving pronghorn antelope habitat and have the following specific comments:

Objective 25 calls for modifying or removing at least 3-5 miles of fence to facilitate movement during the 10 years following Plan approval. Do you have an inventory of fence conditions? If this is all the fence within pronghorn antelope habitat that does not meet standards you are in much better condition than most National Forests in Arizona. This is an area where use of partnerships can be very useful, both in identifying and inventorying needs and in implementing modifications.

Objective 26 calls for treating 15 to 90 thousand acres to increase pronghorn antelope habitat quantity and quality during the 10 years following Plan approval. We support this objective. This is a very wide range of acreage. We realize there are a number of unknown factors such as budgets, natural fire ignitions, appropriate conditions for prescribed fire, etc. We urge you to emphasize this objective and to work closely with the Arizona Game and Fish Department in prioritizing and selecting areas to treat.

Objective 27 calls for treating two to three areas to facilitate pronghorn migration during the 10 years following Plan approval. We believe this is quite important and may be used in helping set priorities to achieve Objective 26. We also believe that the effects on pronghorn migration need to be considered in evaluating new or expanded transportation corridors, in close coordination

with the Arizona Game & Fish Department and ADOT or the local government entity managing the transportation corridor. Opportunities for mitigation should be sought where there are anticipated major effects on migration routes.

Objective 28 calls for improving 3 to 15 water developments for wildlife during the 10 years following Plan approval. We have observed that maintenance of previously constructed wildlife water developments is frequently not funded in Forest Service budgets and too often the effects of time, weather (and sometimes vandalism) result in these facilities no longer functioning or being only partially functional. We would encourage you to implement a system of scheduled inspections and maintenance. This is another area where partnerships and/or volunteers are appropriate.

We support your authorization of off-road travel for retrieval of legally hunted and tagged elk under the conditions and circumstances described in **Guide - Recreation – 1** and urge you to keep it in the final Plan.

We look forward to seeing you Final Plan and potential opportunities for participating in partnerships which enhance wildlife habitat.

Sincerely,

Tom Mackin
President
(prepared and submitted by Region 3 Director Loyd Barnett in consultation with President Mackin)

From:	Gary Beverly
To:	FS-prescott-forest-plan-comments
Subject:	Draft Forest Plan and Draft EIS - Sierra Club comments
Date:	Wednesday, November 28, 2012 12:40:07 PM
Attachments:	Yavapai Group Comments - PNF Draft Plan.pdf

Thank you for considering our comments.
Please contact me if there are any questions.

Gary Beverly, PhD
PO Box 176
Chino Valley, AZ 86323
928-636-2638 (h)
928-308-1003 (c)
gbverde@cableone.net

Sierra Club Yavapai Group

http://arizona.sierraclub.org/Yavapai/

November 28, 2012

Prescott National Forest
Attention: Plan Revision
344 South Cortez Street
Prescott, AZ 86303

SUBJECT: COMMENTS ON THE DRAFT LAND AND RESOURCE MANAGEMENT PLAN AND THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE PRESCOTT NATIONAL FOREST LAND AND RESOURCE MANAGEMENT PLAN, AUGUST 2012

Please accept these comments on the Draft Land and Resource Management Plan (Draft Plan) and the Draft Environmental Impact Statement (Draft EIS) for the Prescott National Forest (PNF) on behalf of the Sierra Club's Grand Canyon Chapter (over 12,000 members statewide) and the Sierra Club's Yavapai Group with 560 members in western Yavapai County.

The Sierra Club, founded in 1892, is one of the oldest grassroots environmental organizations in the country. The Sierra Club's mission is "to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; and to educate and enlist humanity to protect and restore the quality of the natural and human environment." The Yavapai Group, operating within the Sierra Club's statewide Grand Canyon Chapter, has long been committed to protection of Arizona's lands, wildlife, water, and communities and has been significantly involved in restoration and protection of our national forests. Our members recreate and conduct service projects on the PNF.

The National Environmental Policy Act (NEPA) and the regulations promulgated to implement the act (42 U.S.C. §4321, et seq., 40 CFR §1500.1, et seq.) mandate that the United States Department of Agriculture-Forest Service assess and evaluate the environmental impacts of this plan and that reasonable alternatives be considered (42 U.S.C. §4332 102 C). The Forest Service must consider cumulative impacts as well as direct and indirect impacts of the plan (40 CFR §1508.7).

The National Forest Management Act (NFMA) directs the Secretary of Agriculture to issue regulations "that set out the process for the development and revision of the land management plans, and the guidelines and standards prescribed by this subsection" (16 U.S.C. §1604(g)). The Secretary is required to incorporate standards and guidelines in plans for units of the National Forest System (*Id*. § 1604(c)). NFMA further requires "standards" for timber and transportation

management as well as for public participation in forest plans. *See id*. §§§ 1604(m); 1608(c); 1612(a).

The 1982 planning regulations implementing NFMA state, "Plans guide all natural resource management activities and establish management standards and guidelines for the National Forest System. They determine resource management practices, levels of resource production and management, and the availability and suitability of lands for resource management" (36 C.F.R. § 219.1(b) (1982)). Standards and guidelines in forest plans must be "qualitative and quantitative" (*Id*. at § 219.1(b)(12) (1982)). Forest plans must establish "standards and requirements by which planning and management activities will be monitored and evaluated" (*Id*. § 219.5(a)(7) (1982)). Additionally, plans must define reasons for management practices chosen for each vegetation type and circumstance (*See id*. § 219.15 (1982)).

While we are encouraged by the Draft Plan's increased emphasis on the expansion and protection of wildlife habitats, watersheds, riparian areas, responsible recreation, and wilderness and scenic values, it does not meet the planning requirements of NFMA and must be revised to do so as we lay out in our specific comments attached. Furthermore, the Draft Plan does not adequately recognize the importance of wilderness values and riparian areas (particularly the upper Verde River) and therefore the standards and objectives fall short in several areas. If the Draft Plan is amended based on our following comments, it will result in important additional protections for the PNF and be consistent with NFMA.

The Sierra Club is proud to be taking part in this communication about the future of our forest. We look forward to working with the U.S. Forest Service on this and other issues. If you have any questions regarding this letter please feel free to contact us at 928-636-2638, or gbverde@cableone.net, or PO Box 176, Chino Valley AZ 86323. Thank you.

Sincerely,

Thomas Slaback
Chair, Yavapai Group
Executive Committee,
Grand Canyon Chapter

Gary D. Beverly, PhD
Vice-Chair, Yavapai Group
Executive Committee
Yavapai Group

INTRODUCTION: The Upper Verde River is Unique and Irreplaceable.

All Alternatives included in the Draft Plan undervalue the rare and currently healthy riparian ecosystem along the upper Verde River.

The upper Verde River is a remarkable ribbon of life through the heart of Arizona. It provides important habitat for many wildlife species, including species that are threatened or endangered, plus provides opportunity for quiet recreation for countless visitors, including those who hike, kayak, fish, and wildlife watch.

The upper Verde River Watershed comprises 5.8 percent of the land area in Arizona, yet it supports a surprisingly large fraction of Arizona's vertebrate species: 78 percent of breeding birds, 89 percent of bats and carnivores, 83 percent of native ungulates, 76 percent of reptiles and amphibian genera (including 94 percent of lizards and 68 percent of snake genera) — an impressive concentration of wildlife (See Biological Inventory, Citizens' Proposal for the Upper Verde Wild and Scenic River). Ecologists estimate that 80 percent of vertebrate species in a watershed depend on riparian habitat for some or all of their life cycle. The narrow riparian zone along the riverbanks is the heart of a watershed; in a generally arid region, riparian areas are lush, green ribbons full of hospitable opportunities for life.

Riparian communities are biologically the richest habitats throughout the United States; in the Southwest these thin green ribbons are regional hot spots of landscape biodiversity. Riparian zones along perennial rivers occupy less than 0.38 percent of Arizona's landscape and much of this riparian habitat has been destroyed or severely degraded by a wide range of anthropogenic activities. Throughout the Southwest these activities have significantly impacted all major riparian communities: agriculture, grazing, logging, mining, urbanization, and the intentional and accidental introductions of exotic species. The result is direct and indirect riparian and aquatic habitat destruction and degradation caused by groundwater pumping, surface water diversions, dams and other hydrologic changes, siltation and bank erosion, exotic species, overfishing, and a remarkable diversity of pollution agents.

Despite the vast ecological importance of riparian landscapes, nearly all of Arizona's rivers have been degraded by bank-side development, groundwater withdrawal, and surface water diversions. The Colorado River is overallocated and is no longer perennial to the sea as it does not reach the delta in Mexico. The Gila River, dammed and regulated, is no longer perennial for most of the state. The Salt River is constrained and regulated by four dams and is no longer perennial below the confluence with the Verde. The formerly perennial Santa Cruz River is now effluent dependent and mostly ephemeral. The San Pedro River, even after decades of effort to maintain a base flow, is perennial for only 29 percent of its 174-mile length (see The Nature conservancy, http://feeds.feedburner.com/ArizonaConservationScienceDownloads). Most of

Arizona's major rivers are now no longer rivers – they are dry washes flowing only after precipitation; their riparian habitat, and much of their wildlife, is gone.

Today, the Verde River above Horseshoe Dam is the longest (approximately 150 miles) and one of the last perennial, free flowing, relatively pristine rivers in Arizona and the Southwest. The upper Verde's banks comprise a significant portion of the remaining high quality riparian area in Arizona. The lush riparian gallery forest, the rarest named forest type in north America, along the upper Verde River is the lifeblood of the watershed – essential life support for most of Arizona's wildlife species – a truly irreplaceable and endangered ecological resource.

Forty miles of the upper Verde flows through the PNF, supporting a rich collection of threatened and endangered species protected under the Endangered Species Act (ESA). According to a study by The Nature Conservancy, "Arizona's native fish species are among the most imperiled fauna in North America," and the upper Verde is one of the best native fish environments in Arizona. Native fish species currently present in the Verde include the Sonora sucker *(Catostomus insignis)*, desert sucker *(Catostomus clarkia)*, longfin dace *(Agosia chrysogaster)*, speckled dace *(Rhinichthys osculus)* and an experimental, nonessential population of Colorado pikeminnow *(Ptychocheilus lucius)*. Beginning at the headwaters and extending throughout the PNF, the upper Verde is now designated critical habitat for the endangered spikedace *(Meda fulgida)* and loach minnow *(Tiaroga cobitis)* (77 FR 10810 February 13, 2012). On the upper Verde, razorback sucker *(Xyrauchen texanus)* critical habitat extends from Perkinsville downstream to Horseshoe Dam (59 FR 13374, March 21, 1994). Roundtail chub *(Gila robusta)*, abundant in the river reach flowing through the Muldoon potential wilderness area and throughout PNF, is a candidate species for ESA listing (71 FR 26007, May 3, 2006). Additional sensitive aquatic species of concern include the candidate Mexican garter snake *(Thamnophis eques)* (73 FR 71788, November 25, 2008), narrow-headed gartersnake *(Thamnophis rufipunctatus)*, and the lowland leopard frog *(Lithobates yavapaiensis)*.

Avian species protected by the ESA are also present. The yellow-billed cuckoo *(Coccyzus americanus occidentalis)*, found from the Verde headwaters and downstream, is a candidate species for ESA protection (66 FR 38611, July 25, 2001). The southwestern willow flycatcher *(Empidonax traillii extimus)* is ESA listed as endangered with critical habitat along the middle and lower Verde (60 FR 10694, February 27, 1995); we are now collecting evidence that it is present along the upper Verde. The river provides important habitat for nesting and wintering populations of the southwestern desert nesting bald eagle *(Haliaeetus leucocephalus*). Although eagles were recently delisted due to a USFWS finding that it is not a reproductively isolated population, that finding is disputed and litigation is now under way in the US District Court for Arizona (Case 2:10-cv-02130-MHM).

COMMENT: Management Indicator Species and Monitoring

The Sierra Club is concerned that none of the plan Alternatives provides adequate monitoring for the riparian habitat and wildlife. A key concern is the selection of only aquatic macroinvertebrates as Management Indicator Species (MIS) for riparian habitat. Using only one MIS, aquatic macroinvertebrates, is simply inadequate considering the importance of the habitat (see introductory comments, incorporated here by reference) and the issues of concern in these habitats.

We agree that changes in aquatic macroinvertebrate species and population can indicate changes in water quality and stream bottom condition, and that they can partially indicate food source adequacy for fish. However, an abundant aquatic macroinvertebrate food supply is only one of many factors influencing fish populations. Plus, the fish populations that should be the focus of the plan are the native fishes, not all fishes. Thus the chosen MIS is inadequate to assess the status of the native fish populations. A more direct measurement is needed to supplement the macroinvertebrate information.

Additionally, the Forest Service should be looking at the ability of the riparian forest to support bird life. We have published a detailed Biological Inventory of the Verde Watershed that is included in the Citizens' Proposal for the Upper Verde Wild and Scenic River dated August 2011, which is in your possession and which we incorporate by reference. Our inventory shows that in the Verde Watershed, bird species number 270 total species and 209 breeding species, which is 78 percent of the species in Arizona. Of those 209 breeding species, 175 breed in the upper Verde Watershed upstream of Clarkdale. This richness of bird life depends on the riparian and aquatic habitat along the river.

Aquatic macroinvertebrate measurements are too indirect to provide adequate information for managing the upper Verde River riparian habitats. This river is a unique, valuable, and threatened resource for the entire southwestern region. It supports an astounding richness of wildlife. It deserves more attention.

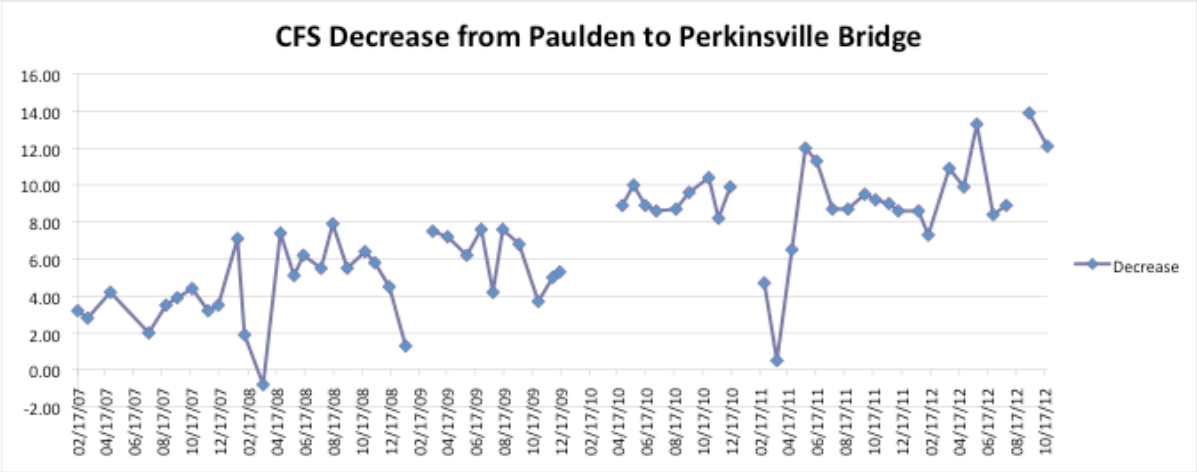
The Sierra Club requests PNF to revise the Draft Plan to include additional objectives that establish additional monitoring requirements and that designate additional MIS to better track the health of the riparian habitat and its wildlife. The plan should include:

- *one or several native fish as MIS (suggestion: roundtail chub and/or sonora sucker?);*
- *a riparian bird as an MIS (yellow-billed cuckoo?);and*
- *the plan should require that periodic transect assays of vegetation in the riparian zone and on the terraces adjacent to the river banks be performed.*

COMMENT: Uplands Management
Management objectives to restore and protect natural vegetation on the riverbanks, terraces, and near uplands is essential to maintain a stable base flow on the upper Verde.

Because all tributaries along the river above Sycamore Creek are ephemeral or intermittent, only flowing springs and inflows from bank storage contribute to the base flow of the upper Verde. Springs on lower Granite Creek and along the Verde west of the PNF boundary contribute 17 cubic feet per second (cfs) of the typical summer 20 cfs base flow measured at the Paulden gage. Between the PNF western boundary and the Paulden gage, Muldoon Spring contributes some of the 3 cfs gain into the riverbed at Muldoon Canyon (USGS, Wirt (2005) and Blasch (2006)). Below the Paulden gage, Duff Spring reliably contributes approximately 1.5 cfs.

However, the flow is diminished when the river reaches Perkinsville Bridge. Since 2007 the Sierra Club Water Sentinels has measured base flow at seven locations along the Verde six times per year. At Perkinsville Bridge, we have measured the flow monthly since 2007. In that time, the loss in flow between Paulden gage (mile 10) and Perkinsville (mile 25) has steadily increased from about 3 cfs up to over 12 cfs. The summer of 2012, when the Paulden gage recorded 20 cfs, the Sierra Club Water Sentinels recorded flows at Perkinsville Bridge as low as 9.1 cfs.



The flow loss between the two points is due to several factors. Only about 2 cfs is due to evapotranspiration. The balance is due to infiltration into the riverbed in this losing reach. Over the last 6 years, we have observed the flow loss steadily increasing. We queried US Geological Survey (USGS) hydrologist Don Pool, who explained (personal communication) that the increasing flow loss is due to gradually diminishing streamflow contributions from groundwater stored in the riverbanks. The last major recharge event on the upper Verde was 2005. During dry years following recharge events, the flow contribution from bank storage declines. Our measurements indicate that bank storage can contribute up to 10 cfs to base flow following recharge events. This is as much as the summer base flow at Perkinsville in drought conditions.

When the terraces and highlands are not protected with vegetative cover, intense rainstorms cause rapid surface runoff, carrying sediments and causing erosion and channelization. When the terrace/highland vegetative cover is healthy, precipitation runoff is slowed and infiltration increases, storing water in the riverbanks and adjoining aquifers for later gradual release. Therefore, healthy, vegetated banks, terraces, and near uplands are essential to maintaining a reliable base flow. Groundwater recharge into banks, terraces, and uplands is a "safety net" for base flow in drought conditions.

Protecting the base flow is especially important since groundwater mining in the Big Chino Valley is projected to diminish the flow from Verde Springs. Under drought conditions, a decrease of 10 cfs (possible by 2050) from Verde Springs would result in a dry river at Perkinsville.

The Sierra Club requests that the PNF plan include objectives and monitoring procedures to manage the terraces and uplands along the upper Verde for the express purpose of protecting natural recharge processes near the river, which is consistent with the desired conditions for watershed integrity and the recommendation in the Hydro and Soils Report, page 3.

The Sierra Club requests that PNF modify ***Guide-WS-5****: Ground cover sufficient to filter runoff and prevent erosion, and to enhance recharge of groundwater, should be retained in riparian corridors, seeps, and springs. Ground cover sufficient to enhance recharge of groundwater should be retained and enhanced in riparian corridors, terraces, and near uplands.*

The Sierra Club requests that PNF add to the Upper Verde Management Area:

- ***DC-UV MA-5****: The banks, terraces, and near uplands along the upper Verde River support a healthy, vegetated environment that maximizes recharge of precipitation into the groundwater table for the purpose of maintaining a reliable base flow on the river.*
- ***Obj-UV MA-1****: Restore and enhance natural vegetation along 20 miles of the upper Verde River riparian corridors, including terraces and near uplands, to promote recharge precipitation into groundwater storage, within the 10 years following plan approval.*
- ***Obj-UV MA-2****: To improve vegetative cover, permanently prohibit grazing in the riparian zone and the surrounding terraces and develop procedures to promptly remove trespass cattle from the no-grazing area, within the 5 years following plan approval.*

Note that the definition of the Upper Verde River Management Area on page 96 of the Draft Plan defines the management area as extending south to Cherry Creek on the western slope of the Black Hills. The commonly accepted terminology for Verde River segments is:

- Upper: headwaters to Clarkdale
- Middle: Clarkdale to Beasley Flat

- Lower: Beasley Flat to Salt River.

The Cherry Creek 5th level HUC – Upper Verde does not conform to this terminology.

COMMENT: Instream Flow Rights

The PNF filed an application to the Arizona Department of Water Resources (ADWR) to appropriate for instream flow (Application 33-094374, Appendix A2.10) on December 2, 1988 for 24 cfs (17,345 acre-feet per year (afy)) measured at the USGS Paulden gage and for 60 cfs (43,362 afy) measured at the USGS Clarkdale gage for the purpose of protecting the riparian values of the upper Verde River. The application has been protested by several parties and is pending resolution between the parties. PNF needs to determine the flow required to protect the resource and to secure the instream flow rights.

Surprisingly, this application has been in progress for 24 years. Several parties protested the application, but none met the requirements of ARS § 45-153(A). USFS hydrologists state that all but two of the protests were dropped. However, the ADWR case file does not contain documents withdrawing the protests. No entries have been made to the ADWR case file since November 12, 1999. The application remains in limbo, but we do not know if this because of lack of database maintenance by ADWR or a lack of attention by the PNF. Either way, this issue should be resolved.

The Sierra Club requests that PNF add ***Obj-UV MA-3****: Secure instream flow rights for the upper Verde River by completing Application 33-094374 within 5 years from the date of plan approval.*

COMMENT: Community Involvement

The upper Verde River now begins perennial flow at Verde Springs within the Upper Verde River Wildlife Area, 8 miles west of the PNF boundary. Over 80 percent of the base flow is groundwater from the Big Chino Sub-basin. That groundwater enters the aquifers as mountain block/front recharge along the ridges to the west of Williamson Valley, part of PNF, including the Apache Creek and Juniper Mesa Wilderness areas, and along the northern bounds of the Big Chino Valley. Between the recharge area and the river, groundwater mining threatens the continued flow of Verde Springs and the future of the upper and middle Verde River.

At this time, critical discussions are occurring in the Yavapai County Water Advisory Committee, the Upper Verde River Watershed Protection Coalition, the Verde River Basin Partnership, the Verde River Institute, the Citizens Water Advocacy Group, the Nature Conservancy, and Prescott Creeks. The USGS is researching ecological flow requirements on the upper Verde. Also the USGS has released the Northern Arizona Regional Groundwater Flow Model for use in studying the effects of various stressors (groundwater mining, climate change, etc.) on the upper and middle Verde River. The US Bureau of Reclamation is completing an appraisal level study of water resources for the area; some of the alternatives include vegetation

management, rainwater harvesting, and groundwater mining – all causing substantial effects to PNF resources in the upper Verde Watershed. All these discussions have a direct impact on the viability of the upper and middle Verde River – a key concern for PNF.

Additionally, the Yavapai County Zoning Commission and Board of Supervisors are making land use decisions that directly affect PNF lands. Arizona Department of Transportation (ADOT) and the Central Yavapai Municipal Planning Organization (CYMPO) are routing new roads through our public lands. Natural gas pipelines and new electric transmission lines are also crossing public lands.

PNF has a vital interest in these discussions but has been largely absent. It is in the public interest for the PNF to participate in all these community discussions to represent the interests of our public lands and to make PNF management goals clear. PNF should have a participating representative at every one of these meetings.

The Sierra Club requests that PNF add ***Guide-Lands-8****: PNF should actively and routinely participate in local community organizations for the purpose of representing the interests and protecting the resources of PNF managed public lands.*

COMMENT: Research Natural Areas

The Sierra Club disagrees with the decision by the PNF to not recommend Research Natural Areas (RNAs) in the Draft Plan.

The cottonwood-willow riparian forest along the upper Verde River handily meets the criteria (see introductory comments, incorporated here by reference) in step 2 of Table 1 - Review of Representative Ecological Conditions. You have apparently disqualified the upper Verde because of livestock grazing in other PNVTs on the forest. Livestock grazing has not been permitted on the upper Verde since the mid-1990s, which has facilitated an astounding recovery of the riparian habitat and wildlife. The aquatic corridor has supported over 17 years of fish monitoring, manipulation, and research. Species that are protected under the ESA and Species of Concern are abundant along the upper Verde (see introductory comments, incorporated here by reference). The riparian corridor now shows no evidence of major anthropogenic disturbance, non-native invasive plants are not a problem, and the area is as pristine as any in Arizona. Prescott College, Museum of Northern Arizona, Northern Arizona University, Yavapai College, USGS, The Nature Conservancy, U.S. Fish and Wildlife Service (USFWS), Arizona Game and Fish Department (AZGFD), the Sierra Club Water Sentinels, the Arizona Department of Environmental Quality (ADEQ), and local high schools all now use the upper Verde corridor for teaching and research.

The Sierra Club requests that PNF modify the Draft Plan to include designation of the upper Verde River as a Research Natural Area.

COMMENT: Aquatic and Terrestrial Wildlife Habitat

On page 61, bullet #1 under the Background and Rationale for Obj-24: the possible locations listed will only be successful if the non-native fish species are controlled in the upstream areas. Otherwise this objective is a waste of resources, as lately demonstrated in the upper Verde River at Stillman Lake, where renovation with native fish was attempted and failed due to inadequate control of non-native fish.

On page 61, sub-bullet #2 of bullet #3 for the Background and Rationale section under Obj-24, lists Southwestern Region sensitive species, including the roundtail chub. Is this the same as Regionally Sensitive Species, Table 36, on page 135 of the Draft EIS? If so, the documents are inconsistent since the roundtail chub is not listed in Table 36. However, the roundtail chub does appear in Table 35, Federal Listed Species, on page 128 of the Draft EIS. The loach minnow, which is on the Federal list, is not in the Draft Plan list of Southwestern Sensitive Species. Please explain or correct these inconsistencies.

The Sierra Club requests addition of a new bullet #4 on page 63 under the Background and Rationale section for Obj-28: Construction of water catchments in Wilderness Areas will be prohibited until there is proof that such catchments benefit the complement of native wildlife and that they do not do harm to ecosystem health. All wildlife water catchments will incorporate devices that allow smaller species an escape route and prohibit their use by livestock, plus the catchment should be designed to be bat friendly as well.

On page 71, bullet #2 under Guide-Fish/Aquatics-4, dealing with the spread of invasive species, states that suction dredge equipment will be cleaned before coming on the PNF. Our understanding from twenty-five years ago was that dredging is prohibited. Does the Draft Plan propose opening the rivers and streams in the PNF to dredge mining? We do agree that any equipment should be cleaned to keep the river as free as possible from invasives, but are concerned about this reference to dredging. Please clarify this guideline to prohibit dredging and require pre-cleaning of equipment used in PNF.

COMMENT: Enforcement

Guide-Rec-6 and Guide-UV MA-3 mention enforcement in the context of other concerns, but there is no emphasis and no objective. Every community vision statement expressed concern for improved enforcement, but the Draft Plan does not specifically address the critical issue of enforcement of existing regulations within the PNF. Law enforcement is essential to deter and potentially prevent impacts from illegal or improper activities, including, but not limited to the following:

- trespass cattle grazing in riparian areas;
- unauthorized target shooting;
- illegal dumping;
- improper mine site activities;
- illegal camping;
- reckless conduct on trails and roads; and
- illegal off-highway vehicle (OHV) activity.

The Sierra Club requests that PNF add an objective that includes quantitative goals and clearly responds to community desires for improved law enforcement.

COMMENT: Vegetation Management and Grazing

The statement that "Encroachment by trees and shrubs is taking place within this PNVT due to past fire suppression" on page 51 of the Draft Plan is not substantiated in the document.

Encroachment compared to when? Where? Perceptions of encroachment by trees and shrubs may simply be the result of a natural ebb and flow of vegetation adjusting to changing conditions occurring on a time scale of centuries. Encroachment in one area may be balanced by retreat in another area. Encroachment may be a response to early wood-cutting, or to very heavy grazing pressures. Harley Shaw authored a Rocky Mountain Research Station report (GTR-177) titled "Wood Plenty, Grass Good, Water None. Vegetation Changes in Arizona's Upper Verde River Watershed from 1850-1997." In this publication, Shaw reports that

> *"…the evidence presented here suggests strongly that the distribution of woodlands over the area is not much different now than it was in the 1850s. Second, while overall juniper density may have been lower prior to Anglo settlement, at least three areas clearly were covered with very dense woodlands. One area, Polson Dam Draw northeast of Ash Fork, may have had a denser stand of juniper in the 1850s than it does now. Another, north of Walnut Creek and including a portion of Juniper Mesa may have lost junipers between the 1850s and 1916 and then returned to high densities later."*

We are concerned that generalized claims of "encroachment" are an inadequate justification for juniper removal projects in specific areas. The Sierra Club requests that PNF document "encroachment" in specific areas where juniper removal is planned.

Where "encroachment" is shown to exist and to be driven by natural forces, we should leave it be; why should we invest scarce resources in trying to change it? Where "encroachment" is shown to exist and to be driven by human activity, we should seek to restore natural processes such as fire and to curtail livestock grazing.

Throughout the Draft Plan, there are repeated statements about fire suppression yet no data is offered of suppressed fire events in juniper PNVTs. We examined the "Vegetation and Fire Specialist Report" and found no specific data of fire suppression efforts in the juniper PNVTs. Where is the record of local suppression efforts? PNF should either provide evidence that fire suppression in a specific area has caused encroachment in that specific area, or remove references to fire suppression as a causative agent for encroachment.

What is the purpose for the proposed juniper removal projects? If the purpose of juniper removal is to restore woodlands and grasslands to an ecological and sustainable state, then PNF needs to justify their definition of that state and then follow up the treatment with sustainable management policies, including the restoration of natural processes. If the purpose of juniper removal is to produce forage for livestock grazing, then PNF should offer that goal for comment and debate.

Natural low intensity fire is a natural process controlling small shrubs and trees in grasslands. It is likely that heavy grazing has eliminated the fine fuels necessary to carry natural low-intensity fire through these landscapes. Long experience shows that juniper removal, typically followed by grazing, must be repeated in 30 years or so to control re-growth. Juniper clearing followed by grazing is not a sustainable vegetation treatment.

The Sierra Club is not opposed to all vegetation management, but asks that the vegetation management be based on restoring natural processes and ecosystem health. The PNF must include a clear rationale in the Draft Plan to justify the proposed juniper clearing operations. As we noted on page one of these comments, "plans must define reasons for management practices chosen for each vegetation type and circumstance."

The Sierra Club requests that PNF present credible:

- *clear goal statements for vegetation management;*
- *records of historical fire suppression in specific areas;*
- *scientific documentation describing encroachment in specific areas; and*
- *scientific studies describing the conditions under which juniper removal is an effective, sustainable method of restoring woodlands and grasslands.*

The Sierra Club opposes juniper removal for the purpose of forage production, which constitutes a subsidy transferring public resources to private business and will not restore ecosystem health or natural processes, such as fire. To illustrate this public subsidy for the livestock industry, the Draft EIS (page 172) lists the net present value (NPV) of range as -$4,361,383. There are 54 active grazing leases in the forest, so PNF spends $80,766 of NPV per lease. For recreation, the NPV is -$13,515,673, which is approximately $50/person in Yavapai County. Therefore, grazing

receives grossly disproportionate subsidies from PNF compared to recreational uses. This point is confirmed on Page 174 of the Draft EIS with the calculation of the annual subsidy:

> *"The benefit to permittees of public forage is approximately $800,000 when compared to market price. The average private land grazing fee is $9 per animal unit month (AUM) in Arizona, compared to $1.35 per AUM for public land grazing (NASS, 2011). If Prescott NF grazing permittees had to replace their public land forage with private land forage, the annual cost of livestock grazing would increase by over $940,000."*

The Sierra Club requests that PNF add a desired condition and supporting objectives for vegetation management that:

- *Assign first priority to ecosystem health and sustainable management practices to benefit the overall public interest, and*
- *Ensure fair and equitable use of public resources without subsidizing minority special interest groups.*

COMMENT: Soil Health and Grazing

The 1986 PNF Plan stated the goal: "Manage to bring all grazing allotments to satisfactory management by the end of the first decade." The current Draft Plan proposes DC- Watershed-3: "Soil condition rating is at or trending toward satisfactory."

The current Soils and Hydro Report also lists soil condition as impaired or unsatisfactory for the following:

- 60% for Piñon Juniper - Evergreen Shrub PNVT
- 87% for Juniper-Grassland PNVT
- 50% of Piñon-Juniper Woodland PNVT.

These PNVTs constitute over half the PNF land area. There are no maps showing where these PNVTs occur on the forest; these should be available for public inspection.

The current Soils and Hydro report also lists the 5th HUC watersheds along the upper Verde as having a substantial fraction of poor condition soils including:

- Grindstone Wash: 100% poor soil condition
- Hell Canyon: 100% poor soil condition
- Sycamore Creek: 82% poor soil condition

These HUCs contain grazing allotments, terraces, and highlands along the upper Verde River.

This data illustrates a vast gap between the 1986 Plan goals and the current unsatisfactory conditions. It is apparent that the management efforts in the 1986 plan were inadequate to accomplish the goal. A significant, different effort will be needed to fix this veritable ocean of poor soils along one of the most important riparian habitats in the Southwest. Therefore PNF needs to adopt significantly more effective management and monitoring strategies for the new

planning cycle, including reducing grazing loads and programs to retire grazing allotments. The Sierra Club believes that the objectives and guidelines in the Draft Plan are completely inadequate to achieve the desired conditions for the watershed.

The Sierra Club requests that new objectives be added to the Draft Plan to improve soils in the upper Verde watershed by gradually reducing allowed livestock grazing load, plus other measures that will be effective in minimizing runoff and sedimentation and which will increase aquifer recharge.

Additionally, ***Guide-WS-4*** *should be amended: "Adverse impacts to stream channel features (e.g., streambanks, obligate riparian vegetation) should be minimized by modifying management actions. Examples of modification could include, but are not limited to, adjusting timing and season of grazing****, reduction in allowable grazing load,*** *limiting use and location of heavy machinery, or avoiding placing trails or other recreation structures where recreation use could negatively affect stream channel features."*

Comment: Climate Change and Grazing

Since climate change will increase stress on vegetation, achieving the above soil health objective becomes significantly more challenging. In the Strategic Plan FY 2010-2015 (http://www.ocfo.usda.gov/usdasp/sp2010/sp2010.pdf), USDA lists "Strategic Goal 2: Ensure Our National Forests and Private Working Lands Are Conserved, Restored, and Made More Resilient to Climate Change, While Enhancing Our Water Resources." USFS concern for climate change is reflected in the report "National Roadmap for Responding to Climate Change (July 2010) that outlines a broad agency approach.

Finally, it is extremely significant that a recent report (Adapting to Climate Change on Western Public Lands: Addressing the Ecological Effects of Domestic, Wild, and Feral Ungulates (http://ir.library.oregonstate.edu/xmlui/handle/1957/34707)) calls for improved management of grazing loads on stressed public lands:

> *"Historical and contemporary livestock production — the most widespread and long-running commercial use of public lands — can alter vegetation, soils, hydrology, and wildlife species composition and abundances in ways that exacerbate the effects of climate change on these resources. Excess abundance of native ungulates (e.g., deer or elk) and feral horses and burros add to these impacts. Although many of these consequences have been studied for decades, the ongoing and impending effects of ungulates in a changing climate require new management strategies for limiting their threats to the long-term supply of ecosystem services on public lands. Removing or reducing livestock across large areas of public land would alleviate a widely recognized and long-term stressor and make these lands less susceptible to the effects of climate change. Where livestock use continues, or where significant densities of wild or feral ungulates occur, management should carefully document the ecological, social, and economic consequences (both costs and benefits) to better ensure management that*

> *minimizes ungulate impacts to plant and animal communities, soils, and water resources."*

We have explained (see introductory comments, incorporated here by reference) the enormous ecological value of the upper Verde and the importance of healthy vegetative cover to stabilize base flow. Because we recognize that PNF resources are limited, we advocate that PNF should focus soils management efforts on the terraces and uplands surrounding the upper Verde River instead of distributing limited resources over the entire forest in a diluted effort. PNF should commit substantial resources to correcting a severe departure from the desired conditions in a critical area, especially because these soils are extremely important for the continued health of the upper Verde River.

The Sierra Club requests that PNF add an objective to the upper Verde River Management Area that commits substantial progress to the Desired Conditions in the near future and designates it as a focused management area for soils improvement and vegetation and grazing management.

COMMENT: Suitable Lands for Grazing

The Draft Plan and all Alternatives state that 920,779 acres of the PNF's 1.2 million are suitable for livestock grazing. That equates to 75 percent of the PNF being suitable. This was untrue 25 years ago and is still untrue today. 920,779 acres may be capable of producing forage for livestock consumption, but those acres are not all suitable. Management area 7 including the Prescott Basin was deemed unsuitable in the previous plan, and since then 50,000 additional acres were added as additional protection to the Prescott watershed. Yet about 80 miles of riparian habitat were not protected and remain designated as suitable. According to the Draft Plan (page 59 Obj-18 & 19, page 61 Obj-23 bullet 3, page 84 Std-Range-2, Guide-Range-5) and the Draft EIS (pages 106,131,133,134, 137, 138, 139, 184, and 186) it appears that the greatest threat to the health of riparian habitat is livestock grazing. The Sierra Club requests that riparian areas be deemed unsuitable for grazing in the plan; this would lessen the suitable acres by only 12,000 acres.

The Sierra Club requests that ***Std-Range-2*** *be amended to read: Riparian areas, streams (perennial or intermittent), springs, and seeps are deemed to be unsuitable for livestock grazing in order to prevent adverse impacts to water quality and riparian habitat with its associated wildlife.*

COMMENT: Logging

Under the 1986 Forest Plan, commercial logging on the PNF was not permitted except to perform logging necessary to meet management prescriptions. Because all Alternatives propose re-opening of the PNF to commercial logging, old growth and large ponderosa pine trees must receive special protection.

Large and old growth trees are important to ecosystem structure and function. Old trees have greater genetic diversity than even-aged groups of young trees. They may have a better greater chance of adapting to changing climate and environmental conditions, which can be passed on to their progeny. The thick bark of old growth trees makes them resistant to low intensity ground fires. Old growth trees increase forest structural diversity, providing more wildlife habitat. Large trees provide roosting sites for bats under bark slabs, nesting sites for goshawks and Mexican spotted owls, and foraging habitat for bark gleaning birds and mammals. Old trees often become long lasting snags upon their death, benefiting many cavity nesting birds and mammals. Large old trees also sequester carbon. Old trees serve as a record of the past, allowing researchers to learn about insect and disease outbreaks, fire history, and climate change. Old growth trees also contribute to forest aesthetics, increasing recreationalist enjoyment.

There is a generally recognized need to retain larger trees and protect old growth in the southwestern ponderosa pine forests. Large post settlement trees have been defined in the Four Forest Restoration Initiative (4FRI) process as those being greater than 16 inches in diameter at breast height (dbh), with exception thresholds. A 16 inch diameter cap is warranted:

- Due to the scarcity of mature and old growth trees regionally;
- Due to the need to re-establish lost mature and old forest structure as quickly as possible;
- Due to the rarity of trees on the PNF that are larger than 16 inches (<4%);
- To ensure recruitment of new trees into the regionally under represented VSS 5, 6, and Old growth structural stages;
- To prevent large tree logging for production oriented, uneven aged, silvicultural goals;
- To discourage large tree logging to pay for small tree thinning;
- To favor small diameter industries over large tree dependant ones;
- To avoid detrimental effects to imperiled species and wildlife populations (especially Mexican spotted owl and northern goshawk) that depend on large live and dead trees and dense canopy cover;
- To mitigate unexpected large tree mortality during and following restoration prescriptions;
- To mitigate unknown large tree mortality resulting from the re-establishment of natural fire regime or climate change effects; and
- To facilitate restoration efforts moving to restore the forest to its natural condition through a combination of thinning and natural fire regime.

Continuing climate change will create warmer and dryer conditions on the forest – conditions that will weaken the resiliency of our pine forests. Already the PNF has a dearth of old growth trees and larger trees that represent the next generation of old growth. Given current forest conditions, it is vital to implement treatments that preserve the greatest biological diversity, while seeking to reintroduce the natural processes necessary to allow forests to restore ecosystem integrity. As a result, the Sierra Club has focused on retaining all old growth trees, regardless of size, and the larger diameter trees that will most quickly become the next generation of old growth and help to provide old growth functions. Logging operations on the PNF should be

limited to restoration, which means the logging of old growth and larger trees, especially all trees 16 inches and larger at breast height, should be eliminated in this plan. Diameter limits and exception thresholds for tree logging are a common strategy for achieving ecological objectives in western forest landscapes.

The Sierra Club requests that ***DC-Veg-2 bullet #3*** *should be amended to read: All old growth ponderosa pine trees regardless of size, and those of 16-inch diameter at breast height (dbh) or greater, are deemed unsuitable for timber production. However, forest products may be removed from unsuitable lands for management prescriptions that restore habitat and provide an opportunity to restore natural processes such as fire.*

Comment: Mexican Spotted Owl, Goshawk, and Vegetation Management

The Sierra Club is concerned that the Draft Plan and Draft EIS propose actions that may conflict with, or are not proven to benefit, the northern goshawk *(Accipiter gentilis)* and the ESA threatened Mexican Spotted Owl (MSO) *(Strix occidentalis lucida)*.

There are three MSO critical habitat areas on the PNF: Sycamore Canyon and two on the Bradshaw District that overlap Wildland-Urban Interface (WUI) zones. The total area is 44,814 acres, the total protected habitat is 4,058 acres, and the total area of restricted habitat is 6,231 acres. Goshawks are known to occur on all three PNF Ranger Districts including areas near Mingus Mountain, Camp Wood, Prescott Basin, and Crown King. Existing nesting habitat for this species is extimated at 50,489 acres, consisting of ponderosa pine stands with medium and large trees with open and closed canopies. Existing foraging habitat for goshawks includes approximately 3,522 acres of seedling/sapling and small trees with open canopies in both ponderosa PNVTs."

Primary threats to northern goshawk and MSO on the PNF are wildfire, recreation, grazing, and even age logging. All these threats justify designating additional area as unsuitable for grazing and implementing a 16-inch cap on logging with an associated threshold exemption. Forest Plan direction should apply the best available science to the management of MSO habitat, move the MSO habitat toward the desired condition, and improve the habitat across the landscape. Preserving snags, increasing number and distribution of large trees, reducing canopy closure, and increasing understory vegetation are expected to benefit MSO.

The DEIS (pages 80-81) states “Although the relative proportion of ponderosa pine-Gambel oak PNVT with medium/large trees and closed canopy slightly decreases in all alternatives, the improved quality of foraging habitat in the medium/large trees with open canopy *may* (emphasis added) have an overall beneficial effect to MSO.” The concern here is the uncertainty. PNF needs to carefully balance a management strategy with inherent internal conflicts: By destroying MSO nesting habitat in order to allegedly improving foraging habitat, there is a net benefit to the

species. Please provide documentation that MSO will utilize prescribed burn areas. Please provide studies that cite such a benefit from forest MSO habitat destruction. The most important effect is the "potential" (pg 81) prevention of stand replacing wildfire eliminating MSO habitat. The PNF appears to believe that with the prescribed removal of MSO habitat they will prevent the loss of said habitat from wildfire. There is no data provided to substantiate these statements.

Furthermore, we question the claim (DEIS page 85) that "Over the next 20 years, additional nesting habitat for the goshawk would occur from increases in the abundance and distribution of medium to large trees growing within the Ponderosa pine PNVTs." This seems to be an optimistic time estimate because even small diameter (<12 inches) black jack pines surrounding Prescott are approximately 100 years old, while the large trees are in excess of 150 years old; nesting habitat improvement is not going to happen within the next 20 years.

The Draft EIS (page 85) states "Proposed vegetation treatments (Objective-5) that reduce canopy closure and increase understory vegetation would improve habitat for goshawk prey species across the landscape. Improving these two facets of the goshawk habitat would be "expected" to have beneficial impacts to the species on the PNF." Please provide all of the studies that cite such expectations. Note above that the goshawk habitats overlap with those of the MSO, and that effects on the ESA protected MSO take precedence.

Implementing forest thinning or controlled burning actions to improve goshawk habitat within restricted habitat for the Mexican spotted owl may violate the Endangered Species Act. The ESA imposes substantive and procedural obligations on all Federal agencies in regard to threatened and endangered species and their critical habitat.

The Sierra Club requests that PNF revise the vegetation management objectives to include a more cautious approach to vegetation management in goshawk and MSO habitat areas, and to present improved documentation as requested above, and to provide greater certainty as to the effects of vegetation management projects.

The Draft EIS (page 87) seems to negate the importance of MSO protection on the PNF by implying that the Tonto, Coconino, and Kaibab NFs adjacent to the PNF contain suitable habitat and designated critical habitat and that because the Coconino and Kaibab are undergoing their own Plan revisions under which ESA and NMFA regulations insure that there are adequate levels of MSO habitat, it is not as critical to do so on the PNF. In fact the Coconino and Kaibab are embroiled in controversy over changes in their goshawk standards without NEPA analysis in conflict with the 1996 Forest Plan Amendment for the Southwest Region, and for dropping the goshawk as an MIS.

The Sierra Club requests that the statement regarding the three adjacent NFs be removed from the document and be replaced by the statement: The PNF acts within ESA and NMFA regulations which will insure that there will be adequate levels of Mexican spotted owl habitat resulting in an increase in their population numbers.

COMMENT: Mining

Throughout both the Draft Plan (pages 20, 48, 68) and the Draft EIS (pages 105, 106, 134, 136, 138, and 189)-are references that directly reference the negative effects of mining, including species threatened by habitat degradation caused by surface and groundwater withdrawal, the impacts of mining and mining exploration on riparian habitats and associated wildlife, and degraded water quality.

Therefore The Sierra Club requests:

- *Add **Std- Minerals Materials- 3**: The effects of placer exploratory mining on groundwater will be documented through NEPA analysis.*
- *Add **Std-All Mineral-2**: Site reclamation will include revegetation with a representative sampling of the larger native shrubs and trees that were originally present and saved for this purpose. A seed mixture of native grasses, herbs, and shrubs may then be broadcast. The reclamation sites will be monitored and appropriate actions taken to insure plant survival until the landscape has fully recovered.*
- *Add **Std-All Minerals-3**: Each mining claim site must have its physical reclamation completed, inspected, and approved by the responsible PNF officer before that permittee is allowed to begin mining their next claim site.*
- *Amend **Std-Locatable Minerals-3** to read: Approval of mining activities shall include the use of reclamation bonds in an amount equal to the actual cost of reclamation to protect and restore surface resources to as close to original natural conditions as possible.*
- *Amend **Std-Minerals Materials-1** to read: Restoration plans shall be prepared before development and use of new mineral material sources. Existing pits that have not been utilized as a source for material minerals for two years shall require a reclamation plan and bonding in an amount equal to the actual cost of reclamation before approval is granted to new applicants.*

Contrary to the statement on page 190 of the Draft EIS that all of the Alternatives would have little to no effect on the Drake quarries, in the last twenty years what were once small individual scars have grown together creating massive scars visible from many miles away and from the air. A new quarry has created a huge eyesore that is very visible from the Drake road (near the Williams road connection where it crosses MC Canyon) caused by mining overburden pushed into MC Canyon. Thus the Draft EIS does not recognize that current management policy has permitted degradation of the scenic values in the region. The Draft Plan on page 13 assigns a Scenery Integrity Objective category of Very Low to the quarries. PNF should increase the

Scenic Integrity Objective (pages 157-8 in the Draft EIS) for the flagstone quarries northeast of Drake.

The Sierra Club requests PNF to add to ***Guide-Minerals Materials-2****: Prior to expansion into new areas, quarries must restore previously mined areas to meet Scenic Integrity Objectives of the surrounding area.*

COMMENT: Monitoring and Evaluation

The Sierra Club requests that a new bullet be added at the top of page 109: Results obtained from monitoring activities are retained in a retrievable database open to public access.

COMMENT: Recreation

On page 55, the Background and Rationale bullet #2 under Obj-7 is acceptable only if two sites, Bear Siding and Perkinsville Bridge, are moved out of the riparian area and the current sites are closed to vehicle entry.

On pages 55-56, under the Background and Rationale bullet #3 for Obj-8, creating a designated dispersed camping area for the upper Verde River may be in conflict with the above if they are the same sites. Again, this is only acceptable if the sites are located outside of the riparian areas.

On page 57, the Background and Rationale bullet under Obj-13 states that Granite Basin Lake could be dredged to enhance fishing. This was done only a few years ago. It would seem that efforts should be directed to improving the lake's watershed to prevent the flow of silt into the lake.

On page 58, under the Background and Rationale bullet #1 for Obj-16, please add human waste as one of the visitor use problems.

COMMENT: Wilderness

Alternative "B" is referred to as the proposed collaborative plan and Alternative "C" is referred to as the Vegetation and Wildlife (resilient habitat/species viability) plan. Yet "B" has only minimal new Wilderness designation, and "C" has none at all. The expansion of Wilderness is only included in Alternative "D," the recreation plan. That seems odd to us.

Recreation, an anthropocentric activity, is the least important justification for the creation of Wilderness. Wilderness provides habitat for wildlife to live and reproduce with less disturbance than in other areas, thus it tends to maintain and protect genetic diversity. Continuing climate

change will require the creation of more areas of refuge in order to protect genetic diversity of wildlife and to ensure greater habitat resiliency.

An expanded Wilderness section should be included in Alternative "C" and in Alternative "B." The negatives of climate change and the desired conditions necessary to insure ecosystem reliance are listed on pages 16-17 of the Draft Plan. Wilderness helps provide these desired conditions.

COMMENT: Potential Wilderness Evaluation for Muldoon

We have a very strong interest in the Muldoon Inventoried Roadless Area (IRA). The Muldoon IRA includes 10.77 miles of the upper Verde River, all of which is proposed as a Wild class Wild and Scenic River by a Citizens' Proposal, and all of which is deemed Wild and Scenic eligible by the PNF, classified as both Scenic and Wild segments. The Sierra Club also has an active educational and recreational program of guided field tours in this area.

As part of the forest plan revision process, the PNF published a "Potential Wilderness Area Evaluation Report" rating Muldoon as High Capability, Low Availability, and Low Need. Although we appreciate the effort by Region 3 to design a systematic rating tool, we do not agree with some of the criteria. We are concerned that many criteria are really only subjective value judgments or are extraneous to the Wilderness Act. The analysis contains errors and omissions that need to be corrected. Critical information has not been considered in the wilderdess evaluation portion of the Draft Plan.

As a result, the Muldoon PWA has been substantially undervalued because many important facts have been omitted and because unsubstantiated opinions have distorted the rating process.

The following comments reference documents from the PNF web site and include:

conc-proc-wilderness-evaluation;

conc-proc-wilderness-need-matrix;

conc-proc-wilderness-capability-matrix; and

conc-proc-wilderness-availability-matrix.

<u>Capability</u>

Naturalness Criteria 3: Night sky

Your report states "Visitors to the PWA experience a moderate level of dark skies, as the unit is not far from Chino Valley", meaning that "some stars are visible and there is moderate degradation from light pollution." What location in this 20,000-acre IRA is that wrong conclusion based on? Having spent many nights in the area, we know that the night sky in

Muldoon is clear, vast, and sharp. Your report has no quantitative measurement, although hand held instruments are available. Visiting the Muldoon area and using the Bortle Dark-Sky Scale, the area rates as a Class 1 in the river bottom and as a Class 2 on the uplands.

We believe that the rating should be "high" for 3 points.

Naturalness Criteria 4: Presence of pollutants

Your report states "it is assumed that the water quality is good, although the results of recent sampling are not final." This ignores the data in the draft "Citizens' Proposal for the Upper Verde Wild and Scenic River," which we submitted to the Forest Service previously and again incorporate by reference, describing the water quality in the river. The Sierra Club Water Sentinels have measured water quality at four locations on the upper Verde for six years; our data and methodology are approved by ADEQ. Our proposal also contains a summary of the ADEQ water quality reports on the upper river. In addition, the Sierra Club has published a report "The State of the Verde River" (available from http://arizona.sierraclub.org/conservation/water/index.asp) that is a detailed evaluation of the water quality along the river.

All data show that the upper Verde River meets the Clean Water Act standards for body contact. We believe that the rating should be "high" for 3 points.

Manageability Criteria 14: Manage wilderness character.

This is an extremely weak criterion that is invented by the USFS. The Wilderness Act does not authorize ease of management or any other administrative conveniences as criteria for wilderness; instead it *directs* the agency to preserve wilderness character. Ease of management should not be a consideration.

Next, the discussion attempts to justify some alleged difficulties for managing Muldoon. The report refers to "three earthen stock tanks and one well that require motorized equipment." If motorized equipment is needed, there are established procedures to gain permission for use. The possibility that motorized equipment may be needed is not a consideration for Wilderness qualification and without an analysis it is unclear that motorized equipment would be needed.

The report alleges, "Preventing motorized use in this area would be moderately difficult as most of the boundary runs through open, flat areas adjacent to existing roads." This ignores that roads are boundaries in Wilderness Areas all over the country. The Wilderness Act does not require easy-to-manage boundaries or physiographic barriers. However, the boundaries of the Muldoon PWA are easy to manage; rugged terrain surrounds nearly all of Muldoon except for small areas on the extreme southern tip and along a portion of the northern boundary. We appreciate the difficulty of managing illegal OHV trespass, but point out that recently, with minimal cost, PNF

control efforts have substantially eliminated OHV trespass along the river, demonstrating that control is possible.

The report alleges "Management activities for pronghorn habitat restoration and river restoration would be difficult to implement due to the need for motorized equipment and their impact on naturalness and visitor solitude." The allegation is not substantiated. A few questions:

- Why and who has determined that the area should be managed for pronghorn?
- Why and who has determined that motorized activities are necessary for pronghorn management?
- Do you have studies showing that this area is suitable for pronghorn habitat restoration?
- What specific pronghorn habitat management activities requiring vehicles do you have planned?
- Have these management activities been written and processed according to NEPA?
- Does PNF have budget funds set aside for these activities?
- When was the last management activity?
- When is the next scheduled management activity?

We are supportive of restoring healthy populations of pronghorn in appropriate habitat, but generally pronghorn preferred habitat is open-canopy grasslands with minimal slope; Muldoon does not fit that. Indeed the pasturage in the area is in poor condition for grasses and forbs due to decades of overgrazing and inadequate management. If PNF desires to improve pronghorn habitat, we would support activities that are justified by careful analysis and are located in areas that could provide the most effective protection for these magnificent animals. We know of no such analysis for this area and none was provided by PNF.

The report alleges that wilderness management would be difficult due to a need for motorized access. The Muldoon PWA can be accessed from EIGHT roads: FR638 (north), FR638 (south), FR9011U, Duff Spring Trailhead, Pothole Tank Trailhead, Hell Point, Verde Ranch, and Gold Basin Tank.

We are concerned that this allegation is nothing more than wishful thinking absent careful analysis. We believe that PNF can manage the Muldoon Wilderness just fine without motors. We believe that the rating should be "high" for 5 points.

Capability Summary

Making the above changes, the Capability score for Muldoon listed on the Potential Wilderness Capability Matrix should be 57 points, moving it to a 100% score, the highest of all PWAs evaluated for Capability.

Need

Factor #1: Other wilderness

Page 97 of the report lists the rating as Medium. The Need Matrix lists the rating as High. Please fix the error in the report and adjust the points accordingly.

Factor #2: Visitor pressure

Although the report classifies wilderness visitation on the PNF as low use, the report does not consider the projected population growth for the area. Future visitor pressure will increase sharply with Wild and Scenic River designation and with local area population growth; Phoenix visitor pressure is less relevant. The PNF "Economic and Social Sustainability Assessment (rev. June 30, 2009)" document projects Yavapai County population growing from 198,052 in 2010 to 278,426 by 2030. The Yavapai County Water Advisory Committee projects population growth to 435,347 by 2050 – more than double the current level. Similar increases are expected for Coconino County. It is reasonable to expect recreational pressure to increase proportionately. Land for recreation only disappears – new land is not being made. We should protect available lands now.

The report makes a good point: "For wilderness acreage in the Southwestern Region to meet the national average would require the addition of about 1 million acres, and northern Arizona in particular could benefit from these additional wilderness acres…"

In view of the regional needs for wilderness and the future population pressures from Yavapai and Coconino Counties, we believe that the visitor pressure rating should be increased to "high" for three points.

Factor #3: Non-wilderness opportunities

Again, this criterion is manufactured by PNF and is not a feature of the Wilderness Act. Interestingly, here the report ignores statements in Factor #2 that wilderness acreage is below average in the southwest then contradicts itself by arguing that there are plenty of other wilderness quality areas available. This view totally ignores future population pressures on recreation. The report ignores the fact that PNF lands support approximately 1500 miles of roads and 410 miles of motorized trails for a total of 1910 miles of motorized routes, contrasted to 402 miles of non-motorized trails (PNF, 2009 MVUM). Non-motorized trails account for less than 17 percent of the designated routes in the PNF. Yet, according to recent PNF planning documents measuring Activity Participation, OHV users account for only 5.6% participation and 1.2% main activity despite having over 50% of the trails and 83% of the routes. Additionally, the report fails to consider that unconfined recreation opportunities are diminished on much of PNF:

- because off road big game retrieval (now following the Kaibab NF rule) is allowed up to one mile off route,
- because off road dispersed motorized camping is allowed up to 300 feet from a route, and
- because off road motorized wood gathering is permitted.

Where is the wilderness quality experience when chainsaws, motor homes, and OHVs are sharing the area?

Most importantly, the report fails to consider that 10.77 miles of the Wild and Scenic eligible upper Verde, the longest surviving living river in Arizona and the last of Arizona's major perennial rivers, lie within the Muldoon PWA. The other areas mentioned do not have this unique feature.

We believe that the Non-wilderness opportunities rating should be increased to "high" for three points.

Factor #4: Ecological sanctuary

The report rating is in error and is not consistent with the criteria in the Potential Wilderness Area Evaluation Report, pages 132-133.

The upper Verde River flows through 10.77 miles of the Muldoon PWA. We have clearly documented (see introductory comments, incorporated here by reference) that the upper Verde corridor throughout the Muldoon PWA is an extraordinary ecological sanctuary for numerous ESA protected fish and bird species. Note that eagles do not tolerate visitors during breeding activities and breeding sites are typically closed from December through June. Wilderness protection will afford this species additional protection to these eagles and limit disturbance.

Because the upper Verde River WSR Eligibility Study (PNF, December 2010) lists 10 aquatic/fish species and 17 wildlife species as MIS, Sensitive, WSC, Candidate, Endangered, or Threatened, and because The Nature Conservancy rates the upper Verde as one of the two best native fish habitats in AZ (Aquatic Conservation: Marine and Freshwater Ecosystems, Vol. 17: 737-748 (2007)), we believe the upper Verde is extremely important as a refuge and deserves a rating of "high" for 3 points.

Factor #5: Wilderness capacity

Again, this is a manufactured criterion that is not a feature of the Wilderness Act. We do not believe that it is proper to evaluate all the PWAs collectively. The report ignores the population pressures that will increase demand for Wilderness areas, thus devaluing every PWA in the forest. See arguments in Factor #3 above.

We believe that the Wilderness capacity rating should be increased to "high" for three points.

Factor #6: Under-represented ecosystems

The report totally ignores the rare and healthy riparian ecosystem along the upper Verde River (see introductory comments, incorporated here by reference). Because 10.77 miles of the upper Verde flows through Muldoon PWA, supporting some of the highest quality riparian habitat in Arizona, we believe that this factor should be scored as "high" for 3 points.

Factor #7: Public input

The Sierra Club was not notified of the public review meetings on PWAs. Please add the Sierra Club to the notification list. The Sierra Club strongly supports wilderness status for the Muldoon PWA.

Need Summary

We believe that Muldoon deserves a rating of "high", earning 18 points.

Availability

Wildlife

We have clearly documented the importance of the upper Verde throughout the Muldoon PWA to regional wildlife (see introductory comments, incorporated here by reference). The "negative" impacts discussed in the report are unsubstantiated allegations, out of date information, and speculation.

The habitat supporting the richness of the Upper Verde River Important Bird Area is the riparian area, not the "second growth juniper." The riparian area contains an important population of gallery forest, the most rare named forest type in North America.

The Upper Verde River Wildlife Area, operated by AZGFD, abuts the PNF western boundary about a mile upstream from the Muldoon PWA boundary. This proximity leads one to question why AZGFD established a wildlife area, in contrast to PNF's flawed evaluation.

A fair and informed comparison of the plusses and minuses of a Muldoon Wilderness Area for wildlife would assign a "high" rating of 3 points.

Water

The PNF document "Analysis of Management Situation", page 10, states "The pinyon-juniper grasslands have the highest level of unsatisfactory soil condition at 62 percent." Mechanical removal of juniper is not a sustainable treatment, especially when grazing removes the fine fuels needed to support a natural fire regime. If PNF is concerned with watershed improvement in Muldoon, the impacts of overgrazing should be the first management priority. We fail to understand how operating motorized wheeled equipment on damaged soils to remove tree cover

qualifies as watershed improvement. We are inclined to believe that the most effective watershed improvement would be to better control the agents of damage, leaving the watershed to heal naturally. We see no evidence that the PNF explanation is more than mere speculation.

More importantly, the analysis completely ignores the essential role of riverbanks, terraces, and uplands in maintaining base flow. See our comments on Uplands Management above for an explanation of this extremely important, generally overlooked point.

The Muldoon PWA is especially important for supporting base flow in the upper Verde. Between the PNF western boundary and the Paulden gage, Muldoon Spring contributes some of the 3 cfs gain into the riverbed at Muldoon Canyon (Wirt, 2005). Below the Paulden gage, Duff Spring reliably contributes approximately 1.5 cfs to the Verde base flow. Both springs drain the Muldoon PWA.

The rating here should be "high" for 3 points.

Timber

In the PNF planning document "Analysis of the Management Situation", every reference to *timber* clearly refers to logs for manufacturing use, which is not a resource in the Muldoon PWA. The report apparently confuses "timber" and "fuelwood" so the meaning here is unclear. However, the report is concerned about losing access to "60,000 cords of fuelwood every 30-50 years," The analysis states:

> *"Consequently, there appears to be sufficient timber inventory to sustain current consumption rates indefinitely assuming moderate rates of growth." (page 21)*
>
> *"Determination of lands not suitable for timber production is based on the following criteria:*
>
> *" • Harvest activities may create irretrievable resource damage…" (page 26)*
>
> *"No attempt was made to measure the demand for fuelwood or specific forest products." (Appendix C, page 18)*

PNF did not consider timber a constrained resource. Apparently, PNF concerns with fuelwood resources don't justify an effort to estimate the demand and supply. Therefore the report's concern with losing the fuelwood is merely speculation and should not be considered in this evaluation. Questions:

- How much fuelwood is available in PNF, excluding all PWAs?
- Is the Muldoon fuelwood a large fraction of the available supply?
- Will motorized fuelwood harvesting activities damage the watershed by breaking ground and increasing sedimentation in the upper Verde, critical habitat for two endangered fish? If so, why is fuelwood harvesting being considered at all?

The rating here should be "high" for 3 points.

Availability summary

The availability matrix score for Muldoon PWA should be 7, justifying a rating of "high."

Overall Muldoon PWA Rating

The PNF evaluation substantially understates the wilderness capability, need, and availability of the Muldoon PWA. The PNF evaluation gives inadequate weight to the enormous ecological importance of the upper Verde River and associated riparian habitats to the southwestern region. Further, the evaluation downgrades the Muldoon PWA based on speculation and nebulous management plans. Finally, the PNF evaluation omits key information. The Muldoon PWA should be rated as "high" for Capability, Need, and Availability.

The Sierra Club requests that the Muldoon PWA be included in the Recommended Additional Wilderness Areas in the adopted plan. Further, we ask PNF to actively support wilderness designation for the Muldoon.

COMMENT: Watersheds

On page 22, sub-bullet #1 of bullet #2, under DC-Watershed-1, states that water quality meets CWA standards. However, there are hundreds of chemicals of concern that are not monitored in our waterways and the State has not set water quality limits for them. An example of one that can be tested for, but is not, is nonylphenol ethoxylates (NPE) which causes sex change in fish. The Sierra Club Water Sentinels have detected NPE in the upper Verde River just below the confluence with Granite Creek.

The Sierra Club suggests that PNF add an objective for additional water quality testing for trace endocrine disrupting contaminants known to interfere with fish reproduction, for the purpose of supporting native fish restoration efforts.

COMMENT: Miscellaneous

On page 105, under Guide-VV MA-5, the management actions should retain SIOs of the Grief Hill IRA. What about Hackberry IRA listed on page 103?

Page 1: "Wildlife" paragraph. Omitted species: razorback sucker, loach minnow, roundtail chub, northern Mexican gartersnake, Gila topminnow.

Page 61: Aquatic species that would benefit… The list is incomplete. Add loach minnow, roundtail chub. Sensitive species list: remove roundtail chub.

COMMENT: Errata (comments pertain to the Draft Plan unless otherwise noted)

- Glossary needs all acronyms in document included.
- There needs to be an Index.
- Draft EIS: the index contains errors and omissions. For example if a reviewer is looking up a mining reference what is listed for page 137 is on page 136, page 139 is on page 138, there is no reference on page 161, and references are on pages 171-174, but not on page 175. Numerous additional index errors may exist within the Draft EIS.
- On page 11, the Definition of Primitive (P) states that there is none on the PNF. However, page 97, DC-UV MA-4, and page 98, DC-WVN MA-2, list opportunities for primitive experiences in Apache Creek, Juniper Mesa, Sycamore Canyon, and Woodchute Wildernesses. We also believe the same applies to Cedar Bench, Pine Mountain, and Castle Creek Wildernesses.
- Page 43 lists recreation opportunities. Change "biking" to “bicycling” to differentiate between motorized and non-motorized vehicle use.

COMMENT: Historical inaccuracies

Page 94: Prescott/Chino/Drake.

- The 1853/54 Whipple expedition was a military/scientific survey to find a transcontinental railroad route along the 35th parallel.
- The Walker party did not discover gold in the Prescott area until 10 years later.
- Whipple never visited Prescott. Some of his men probably visited Chino Valley.
- The first Territorial Capitol of Arizona was established in late 1863 at Del Rio, and though commonly known as Fort Whipple (NOT the later Prescott location) it was Camp Whipple. Within 6 months the military and the Capitol moved to present day Prescott and what is now the VA Hospital. That was in 1864 (so the Capitol was NOT established in Prescott from 1865).

Page 102: Jerome was NOT connected to Ash Fork by the Atlantic and Pacific RR (A&P) in 1882. The narrow gauge United Verde & Pacific RR connected to the standard gauge Santa Fe, Prescott & Phoenix Railway (SFP&P) at Jerome Junction near present day Chino Valley in 1895. The first scheduled train to Jerome ran on January 24, 1895. The SFP&P connected to the A&P (owned by the ATSF) at Ash Fork. The Clarkdale Branch of the ATSF (Verde Valley RR) was completed to Clarkdale in 1912. From Clarkdale, other railroads served the Verde Valley including the Hopewell Tunnel which ran under Cleopatra Hill, serving the various Jerome mining levels by gravity feed.

Ltr#0086

From: Jim Webb
To: FS-prescott-forest-plan-comments
Subject: Draft management plan
Date: Wednesday, November 28, 2012 1:00:45 PM

I support Alternative A. The reason I support Alternative A is that it does the least damage to the ecosystem from the well intentioned but misguided people who administer the programs. Funding is more certain for Alternative A. Alternative A leaves a smaller footprint from all human activity. Less is more on the Prescott National Forest in terms of wilderness, recreationists, hikers and ORV's. The only things that need to be added to Alternative A is more timber cutting and cattle grazing, both of which would create more jobs and provide positive economic inputs into the small communities of Yavapai County. Thank you. James M. Webb, Skull Valley, Arizona.

Ltr#0087

From: dfandjf@q.com
To: FS-prescott-forest-plan-comments
Subject: Draft Environmental Impact
Date: Wednesday, November 28, 2012 1:01:02 PM

I recommend Alternative C.

Thank you,

Jean Focke
520 S. Bradshaw Dr.
Prescott, AZ 86303

(928) 778-2082
dfandjf@q.com

Ltr#0088

From: Brad DeVries
To: FS-prescott-forest-plan-comments
Subject: Comments on PNF Plan
Date: Wednesday, November 28, 2012 1:08:19 PM

To the Prescott National Forest:

Thank you for the opportunity to comment on the current draft of the new Land and Resource Management Plan. I currently serve as the chair of the Advocacy Committee of the Prescott Mountain Bike Alliance, but am offering these comments on the recreational portions of the plan as an individual. I also appreciate the breadth and difficulty of the forest planning process, within which recreation is just one aspect.

I applaud the desire to provide recreational opportunities in the Prescott National Forest for a wide variety of users. Unfortunately, several of the proposals in the current draft would curtail current opportunities for mountain bikes, at a time when that use is increasing both nationwide and in the Prescott National Forest.

Thanks to our climate, terrain, and increasing support by the City Council and staff of Prescott, mountain bike recreation in the area is expanding rapidly. The Prescott Mountain Bike Alliance, of which I am a member & volunteer, is working to improve the user experience for mountain bike riders and all trail users in the area through advocacy, trail construction and education. Even as the number of mountain bike riders in our area increases, we are also seeing a dramatic broadening in the type of experience individual mountain bike riders are seeking. While the adrenaline side of the sport gets most of the press, the most notable growth in recent years has been a surging interest in self-supported bikepacking, with riders carrying gear for multi-day backcountry trips over long distances. While these bikepackers tend to cover larger distances, they are seeking an experience very similar to backpackers or overnight equestrians, looking for multi-day loops or long point-to-point trips.

In particular, several of the proposed Wilderness designations in the proposal would eliminate existing and planned bikepacking routes and curtail the network of trails available to mountain bikes in the Mingus Mountain area. Most notable among these is the Black Canyon Trail, which is shaping up to be one of the premier long-distance trails in Arizona, and a growing draw to cross-country mountain bike riders and bikepackers.

If mountain bike use is increasing but legally available trails are decreasing, you are setting the stage for significantly increased user friction, as well as providing an unfortunate impetus to illegal trail construction.

I would urge you to consider the following revisions to this draft plan:

1. In areas where existing mountain bike access will be curtailed, use alternatives to formal Wilderness designation to preserve the backcountry experience for a wide range of non-motorized users; for example, see the James Peak Special Use Area in Colorado's Front Range and other "special use" areas.

2. Of the proposed additions to designated wilderness, please do not include the areas atop Mingus Mountain, or use the existing Black Canyon Trail as a Wilderness

boundary so bike access to this important bikepacking and mountain bike cross-country trail will not be eliminated.

3. Establish a more rigorous system of user experience monitoring. We need to know what is working and what isn't for the full range of trail users in the PNF, beyond anecdote and conjecture.

Thanks again for the opportunity to offer comment on this plan.

Brad DeVries

444 Campbell Street

Prescott Arizona 86301

Ltr#0089

From: GREGG PAYNE
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS
Date: Wednesday, November 28, 2012 1:36:26 PM

Dear Prescott National Forest Planners,

This comment is in regards to Recreation in Chapter 3. Objectives.

"Provide sustainable, diverse recreation experiences that consider population demographic characteristics, reflect desires of local communities, avoid overcrowding and user conflicts and minimize resource damage."

Please include disc golf as a potential future recreation activity in the Prescott National Forest. The activity is booming in popularity world wide, and is most often played on public lands.

I have 20 years of experience developing all kinds of disc courses in a variety of urban and wilderness areas. I have seen first hand how disc golf provides the highest public benefit to the most people, with the least expense on taxpayers and lowest impacts to the ecology. Disc golf provides a high quality low cost wilderness experience that is compatible with many of the goals and objectives of the planning draft, regardless of which of the four alternatives is eventually preferred. It satisfies many of the same social, competitive and recreational needs as other conventional activities which cost far more and cause much greater impacts. It is compatible without conflict with other recreational uses as well as provides opportunities for interpretive environmental outreach to a young captive audience.

There are currently unofficial courses on National Forest land near Prescott that are hard to notice, since players are tossing at tree trunks as targets. Improved designated sites would allow for safer, more enjoyable and more ecologically sound use. This activity needs very little infrastructure and is similar to hiking trails and bird watching as far as impacts are concerned. It is challenging yet safe, affordable and accessible to all age groups.

One thing is certain. The Prescott National Forest will receive increasing use as the state's population increases, especially if climate temperatures also increase in lower elevations. Disc golf can accommodate a great deal of this demand in the most cost effective environmentally sustainable

means. The small amount of impact associated with it would be contained in relatively small areas that are easy to monitor and manage.

Please feel free to include this correspondence as public record. Anyone interested is welcome to contact me for any further discussion or information regarding disc golf as a suitable activity in Prescott National Forest.
Best regards,

Gregg Payne

Ph: (530) 228-3399
530 Gail Gardner Way, Prescott AZ 86305
www.greggpayne.com
greggpayne@mac.com

Ltr#0090

From: Dwayne Warrick
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS
Date: Wednesday, November 28, 2012 2:25:07 PM
Attachments: IMG.pdf

Please see my comments attached.

Thanks for the opportunity to comment.

Dwayne Warrick, CFP®
Yavapai Financial Planning, LLC
Edelman Financial Network™
1456 West Gurley Street
Prescott, AZ 86305
928.445.1673
888.445.1673
Fax 928.445.7256
warrick@cableone.net
yfplan.com

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Ltr#0090

1456 W Gurley St
Prescott, AZ 86305

November 28, 2012

Prescott National Forest
Attention: Plan Revision
344 South Cortez Street
Prescott, AZ 86303-4316

After reviewing the Draft Forest Plan and Draft EIS, I have the following comments:

First, I want to compliment the planning team and the Forest leadership team for developing and maintaining strategic plan direction rather than getting bogged down in the minutia of site specific project direction.

One concern I have is the omission and/or lack of emphasis on using planned grazing as a strategic tool to improve the herbaceous and browse vegetation components as well as improving the condition of the soil surface. This universal tool is adaptable across all vegetation types and can normally be applied with no or little economic cost.

Another concern is the assumption that all soil condition ratings can be improved to and/or toward satisfactory condition as defined by the "Terrestrial Ecosystem Survey of the Prescott National Forest". Numerous soils have passed beyond threshold conditions that will preclude returning to "satisfactory condition" in any reasonable period of time if ever.

A further concern is the desired condition and management direction for the Pinyon-Juniper Woodland. Stem density needs to be drastically reduced in order to restore woodland health and watershed condition.

A final concern is the desired condition and management direction for the Riparian Gallery Forest. Woody vegetation in the stream channel and flood plain are fundamentally detrimental to the condition and functionality of Prescott NF riparian areas. These sections should be completely revised so as to be consistent with the latest research recommendations as described in RMRS GTR 291.

Please let me know if you have questions or want to discuss further.

Sincerely,

Dwayne

Dwayne Warrick

Ltr#0091

From:	J.D. Greenberg
To:	FS-prescott-forest-plan-comments
Cc:	Rasmussen, Mary C -FS
Subject:	2012 Prescott National Forest Plan Revision
Date:	Wednesday, November 28, 2012 2:51:31 PM
Attachments:	2012 PNF Plan Revision.doc.doc

Just is case I am unable to get the hard copy of my comments to you, I am attaching them to this email.

Thank you.

J.D. Greenberg

Prescott National Forest Revision

Alternatives Comment Form

October 2012 Public Meetings

I **AGREE** with a combination of Alternatives "B" and "C" because:

Wildlife and Native Fish

Since the 1987 Forest Plan was implemented, the Prescott area has undergone considerable growth and development. As a result, many wildlife corridors have been reduced or eliminated. One devastating impact of this encroachment has been the disappearance of Pronghorn herds. This indicator specifies reflects the danger of losing more local native species.

The increased efforts to improve Pronghorn habitat and migration corridors, including fence modification or removal, in Alternatives B and C is critical if these herds are to survive and co-habitate with future development. Added acreage of Pronghorn habitat likewise increases their chance for survival. Consideration should be given to working with ADOT to create overpasses or underpasses to enable the Pronghorn to cross the ever-widening highways being built.

Many bird species such as the Eagle, Spotted Owl, Goshawk and Osprey need to have their nesting areas preserved and protected. Even though some have been removed from the Endangered Species list, their numbers again could quickly diminish if their habitat is not maintained.

I applaud the PNF for including three additional management indicator species to the general plan. However, since it is such a sensitive, important issue, surely the plan could have encompassed all 12 candidate species.

Watershed Integrity

With the increased realization that water is a diminishing precious commodity, more must be done to preserve our watershed from contamination. Again Alternatives B and C best meet the task. The practice of allowing cattle to graze near rivers and streams MUST be re-evaluated. Although ranchers have a right to their livelihood, unrestricted grazing cannot continue. If there is no reduction in the total acreage allocated for livestock grazing, then relocation away from vital watersheds should be required.

While not under the auspices of the PNF, areas such as the Del Rio Springs must be preserved as historic natural riparian areas. Involvement and guidance by PNF in working with developers of these areas would be instrumental in preserving the regional watershed.

Vegetation and Fire

As one who lives in the wildland urban interface area, I appreciate the efforts the PNF and Arizona State Forestry have done over the past 10 years to reduce the risk of catastrophic wild fires. I realize that a variety of methods, prescribed burns, mechanical treatments and the sale of forest products all play an important part in maintaining a healthy forest.

It is interesting that in the area where I live few people responded to calls for more defensible space around their homes even though we are deemed a "Firewise Community." However, when the focus shifted to creating a healthy environment for Ponderosa Pine trees in their yards, more people followed up with necessary thinning. Perhaps the PNF could make use of this approach in their education process. The message must be repeated often as few people are aware of it upon moving to the Prescott area.

Another critical area for PNF action is the presence of non-native, invasive vegetation, such as Tamarisk, Dalmatian Toadflax and several other species that are crowding out native plants and clogging our waterways. It requires ongoing efforts and I realize budgetary constraints limit how much can be done. Perhaps instigating a program of "adopt a trail" or area could produce some volunteer efforts through organizations such as Prescott Creeks.

I have **CONCERNS** with Alternatives "D" because

Living at the doorstep to the PNF, I see and hear about people abusing the forest. Sometimes even when walking in the forest it can be startling, if not actually dangerous, to have mountain bikers come up on you suddenly and speed by. It would pose a greater risk if motorized vehicles were allowed in the forest. If there were an expansion of roads for motorized vehicles in the forest it would negatively impact wildlife, the watershed and user safety.

Furthermore, several of my neighbors previously witnessed campers with a key to the PNF gate at the end of Cougar Trail. These interlopers then proceeded to camp near the pond below Goldwater Lake and to build a campfire. Such camping poses a high risk of wildfire and habitat destruction. This issue was reported to PNF and my neighbors continue to provide vital information about such infractions.

However, the creation of additional campsites in the PNF and opening the area up to more motorized recreational activities only increases the danger of disaster.

I realize the PNF has a delicate balancing job and commend the efforts you are making. We hope to continue being good neighbors in the delicate goal of both preserving and enjoying the PNF.

Thank you for considering my comments. If I can help further, please contact me.

J.D. Greenberg
jdgreenberg@live.com

Ltr#0092

From: Rasmussen, Mary C -FS
To: FS-prescott-forest-plan-comments
Subject: FW: Comments on PNF Draft Forest Plan
Date: Wednesday, November 28, 2012 3:01:25 PM

From: Jackson, Linda L -FS
Sent: Wednesday, November 28, 2012 3:52 PM
To: Rasmussen, Mary C -FS; Brown, Christopher J -FS
Cc: Jackson, Linda L -FS
Subject: Comments on PNF Draft Forest Plan

Great job on this document. Read the plan and some of the EIS. Very impressed. I have three comments. The first one is my primary concern. Here they are. Linda

Draft Forest Plan

Page 23 – comment

Last bullet in DC-Watershed concerning soil condition rating. Concerned whether this is an achievable desired condition. Chris Thiel's comments on this DC state my concerns, so I'll defer to her words.

Page 55 – comment

Obj-7. I believe that 2-5 developed recreation areas within a 10 year period is too many and not realistic.

Draft EIS

Page 102 – correction

First full paragraph and discussion on groundwater:

In first sentence we state that ground water use is limited to special-use permittees and a few other uses. Then second sentence focuses on livestock permittees. Other users of groundwater are organizational camp permittees, recreation residence permittees, mining permittees, etc. I'm thinking that the second sentence should to be expanded to include some of these others.

Linda L. Jackson
Prescott NF
Bradshaw District Ranger
928.443.8050 (office)
928.925.2998 (cell)

Ltr#0093

From:	Sam Frank
To:	FS-prescott-forest-plan-comments
Cc:	Les Corey
Subject:	Draft Forest Plan and Draft EIS
Date:	Wednesday, November 28, 2012 3:17:19 PM
Attachments:	AWC Comments_PNF Draft Forest Plan 11_2012_FINAL.docx

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Hello.
Please accept these comments from the Arizona Wilderness Coalition regarding the PNF Draft Forest Plan. Thank you for all your hard work on the document.
Best,
Sam Frank

***Please note my office phone number has changed.**
Sam Frank
Arizona Wilderness Coalition
Prescott, AZ
928.350.2204

Ltr#0093

ARIZONA WILDERNESS COALITION

Working Together to Protect Arizona's Wild Lands and Waters

Prescott National Forest
Attn: Plan Revision Team
344 South Cortez St.
Prescott, AZ 86303-4316

November 20, 2012

Re: Draft Land and Resource Management Plan

The Arizona Wilderness Coalition (AWC) submits these comments for the Prescott National Forest (PNF) Draft Land and Resource Management Plan. AWC would like to commend the PNF for the amount of time and effort put into creating this comprehensive document. In particular, AWC is very pleased to see the attention that was given to wilderness areas and wild and scenic rivers, existing or potential, throughout the document. However, there are some areas that AWC feels could be improved for the final version of the forest plan.

Desired Conditions

Wilderness and wild and scenic rivers should be moved to the Physical or Biological categories in Desired Conditions rather than being listed in Social/Economic. Wilderness areas and wild and scenic rivers provide many benefits to the ecology, wildlife, economics, and communities within and outside the PNF. Listing wilderness and wild and scenic rivers under the Recreation category in Desired Conditions is addressing only one of the intents of these designations. Indeed, recreation is one of the benefits wilderness and wild and scenic rivers provide. However, within The Wilderness Act Section 4 (b) it states: "…each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area…" And within The Wild and Scenic Rivers Act, recreation is only one of the seven Outstandingly Remarkable Values mentioned. Therefore, AWC feels the intent of wilderness areas and wild and scenic rivers is lessened by prioritizing recreation over the other benefits.

Additionally, since the forest plan will be used by PNF staff to guide their work responsibilities it could mislead employees to incorrectly think that wilderness and wild and scenic river designations are specifically recreation designations. This misrepresentation is evident in section DC-Wilderness-1 (p. 45) where it states "The wilderness character of designated wilderness areas consists of outstanding opportunities for exploration, solitude, risk, and challenge where natural processes influence ecosystems with little or no human intervention". This clearly gives the wrong impression that an area's wilderness character is strongly tied to recreational opportunities and is likely due to wilderness being listed under the Recreation category of Desired Conditions. AWC recommends editing DC-Wilderness-1 to be in line with *Monitoring Selected Conditions Related to Wilderness Character: A National Framework (2005)* which was produced by the Forest Service

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Arizona Wilderness Coalition
www.azwild.org
Main Office
PO Box 40340 Tucson, AZ 85717 (520) 326-4300
PO Box 13524 Phoenix, AZ 85002-3524 (602) 252-5530
PO Box 2741 Prescott, AZ 86302 (928) 717-6076

Wilderness Monitoring Committee. AWC offers the following as a primer: "Maintain the wilderness character of designated wilderness areas. Wilderness character consists of the sum of the following qualities: untrammeled, undeveloped, natural, solitude or primitive and unconfined recreation." The second sentence in the suggested DC-Wilderness-1 above could also be inserted in the Standards and Guidelines sections related to wilderness.

AWC supports the draft Desired Conditions DC-Wild and Scenic-1 for Wild and Scenic Rivers (p. 45). As stated above, AWC feels the Desired Conditions for wild and scenic rivers should be moved to the Physical or Biological section. However, AWC supports the language used DC-Wild and Scenic-1**.**

AWC supports the draft Desired Conditions DC-IRA-1 for Inventoried Roadless Areas (p. 46). AWC supports the language used in DC-IRA-1.

Objectives

AWC feels Objective 7 (p. 55) works towards DC-Wild and Scenic-1, but the PNF must ensure any developed recreation site does not negatively impact the eligibility or suitability of the upper Verde River as a wild and scenic river. Adding recreation sites along the upper Verde River could help to lessen the impacts of unmanaged, overwhelming recreation as well as maintain the river's outstandingly remarkable values. However, the PNF must ensure any constructed recreation area does not preclude a section of or the entire upper Verde River from further consideration as a wild and scenic river. AWC recommends the PNF consults the forest's own eligibility studies as well as the Upper Verde Wild and Scenic River Citizens' Proposal when considering potential sites and site amenities.

AWC supports Objective 15 (p. 57), but feels other Objectives should be added to work towards DC-Wilderness-1. While adding signage along vulnerable wilderness boundaries is a valuable goal, other Objectives could be inserted into the draft forest plan to works towards DC-Wilderness-1. AWC offers the following suggestions for additional Objectives:

- *Field monitor existing and potential wilderness areas to establish wilderness character conditions and track changes over the next 10-15 years.*
- *Engage volunteers to assist with wilderness area monitoring and projects*.
- *Complete non-native plant monitoring in existing wilderness areas within the next 10 years.*
- *Prioritize existing wilderness areas for non-native plant remediation efforts.*

AWC feels Objective 24 (p. 61) works towards DC-Wild and Scenic-1 and should be cited as doing so. Objective 24 deals with reintroduction of native fish species to 2 to 3 stream reaches. Native fish are an outstandingly remarkable value in both the PNF's Upper Verde Wild and Scenic River Eligibility Study as well as the Upper Verde Wild and Scenic River Citizens' Proposal. Therefore, Objective 24 should be cited as working towards DC-Wild and Scenic-1.

Standards and Guidelines

Std-Rec-2 (p. 73) should also state that motorized big game retrieval is prohibited in Inventoried Roadless Areas. Allowing motorized big game retrieval in Inventoried Roadless Areas (IRA) works against DC-IRA-1 which aims to retain the undeveloped character of IRA's. AWC recommends making existing and potential wilderness areas and IRA's visible on updated versions of the Motor Vehicle Use Map (MVUM) so as to ensure these areas are not degraded by motorized travel.

AWC strongly supports Std-Wild-1 through Std-Wild-3 (p. 75). AWC suggests inserting 'wilderness character' in Std-Wild-1 such as "Wilderness *character* and values shall take precedence over recreation uses where conflicts occur". AWC also suggests making clear that Std-Wild-1 through Std-Wild-3 also apply to potential wilderness areas.

AWC strongly supports Guide-Wild-1 through Guide-Wild-9 (p. 75-76). AWC suggests making clear that Guide-Wild-1 through Guide-Wild-9 also apply to potential wilderness areas.

AWC strongly supports Std-W&S-1 through Std-W&S-2 (p. 76). The PNF is legally mandated to maintain or enhance the outstandingly remarkable values and the free flowing character of the existing Verde Wild and Scenic River and the eligible Upper Verde Wild and Scenic River.

AWC strongly supports Guide-Interp-1 (p. 76). Education is crucial to building appreciation and respect among the public for special place designations, cultural and historical sites, wildlife, and unique and imperiled areas (such as riparian areas). AWC suggests inserting a Guide-Interp-2 which states that specialists in pertinent fields (wildlife, wilderness, cultural heritage, etc.) will develop educational plans for categories listed in Guide-Interp-1 over the next 5 years in order to be implemented before the next forest plan is drafted.

Management Area Direction

AWC suggests inserting reference to Management Area Directions in pertinent sections of the Forest Plan. For example, in DC-Wild (p. 45) there should be a reference noting that additional specific guidance for management of existing and potential wilderness areas is located in the Chapter 5: Management Area Direction. Conversely, in each Management Area reference should be cited for pertinent direction such as DC-Wild and DC-Wild and Scenic.

AWC strongly supports the Upper Verde Management Area including all Desired Conditions and Guidelines (p. 96-97). AWC is pleased to see the strong direction placed on maintaining and enhancing the unique values of this management area which contains the eligible Upper Verde Wild and Scenic River and Sycamore Canyon Wilderness and potential additions to Sycamore Canyon Wilderness.

Potential Wilderness Area Evaluation

AWC recognizes the significant amount of effort that went into creating the PNF Potential Wilderness Evaluation Report. A multitude of areas were evaluated using extensive criteria. While AWC is pleased to see the potential wilderness areas carried forward into the alternatives incorporated in the draft forest plan, there are some concerns with some of the evaluation measures.

AWC respects the broad scale used by the PNF to identify potential new wilderness areas and additions to existing wilderness areas. However, AWC has concerns about the fact that Inventoried Roadless Areas (IRAs) were enlarged from their original size. This method could be beneficial in order to include as much land a possible with wilderness character. But when expanding an area led to conflicts the boundaries were not reduced to original size in order to avoid negatively impacting the area's evaluation score. An example of this is Ash Creek IRA. The original IRA boundaries were expanded in the Initial Potential Wilderness Review. By expanding the boundaries, the Grapevine Gulch motorized trail (#9708) was included in the evaluated area and rating criteria in the Capability section deducted points if motorized trails were present. Inclusion of this trail lowered the score for Ash Creek and was used as rational for

not carrying Ash Creek forward in the Preferred Alternative of the draft Forest Plan. **If the PNF chose to expand on the original IRA boundaries and that expansion led to conflicts, the PNF should have shrunk the area to the original boundary.**

Additionally, AWC questions whether roads or motorized trails that lowered an area's score were in fact legal, NEPA documented, system roads/trails? Did the PNF ensure that roads and trails evaluated were legal? For example, Blind Indian Creek IRA was subtracted for 15 miles of motorized trails that "have been in use for decades". While these motorized trails may have been in use for decades and might even have signs on them, were they legally created and legally added to the PNF trail system?

Other evaluation criteria in the Capability section were arbitrary and illegal. For example, question 3 in the naturalness evaluation dealt with "Quality of night-sky as affected by light pollution". AWC is doubtful that PNF staff actually visited all potential wilderness areas at night to assess the amount of light pollution and is curious to know what methodology was used to make determinations. This evaluation criteria is illegal because external 'sights and sounds' were disallowed when evaluating potential wilderness as stated House Report 95-540, which accompanied the Endangered American Wilderness Act of 1977. Specifically, H.R. 95-540 states " This (sights and sounds doctrine) eliminated many areas near population centers and has denied a potential nearby high-quality wilderness experience to many metropolitan residents, and is inconsistent with Congress' goal of creating parks and locating wilderness areas near population centers". This is also applicable to question 14 related to manageability also within the Capability review. Question 14 states: "Includes the ability to manage the area for wilderness character, *including distance and influence from outside activities;..*".

Within the Availability section, the PNF evaluated an area based on timber. In some instances this criteria was based on timber management for wildlife activities, but in other instances timber was evaluated on harvestable timber (fuel wood or commercial). **Again, this criteria is illegal as stated in House Report 95-540, which accompanied the Endangered American Wilderness Act of 1977.** The PNF should not have evaluated an area's wilderness potential based on the amount of timber that could be harvested. An example of the misuse of this criteria is found in the evaluation in Ash Creek IRA.

AWC feels the Need section was inappropriately weighted towards recreation where four of the seven questions in the Need section were based on recreation demand. The PNF used Forest Service Handbook (FSH) 1909.12 Chapter 72.3 to evaluate Need for potential wilderness areas. The FSH states: "*Determine the need for an area to be designated as wilderness through an analysis of the degree to which it contributes to the overall National Wilderness Preservation System"*. Nowhere does it mention recreation demands current or future. The other three question in the Need section dealt with providing refuge for species or unique scientific values, preserving identifiable landforms and ecosystems, and public review and comments.

Based on the deficiencies pointed out, AWC feels certain areas should be included in the Proposed Revised Plan Alternative in the draft forest plan. Ash Creek PWA (PW-03-09-004) and Muldoon PWA (PW-03-09-020) are areas that have high ecological value, provide benefits to citizens even to those who are not recreationists (such as clean water and air), protect important and rare riparian habitat (Agua Fria River headwaters and upper Verde River), contain historic and pre-historic cultural sites, and would be beneficial additions to the National Wilderness Preservation System.

Ltr#0094

From:	Jeremy Fancher
To:	FS-prescott-forest-plan-comments
Cc:	Patrick Kell
Subject:	PNF Draft Plan and DEIS comments
Date:	Wednesday, November 28, 2012 3:19:01 PM
Attachments:	IMBA Prescott NF Draft Plan Comments Final.pdf

Please find the attached document which are the comments from International Mountain Bicycling Association. We look forward to partnering with you to create, enhance and preserve mountain bicycling experiences on the Prescott National Forrest.

_____

Jeremy J. Fancher Esq.
Attorney
International Mountain Bicycling Association
jeremy.fancher@imba.com
303.250.0720

INTERNATIONAL MOUNTAIN BICYCLING ASSOCIATION

November 28, 2012

Mary C. Rasmussen, Forest Planner
Prescott National Forest
Attention: Plan Revision
344 South Cortez Street
Prescott, AZ 86303

RE: International Mountain Bicycling Association Comments on the Draft Land Management Plan and EIS for Prescott National Forest

Dear Ms. Rasmussen,

Thank you for the opportunity to provide feedback on the Draft Land Management Plan for the Prescott National Forest (Draft Plan) and the concurrent EIS. The National Forest system is home to more mountain bicycling experiences than any other land management organization. Through our National Memorandum of Understanding and participation in the planning processes the International Mountain Bicycling Association (IMBA) and our local Chapters and affiliate clubs seek to enhance and preserve those experiences.

Founded in 1988, IMBA leads the national and worldwide mountain bicycling communities through a network of 80,000 individual supporters, 750 affiliate clubs, and 600 dealer members. IMBA teaches sustainable trail building techniques and has become a leader in trail design, construction, and maintenance; encourages responsible riding, volunteer trail work, and cooperation among trail user groups and land managers. Each year, IMBA members and affiliated clubs conduct more than 750,000 hours of volunteer trail stewardship on America's public lands and are some of the best assistants to federal, state, and local land managers.

The Prescott National Forest is home to two local mountain bike groups. The Prescott Mountain Bike Alliance, a Chapter of IMBA, frequently works with the Bradshaw Ranger District and the Verde Valley Cyclist Coalition (IMBA affiliate club) put substantial efforts into the Verde Ranger District.

We support the Preferred Alternative as it applies to the Desired Conditions and Objectives. As it applies to Wilderness recommendations we can not support any alternative that includes Wilderness recommendation for the Black Canyon parcel.

Notice in the Federal Register

Our first concern is with the notice published in the Federal Register. The notice was actual published by the Environmental Protection Agency as they are required to publish their comments on other Federal agency action. This is not acceptable. We may have gotten actual notice through our local network, but we are very disappointed that the Forest Service would find this to be acceptable practice for soliciting input. The purpose of public notice is to make the public aware of the action so they can engage in those issues that are relevant to them. Because Forest Service Planning and Actions are so important to mountain bikers we search the Federal Register on a daily basis. However, when those notice are not filed under the acting agency we are substantially less likely to get actual notice. Please publish your own notice in the Federal Register under the Forest Service section so that the public can fully engage in these processes.

INTERNATIONAL MOUNTAIN BICYCLING ASSOCIATION

Need for Change Statement

We applauded the Forest Service for acknowledging the public's concern for sustainable recreation opportunities. We share these concerns, and add that we are concerned with the quality of those opportunities. However, we do not see sufficient evidence in the EIS that the Forest Service has adequately considered how the landscape is used for and creates quality recreation experiences.

The Forest Service has relied on data from the National Visitor Use Monitoring system. We believe this system to be severely and fatally flawed because it is generated based on random sampling. Outdoor recreation does not occur randomly. For example mountain bikers tend to ride certain trail in a direction, are more apt to ride when temperatures are mild and there is just enough moisture on the trails to make them tacky. So the time of year, recent weather, and location are influential over when recreation users will be available for intercept surveys.

As a more robust way of collecting this data we suggest the addition of interactive mapping tools similar to what is currently being used in the Chugach National Forest Planning. By allowing users to identify place such as trails, climbing routes or whitewater river runs that important to them the Forest Service and develop an inventory of sorts that informs them of the recreational assets on their forest and can help develop management strategies that preserve the recreational experience and the landscapes that provide them.

Desired Conditions

We are pleased to see that the Desired Conditions include an entire section on trails, DC-Rec-2 Trails. We believe our local Chapter and Affiliated Club can be of great assistance to bring about these conditions. To that end we highly recommend that the Forest Service engage in discussions with these local groups to develop a partnership agreement with them. This could be a simple as a Memorandum of Understanding or a more robust agreement and the Forest Service Partnership rubric. These dedicated volunteers can bring a wealth of resources from trail building and stewardship to safety and visitor assistance with trail patrols. We do request that mountain bike use is incorporated into the desired conditions even if only a clarification that mountain bicycling is a non-motorized use.

Objectives

We would like to give input on several components of the standards and objectives so we will address them by number.

Objective - 9
Maintenance Backlog - Both the Prescott Mountain Bike Alliance and the Verde Valley Cyclist Coalition are knowledgeable about trail building and maintenance and can assist with the main objective through a partnership agreement. IMBA's Subaru Trail Care Crew is also available, through an application process, to help facilitate education and training on sustainable trail design and construction as well.

Objective 9 -17
Comprehensive Trail Planning - We are pleased to see the Forest Service acknowledge the need for trail planning. The first step would be to engage in a deliberate non-motorized trail planning that was not simply an assignment of permitted uses. Rather the Forest Service should think primarily about what the experience of a given trail is and why users choose it. Significant quantities of the Forest Service trails currently in use were not designed or constructed to be sustainable recreation trails. They were developed as temporary extraction roads, firebreaks, hunting routes, or game trails and have been repurposed as long

term public access routes. As they these routes often were not planned to act as trails they often fail to showcase the landscape or effectively manage visitor access and experiences as well as well to be sustainable. A purposefully designed trail system is light on the land, showcases the land, steers visitors way from sensitive areas, and provides a myriad of experiences.

In developing a forest-wide trail model we recommend creating a "Hub and Spoke" system allowing for easier management and providing opportunities for a range of trail experiences, access to other recreation resources and destinations within the forest.

A Hub is an area in the front or side country that is relatively easy to access. The area features a higher trail density with a stacked loop system that could offer beginner, intermediate and expert trails, as dictated by the management needs of the area and the landscape. Hubs can also include facilities where riders can be transported via automobile or lift operations can provide gravity focused or single purpose trial opportunities. Ski areas or other special use permit areas can make excellent hubs.

Spoke trails are the connections between Hub areas and other destinations such as into town, other developed recreation sites and into the backcountry. Ensuring that the areas are interconnected creates benefits such as allowing trails to be used for transportation as well as recreation, allowing recreational riding to begin from home eliminates the need to drive to the trailhead and adds value to local properties.

Spoke trails into the backcountry provide experiences that demand endurance, intestinal fortitude and self-reliance. These trails are lightly traveled and rugged, maintained only for passage. These are some of the most cherished trail experiences for all outdoor recreationalists regardless of mode of travel.

A fully planned and developed system of interconnected Hubs and Spokes will form an intentional and integrated trail network that meets the experiential and access needs of a majority of trail users. If these experiential and access needs are proactively managed through system-wide trail planning incidents of conflict and resource degradation can be avoided. We strongly encourage the Forest Service to engage in this type of planning as soon as resources permit.

Objectives 11 - 12
Signage - We completely concur. Appropriate trail signage is one of the best ways to mitigate potential for conflict. Setting users expectations as to what the intended trail experience is in terms of exertion and technical difficulty and other uses is one of the most beneficial management tools available.

Separation of Uses /Conflict Management - There is mention of separation of uses. We concur in part. Separation of uses is one management strategy and may be the correct one where the trail is intended for a specific purpose. For example uphill travel on a trail that has been designated for use as an aggressive downhill travel is not a good idea. A comprehensive trail plan should allow for a diversity of trails optimized to provide for different experiences, modalities, and levels of skill development and challenge and likely incorporate some purpose built trails to accommodate those separated uses.

By designing and developing trails that provide visitor experiences that are in demand visitors will assist as volunteers, donors, partners, and advocates for the those projects and possibly the larger mission of the Forest Service. Managing the trail based on desired experience, sustainable construction and maintenance, and suitability for the desired conditions of the area rather than simply by mode of travel would allow the Forest Service to actually manage a trail system rather than a spider web of legacy routes.

However, where it is a matter of multiple modes of use there are a wealth of management options available. For instance, education on trail etiquette often handles the potential issues. In other cases audible warning

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devices such as bells have been used where the community was concerned about being aware of other users. Directional travel or alternating days of use have also been successful means of mitigating potential conflict.

Wilderness Assessment

The Draft Plan has considerable content regarding the need for trail planning but trail use, specifically the adverse effects on mountain biking opportunities are not sufficiently addressed in the Wilderness assessment. When a cherished long distance backcountry ride that cannot be replaced because it is the surrounding landscape that creates the experience we are disappointed. However, we frequently support Wilderness designations and recommendations where they have been mindful of the effects on mountain biking and have used creative solutions to protect those experiences.

If the Forest Service had engaged in comprehensive trail planning, include some of those backcountry riding opportunities, and shaped the Wilderness recommendations in such a way that they worked together we would be much more inclined to give our full support to the proposals. Without that opportunity to engage in the actual planning of these places we are forced into either a wholesale objection of loss of beloved experiences.

Of particular concern in this Draft Plan is the Black Canyon parcel. That parcel is home to the Black Canyon Trail #114. This trail serves is a unique backcountry experience that we would love to preserve. Verde Valley Cycling Coalition is currently working to add additional mileage to this trail and provide a connection to the soon to be developed Mingus Mountain trail system. We strongly encourage the Forest Service to work with Verde Valley Cycling Coalition to find a solution that will allow continued bicycle use on this trail and meet the conservation objectives for the surrounding landscape.

In addition to the lack of consideration of the negative effects of precluding bicycles in this area we believe the presumed benefits, particularly those related to visitor increases, are overstated. They rely on generalizations and data that are four years old to reach a conclusion that we find highly unlikely. We ask that more documentation of this methodology be demonstrated in the Wilderness Assessment and EIS.

We greatly appreciate your efforts in enhancing outdoor recreation opportunities and thank you for accepting our comments. We look forward to continuing a productive relationship in the future. Please feel free to contact us Patrick Kell (802) 371-9033 (patrick.kell@imba.com) or Jeremy Fancher (831) 975-4522 (jeremy.fancher@imba.com) if we can be of further assistance.

Respectfully Submitted,

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Patrick Kell
Regional Director, Southwest
International Mountain Bicycling Association

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Jeremy J. Fancher, Esq.
Attorney
International Mountain Bicycling Association

Ltr#0095

From:	R.D. Pascoe
To:	FS-prescott-forest-plan-comments
Subject:	Access Fund Comments on the Draft Environmental Impact Statement and Draft Land Management Plan Proposed for the Prescott National Forest
Date:	Wednesday, November 28, 2012 3:24:27 PM
Attachments:	AF Comments to Prescott NF Draft EIS and LMP 11.28.2012.pdf

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To whom it may concern,

Attached please find Access Fund's comments on the Draft EIS and Draft Land Management Plan for the Prescott National Forest.

Please let me know if you have any difficulty opening the attachment.

Best Regards,

R.D. Pascoe
Policy Director | Access Fund
Tel 303-545-6772 x113

Right now, roughly 1 in 5 climbing areas in the U.S. are threatened by access issues.
Be a part of the solution with *my*AccessFund.

Ltr#0095

Protect America's Climbing

November 28, 2012

Prescott National Forest
Attention: Plan Revision
344 South Cortez Street
Prescott, AZ 86303
prescott-forest-plan-comments@fs.fed.us

RE: Access Fund Comments on the Draft Environmental Impact Statement and Draft Land Management Plan Proposed for the Prescott National Forest

Dear Forest Planning Team,

The Access Fund welcomes this opportunity to comment on the *Draft Environmental Impact Statement* (Draft EIS) *and Draft Land and Resource Management Plan for the Prescott National Forest* (Draft LMP).[1] Climbing is a historic and continuing use of the Prescott National Forest[2] which provides climbing routes that range from single-pitch sport climbs to multi-pitch wilderness adventures. Granite Mountain is one of Arizona's premier traditional climbing areas with rock quality second to none.[3] The Access Fund is committed to assisting planners by providing climbing management expertise, resources, and community outreach.

Access Fund

Access Fund is the only national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)3 non-profit supporting and representing over 2.3 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—Access Fund is the largest US climbing organization with over 11,000 members and affiliates. We currently hold memorandums of understanding with the Bureau of Land Management, National Park Service, and Forest Service to help define rules for how climbing will be managed on federal land.[4] Arizona is one of our larger member states and many of our members regularly travel to climb in the Prescott National Forest. For more information about the Access Fund, visit www.accessfund.org.

COMMENTS

Two concerns stand out with regard to climbing management within the Draft LMP. First, the prohibition against "new fixed anchor climbing routes" within Granite Mountain Wilderness is unnecessary. Second, the current seasonal closure of the entire Granite Mountain climbing area

from February until July regardless of raptor nesting activity or location is overly broad, unnecessary, and out of line with other raptor programs in place around the country.

History of Managing Fixed Anchors in Wilderness

In 1996, the Sawtooth National Forest Supervisor made a controversial decision to prohibit the placement of new fixed anchors in the Sawtooth Wilderness. The Access Fund immediately appealed the decision, and the Forest Service responded by instituting a negotiated rulemaking process to clarify national policy about fixed anchor use in wilderness areas. In 2000, the Secretary of Agriculture established the Fixed Anchors in Wilderness Negotiated Rulemaking Advisory Committee comprised of 23 stakeholders including the Access Fund, US Forest Service (USFS), National Park Service (NPS), Bureau of Land Management (BLM), and U.S. Fish and Wildlife Service (FWS) to develop recommendations for a proposed rule regarding fixed anchors in designated wilderness. The Negotiated Rulemaking Committee generally agreed on the following approach for managing wilderness fixed anchors:[5]

- Crafting a rule allowing fixed anchor use in wilderness is permissible under the Wilderness Act.
- Bolt-intensive climbing is generally incompatible with wilderness.
- Leave-No-Trace and "clean climbing" ethics should be integrated into a rule.
- Through a climbing management plan the limited use of fixed anchors should be allowed.

The BLM was the first to incorporate the Negotiated Rulemaking Committee's findings into a national policy: BLM Instruction Memorandum No. 2007-084-Use of Permanent Fixed Anchors for Climbing in Designated Wilderness Areas Managed by BLM.[6] Indeed, Instruction Memo No. 2007-084 recognizes that climbing is a legitimate and appropriate use of BLM Wilderness Areas," and that "climbing, including the use of fixed anchors, has a history that predates the Wilderness Act, and Wilderness Areas represent a unique resource."[7] While the US Forest Service is still working on a national rule or policy[8] regarding fixed anchor use in wilderness, in January 2011 the National Park Service released a draft version of Director's Order #41 on Wilderness Stewardship (DO 41) [9] including a section on climbing which reflects the agreement reached by the Negotiated Rulemaking Committee for managing fixed anchors in wilderness. Subject to a few concerns,[10] the Access Fund generally supports the policy for managing fixed anchors in wilderness adopted by BLM Instruction Memo No. 2007-084 and proposed in the NPS's DO 41.

Concerns regarding fixed anchor use in Granite Mountain Wilderness can be ameliorated with proper management. Existing management strategies in use around the country successfully conserve climbing access while preserving wilderness characteristics. BLM Instruction Memorandum No. 2007-084 and DO 41 provide an effective framework for managing fixed anchor use in Granite Mountain Wilderness, and planners can utilize the proven wilderness climbing management plans and policies of Rocky Mountain,[11] Zion,[12] and Yosemite[13] National

Parks as models for Granite Mountain Wilderness. Each of these National Parks is a world-renowned climbing destination that has experience successfully managing climbing and preserving wilderness characteristics. Each of these plans provide "programmatic" (as opposed to case-by-case permitting) guidance for placing new and re-placing existing fixed anchors without arbitrary bolting standards or complex permitting processes.

One of the most significant and effective wilderness climbing management plans in the country is found at Rocky Mountain National Park. That park's backcountry plan directs that fixed anchors should be tools of last resort, but may be appropriate when necessary:

> [T]o enable a safe rappel when no other means of decent is possible. The infrequent placement of new fixed anchors is allowed when ascending a route to connect terrain that is otherwise protected by removable anchors…or when there are no features which will accommodate removable equipment but the occasional placement of a fixed anchor may provide a modicum of safety during the ascent (e.g., traditional face climbing).[14]

We encourage planners to consult with these parks to better understand how successful these basic policies have been at these popular wilderness climbing areas.

Minimum Tool

We believe that when placed by hand on rare occasions, climbing fixed anchors are a "minimum tool" necessary for the administration of wilderness recreation. Some practices related to fixed anchors outside of wilderness, however, are not the "minimum tool." For example, power drills are banned by the Wilderness Act and removable bolts are unproven and likely impractical, thus both of these practices are clearly not an acceptable minimum tool for managing fixed anchors in Granite Mountain Wilderness. The minimum tool required to safely and successfully place fixed anchors in Granite Mountain Wilderness is a hand drill, which necessitates a higher degree of both skill and difficulty. Thus, requiring this arduous hand-drilling method will limit the proliferation of new bolts yet still allow a minimum number for the administration of unrestrained wilderness climbing within Granite Mountain.

Specific Management Recommendations for Granite Mountain Wilderness Fixed Anchors

We believe that the following are key components for effectively managing fixed anchors in Granite Mountain Wilderness, which are consistent with successful management by other federal wilderness managers, will preserve the wilderness character of Granite Mountain, and will provide opportunities for solitude through primitive and unconfined recreation without overly-complicated and arbitrary permitting standards:

- Allow hand-drilling only, which naturally limits the use of fixed anchors.

- Allow new fixed anchors placements, subject to programmatic approval, to improve climbers' safety on sections of routes and descents where the use of removable hardware is not feasible.
- Allow for increased regulation, restrictions, and/or require case-by-case approval for placing new or replacing existing fixed anchors based on the demonstration of unacceptable impacts which are caused by or associated with fixed anchor use.
- Promote a Leave-No-Trace/Clean Climbing Ethic under which bolt intensive (i.e. sport climbing) routes are generally considered an incompatible use of Granite Mountain Wilderness.
- Allow replacing existing fixed anchors without a permit for safety reasons.
- Allow for climbing and fixed anchor restrictions based on Forest Service standards[15] to be imposed to protect natural and cultural resources, visitor safety, and wilderness characteristics.
- Avoid overly complicated permitting processes, arbitrary bolting standards, and excessive management.

Climbing and Cliff Nesting Raptors

The Access Fund manages the largest crowd-sourced list of wildlife-related climbing closures in the country.[16] We work with federal, state, and private land managers to develop and implement climbing management plans that are currently in use across the country, and have organized and hosted several national climbing management conferences, attended by hundreds of land managers from across the country.[17] In many cases, climbers actively assist[18] by maintaining trails, removing trash,[19] and participating in the locating, monitoring, and reporting on species of concern.[20] The Access Fund has the experience, expertise, and resources to assist planners develop management policy that protects wildlife and maximizes recreational access.

Climbers care deeply for the places they climb and for the opportunity climbing affords to interact with the natural world. Watching a peregrine or a golden eagle effortlessly soaring on a thermal is often more memorable than the climb itself. It is the wildlife and natural beauty of places like Granite Mountain that attract climbers, and protecting an area's ecology is central to conserving the climbing experience. Climbing is a low impact activity that managed properly poses no threat to cliff dwelling raptors, such as golden eagles or peregrine falcons. A combination of seasonal buffers, based on credible evidence, monitoring/data collection and expert participation can protect raptors and keep public access restrictions to a minimum. The Access Fund and local climbers have the interest, resources, and experience to assist the Forest Service design and to implement an effective management plan for protecting raptors nesting in the Prescott National Forest. We also have national experts willing to provide scientific evaluation of data and comments.

Seasonal Restrictions

Generally, seasonal closures to protect raptors run from February and can last until August. The size, location, and length of a closure can vary each year based on nest location and success or failure of the hatch. Smith Rock State Park is a world renowned climbing destination in Oregon where golden eagles successfully nest regularly. As an example, this year's closure at Smith Rock began February 15th and is in place through August 1st, but continued monitoring can allow the area to re-open earlier, once the eaglets have fledged or if the nest does not take.[21] A management strategy for Prescott National Forest should roughly follow the same time frame and ongoing monitoring can provide important data that allows the closure to be re-opened or re-shaped based on the location and status of any active nest(s). If no nesting occurs or a nest fails, the area can be re-opened. Similarly, a closure can be lifted early following a successful fledge. Either way, continued monitoring minimizes access restrictions and provides valuable information regarding raptors in the area.

Buffer Zones

Prescott National Forest contains multiple smaller crags, such as Swamp Slabs, many of which could remain open depending on nest location. Developing tailored site-specific buffer zones based on the topography and location of any active nest(s) is a successful strategy used at other locations around the country. In such a setting, closing an entire area from February through July is unnecessary and overly broad. Closing specific climbs or sections of cliff within the immediate vicinity of an active nest protects nesting raptors and minimizes public use restrictions. Local climbers from the Prescott Climber's Coalition are willing to provide volunteers to assist with monitoring of the area.

Monitoring/Data Collection and Expert Participation

It is our understanding that no regular monitoring of nesting raptors occurs in the Prescott National Forest. Thus, failed nest sites are never visited to investigate potential causes and no good data exists regarding raptor use of the area. Several human-caused and natural factors (totally unrelated to human activity) can lead to nest failure (such as: lead poisoning, shooting, transmission line/wind turbine collisions, parasites, poisons, egg predation, loss of a parent, etc…). Evaluating potential disturbances of nesting raptors from benign recreational activities, such as climbing, must occur within the larger context of demonstrable (i.e. data supported) causes of raptor mortality and nest failure. Collecting such information and consulting an expert are critical to understanding and rule-out causes of nest failure and developing a management plan focused on conservation without restricting activities that pose no threat to raptors.

Specific Local Input

The Access Fund works with local climbing organizations across the country.[22] The local climbers are volunteers that donate their time and energy to care for the places they climb. The Prescott Climber's Coalition was formed to help conserve the climbing environment around Prescott, including Granite Mountain. Kevin Keith, Access Fund Central Arizona Regional Coordinator[23] and Prescott Climber's Coalition member, has decades of experience climbing in and around the Prescott National Forest. Kevin submitted the following comments to be included in this comment letter:

> As the regional coordinator for the Access Fund and a member of the Prescott Climber's Coalition I would like the Forest Service to further consider the use of permanent fixed anchors in the Granite Mountain Wilderness. The modest addition of fixed anchors to link natural features and secure a belay is not unreasonable. This is a request regarding the wilderness at large. I assure you that hand drilling fixed anchors is self-limiting as it is laborious and is additionally challenging when it is accompanied by a ground up ethic.
>
> I am also requesting consideration of a partial bird closure to the main Granite Mountain crag. The Swamp Slabs are located on the western aspect of the main climbing crag and see little action with regard to nesting peregrines. I recommend keeping this area open year round. Monitoring the nesting pairs and opening other unaffected areas based on the findings is also worth mentioning.
>
> Prescott has a strong tradition of conservation with regard to the climbing resource prior to the implementation of a bolting moratorium or the bird closure mandate. Local climbers imposed a bird closure in the early 90's out of respect to the endangered peregrine. Local climbers limited new route development as well through consensus. We would like to continue this tradition as it relates to fixed anchors and new route development with consideration of all wilderness residents, and other users.
>
> Thank you for your consideration,
>
> Kevin Keith

Access Fund Assistance

Please contact us for assistance developing a climbing management plan for the wilderness and non-wilderness areas of the Forest. Our publication, *Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan*[24] and website www.climbingmanagement.org, have both proven to be a useful tool for land managers across the country. The climbing community and the Access Fund are ready, willing, and able to help

planners identify and improve the climbing related trail system and other management needs. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program[25] or assistance from our Conservation Team[26] which helps maintain climbing areas throughout the United States by assessing climbing area conservation needs, working with locals to address those needs, and providing training on planning and stewardship best practices to keep those areas healthy.

* * *

Thank you for your consideration of climbing management for Prescott National Forest. The Access Fund looks forward to participating throughout the entire planning process and assisting planners to develop management policy that encourages climbing while sustaining the health, diversity and productivity of the Forest. Please keep us informed as this Plan Revision process proceeds. Feel free to contact me via telephone (303-545-6772 x113) or email (rd@accessfund.org) to discuss this matter further.

Best Regards,

R.D. Pascoe
Policy Director
Access Fund

Cc: Brady Robinson, Access Fund, Executive Director
Kevin Keith, Access Fund and Prescott Climber's Coalition
Scott McNamara, Attorney and Tucson Climbing Advocate
Dave Lovejoy, Prescott College, Outdoor Adventure Program
Rusty Baillie, Founding Member Prescott Climber's Coalition

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[1] http://www.fs.usda.gov/detail/prescott/home/?cid=STELPRDB5122002.

[2] http://www.fs.usda.gov/activity/prescott/recreation/climbing/?recid=67155&actid=37.

[3] http://www.mountainproject.com/v/granite-mountain/105787785.

[4] *http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000797/k.40E2/Collaboration_with_federal_agencies.htm*.

[5] http://www.fs.fed.us/t-d/pubs/htmlpubs/htm01232826/page03.htm.

[6] http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2007/im_2007-084__.print.html.

[7] *Id*.

[8]The USFS has stated repeatedly their intention to generally follow the outline of the Negotiated Rulemaking Committee findings.

[9]http://www.nps.gov/policy/DO-41draft.pdf.

[10]*http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/National--NPS_DirectorsOrder41_Comments_3.10.2011.pdf.*

[11] *See* Rocky Mountain National Park Backcountry and Wilderness Plan (2001), http://www.nps.gov/romo/parkmgmt/upload/alternatives_2.pdf at 2-40.

[12] *See* Zion National Park Backcountry Management Plan (2007), http://www.nps.gov/zion/parkmgmt/zion-backcountry-management-plan-and-environmental-assessment-available-for-review.htm, at 47-49.

[13]http://www.nps.gov/yose/planyourvisit/bolting.htm.

[14]*See* Rocky Mountain National Park Backcountry Management Plan (2001).

[15]Such as 50 foot buffers around discrete cultural resource sites and seasonal closures to protect cliff dwelling raptors.

[16] http://status.accessfund.org.

[17] www.climbingmanagement.org.

[18] The Access Fund sponsors approximately 130 Adopt a Crag events annually across the country. Adopt a Crag is the Access Fund's signature stewardship program. It exists to unite local climbing communities in partnerships with land managers to conserve local climbing areas. Adopt-a-Crag events typically include activities such as litter clean-ups, trail construction and restoration, erosion control, and invasive weed removal. *See* *http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000889/k.166C/AdoptaCrag.htm*.

[19] In July 2011, the Access Fund launched a new Conservation Team that will spend ten (10) months a year traveling the country addressing conservation issues. *See* http://www.accessfund.org/site/apps/nlnet/content2.aspx?c=tmL5KhNWLrH&b=5000939&ct=11053041.

[20] *Examples include:* Luther Rock, Lake Tahoe, CA; Pinnacles National Monument, CA; Eldorado Canyon State Park, CO, Jefferson County Open Space, CO; Acker Rock, OR; Trout Creek, OR; Boulder Canyon, CO.

[21] *http://smithrock.com/b2evolution/blog4.php* Arapahoe National Forest in Colorado uses a similar approach.

[22] http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000683/k.CE6C/Local_climbing_organizations.htm.

[23] http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000687/k.6B48/Regional_Coordinators.htm.

[24] http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CM-web.pdf.

[25] http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants_program.htm.

[26] http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm.

Ltr#0096

From: Anna Aja
To: FS-prescott-forest-plan-comments
Subject: Prescott National Forest Plan Revision
Date: Wednesday, November 28, 2012 3:39:54 PM

Dear Ms. Mathews:

I am writing this letter because I am a native Arizonan whose family has five generations of stewards of public and federal lands and I have reviewed the four alternatives in the Draft Environmental Impact Statement and have the following comments and suggestions, and request:

My concern is that there is a disturbing trend in Arizona with more and more lands being set aside exclusive from multiple use. With less emphasis on the multiple use concept, this reduces Arizona's and Yavapai County's ability to provide for future job creation and the growth of the core natural resources industries (grazing, timber harvesting, and mining). These core industries – ranching and mining are historic and have played a major role in the development of Yavapai County, and still are the major economic drivers in Yavapai County. We need to make sure that you select a plan that emphasizes multiple use and enhances these core economies in our communities.

The Multiple Use designation on federal lands is defined under the 1976 Federal Land Policy and Management Act (FLPMA), and was enacted to ensure that the land was available for use by all sectors of the public. In Sec.102. [43 U.S.C. 1701] (a) it states:

> *The Congress declares that it is the policy of the United States that (7) goals and objectives be established by law as guidelines for public land use planning, and that management be on the basis of multiple use and sustained yield unless otherwise specified by law; (2) the public lands be managed ina manner which recognizes the Nation's need for domestic sources of minerals, food, timber, and fiber from the public lands including implementation of the Mining and Minerals Policy Act of 1970 (84 Stat. 1876, 30 U.S.C. 21a) as it pertains to public lands.*

In two of the four alternatives, Alternatives B and D include the proposed designation of more wilderness areas on the PNF. The Prescott National Forest already has eight wilderness areas totaling 104,483 acres. As we all know, creating a wilderness area removes "tools" in the toolbox that is used to manage our productive rangelands and essentially discourages multiple use. My family along with many other ranchers (grazing permittees) have worked in cooperation with the Agency to improve the quality of our rangelands and watersheds for not only the public but the wildlife and ecosystems. By not being able to use mechanized equipment to maintain existing range improvements and not being able to develop additional range improvements in wilderness areas, eventually, over time leads to lower productivity of those

lands. This negatively effects not only us as stewards and the beef we harvest from the grass we grow but the wildlife as well.

The USFS continues to dedicate more and more acreage to the “Roadless Area Program” throughout the State, plus encourages the additional designation of wilderness areas, further eliminating the Multiple Use designation under FLPMA. It is the stated mission of the USFS to “sustain the health, diversity, and productivity of the Nation’s forests and grasslands to meet the needs of present and future generations.” This is also incorporated into the Agency’s vision and guiding principle statements. Huge roadless areas and wilderness areas are contrary to the USFS mission, and impact the ability of industry to provide for the needs of present and future generations of Arizonans.

Request:
I respectfully asks that Prescott National Forest preserve and build upon the multiple use mandate that is identified under FLPMA. With that in mind, and after reviewing Alternatives A, B, C, and D, we are requesting that you select Alternative C, having an emphasis on vegetation and wildlife. This alternative focuses on range/watershed restoration treatments, which results in improved habitat for cattle and wildlife. In addition, there are no areas recommended for wilderness designation. As ranchers being the true stewards of the land and working together with the PNF, Alternative C best defines the “road map” to follow regarding the future of the Prescott National Forest. In addition, it supports the multiple use concept more than any other of the alternatives.

Sincerely,

Anna M. Aja

Ltr#0097

From: earthhous@aol.com
To: FS-prescott-forest-plan-comments
Subject: From Upper Agua Fria Watershed Partnership
Date: Wednesday, November 28, 2012 3:45:05 PM

To Prescott National Forest
Re: Forest Plan Revision

The Upper Agua Fria Watershed Partnership is pleased to have participated with PNF throughout the Plan Revision Process starting with the Community Landscape Visioning Meetings several years ago. Sustainable Recreation Planning and the development of citizen support groups to help the general public steward the forest have been great outcomes of the process.
Our group which focuses on the 1200 square miles from the Prescott AMA to Lake Pleasant and from Crown King to Pine Mountain and Turret Peak and is concerned with the entire watershed health from upland to riparian welcomes the inclusion of much public input in the revised proposed plan. Citizen Science Environmental Monitoring as a form of Sustainable Recreation enhances education and public outreach critical to good land stewardship. The All Lands approach fostering interagency collaboration and cooperation should increase the effectiveness of many PNF land management activities.
Thank you for all your efforts and for PNF's support for our group.
Mary Hoadley, Chair
Upper Agua Fria Watershed Partnership
HC 74, Box 4136
Mayer, AZ 86333

Ltr#0098

From:	Andy
To:	Mathews, Betty A -FS; FS-prescott-forest-plan-comments
Cc:	Rasmussen, Mary C -FS; Brown, Christopher J -FS; Newman, Corbin -FS
Subject:	Comments on revision of the Draft Land Management Plan and Draft Environmental Impact Statement, Prescott National Forest - PNF plan comments 11-28-12
Date:	Wednesday, November 28, 2012 3:48:19 PM

Betty Mathews, Supervisor
Prescott National Forest:

Please find attached my comments on the revision of the Draft Land Management Plan and Draft Environmental Impact Statement for the Prescott National Forest.

Andy Groseta

GROSETA RANCHES LLC
P.O. Box 1619
Cottonwood, Arizona 86326
(928) 634-7872 (Ranch)
(928) 634-4333 (Office)
(928) 634-2113 (Fax)
E-mail: wdartranch@qwestoffice.net

November 28, 2012

Delivered via email to:
Prescott-forest-plan-comments@fs.fed.us
With cc to:
mcrasmussen@fs.fed.us, christopherjbrown@fs.fed.us and cnewman02@fs.fed.us

Betty Mathews, Supervisor
Prescott National Forest
Attention: Plan Revision
344 S. Cortez Street
Prescott, AZ 86303-4398

RE: Comments on revision of the Draft Land Management Plan and Draft Environmental Impact Statement, Prescott National Forest

Dear Ms. Mathews:

On several occasions over the past couple of months I have shared my thoughts with you regarding the PNF's revision of the Draft Land Management Plan and Environmental Impact Statement.

As a third generation rancher, I am strongly opposed to the addition of any increased acreage to existing wilderness areas, including the proposal to designate a new 9,600-acre Black Canyon Wilderness area, located just south of Cottonwood on the Jerome Grazing Allotment. The Prescott National Forest lands today already provide abundant open space and aesthetic values to the public. That is especially true in the Verde Valley where over 80% of the total land area is National Forest.

As you well know, motorized equipment is not allowed to be used in wilderness areas for any purpose, including maintenance of existing range improvements, creation of new range improvements, or for firefighting purposes.

Wilderness areas limit the Agency and grazing permittees the ability to manage those lands as they need to be managed. The Prescott National Forest already has existing wilderness areas (104,483 acres), and we don't need to expand those or need to create any new wilderness areas. The newly proposed Black Canyon Wilderness adjoins two (2) subdivisions on private properties and dozens of residences. Also, there are existing roads (FR 359) and ATV/Dirt Bike Trails #509 and 514 plus numerous illegal "wildcat" trails either on or near the immediate vicinity of the proposed Black Canyon Wilderness. Presently it is classified as a "roadless area" with roads and trails present. How can this meet the objectives of a wilderness area?

November 28, 2012

Creating a wilderness area will not minimize the public's impact (OHV/ATV users) to the land, as some nearby homeowners think.

Please note that the western portions of the proposed Black Canyon Wilderness are included in the Black Hills Vegetation Management Project (BHVMP), which includes vegetative treatment (prescribed burns). This project has already been approved by the Agency and is being implemented. If this area is designated as a wilderness area, it would restrict the Agency's ability to use motorized equipment to reduce fuel loads by using prescribed burns, and equipment used to crush the brush. This would be a travesty, since the Agency worked so hard over many years to get the BHVMP approved. The entire Black Hills region needs prescribed burns to reduce fuel loads and to enhance the productivity of these lands for wildlife and cattle.

In conclusion, creating more wilderness areas is not beneficial to the productivity of the lands, including the Forest Service and grazing permittees' ability to manage. All of the "management tools" should be available to both the Forest and the ranchers to better manage those lands.

Of the four (4) alternatives presented, we support Alternative C. Alternative C best supports the "multiple use" concept in that it focuses on range and watershed restoration treatment projects that will improve the productivity of the rangelands and watersheds, resulting in higher productive lands for the benefit of not only the forest and grazing permittees, but also for our citizens. Also, under FLPMA, the Forest Service is mandated to continue to implement the multiple use concept. That does not seem to be included in the new proposed alternatives. This is a Federal mandate, and the Agency (Prescott National Forest) needs to adhere to those guidelines.

In closing I respectfully ask that you select Alternative C regarding the finalization of the new Forest Plan. Thanks for allowing us an opportunity to provide input into this important planning process. Please keep us posted regarding the outcome of your decision.

Sincerely,

Andy Groseta

AG:cr

cc: Paul Groseta

W Dart Ranch
Cottonwood

Ltr#0099

From: Toni Kaus
To: FS-prescott-forest-plan-comments
Subject: Comments on Prescott National Forest Plan
Date: Wednesday, November 28, 2012 4:27:01 PM

Thank you for the opportunity to comment on the proposed plan.

I have read and support the Sierra Club Yavapai Group comments, with particular emphasis on protecting the amazing upper Verde River by designating the Muldoon PWA as a Recommended Additional Wilderness Area.

Toni

Toni Kaus
425 Keen St
Prescott AZ 86305
toni.kaus@gmail.com

Ltr#0100

From:	Dustin Van Liew
To:	FS-prescott-forest-plan-comments
Subject:	Draft Forest Plan and Draft EIS
Date:	Wednesday, November 28, 2012 4:32:40 PM
Attachments:	PLC Prescott Natl Forest Plan Revision Comment Letter - 11-28-12.pdf

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To Whom it May Concern:

Please accept the attached comments on the Prescott National Forest Plan revisions, specifically the draft environmental impact statement. These comments are submitted on behalf of the Public Lands Council and the more than 22,000 public land grazing permittees in the west.

Please feel free to contact me with any questions you may have.

Thank you
Dustin Van Liew
Executive Director
Public Lands Council

Ltr#0100

November 28, 2012

Prescott National Forest
Attention: Plan Revision
Betty Mathews, Supervisor
344 South Cortez Street
Prescott, AZ 86303

Submitted via e-mail: prescott-forest-plan-comments@fs.fed.us

RE: Prescott National Forest Plan Revisions

Dear Ms. Mathews:

On behalf of the locally-affected permittees and the ranchers across the Prescott National Forest (PNF) who depend on public lands grazing permits for their livelihoods and for all permittees across the west, the Public Lands Council (PLC) submits the following comments.

We have reviewed the Draft Environmental Impact Statement (DEIS) including the four alternatives discussed in the analysis.

There continues a concerning trend across the west including in Arizona to diminish the multiple use mandate required by Congress through statute for how our public lands must be managed. The organic acts passed by Congress mandating management of federal lands, both by the US Forest Service and the Bureau of Land Management, focused on multiple use and sustained [economic] yield. We are opposed to any actions by federal agencies which depart from the legally required management of public lands for multiple uses.

Additionally, Congress has sole authority for designating wilderness, an authority we support so that citizens through their Representatives and Senators can decide whether additional public lands should carry the most restrictive land use designation.

Alternatives B and D, half of the alternatives considered, include proposed additional wilderness. Setting aside the fact that an agency should not be proposing wilderness due to the above stated authority held by Congress, the PNF already contains over 100,000 acres of wilderness which has been put off limits to multiple uses or at best severely limited those uses. Adding more acres to roadless areas (and wilderness) will only increase the size and severity of wildfires in Arizona, something the state has been devastated by recently. For these reasons we are strongly opposed to the adoption of alternatives B and D.

Alternative C is the only sensible alternative provided in the DEIS containing a focus on vegetation and wildlife and keeping with the congressionally mandated multiple use of public lands. PLC supports the PNF selecting alternative C, and continuing management based on multiple uses including a focus on grazing as a tool for managing healthy rangelands and forest

all while minimizing the threat of catastrophic wildfire. Ranchers are the true stewards of the land and for generations have managed lands across the west on behalf of our nation. We believe alternative C provides the best way forward for managing the PNF with rangers working with the forest service to provide healthy productive rangelands for the future.

Please accept these comments as complementary to those submitted by the Yavapai Cattle Growers' Association and the Arizona Cattle Growers' Association.

We look forward to working with you to continue the multiple use management of the Prescott National Forest and appreciate the opportunity to provide these comments on behalf of the 22,000 public land permittees across the west.

Sincerely,

Dustin Van Liew
Executive Director
Public Lands Council

Ltr#0101

From:	Gail Luedtke
To:	FS-prescott-forest-plan-comments
Subject:	Forest Plan Proposals
Date:	Wednesday, November 28, 2012 5:19:40 PM

All I want is for there to be no more controlled burns. It is causing widespread respiratory issues in Prescott and the domino effect of lost work and additional medical costs for the residents. If this continues expect a migration from Prescott and don't expect anyone to move here that is in town real estate shopping when the burns are occurring.

Gail Luedtke
928-541-0728

Ltr#0102

From: RICK ERMAN
To: FS-prescott-forest-plan-comments
Subject: comments to the Draft Plan and EIS
Date: Wednesday, November 28, 2012 5:47:24 PM
Attachments: Forest Plan Comments - 11272012.doc

Ltr#0102

The Friends of Anderson Mesa

To Conserve & Enhance Native Habitats & Wildlife

November 27, 2012

Ms. Betty Mathews, Supervisor
Prescott National Forest
344 South Cortes Street
Prescott, Arizona 86303

Ms. Mathews,

We want to thank you for the opportunity to provide comments to the Draft Environmental Impact Statement and new Forest Plan for the Prescott National Forest, August 2012.

Given this is the second Forest Plan, with the first / current plan – directing management spanning over 25 years with 17 amendments, we were surprised and dismayed not to find a comprehensive summary / discussions to just how well the first Forest Plan worked, both the good and the not-so good. For any planning process to be successful, especially in a modification / update / coarse correction to management for another 10 – 25 years the successes as well as the failures of past plants and management must be understood to know "was the goal achieved or not" and in either case Why.

Taking a view of the Integrated Resource Management Method put in place by the Forest Service;

- Plan
- Control / Manage
- Monitor – Adjust Management if necessary
- Control - Manage

It must be noted that issues identified as needing to be corrected identified in the 1986 EIS and Plan for the conditions that were present as a result of Forest Service administration for (approximately) 100 years. Those issues were to be corrected through management as outlined in the first forest plan, and now 25 years later review of the DEIS and draft Plan, the same issues exist today. Clearly the first forest plan was nothing more than a codification of historical management. Review of the proposed / draft plan, due to the lack of any specificity and details, it looks pretty much like the first plan. We find no details which would provide the public any assurance that any improvements to the land will actually happen in the future.

A second major shortfall in the documents presented is a factual discussion to the funding necessary to function any of the alternatives presented. This was a major flaw in the first plan and now 25 years later funding is even more important given the current status of the National Treasury. All grand and great sounding DFC's will not happen without adequate funding.

We request the PNF provide a comprehensive summary of its first – current plan and how this new plan especially the preferred alternative will actually move forward to reach the goals presented. Added to that must be a factual explanation to how funding will effect the outcomes / accomplishments for alternatives presented.

Another very disturbing issue with this proposed DEIS and Plan is the movement by Forest Service per se away from the original intent and direction of the National Forest Management Act of 1976. The first / current Forest Plan was/is an integrated document addressing the all the various functions that make up a "Forest" and its "operation, which includes; Range, Timber, Water, Minerals, Wildlife and Recreation. This First Plan was the first time the public was encouraged to participate in a process with the Agency to have the various functions of the FS work together in an integrated method putting the needs of the lands long-term sustainability the primary goal and objective.

Support for that direction can be found in the document produced and published by the RO, *Integrated Resource Management - The Road to Ecosystem Management*. Our copy is the 4th edition printed in 9/1993. The RO was so enthused with this message and method they sent teams to each NF in the Region to work with FS personal and active publics to teach and preach "the system". Jim Crawford and Ron Sein were most prevalent in Arizona.

Today in this second Plan we see that integrated ecosystem management is nothing more than an old word phase to be tossed about, reality is showing us old school functionalism is again the norm in the Agency. Today the public must deal with three major documents interacting with the FS;

- Travel Management – deals with controlling human use of the Forest, that function historically was called Recreation. It is important to not here with the implementation of this "plan" the negative impacts from humans brought forward in the DEIS and Plan will be greatly reduced.
- The FSH – the hidden set of "how to do things the FS way". Truly amazing in this day with all the use of NEPA that the Agency proclaims to how it does business in a transparent manner uses this "how to do" manual, that was developed internally without any consultation or input from any public, or vetted through the NEPA process. Anyone who has interacted with the FS knows this manual drives the day to day operation of the Agency. One specific example is the Agency use of 2209 Chapter 90 – livestock grazing.
- The New Plan – dealing with the other parts not covered by the others above.

The public has not idea to;

- how these documents will be integrated?
- which of these documents will be the primary document?

The PNF must provide the public a detailed explanation to:

- ***Why the documents are not integrated into the proposed Forest Plan, and given they are separate***
- ***How will these 3 separate documents be integrated specific to projects, and***
- ***Which of the 3 documents is to be the primary document?***

Draft Environmental Impact Statement (DEIS) at Page v – Contents,

Chapter 1 – Need for Change

1. page 4 the second paragraph, the fourth sentence"… and grazing by native species." Herbivores native to the PNF are deer and antelope, they are not considered "grazing animals" rather they are browsing species. There diets are composed of (on average);

- primary are forbs @ 44% & 41% respectively, and
- secondarily are shrubs at 48% & 44% respectively, and
- a very distant third are grasses at .08% & .15%

It is wrong for the PNF to imply that "grazing animals" IE; cows are a native species that must be considered as an equal to native wildlife. Further it must be noted that:

- the area of administration by the PNF did not evolve with a heavy-bodied bovine such as bison. Therefore the PNF cannot make the assertion that domestic livestock "somehow" replace and replicate an extirpated animal, and as such do not cause any environmental impacts.

It is well documented by the Forest Service and the history of Arizona that large numbers of domestic livestock were introduced into Northern Arizona after the Civil War – circa late 1860's and in the mid1870's even larger numbers of were brought with the completion of the rail road to Flagstaff. See page 95 DEIS, last paragraph, last sentence.

The PNF must be clear in its evaluations, discussions and proposals that domestic livestock are correctly represented as non-native species.

Chapter 2 – Alternatives

1. page 17 the first two items, the Forest needs to supply more detail to what these two items are representing.

- Economic Impact - is this statement implying the PNF generates $24 Million dollars in revenues which provides 669 jobs – annually ?
- Financial Efficiency – is this statement implying the PNF has a negative net value in relationship to its budget over 15 years of -$23 Million ?

These are very confusing for public to understand, the PNF must provide clarity to these statements.

2. page 17, the forth statement, "Suitable range acres: The land base determined to be suitable for livestock grazing under alternative A is 920,779 acres. This figure is the same across all alternatives." The 920,799 acres is repeated on at least 6 pages of the DEIS and on page 3 of the document Determination of Livestock Grazing Capability and Suitability Report, (Determination Report)

We reject this statement and challenge the PNF to provide the peer reviewed, ecosystem specific science which supports this finding.

3. Pages 95 & 96 the reader learns that grazing by livestock have been an impact to water resources currently exist today. After the past 25 years of Management of the current forest plan, with the facts that riparian areas are very limited in Arizona combined, these negative impacts were brought forward in the first Plan EIS, with there overall importance of Riparian areas, **why are there still these issues today ?**

4. Page 164, the third full paragraph in the last sentence, "….. (grazing) ,,,, is a tool for achieving management objectives." **We ask the PNF to provide the peer reviewed science from the ecosystems of the PNF which support such a statement.**

Page 182, the 2nd paragraph under Livestock Grazing, #2) And Page 25 of the Draft Plan CE-Veg – 3 present the statement "herbivore aids in sustaining or improving native vegetation cover and composition." **We ask the PNF to provide the peer reviewed science from the ecosystems of the PNF which support such a statement.**

5. Page 183, the last sentence of the first paragraph at Environmental Consequences, "The more range treated ……. the long-term increase in available forage." This is in the section addressing Livestock Grazing and as such this statement is saying in essence;

- There needs to be vegetation treatments for ecological reasons,
- With these treatments will be the opportunity for increase stocking rates or time of use due to the improved forage production.

Conclusion; vegetation treatments are for the direct benefit of livestock grazing, **a non-native species**,,,,, under the banner of ecological / watershed / fire / (other) "land needs".

The only qualifications presented in the DEIS and Draft Plan which support the PNF statement that 920,779 acres are suitable and / or capable to support domestic livestock use are found in Table 1, on page 2 of the Determinations Report;

- Slopes less than or equal to 60%
- Soil types that produce 100 pounds per acre or more
- Those soils deemed not "severe erosion hazard".

Since 2002 the members of the Arizona Wildlife Federation and subsequently the members of the Friends of Anderson Mesa have been asking the Arizona Forests of Region 3, including the Prescott National Forest to provide the ecosystem specific scientific information that were used by the Forest Service in the drafting of the first / current forest plans which led them to decide on the qualifications of 100 pounds per acre and slopes equal to and less than 40% - 60% (depending on which NF in the Region 3), were capable of supporting herbivore by non-native species, and not be detrimental to native ecosystems and the key elements of those systems.

The request for information in support of the 40% slope if not totally ignored were answered with direction to the text book; *Range Management – Principles and Practices,* Jerry L. Holechek, Rex D. Pieper and Carlton H. Herbel, Pearson / Prentice Hall, the third edition 1998 and/or the fifth edition 2004.

Both editions have the same chart showing Table 8.10 in both editions "Suggested Reductions in Cattle Grazing Capacity for Different Percentages of Slope"

Percent Slope	Percent Reduction in Grazing Capacity
0-10	none
11-30	30 %
31-60	60 %
over 60	100 %

Note; there is no specific declaration to full capacity on slopes less than or equal too 60%.

Noted below the chart in the 5th edition of Range Management as supporting literature for the table from; Glendening (1944), Mueggler (1956), Cook (1966), Gillen et al, (1984), Ganskipp and Vavar (1987) and Pinchak et al, (1991).

Review of these documents shows;

- Only Glendening's study was in an Arizona ecosystem, somewhere near Flagstaff in Pipo.
- The five other studies were not in Arizona nor the ecosystems of the PNF, they were in western states.
- Cook did not provide any slope specificity, however he did speak to there being "21 independent variables" that needed to be analyzed to determine utilization and that "no one factor could be used as a reliable index."
- Ganskipp & Vavra report that "cattle favored slopes in the 0-9% category in all pastures and appeared indifferent to slopes in the 10-19% category".
- Gillen et al reports, "cattle appeared to avoid slope gradients in excess of 20% …"
- Mueggler, 75% of use in slopes of 10% or less

- Pinchak, 79% of use on slope 7% and less

Clearly Holechek et el and the sightings offered make no blanket statements or even reference the position of R-3 and the PNF for full capacity on slopes of 40% or 60% or less. In fact the consensus of the 5 papers which speak to use by livestock in relationship to slope, cattle prefer slopes less than or equal to 10% and are indifferent to slopes to 20%, thus cattle prefer to graze on slopes less than 20% slope.

Information from FS employees tell the reason for the divisions of slope; 0 – 5%, 5 – 15%, and 16 – 40% and greater than 40 were based on definitions in place by timber. The selection of " less than 40%" as capable to support cows is based on the ability for rubber tired skidding equipment to haul logs to the "deck". An effort to have one set of slope criteria and data base.

The Forest Service does not have any site specific science to support the criteria - lands with slopes 40% / 60% or less are capable of ecologically supporting use by domestic livestock. The only science we have been able to find clearly states that livestock <u>prefer</u> slopes less than 20%.

<u>Production, Pounds per Acre</u>

The second criteria to determine capability for use by domestic livestock is production of forage greater than or equal to 100 pounds per acre. As with the quest for the science to support the slope criteria, at the same time we were also asking for science to support this standard, again starting in 2002.

On October 3, 2011, after 9 years of seeking a valid answer, in response to FOIA's submitted to all the Arizona Forests for information to obtain the science establishing this standard, an email from Dave Stewart, imbedded below;

> **"Rick, I don't know who Daryl Stewart is but your note here has been referred to me.**
>
> **For well over 40 years that I am aware the Region has used various factors, one of which is estimated pounds of forage per acre to assist in estimating the utility of various lands for livestock use and production. Right off hand I don't know of any "scientific paper" related to the "100 pounds (of forage) per acre" you refer to. As used in the document you reference, this is not a "hard and fast" figure but rather a general guideline to assist forest personnel in classifying rangelands as to their relative capability to produce forage for use by domestic livestock. As determined locally, and depending on circumstances, forests have the option of modifying the "100 pounds" of forage per acre depending on what makes sense for site-specific circumstances.**
>
> **Regardless, rangelands classified as "potential capacity" or even "no capacity" does not imply these lands do not contribute in some limited way to the forage base for domestic livestock for in some circumstance they certainly can and do.**
>
> **I am also aware you have apparently sent a similar e-mail direct to national forests in AZ. Please consider this the clarification you are seeking an behalf of all AZ National Forests.**
>
> **Dave Stewart**
> **Director. Rangeland Management**

Clearly, by admission of the Director for Region 3 of Rangeland Management there is no site specific / ecosystem science to support the standard that lands producing 100 pounds per acre can ecologically support herbivore by non native species.

The stated position by the Forest Service and in these PNF planning documents is that grazing by domestic livestock has no detrimental effects to the ecosystems, there many and varied components as well as there natural function. Cows "just are", and "everything about them is OK".

All of the listed negative impacts and more resulting from improper use by domestic livestock have been scientifically studied and reported. A short list of references which support our statements and positions;

- Belsky, A.J., and D.M. Blumenthal. 1997. Effects of Livestock Grazing on Stand Dynamics and Soils in Upland Forests of the Interior West. Conservation Biology 11:315-327.
- Donahue, Debra. 1999. *The Western Range Revisited: Removing Livestock from Public Lands to Conserve Native Biodiversity*. Norman, OK: University of Oklahoma Press. 338 pages.
- Ferguson, Denzel, and Nancy Ferguson. 1983. *Sacred Cows at the Public Trough*. Bend, Oregon: Maverick Publications.

- Finch, D.M., M.J. Ganey, W. Yong, R.T. Kimball, and R. Sallabanks. 1997. Effects and Interactions of Fire, Logging and Grazing. Pp. 103-136 in Block, W.M., and D.M. Finch. *Songbird Ecology in Southwestern Ponderosa Pine Forests: A Literature Review*. General Technical Report RM-292. Fort Collins, CO: USDA, Forest Service.
- Fleischner, Thomas L. 1994. Ecological Costs of Grazing in Western North America. *Conservation Biology* 8(3):629-644.
- Fleischner, T.L., D.E. Brown, A.Y. Cooperrider, W.B. Kessler, and E.L. Painter. 1994b. Society for Conservation Biology Newsletter 1(4):2-3.
- Beshta, Robert L. Donahue, Debra L., DellaSala, Dominick A., Rhodes, Jonathan J., Karr, James R., O'Brien, Mary H., Fleischner, Thomas, Williams, Cindy D. *Adapting to Climate Change in Western Public Lands: Addressing the Ecological Effects of Domestic, Wild and Feral Ungulates*. Journal of Environmental Management.
- Zwartjes, P., Cartron, J., Stoleson, P., Haussamen, W. Crane, T. *Assessment of Native Species and Ungulate Grazing in the Southwest: Terrestrial Wildlife.* US Department of Agriculture, Rocky Mountain Research Station, General Technical Report; RMRS – GTR – 142, September 2005.

Not mentioned in any of the PNF planning documents for the public to see are the impact of this commercial use. There are volumes of peer reviewed papers which speak to the negative impacts of herbivore by non native species, the effects to; plants, soils, water sheds, riparian areas / systems wildlife and fire. We have yet to find after 30 plus years of interaction with the USDA FS in Region 3 any peer reviewed studies which prove grazing by these non-native species was in any way beneficial other than financial gain to those who hold the permits.

One way to better understand the impact of grazing by cows is to look at the amount of forage and water removed in one year from the "suitable acres" of the PNF. The table below was developed from data obtained from the PNF to the actual Head Months from District Reports.

On average for the years 2005 through 2011

- Domestic livestock numbered 94,000 head months
- Those non-native animals consumed 940 tons of herbage, of which;
    - 737 tons was grasses
    - 219 tons was forbs
    - 263 tons was shrubs

- 12,200 gallons of water

	Forage & Water Consumed by Livestock							
	Head Months	forage	forage consumed in tons / year				water	Climate
		#'s / day 26	total tons	grass 0.60	forb 0.18	shrub 0.22	10 gallons / day per year	
2011	71,930	1,870,180	935	563.9	167.4	201.0	9,351	
2010	70,730	1,838,980	919	554.5	164.6	197.7	9,195	Extreme Drought
2009	66,354	1,725,204	863	520.1	154.4	185.5	8,626	
2008	110,243	2,866,318	1,433	864.2	256.5	308.1	14,332	
2007	121,370	3,155,620	1,578	951.4	282.4	339.2	15,778	Severe Drought
2006	132,790	3,452,540	1,726	1040.9	309.0	371.1	17,263	Extreme Drought
2005	84,776	2,204,176	1,102	664.6	197.3	236.9	11,021	
Average	94,028	2,444,717	1,222	737	219	263	12,224	

There are two very significant points that come from this information and MUST be addressed by the PNF in the new Forest Plan and its associated EIS.

First; the forage removed by non-native species, the 1,222 tons annually (average) were, in the time before the introduction of livestock, that plant material remained on the land and was an integral part in the natural functions of the various ecosystems. Most notable; soils, watersheds, plants, riparian systems, both surface and subsurface, wildlife and fire, all of which are put forward as important elements in both the first Plan and EIS and in this proposed plan and its DEIS

Water is a very precious resource here in Arizona and the PNF. The 12,200 gallons (average) annually removed by non native species historically was integrated into the various ecosystems on the Forest in a number of different ways;

- Absorbed into the soil to be used by plants, both big and small
- Absorbed into the soil to charge sub-surface water systems feeding seeps & springs, recharging the aquifer
- Surface runoff as streams.

After knowing how much forage and water are removed annually by these non-native species how is it possible for any Forest Service employee to say, that cows have little to no impact on the land or any other aspect of the PNF ecosystems?

Second; when looking at the proportion of the forage removed, consideration must be given to the needs of native wildlife such as deer and antelope. The primary dietary need of these species is forbs and the next most important is shrubs.

The diets of deer and antelope are composed of (on average);
- primary are forbs @ 44% & 41% respectively, and
- secondarily are shrubs at 48% & 44% respectively, and
- a very distant third are grasses at .08% & .15%

Also one must consider how much / volume native species consume compared to that of bovines.
- Deer = 3 pounds per day
- Antelope = 2.4 pounds per day
- Cows = 26 pounds per day

Optimum antelope recruitment comes through successful fawning which requires
- Ample hiding cover, dense grasses 12 to 16 inches in height
- Abundance of forbs during the term of pregnancy as well as 30 – 45 days after birth to provide high quality mothers milk to help produce strong fawns.

More details to the plight of antelope are put forward in the section on MIS.

- Optimum forage condition supports natural fire, a very key element in these "fire adaptive ecosystems of the Southwest.

Water, open water is vital to support domestic livestock, without adequate open water there would not be grazing by cows, and yet we can find no qualifications determining land capability / suitability to livestock grazing linked to distance from water.

With Dr. Holechek as a primary expert and reference for the Regional Range program and grazing in general for the west, we are surprised that his direction for capability linked to distance from water is not used in Region 3 or on the PNF as are his recommendations for production and slope?

From *Range Management Principles and Practices*, 5th edition, page 238

Distance From Water	
Miles	% Reduction in Capacity
0 - 1	None
1 - 2	50%
2	100% - Ungrazable

Clearly water is important to ecosystem function and to livestock. Both Holechek and the FS / PNF do not want areas overgrazed by livestock congregating adjacent to water sources, and both strive for long term sustainability. We must ask why the Agency / PNF does not use distance from water as a primary criteria in determining lands capable of supporting herbivore by non-native species only relying on slope and production?

Looking at the references noted by Holechek - *Range Management Principles and Practices*, 5th edition , Cook did not provide any specificity to slope, however he did speak to there being "21 independent variables" that should be analyzed to determine utilization by livestock and that "no one factor could be used as a reliable index."

The public needs to know why the other key factors of;
- food and hiding cover for wildlife
- distance from water
- amount of litter
- amount of bare soil
- erosion rates
- current plant composition, abundance and distribution as compared to historical and/or potential
- fire

are not given equal importance.

For grazing by domestic livestock is to continue on the PNF, they must provide;

- ***a new criteria in the determination of those lands capable of supporting livestock use a specific distance to water such as that of Holechek as well as "other" criteria as noted by Cook.***
- ***A requirement that there is a quantitative and qualitative analysis prior to the issuance of any AOI that there is adequate open water available for the term of livestock grazing AND ample supply to support the current populations of native wildlife in the area adjacent to that open water.***
- ***Both of these new requirements will be implemented immediately on all allotments starting with the next AOI's when the new plan is approved.***

Another very important key aspect not analyzed in the first determination of suitability and capability for commercial grazing of non-native species, IE: domestic is climate. Please this is not a discussion on macro climate change due to green house gasses, this is a mid level / project level discussion.

The planning period for the first plan was conducted during the period "The 20th Century Wet Period", 1979 through 1965, one of the wettest periods recorded in Arizona. Today and since 1986 Arizona is in a period of drought called "the Early 21st Century Drought". Some experts on the Climate of Arizona / southwest claim this is one of the driest periods in recorded history, almost as bad as the Mid-Century Drought, 1942 – 1978.

The following table is a summary of precipitation data collected at NOAA sites from four locations on or directly adjacent to the PNF.

Location	Period	
	1979 - 1995	1996 - 2010
	extremely wet	extremely dry
	inches of moisture above or below mean	
Prescott	+16.4	- 61.37
Seligman	+ 33.0	+2.97
Cordes	+ 66.6	+ 6.39
Montezuma Castle	+ 47.0	- 5.53

The Prescott National Forest must analyze and provide to the public the effects of mid to small scale climate change, wet periods to that of drought periods. How these changes in moisture regimes effect the ecosystems on the Forest as well as the key elements within those ecosystems,,,,, AND the effects of herbivore by non-natives in both the wet as well as drought periods.

The Prescott National Forest must prove that use by non-native species; cows and other domestic livestock have not historically, are not today nor will in the foreseeable future be a detriment to the natural functions of the ecosystems of the PNF. Proof is through ecosystem specific scientific literature NOT the arbitrary decisions of a forest service employee.

6. page 19 Seeps, Springs and Riparian. The discussion on seeps, springs and riparian areas is scattered throughout the DEIS pages 19 to 103 these different pages with various sections / statements providing "bits and pieces" to the current status of seeps, springs and riparian areas.

Sadly we could not find a simple summary or table detailing;

- The number of seeps & springs;
  - How many there are that administered by the PNF ?
  - How many of them are in good condition ?
  - How many are "at risk – not fully functioning" ?
  - How many are on each District ?
  - How many of the at risk seeps & springs, a number not a percent, will be treated in each alternative ?
  - How many acres, (on average) will be treated at each site ?

- The miles of riparian
  - How much is administered by the PNF ?
  - How much is in good condition ?
  - How much is "at risk – not fully functioning" ?
  - How much is on each District ?
  - How much is to be treated in each alternative ?

The PNF must supply the public an easy to read and understand the current conditions of all the riparian areas on the Forest, IE: the problems for each. It must also show, the amount of each, as well as details to how the different alternatives will address the current problems.

Economic Analysis

The Economic analysis prepared by the Forest Service is woefully inadequate and incomplete.

In October 2005 the RO put forward the document; Technical Report #103 "Evaluating the Economic Contribution of the National Forests of Arizona: a Supplement to the 2005 Social-Economic Assessments". August the Forest put forward another foundational economic document for the New Plan & EIS; PNF Social and Economic Sustainability Report. These reports are written more like a marketing document speaking to "uses & trends" in an abstract economic-speak using there own vocabulary, terms, systems-computer programs which, in the end do not produce any values to the costs or revenues of the specific functions of the PNF.

Market analysis are important to help guide a business, organization and even the Forest Service, those analysis's are always combined with a "nuts and bolts" look at revenue and associated costs.

Analysis of these documents found glairing omissions including the total lack of consideration to the detailed contributions of the different pieces lumped under the heading Recreation, which includes camping, hiking, rock climbing, caving, enjoying the views of the landscape, snow sports, wildlife watching, use of wilderness, fishing and hunting. Phone calls to those who drafted the documents told they had not included these factors for two primary reasons;

- there was not sufficient – valid - high quality information / data they could use to develop and economic value.
- the model used did not require or have an entry point for such information.

The size of those omissions is significant in the terms of dollars and the reasons for the omissions is very suspect, did the developers not have valid data or were they told not to display and factor in the values due to there overpowering values ?

A second major issue with TR #103 the values shown are for *Labor Dollars* an abstract economic value rather than a much more simplistic method of values generated and there associated costs.

Looking at the TR #103 on page 32 we learn the "contributions to labor income" for;

- recreation $9,114,000.00
- wildlife & Fish $1,608,000.00
- grazing $ 399,000.00

Recreation, specifically the value of Camping;

We were told the FS is unable to accurately measure the use of the 11 campgrounds and dispersed capning on the PNF. That is a most interesting statement when you consider the uses a;

- National Reservations System, and
- Camp Ground Hosts, and
- FS folks visiting the established campgrounds as well as the "other camping areas IE; non-improved areas" where the public congregate.

Developers of the economic analysis made the decision there was not valid data to develop an economic value. We find it strange the FS cannot trust its employees and vendors to accurately count people even in the PNF campgrounds.

The question then becomes, if the FS cannot trust its employees and/or vendors to accurately count people in a designated / confined area, how can they be trusted to count anything else like: trees in a given area being prepared for a treatment or the number of livestock on an allotment ?

From the DEIS on page 164 we learn that the PNF estimates there were 1.230,500 RVD's on the Forest.

From another FS document we found that Stynes and White (2005) set the value of a FS "visit" to be;

- A developed NF campground $138.00, and
- an undeveloped campground $115.00

  the average $126.50

Summary Camping;

- the value from Stynes and White the PNF generated $155,650,250.00
- the value from TR #103 shows the PNF generated $9,114,000.00

A discrepancy of $146,536,250 a factor of 16 : 1.

Questions;

- ***With this much difference, which is correct?***
- ***What does it cost the PNF to administer this function; time, labor, hard costs (improvements & maintenance) or fees.***
- ***Without this important information how do the line officers of the Forest as well as the Public know the Present Net Value of camping / Recreation or what it will be in the future ?***
- ***Without this knowledge how can the public make informed input to pending FS decisions on projects that directly or indirectly effect camping ?***

The value of hunting days is included in the analysis above as "visits – RVD's" to the Forest. It is important to look at the detailed economic contribution that this segment produces for the PNF and associated communities and counties. It should be noted that the FS economic analysis did not look at these numbers either. We were told the Arizona Game and Fish Department numbers were not considered valid. Again we find this to be a very strange statement in that the FS touts its "partnership" and "strong working relationship" with the Game & Fish Commission and Department as well as its employees.

Unfortunately the Game and Fish Department does not track the hunting of small game buy hunt unit nor do they collect day use for fishing by water bodies to develop values for those segments.

Looking at the Game Department data for 2010; hunting deer, antelope, elk, turkey and Javelina for hunt units 8, 17 A&B, 19 A&B and 21 we find;

- Licenses sold 16,593, which generated
- Revenue
  - Licenses $539,273.00
  - Species Tags $645,298.00
  - Hunter days afield 62,060

These sales generated direct revenue to the Game Department / State and Counties of $1,184,570.00

Additionally there are values that can be assigned to a Hunter days which show the economic impact for that single use. The for the FS came from the WO website and the other from the US F&WS, *2006 National Survey of Fishing, Hunting and Wildlife Associated Recreation*. These values include the sales of hunting licenses and game tags.

The values developed are;

- FS $186.00/day
- US F&WS $248.00/day

Rather than pick one for this discussion we simply averaged the two,

- The average $217.00/day

Using the average value of a hunting day $217.00 for 62,060 days, the economic impact of hunting generated **$13,467,020.00** to the economy from and adjacent to the PNF, which equates to average value of a big game tag of $811.60.

It must also be noted here that there were 1,558 unsuccessful first choice applications; simply there were not enough tags – animals to be harvested to meet the demand. Given those additional applications were functioned with a species tag, there could have been an additional economic contribution of; $1,677,184.00

As we can see from this crude analysis the real and potential income from the hunting of deer, antelope, elk, turkey and Javelina on the PNF has a relative economic value of $13,467,000.00. Again this does not include any economic value for the hunting of small game and fishing.

Summary Hunting;

- the value from G&F data hunting generated $13,467,000.00
- the value from TR #103 shows hunting $ 1,608,000.00

A discrepancy of $9,731,000.00 a factor of 8.4 : 1.

Questions:

- ***With this much difference, which is correct?***
- ***What does it cost the PNF to administer activities directly related to hunting, its function; time, labor, hard costs (improvements & maintenance) or fees.***
- ***Without this important information how do the line officers of the Forest as well as the Public know the Present Net Value of wildlife / hunting or what it will be in the future ?***

- ***Without this knowledge how can the public make informed input to pending FS decisions on projects that directly or indirectly effect wildlife, be they game or non-game?***

Worksheet showing the value of permitted hunting for the Hunt Units of the PNF is attached.

Grazing by domestic livestock on the PNF is conducted on 62 active allotments held by 49 premittees on (approximately) 920,779 acres. (Data of the analysis to follow is from 2010).

- actual Head months 70,730
- AUM fees of $1.35/aum $95,486.00
- Making the estimate that 50% of these animals were sold at auction in Arizona, the prevailing price of $.94 / pound (USDA value in 2010 livestock sold in AZ) with an average weight of 600 pounds that would generate a economic value of $1,589,650.00.

Net economic value generated by domestic livestock on the PNF;

- AUM fees $ 95,486.00
- livestock sales $1,589,650.00

net income value $1,685,136.00

To this we must also consider the cost to administer the livestock program. From the Congressional Budget Office in 2005 we find the cost to administer the livestock program on NFS lands was $11.32 / AUM which would equate to cost $800,664.00 for the PNF.

Thus the net value of livestock grazing to the PNF for 2010 was
income

- income $1,685,136.00
- costs -$ 800,664.00

net $ 884,472.00

Summary Grazing;
the value from FS data shows a net of $ 884,472.00
the value from TR #103 shows $ 399,000.00

A discrepancy of $ 485,472.00

Questions:

- ***With this much difference, which is correct?***
- ***Is grazing by a non-native species for the net gain of a small group of private citizen's a function that should be kept in place when faced with the realities of:***
  - ***Costs to administer this function in light of the few premittees and the relative small numbers of livestock allowed for use ?***
  - ***Direct competition for limited forage and water with native wildlife species, most importantly forbs. It is well documented that wildlife is highly regarded and also in high demand by the public.***
  - ***The impact these animals have to the small plant community directly effecting;***
    - ***Soils – shading, organic matter to develop top-soil.***
    - ***Litter – vertical & horizontal***
    - ***Erosion***
    - ***Plant vigor, abundance, distribution***
    - ***Species mix in a given area reversing trends to monoculture of blue gramma***
    - ***Food and hiding cover for wildlife including antelope fawns***
    - ***Fuel for natural fire***
    - ***Water use***
    - ***Hydrological functions; both surface and sub-surface***
  - ***Impacts to aspen sustainability***

- ***Without this important information how do the line officers of the Forest as well as the Public know the Present Net Value of wildlife / hunting or what it will be in the future when faced with this direct competition for limited resources?***
- ***Without this knowledge how can the public make informed input to pending FS decisions on projects that directly or indirectly effect wildlife, be they game or non-game?***

To be fair we were unable to obtain any values to the costs to administer its Recreation function, which would include the wildlife program.

We acknowledge this is not a professional economic evaluation; it is a simple "macro - business" approach to show the magnitude of economic values and costs. Given the tremendous value Recreation through its associated sub groups from the land are of PNF into the surrounding communities and counties it is imperative that the PNF develop detailed analyses of recreation and livestock grazing to show the public the benefits and costs.

Secondarily allegedly the "deciding officer" does not need to consider the economic contribution of any function in deciding an alternative, which may – or may not be true, however when that deciding officer is considering the long-term sustainability of the Forest Reserve being administered combined with providing for the highest and best use, we assert that economic considerations should be given strong consideration.

The PNF is in-effect a business, it has an annual budget of (approximately) $14,800,000.00 and employs 120 people full time. Clearly its operating budget is in adequate to hire the staff needed when looking at the priceless resource it is directed to manage with the primary edict of long-term sustainability.

With limited resources the line officers must invest in those key programs which will insure the prime goal of long-term sustainability.

The question becomes is the use of these public lands by domestic livestock a correct use given;

- Cows are a non-native species, they do not fill an ecological gap left by the extirpation of a species such as bison, the PNF must detail what ecological benefit do livestock bring to the PNF ?
- Cows are competing with native wildlife for forage and water, where is the site specific science to prove this private commercial use is not detrimental to native species and there ecosystems ?
- The current drought, which requires some premittees to haul water for their livestock, if there is not enough moisture to fill stock ponds adequately how can there be enough moisture to support adequate growth of the small plant community ?

The Economic analysis prepared by the PNF is inadequate and incomplete, the next generation of DEIS and Plan must fully disclose to the public an economic analysis for recreation, grazing and wildlife on par with what was produced for timber.

Management Indicator Species;

Goshawk

We are pleased and thankful the PNF decided to keep the Northern Goshawk as a MIS. It is our hope the ecosystem / prey based model for management of the Goshawk will be expanded to the other MIS on the Forest. We ask that an ecological based management be put in place immediately on the current and historical areas used / need by antelope.

Antelope

Thankfully the Forest decided to keep the Antelope as a MIS.

DEIS

- Page 78, the last paragraph -
  - "**Pronghorn antelope** was chosen an indicator because it demonstrates a strong and /or predictable response to proposed management activities within the grassland…"

    We feel its only logical to add to this statement, *Past & Current Management*

  - "By monitoring pronghorn habitats and populations, the health and productivity of grassland ecosystems can be assed."
- Page 40,
  - the forth paragraph; "The grasslands, (164,000 acres), PNVT's of the PNF have undergone some dramatic changes over the last 130 years. Changes include encroachment by trees and shrubs, loss of perennial grass cover, loss of cool season plant species, increases in exposed soils surfaces, and the spread of nonnative annual grasses."

    These two sentences speak volumes to the negative impacts domestic livestock has wrought to the lands of the PNF;
    - livestock were introduced in the late 1860"s – 140 years ago, more or less !!!
    - encroachment by trees and shrubs is directly related to the lack of natural fire, due directly to;
      - fear of fire by early settlers, and until just a few years ago the FS tried to put out every fire in less than 10 acres.

- Allowable use – consumption by cows to 30 – 40% of annual plant production.
- ❖ loss of cool season plants, increased bare soil and spread of nonnative plants are also directly linked and caused by domestic livestock.

o the last paragraph; "Healthy grasslands are important habitat for a variety of wildlife species and are essential to maintaining pronghorn antelope populations."

All of the above further proves that the Forest Service and especially the PNF must provide the peer review science specific to the ecosystems of the PNF that use at any level of use by non-native species – herbivore, is not detrimental to those ecosystems and the elements within them.

Review of *the PNF Annual Management Indicator Species Report* 10/2010 shows a generic analysis and discussion which makes the bland summary statement on page 50, antelope "…. appear to be declining."

Looking at the Game and Fish Department data for each of the hunt units associated with the PNF having antelope, indeed antelope are declining and are in serious trouble long term. The key indicator to the health of antelope and there habitat is through the Fawn to Doe Ration, F:D. The Game and Fish Departments recommendation is antelope have a fawn to doe ration of 30-40 :100, simply to keep a static population.

The PNF approach in the MIS report was to plot and discuss the annual F:D numbers, that method alone does not take into account "spikes" be the up or down nor does it look at the overall trend.

Below is a summary table developed from the Game and Fish Department historical data. The numbers shown are from a 3 year rolling average to "soften" the spikes. The raw data was graphed in Excel and the Trend Line produced is a function within Excel.

G & F Survey Data			
		F:D	
unit	year	3 yr avg	trend
8	1959	70	51 - 29
	2010	20	
17A	1975	30	flat
	2010	10	
17B	1975	54	45 - 29
	2010	22	
19A	1963	61	49 - 37
	2010	30	
19B	1963	60	47 - 19
	2010	7	
21	1963	42	53 - 37
	2010	42	

Key items to note from the table;
- ❖ F:D ratio in hunt unit 21 has remained static, the other 5 units have dropped
- ❖ Only 2 units 19A & 21 have a F:D ratio at or higher than the Department recommendation of 30-40:100
- ❖ Only hunt unit 17A has a trend line that is flat, the other 5 are all declining

With the historical trends for each hunt unit, the F:D ratio and populations would be much lower today, however during the period 1998 through 2004 each of these units experienced a marked spike-up in F:D numbers. Since those spikes, each hunt unit has continued its downward trend in the F:D ratios as seen for 2010.

Graphs for each hunt unit attached

Looking forward, using the proposed Plan alternatives we find no specific / significant management changes in any program which would lead us to have any hope antelope will do anything more than continue to decline.

DEIS:

- Page 22, "10 to 15 miles of fence removed or modified. We have no idea at all what this amount of fence means in relation to the amount of
    - Total fencing in antelope habitat
    - Amount of fencing that is considered an impediment to antelope movement
    - Noted in the documents, these fence modifications are only going to happen if the AZ Game Department does them, the PNF is not committing they do any modifications. This clearly shows the commitment of the Forest Service too helping antelope.
- Pate 48, ALT B proposes to treat, burn 25,000 to 65,000 acres over 10 years. We have to question if this is realistic given the current economic condition of the US Treasury?

The PNF must:

- ***Tell the public just how much fence is;***
    - ***In antelope habitat***
    - ***A detriment to antelope***
    - ***How much is deemed critical needing to be removed and/or replaced.***
- ***How much "treatment" it will do on grasslands given the current and realistically anticipated funding levels.***

Even though the PNF states it is important of "quality habitat" for the lands of there administration, critical to the survival of antelope, and we also know that antelope on / adjacent to the PNF is a valuable resource producing $227,900.00 in revenues for 2010, there is not one solid commitment to do anything at all.

We strongly urge the PNF to develop specific standards, guidelines and Desired Conditions for the Grassland habitats of its administration.

We suggest the adoption of the Desired Conditions on all habitats currently as well as historically found on the PNF. The: Semi-Desert Grasslands, Great Basin Grasslands and Juniper Grasslands;

- Understory height provides cover for pronghorn fawning, small mammals foraging and songbird nesting, typically averaging 15 inches in height, …",,

- Understory composition is within the natural range of variability and contains diverse native herbaceous plant species that provide nutrition for pronghorn and other species. Depending on soil type, ground cover typically averages 50 percent live vegetation and 50% non living vegetation, with vegetation composition averaging 40 to 60 percent grass, 10 – 30% forbs and 5 to 20% shrub."

- "Fires are typically low severity with a 0 – 35 year return interval."

- Antelope fawns will be at least 40 : 100 at the time of the G&F Department annual surveys.

- Restoration of grassland habitats is a top priority for the PNF.

- Any new construction of fence and/or modification of existing fencing a mandatory requirement for the bottom wire to be
    - smooth, and
    - at least 20 inches above the ground.

All of the items listed above are major steps forward to getting the grassland ecosystems back to a more natural condition and natural function.

If the PNF decides not to include these DFC in the final plan it must provide scientific the reasons why.

There is strong support for the propose actions of hiding cover and a robust small plant community from *Pronghorn Ecology and Management*", Bart O'Gara and Jim Yoakum, University of Colorado Press, 2004 – A Wildlife Management Institute Book. A key element commonly put forward to the decline in antelope numbers is predation by coyotes, mountain lions, bob cats and golden eagles.

Not often discussed is the condition - quality of or the lack of quality of the grassland habitat to support native small mammals & birds. It has been shown in a number of studies that a robust small plant community produces a large numbers of small mammals and birds which are prey species and can help take the pressure off antelope fawns and adults. Quick and full implementation of the DFC's should greatly help with providing more prey species taking the pressure off antelope.

There are other elements to pronghorn and grassland recover that must be addressed in detail by the PNF in this new forest plan. We did not find any details to how the Forest will implement and practically function management that will provide for

the needs of antelope of hiding cover and high quality food resources and at the same time resolving the very real conflict of also provide forage for cows, non-native species ?

For native grasses to grow to there full potential to obtain the desired height to provide the fawn hiding cover in the spring, they cannot be grazed in the summer. Proof of this is seen with the current conditions of the grasslands under current management. Even with an active monsoon there is no assurance the cool season grasses with re-grow to an adequate height. Again this point is proven with current conditions under current management. Even with livestock grazing curtailed or tightly managed, elk are still a problem.

Early grazing by cows, this does not allow the grass seeds to set, which is not good for a number of reasons and counter to current management direction. Further at this same time there is a bloom of forbs which is vitally necessary for pregnant does and early fawns. It is well documented that forbs are the primary dietary item for antelope and deer, both species needed that high nutritional source to develop healthy fetuses, and to provide the necessary food source for lactating deer and antelope as well as the first few weeks of live for their fawns.

Facts are that cows like to eat forbs, the size of and consumption capability by cows create severe competition for that limited food source with antelope and deer. Cows directly compete against deer and antelope for forbs.

Dietary Consumption by Plant Group				
	Pounds per Day	forb	grass	shrub
antelope	2.4	0.98	0.36	1.06
deer	3	1.32	0.24	1.44
cows	26	4.68	15.6	5.72

It is imperative the PNF set forward a set of DFC's that specifically address the needs of antelope and deer, AND at the same time the proper wording which will have the effect to make sure these DFC's are used in the AMP process.

The other major issue with grazing and antelope is the direction provided by the Forest Service Handbook @ 2209.90. The AMP process does look to the Forest Plan for guidance, however it also looks at other laws and directives of the Agency. History has clearly shown the primary driver of the APM process is the FSH 2209.13-2007-1.

The latest copy we have of 2209.13 makes no mention at all to how a DFC's of any forest plan such as we have proposed will be integrated, nor is there clear language in the current or proposed Plans to resolve of conflicting management direction and/or details.

- DFC's speak to providing hiding cover for fawns, grasses averaging 15 inches, while
- The FSH 2209.13-2007-1. speaks to allowable use, consumption of forage at "a conservative" amount of 31 – 40% utilization as measured at the end of the growing season.

Clearly the habitat needs of antelope are in direct conflict with the dietary needs of cows.

With the continued long term decline in antelope populations combined with the "just at" or more often below ZPG fawns per 100 does the PNF must make every effort to provide the best antelope habitat possible on the lands under its administration no matter how large or small. There must be a DFC that speaks to achieving at least 40 fawns per 100 does as a goal to meet in an effort to expand the existing populations of antelope to much higher levels.

Fences are a major issue for antelope movement. Noted on page 18 of the DEIS "… modification or removal of 3 to 5 miles of fence."

Two items here,

- First, the reader has no idea at all how many miles of fence are in current and historic antelope habitat that need to be modified. Please provide the public some factual or lacking that an estimate to the magnitude of the issue.
- We were unable to find any reference to the fence standards which will be implemented by the PNF for fence construction or modification.

From the *AGFD Statewide Pronghorn Plan, April 2006* " Pronghorn traverse fences by passing under, rather than over, the fence. Woven wire or fences with bottom wires below 20 inches impeded to their movement. Keep a smooth bottom wire greater than or equal to 20 inches above the ground."

Given the importance of antelope movement and the fact that fences are an impediment to easy movement of antelope, the Forest must provide the specifications / standards for fence modification and / or replacement

Key elements to pronghorn management come from *Pronghorn Ecology and Management*", Bart O'Gara and Jim Yoakum, University of Colorado Press, 2004 – A Wildlife Management Institute Book. Two macro points that should be considered with any project that could effect antelope.

- Isolated small pronghorn populations become increasingly vulnerable to extirpation as numbers decrease. Genetic consequences are commonly considered, but stochastic events like predation, disease, and climatic events have a greater likelihood of causing extirpations.

- " ,,, predators taking 100 fawns from a population in a valley were 1,000 fawns are borne probably is biologically insignificant, but their taking 100 fawns in the same valley when only 150 fawns are born is significant."

Soils

Review of the soils section of the DEIS, the Hydrologist and Soils Specialist Report 2011f, provided little details and provided nothing to tell the reader of any improvements or decline over the time period of the current plan. We did find two interesting pieces which us to "drill down" to find details.

Review of the 1986 EIS speaks to;

- Page 86, "Also, the loss or destruction of protective vegetation increases the speed and severity of erosion."
- Page 97, "Watershed/Soils – Unsatisfactory watershed conditions and soil loss above tolerance level is decreasing long term productivity."
- Page 100, Soil and Water – "Over-utilization of the timber and range resources from early settlement days denuded the soils of ground cover, thus resulting in increased sheet erosion and gully erosion."
- Page 114, "Soil and water are the primary resources upon which productivity is based. Short-term uses that damage soils and soil-water relationships impair long-term productivity. Management requirements provide for protection of long term productivity by requiring that impacts on soils and water from short-term uses be mitigated and/or that short-term uses enhance soil productivity and water resources."

Review of the DEIS we see the same statements found on pages 86 though 100 of the 1986 EIS, and we also learn that the statement - direction of page 114 was not implemented.

In the DEIS, page 94 at table 26. The data put forward is a simple summary that does not show the magnitude - size of soil conditions on the PNF. The worksheet below provides a much better explanation to the issues.

Soil Conditions by PNVT										
Vegetation Type	Total Acres	Percent of Forest	Satisfactory		Impaired		Un-Satisfactory		Impaired & Un-Satisfactory	Total Acres I & Un-S
			%	acres	%	acres	%	acres		
All PNVI's	1,247,328		48%	598,717	35%	436,565	17%	212,046	52%	648,611
Semi-Desert Grassland	125,712	10%	11%	13,828	85%	106,855	4%	5,028	89%	111,884
Great Basin Grassland	38,389	3%	0.50%	192	46%	17,659	54%	20,730	100%	38,389
Juniper Grassland	137,274	11%	13%	17,846	25%	34,319	62%	85,110	87%	119,428
Pinion-Juniper Evergreen Shrub	463,296	37%	40%	185,318	46%	213,116	14%	64,861	60%	277,978
Interior Chaparral	315,445	25%	91%	287,055	8%	25,236	1.00%	3,154	9%	28,390
Ponderosa Pine-Evergreen Oak	63,539	5%	92%	58,456	8%	5,083	0.60%	381	9%	5,464
Ponderosa Pine-Gambel Oak	49,052	4%	90%	44,147	10%	4,905	0.15%	74	10%	4,979
Pinion - Juniper Woodland	36,263	3%	25%	9,066	45%	16,318	30%	10,879	75%	27,197
Desert Communities	5,919	0%	57%	3,374	43%	2,545	1%	59	44%	2,604
Riparian Gallery Forest	12,439	1%	20%	2,488	54%	6,717	26%	3,234	80%	9,951

Semi-Desert Grassland	125,712		11%	13,828	85%	106,855	4%	5,028	89%	111,884
Great Basin Grassland	38,389		0.50%	192	46%	17,659	54%	20,730	100%	38,389
Juniper Grassland	137,274		13%	17,846	25%	34,319	62%	85,110	87%	119,428
	301,375		24%	31,866	11%	158,833	53%	110,868	63%	269,701

The PNF encompasses 1,247,000 acres, of that 52% percent, 648,600 acres of its soils are either impaired or un-satisfactory, those habitats types with more than 50% acres impaired or un-satisfactory.

After 25 years of "Management" how is it possible these deplorable soil conditions still exist, when the 1986 EIS clearly identified the problems and also provided solutions?

Page 30 of the specialists report 2011f, in the Summary of Soils; " Soils ….. of particular concern; Juniper-Grassland, Great Basin Grassland, ……. The Semi-Desert Grassland.." Note the small section of the worksheet above.

These Grasslands are the primary habitats for antelope. Note there condition, of 301,375 total acres for 3 different grasslands, of that 269,701 acres are classified as Impaired or Un-Satisfactory. **Is it any wonder antelope are in trouble on the lands of the PNF?**

Looking for more details to the pathetic conditions of the soils on the PNF we turned to the PNF Terrestrial Ecosystem Survey, published in 1997. From the information in the TES we developed the five summaries below.

This summary deals with Production, Pounds per Acre associated with slope. Both slope and production are the only physical limitations associated with capability of domestic livestock use. As we demonstrated earlier in this document, the Forest Service or the PNF can validate the "standards" they currently have in place;

- Slopes < 60% - the AZ forests use 40%
- Production of 100 pounds per acre or more. Other regions of the FS use 200 pounds per acre.

Sadly the PNF – TES does not make simple designations of slope like the other AZ forests where it is very easy to look clearly understand those soil units – acres that have slopes greater than 40%.

Information from the table;

- 130 map units – 1,295,470 acres that produce 100#'s or more annually

- Of the 25 units producing 100#'s 19 have slopes of 40% or less with 259,734 acres. There are 6 map units that are rated from 0 to 120% with 61,003 acres, we have no idea from the documents at our disposal to the amount of these acres are considered capable of supporting livestock.

- There are 44 units – 501,354 acres that produce between 100 and 200#'s per acre. Of those 20 units – 421,321 acres. There are 24 units – 80,033 acres are of slopes of 0 – 120%.

- 59 units have production > 200# per acre. 49 units – 339,767 acres are on slopes less than 40%. There are 10 units – 97,612 acres with slopes of 0 – 120%

Production					
# / ac	total units	units	slope	acres	total acres
> 100 #	130		0 - 120%		1,295,470
100#	25				320,737
		19	0 - 40%	259,734	
		6	0 - 120%	61,003	
100# - 200#	44				501,354
		20	0 - 40%	421,321	
		24	0 - 120%	80,033	
> 200#	59				437,379
		49	0 - 40%	339,767	
		10	0 - 120%	97,612	

Notes;

- other Regions of the FS, the minimal amount of forage production per year is 200 pounds per year with slopes of 40% or less. If that "standard" was put in place on the PNF there would be 339,767 acres that could be potentially capable / suitable for domestic livestock use, compared to the 920,779 acres considered capable of supporting domestic livestock, page 17, DEIS.

- In the details of the TES we find that “the production”, in pounds per acre for each of the units is based on Mean precipitation. As noted earlier in this document, the field work for this document was done in one of the wettest periods of Arizona history. No where do we see any adjustment for production values in times of drought.

The following are four Summary Tables addressing;
- Slope
- Litter, those units with less than 50% of natural
- Bare Soil, those units with less than 100% of natural
- Erosion, those units with rates more than 100% of natural

Slope		
Slope	Units	Acres
0 - 5%	12	59,531
0 - 15%	44	400,596
0 - 40%	9	127,660
15 - 40%	23	269,035
15 - 60	21	160,229
	109	1,017,051

Litter < 50% of Natural		
slope	units	acres
0 - 5%	12	59,531
0 - 15%	44	400,596
0 - 40%	9	127,660
15 - 40%	22	253,666
15 - 60	20	162,858
	107	1,004,311

Bare Soil > 100% of Natural		
slope	units	acres
0 - 5%	11	59,193
0 - 15%	43	394,826
0 - 40%	9	127,660
15 - 40%	22	237,465
15 - 60	15	144,980
	100	964,124

Erosion > 100% of Natural		
Slope	Units	Acres
0 - 5%	12	59,531
0 - 15%	44	400,596
0 - 40%	9	127,660
15 - 40%	23	269,035
15 - 60	21	160,229
	109	1,017,051

Removing the 21 units that have slopes greater than 40%, and the 14 not producing 100 pounds per acre, our assumption is they are not grazed by domestic livestock. We developed the summary above from which looked at;
- Litter, of 109 units, 107 were found to have less than 50% of natural litter.
- Bare Soil; of 109 units, 100 were found to have more than 100% of natural amount of bare soil.
- Erosion; all 109 units have erosion rates more than 100% of natural.

Two very important points:
- These conditions exist today after 25 years of management under the current forest plan, and
- We were unable to find any statements or proposals the proposed plan that would factually change any management methods in use today, which would improve any of these soil conditions on these map units.

The Really Big Question is;
- How did the experts in the FS get timber so wrong ? The ink was hardly dry on the current plans when the legal challenges came to; ASQ, Goshawk and the Mexican spotted owl ? So wrong that today the Region is developing a stand alone document with a whole new set of Standards, Guidelines and Management direction to treat large woody vegetation.

- How did the experts in the FS totally miss that human recreation would grow so large and so many would want to drive off-road ? So wrong that today the Region is developing a stand alone document with a whole new set of Standards, Guidelines and Management direction to deal with human activity, AND

- That same group of experts, over 25 years ago developed a perfect set of Standards, Guidelines and Management systems for non-native herbivore across the entire Region including the PNF across so many different ecosystems and not to cause any problems to;
    - Soils
    - Plants
    - Wildlife
    - Hydrology
    - Fire

The PNF must provide ecosystem specific - scientific proof that herbivore by non-native species - cows are not detrimental to the ecosystems on the Forest where that activity took place historically, takes place today as well as in the near future with the management it is proposing.

Mulch / Litter

The need and function of Mulch / Litter cannot be under stated; to date we have yet to find one Natural Resource Professional or statement in a publication to the counter. It has been proven to be vitally important to a wide array of elements found in all of the PNF ecosystems. Litter is Vital to the needed of; soils, erosion, hydrology, fire, wildlife, watersheds, plants both big and small.

The FSH speaks to Litter at, 2509.18.2.05 - Litter. "Organic materials on the soil surface that are at least 1.25 cm (0.5 inches) thickness. This includes needles, leaves and all woody material."

Another important document speaking to the importance of Mulch is *Managing for Mulch*, Molinar, Galt & Holechek; August 2001, Rangelands 23(4). On page 6, the authors recommend minimum residual herbage levels starting at 300 pounds per acre to 1,500 pounds per acre depending on the ecosystem. It must be noted that this paper speaks to studies in ecosystems not found on the PNF and therefore are suggestions. However these same authors and same ecosystems were used by R 3 Range Staff in developing the amounts of forage that can be removed each year – 30 to 40% by herbivore from non-natives, even though they are NOT ecosystems found on the PNF.

In the DEIS the word litter as relating to organic material is mentioned 3 times and in the proposed Plan 5 times, 3 of which are in the glossary. 40 years of interaction with the Forest Service in R-3 we have yet to see any reference to mulch / litter in the current forest plans or any AMP's for the Arizona Forests.

How can such an important aspect of natural ecosystem functions be so blatantly overlooked or ignored when it is stipulated in the FSH 2209.18.2 and is considered a Primary Resource Issue for livestock grazing by Holechek ?

The logical and political answer to the question above is very simple, the Line Officers and District Rangers of R-3 have not and can not keep domestic livestock at there current levels if 2209.18 is enforced, 2209.18 being totally counter to 2209.90. and the allowable use value of 30 – 40% annual growth.

The PNF must provide the soil / site specific scientific justification for use by non-native herbivores on any Map Unit where;

- ***the litter volume is less than or equal to 50% of natural.***
- ***the Bare Soil is found to be more than 100% of natural.***
- ***the erosion rates are more than 100% of natural.***

The PNF must make a Standard which speaks clearly to the use of 2209.18 and litter for all projects and treatments moving forward immediately.

It is very important to point out that the FS does not have any "set standards" - objective values that can be measured to categorize soils as capable or not capable when analyzing soil erosion rates, bare soil or amount of litter current to natural. Rather the Agency uses a totally subjective approach with staff and/or line officers deciding if soils are satisfactory or unsatisfactory. Without specific criteria or thresholds or limits this is a totally arbitrary process resulting in arbitrary decisions.

It is very disconcerting that the FS/PNF does not have any standards for litter, bare soil or erosion rates, given all the very important aspects to the ecosystems, their key elements AND the Long Term Sustainability of the lands of the PNF.

When the Agency is considering a timber treatment or Vegetation modifications the public is shown pages and pages of objective standards backed with volumes of ecosystem, site, and plant specific scientific studies. Vegetative treatment criteria include items like:

- Snags per acre, standing - both dead and future
- Down woody material > 12 inches in tons per acre
- Down woody material > 3 inches in tons per acre
- VSS classes, current various desired
- Size of stands
- Distance between stands
- % shading and canopy openings
    - within a stand
    - between stands

- o at a number of scales;
  - 1K
  - 10K blocks, and
  - 100K blocks

Absent, there are no standards put forward for litter, bare soil or erosion rates; either current and desired.

Without site specific science to the ecosystems of the PNF to support non-native herbivore at production greater than 100# / acre and on slopes up-to 40%, AND with no requirements to the amount of litter be it dead standing or horizontal on the soil, Nor any standards to acceptable or unacceptable bare soil and erosion rates the only conclusion that can be drawn is the criteria to graze non-native species are arbitrary, put in place to maximize the amount of land area for use by commercial operations of grazing domestic livestock.

The PNF to provide in the next document a standard in tons per acre specifically for litter, litter being composed of all native plants that are indigenous to a specific area, not just pine or juniper needles and limbs. The amount of litter be both vertical or horizontal is to provide for;

- ***Soil shading***
- ***Top soil development***
- ***Erosion control / elimination***
- ***Moisture retention allowing for absorption into the soil & sub-straight / groundwater***
- ***Food and shelter for small wildlife***
- ***Hiding cover for fawns, antelope and deer***
- ***Seed bedding***
- ***Small plant production***
- ***Fine fuel for fire***

Those map units that do not meet the criteria of litter would be removed from consideration to be capable of supporting herbivore by non-native species.

Further we ask the PNF to provide in the next document a standard in tons per acre specifically for unacceptable erosion rates. Those map units that do not meet these criteria would be removed from consideration to be capable of supporting herbivore by non-native species.

At one time in the start of this planning process there were discussions to developing a value of forage and litter to be left on the land to provide for "ecosystem functions" sadly that concept was not carried forward.

Drought

In the proposed Plan and DEIS drought is discussed in many forms;

- A primary threat
- A secondary threat
- A current threat
- A future threat
- Cause of current issues with plants, animals, hydrology, watersheds & soils;
- Potential impacts to plants, animals, hydrology, watersheds & soils

These references are a giant leap forward from the current plan and EIS where the topic is not even mentioned, to openly discussed point out its impacts. Given the importance of drought and its wide ranging impacts, we were unable to find in the Plan or DEIS was;

- A definition to "what is drought" to the Forest Service / PNF ?
- What resources does the PNF use to determine if there is a drought or not ?
- What actions the Forest will take once it determines there is a drought ?

The last document specific to drought we saw from the Region spoke to there was no drought until the Standard Precipitation Index was a -1 for 12 consecutive months. The SPI reporting end of May, 2012;

- -1 for six months
- End of May, very close to -2

http://www.wrcc.dri.edu/cgi-bin/spiMAIN.pl?0202+spi1+spi1

Discussions with the professionals' who produce the *Drought Monitor* of the National Climate Data Center, a division of the Department of Commerce, working closely with NOAA feel the SPI is not a good tool to use to determine drought and the severity of the drought. Four reasons given

- The SPI is a lagging index at best 4 weeks, sometimes longer

- The SPI only looks at precipitation.
- Hard to understand the data
- Covers a very large area - units, one major moisture event in an isolated area can drastically skew the rating for the entire unit.

They feel they have a much better product one that;

- The information is current, only lagging one week
- An easy to understand rating system, color coded by level of drought
    - D 1 – Moderate
    - D 2 – Severe
    - D 2 – Extreme
    - D 4 – Exceptional

They produce a map weekly which shows county boundaries with the different levels of drought, in color, superimposed on top making it very easy to find the drought rating for a specific location.

The *Drought Monitor* takes into account a number of drought indexes with varying weighted values;

- 35% - the Palmer Z
- 25% - the 3 month precipitation
- 20% - the 1 month precipitation
- 13% - CPC soil moisture model
- 7% - Palmer Drought Index

http://droughtmonitor.unl.edu/DM_state.htm?AZ,W

Arizona Department of Water Resources also has drought information and maps, it appears they work with the DM folks, the product shown on the AZDWR web site looks very similar to the DM product.
http://www.azwater.gov/azdwr/StatewidePlanning/Drought/DroughtStatus2.htm

Given the negative impacts of drought, the number of references to drought in the new DEIS and proposed Plan to historical, current and real potential for this drought to continue as well as future droughts, its time the PNF develop its own drought policy.

The policy must address both; what is a drought, what resources were used to determine the severity of the drought AND then what actions the PNF will take to insure harm is not inflected to the various ecosystems on the Forest from those impacts it can control, IE; humans and domestic livestock.

The PNF must develop a real drought policy and put it in the new Plan. The drought policy would use the latest and best scientific resources; we strongly urge the Forest use the Drought Monitor. This policy would be used in a proactive approach rather than a subjective approach based on professional opinions leading to arbitrary decisions.

Retirement of Grazing Allotments

The new plan should expressly authorize the voluntary, permanent retirement of grazing allotments by premittees for conservation purposes, including endangered species recovery.

We would like to thank the PNF for inviting our participation in this process. We ask that our organization be on the list of those wanting to remain active in this project as it moves forward.

If there are any questions, if clarifications or more detail is needed please feel free to call at any time. 602-769-6111 is my cell and is the best way to reach me.

Rick Erman, Member

Copies:
General Distribution

Ltr#0103

From: Lars Romig
To: FS-prescott-forest-plan-comments
Subject: Draft Forest Plan and Draft EIS
Date: Wednesday, November 28, 2012 6:42:00 PM

To the Prescott National Forest Staff,

In reviewing the Draft Forest Plan there is an area of concern to the local cycling community. The recommended wilderness area of Black Canyon would remove access to Mountain Bikers. The Black Canyon Trail 114 is a beautiful and rugged mountain bike experience that we do not want to lose. The trail fits into a large epic ride enjoyed by locals and visitors that holds value to the local MTB experience. Out of the proposed plans for recommended wilderness area we would stand behind plan C with no new wilderness, allowing further assessment of how to preserve these areas while including cyclists. The trail included in the proposed Black Canyon Trail is also in need of maintenance which we would be willing to provide. If plan C can not be considered we would be in support of plan B but excluding the proposed Black Canyon Wilderness Area.

With Mountain biking being a well established economic driver to Northern Arizona, reducing opportunities will impact the future potential not yet realized by the Verde Front area. With the planned West Mingus Trail System and connecting these two trail heads this would provide extended trail experiences that are more likely to be utilized by Mountain Bikers than the majority of hikers. Even with the current enhancements being added to trail 114 the future majority of use will likely be concentrated to the West Mingus area. As the Verde Front area continues to develop and the VVCC advocates for better MTB experiences the development of a IMBA epic is on our list of future goals. Trail 114 posses the qualities needed for a "epic ride" combined with coleman 108 or north Mingus 105 and the idea of a connecting trail to west Mingus this would create an invaluable asset to the local communities of the Verde Valley as well as bolstering the appeal to the entire Northern AZ region.

In the future please include me in your e-mail list for outreach on public input from user groups. I caught wind of the proposal at my Verde Front Meetings but was unaware of the timeline connected to the Forest Plan Revision.

Thank you for listening to our user groups input. If we can assist in any way with making Prescott National Forest the best it can be please look to us for help.

Sincerely,

Lars Romig

Verde Valley Cyclists Coalition

President@vvcc.us | 928-301-7792 | www.vvcc.us

Ltr#0104

From:	Erik Ryberg
To:	FS-prescott-forest-plan-comments
Subject:	Forest Plan DEIS comments
Date:	Wednesday, November 28, 2012 7:00:23 PM
Attachments:	Prescott Forest Plan Comments.pdf

Erik Ryberg
Attorney, Western Watersheds Project
Tucson, AZ 85722

November 28, 2012

Prescott National Forest
Plan Revision
344 S. Cortez St.
Prescott, AZ 86303

Dear Forest Plan Revision Team:

Thank you for the opportunity to comment on the Revised Prescott Forest Plan,. These comments are submitted on behalf of Western Watersheds Project, Inc., a non-profit conservation organization based in Hailey, Idaho and with offices throughout the West. Members of Western Watersheds Project frequent the Prescott National Forest and take a keen interest in the sustained protection of its rangelands, soil productivity, wildlife habitat, water quality, cultural and natural resources, and scenic vistas.

We are disappointed with this Forest Plan. We do not believe that it meets either the spirit or the law of the National Forest Management Act, the statute under which it was prepared. Nor do we feel that the Forest Service has met its requirements under the National Environmental Policy Act. These shortcomings are all the more disappointing when we reflect that this plan is ten years overdue. We believe that in the ten extra years the Prescott National Forest took to prepare its plan, it could have done a more thorough job of analysis of the net benefits and costs of its management of this important ecological treasure, could have provided an adequate accounting of the “Affected Environment” in the DEIS, and prepared a more creative and comprehensive set of alternatives to address management tradeoffs.

We don't believe this plan provides the needed protection for the Prescott National Forest's vegetation, soil productivity, wildlife, fish, or riparian areas, and would like to see it improved.

Our specific comments follow.

Introduction: the statute, the regulations, and 1988 Forest Plan

1. What a Forest Plan is, and what it is supposed to do.

The contents of, and development of, a Forest Plan is guided by the National Forest Management Act at 16 U.S.C. 1600 et. seq., and by (in this case) regulations at 36 C.F.R. § 219 (1982).

a. The National Forest Management Act

The National Forest Management Act requires Forest Plans to (a) collect

and display the results of a comprehensive forest inventory of natural resources, (b) depict the costs and benefits of various management strategies, and (c) provide standards and guidelines that assure that forest resources will be protected and sustained "in perpetuity."

The National Forest Management Act directs the Forest Service to prepare a forest plan "at least every fifteen years."16 U.S.C. §1604(e)(5).

Forest Plans are to contain "a comprehensive assessment of present and anticipated uses, demand for, and supply of renewable resources . . . through analysis of environmental and economic impacts." Id. at § 1600 (a)(3). They are designed to foster the "efficient long-term use and improvement" of Forest Service lands. Id. at (5). To that end, the Forest Service is to conduct "an inventory . . . of present and potential renewable resources" as well as "estimates of investment costs and direct and indirect returns to the Federal Government." Id. at § 1601(a)(1) and (2).

The agency is directed to "recognize the fundamental need to protect and, where appropriate, improve the quality of soil, water, and air resources. Id. at § 1602(a)(5)(C).

The Forest Service is to "assure" that its forest plans provide for "sustained yield of products and services" (§1604(e)(1)) while considering the environmental effects upon range, watershed, wildlife and fish. See §1604(e)(1) and (g)(2)(A). Moreover, the plans are to "provide for diversity of plant and animal communities" and are to "insure" that "continuous monitoring and assessment in the field" is done to evaluate the effects of forest management so that "it will not produce substantial and permanent impairment of the productivity of the land." Id. at §1604(g)(2)(B) and (C).

Thus, the Forest Service is directed by the statute first to assemble its inventory information, calculate the cost and benefit information, and then to prepare a plan that protects the natural resources under its care. The timeframe the agency is instructed to look at is infinite: the agency is to manage the resources such that they are sustained "in perpetuity." Id. at §1600(a)(6).

The mechanism by which the Forest Service is to meet its obligation to "assure" this sustained protection of natural resources is through "standards and guidelines," or "minimum management requirements." Id. at §1604(c), (g)(1)-(3). The Act sometimes refers to "standards and guidelines" (§1604(c)), sometimes "guidelines and standards," (§1604(g)) and sometimes just "guidelines"(§1604(g)(2)), but it seems to be referring to the same thing each time. It does not define the terms; rather, it sets out what they are to accomplish. For example, the guidelines are to "require the identification of suitability of lands," to "insure consideration of the economic and environmental aspects of . . . management," and to "provide for diversity of plant and animal communities." §1604(g)(2) and (3).

b. The 1982 National Forest Management Act Planning Regulations

The 1982 planning regulations, at 36 C.F.R. § 219 (1982) apply to the Prescott Forest Plan revision. These regulations supplement and clarify the National Forest Management Act, and are binding upon the Forest Service. They generally track the statute, requiring the agency to assemble information, reveal net costs and benefits of different management strategies, and protect natural resources with standards and guidelines.

Like the statute, the regulations require the agency first to assemble data and reveal how the "net public benefits" can be maximized "in an environmentally sound manner." 36 C.F.R. § 219.1(a). This requires the agency to actually go out and obtain data about its Forest: "Management direction shall . . . include requirements for analysis to determine

programs that maximize net public benefits, consistent with locally derived information about production capabilities. Id. at § 219.4(a). A Forest Plan must include "demand and supply conditions for resource commodities and services, production potentials, and use and development opportunities." Id. at § 219.11(a). Where information does not exist, the Forest Service is to obtain it: "The Supervisor will assure that the interdisciplinary team has access to the best available data. This may require that special inventories or studies be prepared." Id. at § 219.12(d). This data is to be evaluated periodically for accuracy and effectiveness. Id.

Second, a Forest Plan must evaluate the costs and the benefits of various management strategies. The agency is to "formulate a broad range of reasonable alternatives . . . to provide an adequate basis for identifying the alternative that comes nearest to maximizing net public benefits." Id. at § 219.12(f). These alternatives are to "provide different ways to address and respond to the major public issues," and must "be distributed between the minimum resource potential and the maximum resource potential." Id. at § 219.12 (f)(1) and (4). Alternatives are to be based on different objectives, and should strive to meet those objectives in the most cost efficient manner. Id. at (8). A plan must reveal the environmental and economic effects of each alternative. Id. at § 219.12(g). ("The physical, biological, economic, and social effects of implementing each alternative considered in detail shall be estimated and compared according to NEPA procedures.)

Finally, a plan is to "establish management standards and guidelines for the National Forest System." Id. at (b), see also § 219.12 (f)(9)(iii). These standards and guidelines are to be "quantitative and qualitative," and are to be used in order to attain the "goals and objectives" of Forest Plans. Id. at §§ 219.1(b)(12), 219.3. These standards and guidelines are to accomplish the objective of maintaining viable populations of all existing native species throughout the planning area (§219.19), conservation of soil and water resources (§219.27(a)(1)), streams and streambanks (§219.27(a)(4)), and diversity of plant and animal communities (§219.27(g).

2. The 1986 Forest Plan.

We believe that the 1986 Forest Plan was a good start, and should have been used as a building block for a 1998 or, at most, a 2002 Plan that should have been even better. When the 1986 Plan was written the Forest Service did not have the benefit of years of study, previously prepared plans, or GIS. But at least the 1986 plan articulated and attempted to achieve the designs of the statute and the regulations, and made clear that management of the forest was to ensure the protection of water quality, wildlife habitat, and soil productivity.

To begin with, the 1986 Plan addressed livestock grazing with at least a pretense of concern for the effects grazing can have upon vegetation, soils, riparian areas, and wildlife. It also took a stab at capacity and suitability analyses, and concluded that 29 of the allotments were overstocked (PNF Amendment No. 4). It called for taking actions that would lead to fair or better range conditions with an upward trend (Amendment No. 3), and set a priority of "bringing problem allotments to satisfactory management." Year-long riparian grazing was eliminated and all riparian grazing would incorporate "sufficient recover rest to meet the physiological needs of the plants" in riparian areas. As for soils, the 1986 Plan stated that "causes of unsatisfactory conditions will be corrected." A Regional Guide in place at this time covered riparian areas, with requirements that (for example) the Forest Service maintain an 80 percent shade canopy over water surfaces, 80 percent natural bank protection, 60 percent of woody plant composition, as well as other protective requirements. Regional Guide for Southwestern

Region, August 1983 at 3-6.

More recently, a Forest Plan Amendment added many new standards and guidelines involving goshawk and Mexican spotted owl.

But the new Prescott Plan scraps nearly 100 percent of this protection for all resources. Of the above listed standards, the prohibition of year-long riparian livestock grazing is the only standard that remains.

3. The Proposed Plan.

The Prescott National Forest, despite taking fifteen extra years to prepare its plan, has almost entirely failed to follow the requirements of the statute and regulations, and has proposed a plan that is demonstrably worse than the old one. You have not obtained the needed information, have not described or discussed the net public benefits, have not revealed costs, have not prepared a variety of alternative management strategies that address alternative objectives, have not discussed the benefits or costs of those strategies, and worst of all have not established standards and guidelines that will assure that you meet minimum management requirements and protect the Prescott's forest resources in perpetuity. For those reasons, the proposed plan is inadequate and needs to be dramatically revised.

Specific Shortcomings of the Proposed Plan

1. Standards and Guidelines have been transformed into wholly discretionary, aspirational goals, and do not serve the statute's requirement to protect wildlife habitat, water quality, and soil productivity.

Where the 1986 Plan made an attempt at forceful articulations of its minimum management requirements, the proposed plan offers nothing but empty promises, carefully worded so that they can never be enforced.

As discussed above, the statute and the regulations envision “standards and guidelines” that set minimum requirements below which the Forest Service cannot go without a formal Forest Plan amendment. Neither the statute nor the regulations define standards and guidelines, and both appear to use “standard” and “guideline” interchangeably. Notably, the regulations do define “objectives” and “goals,” both of which are things to be obtained in the future.

Here, the Forest Service has drawn a distinction between a “standard,” which it says is a design constraint that “must be followed” and a “guideline” which it says can be deviated from so long as “the intent of the guideline is met.”

A review of the proposed plan reveals precious few standards and many guidelines, 100 percent of which contain the word “should.” What is the intent of a guideline that says a project “should” include measures to protect water quality? If a project does not include such a measure, does it violate the plan? Whenever there is a “should,” there is an implied “except when.” But the Plan does not describe those exceptions, and of course the reality is that a guideline could be lawfully ignored at any time thanks for that careful inclusion of the word “should.”

Worse, it is well known that the agency is given deference in legal proceedings as to how it has interpreted its own plan. See Lands Council v. McNair, 537 F.3d 981, 992-994 (requiring “particularly deferential review” within agency’s“field of discretion”). The word “should” thereby casts an opening as wide as the sea for forest managers who prefer not to include features to protect, say, water quality—if they can come up with some reason not to, such as it would cost too much. That will suffice. The result is that the guidelines prepared in

this proposed plan are not just toothless, they are literally meaningless. The guidelines do not actually afford any protection at all, because they enable the Forest Service to decline to follow them whenever the agency doesn't want to. (Or more likely, whenever it is not politically palatable to do so.)

The statute makes clear that standards and guidelines are to be baseline, minimum management requirements below which the agency cannot go without amending the Plan. These guidelines do not accomplish that. Deference to the agency is supposed to be applied as a shield, to shield the agency from having to address every imaginable expert opinion, as well as to protect the judiciary from having to make a decision about subjects it cannot be an expert on. But in this case, the Prescott National Forest is actually applying judicial deference as a sword, by making its Forest Plan “requirements” subject to discretion in advance in a way that their application can never be challenged. This circumvents the National Forest Management Act's intent that the Forest Service provide baseline limits to what the agency can do, and what the public can expect.

The very few standards that do exist in this plan are far less comprehensive than the old standards.

We note that there is not one single standard that protects wetlands, not one that protects riparian areas, and not one that protects springs, not one that protects soil productivity, nothing for wildlife or fish, and the Mexican spotted owl standards are gone as well. This even though one “Need for Change” is to restore vegetation structure and composition, and another is to improve watershed integrity. The Plan admits that an alarming percentage of the Prescott's lands and vegetation are in unsatisfactory condition (See e.g. DEIS at 94, 95) Why no standards to protect these areas? Why does the Prescott NF all but act like livestock grazing is benign, even though its individual decisions show otherwise? Why is there not a single remnant remaining of the strong riparian protections this Forest used to enjoy?

2. The EIS does not take a hard look at the consequences of removing all of its substantive Forest Plan standards.

As you know, NEPA requires the Forest Service to take a “hard look” at its actions. Currently, if the Forest Service wished to depart from a Forest Plan standard, it would have to write a Forest Plan amendment. Should this plan be put into place, there won't be any Forest Plan standards of any consequence, and most of the old standards will be gone. There won't be any water quality standards, wildlife standards or soil standards because they've all been excised and replaced with vague, empty, and unenforceable promises about what the agency “should” do. The DEIS fails to acknowledge, must less discuss, this difference.

An important example is the difference between what the 1982 regulations say about wildlife, which is that habitat be provided for all native species in the planning area (a requirement repeated in the 1986 Plan), and what the new Plan does, which is abandon that requirement altogether. That is a significant downgrade from what the statute requires.

How is riparian improvement to be achieved by removing all your riparian standards? We note that this document does not acknowledge livestock impacts to riparian areas even though the persistent, long-term, chronic effects of livestock upon riparian areas are well known and document. You state for example that Mexican garter snake has been effected by loss of habitat in riparian areas, but do not identify livestock as one of the causes.

Your plan is very unclear regarding fire in the desert habitat types. At times you seem to suggest you want to introduce more fire; at other

times you acknowledge fire is historically rare in these habitats. Which is it?

The desert habitat types show astonishing degradation in soil and vegetation but again you do not attribute any of this to the grazing program, and again after removing all the Forest Plan standards you claim things will nonetheless improve. How? How will this happen? The authors of this Plan repeatedly disparage the 1986 Plan as being "reactive instead of proactive" and as not setting "time-specific" goals, but this plan removes what that Plan did have—enforceable standards that are designed to prevent further degradation—and does not add anything substantive. You claim for example you will "rehabilitate" seeps and springs, but do not reveal what this actually means. I fear it means sinking structures and turning them into livestock watering areas. Does it?

And how exactly does removing all the Mexican spotted owl and Northern goshawk standards and guidelines currently in place lead to improvement in their populations? Is something in those guidelines forcing the Forest Service to harm their habitat?

In sum, the EIS does not acknowledge important differences between the proposed plan and the current plan at all. This is a major shortcoming of the EIS.

3. The Plan does not reveal the extent to which monitoring in the current plan has been completed.

The monitoring plan can only be judged based on how well the last one worked—if it didn't work, then some changes are in order. But the plan does not reveal that. As commenters who have experience with Prescott grazing allotment NEPA projects, we know that in many, many cases, planned monitoring never occurred. We also know that "monitoring" can be reduced to asking a permittee whether he grazed the proper number of cows last year, or more. The Forest Service often does not reveal that it uses permittees to conduct its monitoring, and trusts their answers even though they have zero incentive to self-report their failings. This is an important point that needs to be disclosed to the public if the public is to be able to draw a reasoned conclusion about the veracity of the agency's claims.

Another reason it is important to reveal the previous plan's monitoring successes is that neither the current plan nor the proposed one has any consequences if monitoring does not get completed. Under the current plan, livestock does not get reduced just because forty years goes by between ten-year monitoring events. If monitoring is to be used as feedback, then some consequences need to occur when it gets shunted aside. It is arbitrary and capricious to rely on monitoring to drive future actions when it has been proven the monitoring does not always occur.

4. Large and important bodies of material were not obtained prior to the development of this plan, a violation of both the National Forest Management Act and the National Environmental Policy Act.

The NEPA requires a hard look at both the affected environment and the consequences of the plan, and where the agency does not have the needed information, both the NFMA and the NEPA require it to obtain it.

Here, the shortcomings are legion. The DEIS needs a significantly improved Affected Environment section that discloses important ecological, economic, and historic information about the Prescott National Forest, including how management under the old plan succeeded or failed. As for economics, we are particularly interested in an honest assessment of returns to the treasury and costs to the public of livestock grazing. As natural water sources and aspen regeneration are

highlighted needs, they must be addressed thoroughly, and grazing, too, is owed a more thorough treatment.

Finally there is the issue of Capability/Suitability for grazing. Under the 1982 regulations, suitable and capable lands “shall be identified.” 36 CFR 219.20(a). Their condition and trend “shall be determined.” And those lands “in less than satisfactory condition shall be identified and appropriate action planned for their restoration.” Id. This document meets essentially none of the requirements of 219.20, and definitely fails to identify suitable and capable lands. Mr. Rick Erman has been attempting for some time—possibly years—to obtain the criteria that the Forest Service used to make this determination in 1986, and the scientific basis for selecting that criteria. He has been met with stonewalling, obfuscation, misdirection, and, finally, an admission that back in the 1980's the Forest Service just did the best they could.

It's not the 1980's any more and the Forest Service needs now to go out and calculate suitability and capability in a scientifically justifiable manner and reveal what it finds in its EIS and Forest Plans, as required by the regulations at 219.20. (It then needs to develop alternative ways of grazing, and meet the other requirements of that section.)

The range of alternatives does not address the Purpose and Need or the Issues, and is inadequate.

Both the NEPA and the NFMA require you to look at a broad range of alternatives. In this case, the Forest Service really only has two alternatives as the three action alternatives set the exact same management strategies, guidelines, standards, objectives and goals for each alternative. The promises of x number of acres to be “treated” and so forth should be taken with plenty of salt given the total failure of the Prescott NF to meet any of its targets or timelines in its former plan. Those targets are completely meaningless and cannot provide the basis for a “range” of alternatives. We can't tell how things would be different under the action alternatives since all the management instructions are the same. How would a given grazing allotment or timber sale be handled differently under Alternative B or Alternative C? Not at all – both have the exact same management requirements.

Notably, watershed integrity is considered a major need for change and yet the alternatives are identical for watershed management. Wildlife, too, have only cursory differences among the alternatives, and again the focus is always on vague and undescribed future actions for which there is no guarantee at all of completion.

This failing is fatal, and comprehensive. You need to look at different ways of meeting or maximizing net public benefits as required by the NFMA, and that includes grazing schemes, land allocations, and different mixes of standards and guidelines. We believe there should be at least one alternative that maximizes long-term vegetative health through a hands-off approach and a conservative strategy toward grazing that minimizes the damage livestock grazing can do and maximizes the retention of water and forage for wildlife. This alternative would have restrictive management standards and ambitious goals to finally reduce the acreage of unsatisfactory lands and improve forage and grassland habitat.

The Plan does not contain Management Indicator Species that address its purpose and need or its stated Issues.

It appears you have selected only two Management Indicator Species, antelope and goshawk. Why have you not chosen a riparian MIS? Why not an MIS that reflects desert habitat, of which there is a lot on your

National Forest and which your analysis shows to be significantly impaired and with a high departure from potential? We suggest the Mexican garter snake, which is sensitive to riparian disturbance. More MIS are needed to cover all the major habitat types on the Prescott NF.

Conclusion

From the looks of this Plan, it seems that the Prescott NF thinks that the NFMA is a burdensome chore that only serves to produce roadblocks. Maybe so. But it also protects the Forest Service, and you should consider that. A set of strong, defensible Forest Plan standards protects you from the overbearing and politically connected ndustry representative or permittee who insists that mining is good for the landscape or grazing needs to be doubled. It sets boundaries that will help. Forest Standards, after all, are supposed to be baseline limits that we can all pretty much agree on. We can all pretty much agree that the Forest Service should not do anything that permanently impairs water quality or soil productivity, so why not enshrine that belief in a standard, like the 1986 Plan did? We can all agree that grazing should only occur where the land is capable of sustaining it, so why not figure out where that is? What's the harm?

We ask that the DEIS and plan be significantly revised and a second DEIS released for public comment prior to a final.

Sincerely,

Erik B. Ryberg
Attorney for Western Watersheds Project

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Erik B. Ryberg
Attorney at Law
Post Office Box 3371
Tucson, AZ 85722
phone: (520) 622-3333

Erik Ryberg
Attorney, Western Watersheds Project
Tucson, AZ 85722

November 28, 2012

Prescott National Forest
Plan Revision
344 S. Cortez St.
Prescott, AZ 86303

Dear Forest Plan Revision Team:

Thank you for the opportunity to comment on the Revised Prescott Forest Plan,. These comments are submitted on behalf of Western Watersheds Project, Inc., a non-profit conservation organization based in Hailey, Idaho and with offices throughout the West. Members of Western Watersheds Project frequent the Prescott National Forest and take a keen interest in the sustained protection of its rangelands, soil productivity, wildlife habitat, water quality, cultural and natural resources, and scenic vistas.

We are disappointed with this Forest Plan. We do not believe that it meets either the spirit or the law of the National Forest Management Act, the statute under which it was prepared. Nor do we feel that the Forest Service has met its requirements under the National Environmental Policy Act. These shortcomings are all the more disappointing when we reflect that *this plan is ten years overdue*. We believe that in the ten extra years the Prescott National Forest took to prepare its plan, it could have done a more thorough job of analysis of the net benefits and costs of its management of this important ecological treasure, could have provided an adequate accounting of the "Affected Environment" in the DEIS, and prepared a more creative and comprehensive set of alternatives to address management tradeoffs.

We don't believe this plan provides the needed protection for the Prescott National Forest's vegetation, soil productivity, wildlife, fish, or riparian areas, and would like to see it improved.

Our specific comments follow.

Introduction: the statute, the regulations, and 1988 Forest Plan

1. <u>What a Forest Plan is, and what it is supposed to do.</u>

The contents of, and development of, a Forest Plan is guided by the National

Forest Management Act at 16 U.S.C. 1600 *et. seq*., and by (in this case) regulations at 36 C.F.R. § 219 (1982).

a. The National Forest Management Act

The National Forest Management Act requires Forest Plans to (a) collect and display the results of a comprehensive forest inventory of natural resources, (b) depict the costs and benefits of various management strategies, and (c) provide standards and guidelines that assure that forest resources will be protected and sustained "in perpetuity."

The National Forest Management Act directs the Forest Service to prepare a forest plan "at least every fifteen years."16 U.S.C. §1604(e)(5).

Forest Plans are to contain "a comprehensive assessment of present and anticipated uses, demand for, and supply of renewable resources . . . through analysis of environmental and economic impacts." *Id.* at § 1600 (a)(3). They are designed to foster the "efficient long-term use and improvement" of Forest Service lands. *Id.* at (5). To that end, the Forest Service is to conduct "an inventory . . . of present and potential renewable resources" as well as "estimates of investment costs and direct and indirect returns to the Federal Government." *Id.* at § 1601(a)(1) and (2).

The agency is directed to "recognize the fundamental need to protect and, where appropriate, improve the quality of soil, water, and air resources. *Id.* at § 1602(a)(5)(C).

The Forest Service is to "assure" that its forest plans provide for "sustained yield of products and services" (§1604(e)(1)) while considering the environmental effects upon range, watershed, wildlife and fish. *See* §1604(e)(1) and (g)(2)(A). Moreover, the plans are to "provide for diversity of plant and animal communities" and are to "insure" that "continuous monitoring and assessment in the field" is done to evaluate the effects of forest management so that "it will not produce substantial and permanent impairment of the productivity of the land." *Id.* at §1604(g)(2)(B) and (C).

Thus, the Forest Service is directed by the statute first to assemble its inventory information, calculate the cost and benefit information, and then to prepare a plan that protects the natural resources under its care. The timeframe the agency is instructed to look at is infinite: the agency is to manage the resources such that they are sustained "in perpetuity." *Id.* at §1600(a)(6).

The mechanism by which the Forest Service is to meet its obligation to "assure" this sustained protection of natural resources is through "standards and guidelines," or "minimum management requirements." *Id.* at §1604(c), (g)(1)-(3). The Act sometimes refers to "standards and guidelines" (§1604(c)), sometimes "guidelines and standards," (§1604(g)) and sometimes just "guidelines"(§1604(g)(2)), but it seems to be referring to the same thing each time. It does not define the terms; rather, it sets out what they are to accomplish. For example, the guidelines are to "require the identification of suitability of lands," to "insure consideration of the economic and environmental aspects of . . . management," and to "provide for diversity of plant and animal communities." §1604(g)

(2) and (3).

b. The 1982 National Forest Management Act Planning Regulations

The 1982 planning regulations, at 36 C.F.R. § 219 (1982) apply to the Prescott Forest Plan revision. These regulations supplement and clarify the National Forest Management Act, and are binding upon the Forest Service. They generally track the statute, requiring the agency to assemble information, reveal net costs and benefits of different management strategies, and protect natural resources with standards and guidelines.

Like the statute, the regulations require the agency first to assemble data and reveal how the "net public benefits" can be maximized "in an environmentally sound manner." 36 C.F.R. § 219.1(a). This requires the agency to actually go out and obtain data about its Forest: "Management direction shall . . . include requirements for analysis to determine programs that maximize net public benefits, consistent with locally derived information about production capabilities. *Id.* at § 219.4(a). A Forest Plan must include "demand and supply conditions for resource commodities and services, production potentials, and use and development opportunities." *Id.* at § 219.11(a). Where information does not exist, the Forest Service is to obtain it: "The Supervisor will assure that the interdisciplinary team has access to the best available data. This may require that special inventories or studies be prepared." *Id.* at § 219.12(d). This data is to be evaluated periodically for accuracy and effectiveness. *Id.*

Second, a Forest Plan must evaluate the costs and the benefits of various management strategies. The agency is to "formulate a broad range of reasonable alternatives . . . to provide an adequate basis for identifying the alternative that comes nearest to maximizing net public benefits." *Id.* at § 219.12(f). These alternatives are to "provide different ways to address and respond to the major public issues," and must "be distributed between the minimum resource potential and the maximum resource potential." *Id.* at § 219.12 (f)(1) and (4). Alternatives are to be based on different objectives, and should strive to meet those objectives in the most cost efficient manner. *Id.* at (8). A plan must reveal the environmental and economic effects of each alternative. *Id.* at § 219.12(g). ("The physical, biological, economic, and social effects of implementing each alternative considered in detail shall be estimated and compared according to NEPA procedures.)

Finally, a plan is to "establish management standards and guidelines for the National Forest System." *Id.* at (b), *see also* § 219.12 (f)(9)(iii). These standards and guidelines are to be "quantitative and qualitative," and are to be used in order to attain the "goals and objectives" of Forest Plans. *Id.* at §§ 219.1(b)(12), 219.3. These standards and guidelines are to accomplish the objective of maintaining viable populations of all existing native species throughout the planning area (§219.19), conservation of soil and water resources (§219.27(a)(1)), streams and streambanks (§219.27(a)(4)), and diversity of plant and animal communities (§219.27(g).

2. The 1986 Forest Plan.

We believe that the 1986 Forest Plan was a good start, and should have been used as a building block for a 1998 or, at most, a 2002 Plan that should have been even better. When the 1986 Plan was written the Forest Service did not have the benefit of years of study, previously prepared plans, or GIS. But at least the 1986 plan articulated and attempted to achieve the designs of the statute and the regulations, and made clear that management of the forest was to ensure the protection of water quality, wildlife habitat, and soil productivity.

To begin with, the 1986 Plan addressed livestock grazing with at least a pretense of concern for the effects grazing can have upon vegetation, soils, riparian areas, and wildlife. It also took a stab at capacity and suitability analyses, and concluded that 29 of the allotments were overstocked (PNF Amendment No. 4). It called for taking actions that would lead to fair or better range conditions with an upward trend (Amendment No. 3), and set a priority of "bringing problem allotments to satisfactory management." Year-long riparian grazing was eliminated and all riparian grazing would incorporate "sufficient recover rest to meet the physiological needs of the plants" in riparian areas.

As for soils, the 1986 Plan stated that "causes of unsatisfactory conditions will be corrected." A Regional Guide in place at this time covered riparian areas, with requirements that (for example) the Forest Service maintain an 80 percent shade canopy over water surfaces, 80 percent natural bank protection, 60 percent of woody plant composition, as well as other protective requirements. Regional Guide for Southwestern Region, August 1983 at 3-6.

More recently, a Forest Plan Amendment added many new standards and guidelines involving goshawk and Mexican spotted owl.

But the new Prescott Plan scraps nearly 100 percent of this protection for all resources. Of the above listed standards, the prohibition of year-long riparian livestock grazing is the only standard that remains.

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The Prescott National Forest, despite taking fifteen extra years to prepare its plan, has almost entirely failed to follow the requirements of the statute and regulations, and has proposed a plan that is demonstrably worse than the old one. You have not obtained the needed information, have not described or discussed the net public benefits, have not revealed costs, have not prepared a variety of alternative management strategies that address alternative objectives, have not discussed the benefits or costs of those strategies, and worst of all have not established standards and guidelines that will assure that you meet minimum management requirements and protect the Prescott's forest resources in perpetuity. For those reasons, the proposed plan is inadequate and needs to be dramatically revised.

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Both the NEPA and the NFMA require you to look at a broad range of alternatives. In this case, the Forest Service really only has two alternatives as the three action alternatives set the exact same management strategies, guidelines, standards, objectives and goals for each alternative. The promises of x number of acres to be "treated" and so forth should be taken with plenty of salt given the total failure of the Prescott NF to meet any of its targets or timelines in its former plan. Those targets are completely meaningless and cannot provide the basis for a "range" of alternatives. We can't tell how things would be different under the action alternatives since all the management instructions are the same. How would a given grazing allotment or timber sale be handled differently under Alternative B or Alternative C? Not at all – both have the exact same management requirements.

Notably, watershed integrity is considered a major need for change and yet the alternatives are identical for watershed management. Wildlife, too, have only cursory differences among the alternatives, and again the focus is always on vague and undescribed future actions for which there is no guarantee at all of completion.

This failing is fatal, and comprehensive. You need to look at different ways of meeting or maximizing net public benefits as required by the NFMA, and that includes grazing schemes, land allocations, and different mixes of standards and guidelines. We believe there should be at least one alternative that maximizes long-term vegetative health through a hands-off approach and a conservative strategy toward grazing that minimizes the damage livestock grazing can do and maximizes the retention of water and forage for wildlife. This alternative would have restrictive management standards and ambitious goals to finally reduce the acreage of unsatisfactory lands and improve forage and grassland habitat.

The Plan does not contain Management Indicator Species that address its purpose and need or its stated Issues.

It appears you have selected only two Management Indicator Species, antelope and goshawk. Why have you not chosen a riparian MIS? Why not an MIS that reflects desert habitat, of which there is a lot on your National Forest and which your analysis shows to be significantly impaired and with a high departure from potential? We suggest the Mexican garter snake, which is sensitive to riparian disturbance. More MIS are needed to cover all the major habitat types on the Prescott NF.

Conclusion

From the looks of this Plan, it seems that the Prescott NF thinks that the NFMA is a burdensome chore that only serves to produce roadblocks. Maybe so. But it also protects the Forest Service, and you should consider that. A set of strong, defensible Forest Plan standards protects you from the overbearing and politically connected ndustry representative or permittee who insists that mining is good for the landscape or grazing needs to be doubled. It sets boundaries that will help. Forest Standards, after all, are supposed to be baseline limits that we can all pretty much agree on. We can all pretty much agree that the Forest Service should not do anything that permanently impairs water quality or soil productivity, so why not enshrine that belief in a standard, like the 1986 Plan did? We can all agree that grazing should only occur where the land is capable of sustaining it, so why not figure out where that is? What's the harm?

We ask that the DEIS and plan be significantly revised and a second DEIS released for public comment prior to a final.

Sincerely,

Erik B. Ryberg

Attorney for Western Watersheds Project

Ltr#0105

From: Eric Nelson
To: FS-prescott-forest-plan-comments
Subject: Attention: Plan Revision
Date: Wednesday, November 28, 2012 8:42:34 PM

To Whom it may concern:

I am writing to comment on the upcoming forest plan revision. I primarily use the forest for mountain biking, but also use it for hiking and trail running along with my wife and five children. Occasionally we camp as well.

As you consider revisions to the plan I ask that you consider recreations uses of mountain biking strongly, and avoid irreversible steps that could limit access to the great numbers of bikers in this region. I use the trails up to ten hours a week for this activity and honestly have never had any sort of trail conflict in the eleven years I have been biking the Prescott National Forest. I hope, as my children grow that they also have the opportunity to use the recreational resources of the forest in a similar manner.

Thank you for the opportunity to comment.

Eric Nelson MD, FACS
731 N Lakeview Dr
Prescott AZ 86301

Ltr#0106

From:	Jay Lininger
To:	FS-prescott-forest-plan-comments
Subject:	Comment on Prescott Forest Plan Revision DEIS
Date:	Wednesday, November 28, 2012 8:44:56 PM
Attachments:	CBD_cmt_Prescott_DEIS_112812.pdf

Please find attached to this message a letter from the Center for Biological Diversity commenting on the Draft Environmental Impact Statement for the proposed revision of the Prescott National Forest Land and Resource Management Plan.

Thank you.

Jay Lininger, Ecologist
Center for Biological Diversity
P.O. Box 25686
Albuquerque, NM 87125
Tel: (928) 853-9929

www.biologicaldiversity.org

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CENTER *for* BIOLOGICAL DIVERSITY *Because life is good.*

Via Web

November 28, 2012

Prescott National Forest
Attn: Plan Revision
344 South Cortez Street
Prescott, AZ 86303
prescott-forest-plan-comments@fs.fed.us

RE: Draft Environmental Impact Statement for the Prescott National Forest Land and Resource Management Plan

This letter supplies comment from the Center for Biological Diversity ("Center") responding to the draft environmental impact statement ("DEIS") for the Prescott National Forest Land and Resource Management Plan ("Forest Plan"). The Center is a non-profit public interest organization dedicated to conserving and recovering at-risk native species and their habitats through science, policy and law. The Center has over 300,000 members and online activists, many of whom live in Arizona and who maintain long-standing interests in management of the Prescott National Forest.

NFMA Requirements

(1) Standards

The National Forest Management Act ("NFMA") directs the Secretary of Agriculture to issue regulations "that set out the process for the development and revision of the land management plans, and the guidelines and standards prescribed by this subsection." 16 U.S.C. § 1604(g). The Secretary "shall … incorporate the standards and guidelines required by this section in plans for units of the National Forest System…" *Id*. § 1604(c). NFMA further requires standards for timber and transportation management as well as for public participation in forest plans. *See id*. §§§ 1604(m); 1608(c); 1612(a).

The 1982 planning regulations implementing NFMA state, "Plans guide all natural resource management activities and establish management standards and guidelines for the National Forest System. They determine resource management practices, levels of resource production and management, and the availability and suitability of lands for resource management." 36 C.F.R. § 219.1(b) (1982). Standards and guidelines in forest plans must be "qualitative and quantitative." *Id*. at § 219.1(b)(12) (1982). Plans must establish "standards and requirements by which planning and management activities will be monitored and evaluated."

Id. § 219.5(a)(7) (1982) [emph. added]. Additionally, plans must define reasons for management practices chosen for each vegetation type and circumstance. *See id*. § 219.15 (1982).

The Prescott National Forest in August 2012 proposed a draft Forest Plan ("Draft Plan") that would repeal virtually all standards and guidelines in the existing 1986 Forest Plan, as amended ("1986 Plan"). *See* DEIS at 17-21 (Alternative B). The Draft Plan amounts to a major rollback of environmental safeguards affecting management of forest resources. *See id.* 13 ("Alternatives B, C, and D share a common set of standards and guidelines whereas the set that applies to alternative A is unique"); Draft Plan at 6 ("[S]ome standards and guidelines in the 1986 plan will not be included in the revised plan because they: were unnecessarily prescriptive about how to accomplish a project; did not support attaining desired conditions or accomplishing objectives; or were duplicative"). It would replace existing standards and guidelines with vaguely worded "desired conditions" and "objectives" that are designed to maximize agency discretion and evade accountability in project-level management activities.

> Typically, projects or activities are developed specifically to achieve the desired conditions or objectives of the plan; however, some projects or activities may not necessarily be tied to any specific desired condition or objective in the plan (e.g. routine road maintenance, facility maintenance, etc.). In such cases, these may still be considered consistent with the plan if they do not prevent the attainment of these plan components; these projects and activities should be briefly evaluated for any conflicts with the plan's desired conditions and objectives. In implementation of the plan, projects are expected to comply with the plan's standards and guidelines, suitability, and management area direction.

DEIS at 123. The Forest Service clearly states its intent that desired conditions will drive site-specific project development and decision-making, even if they do not necessarily control project implementation on the ground:

> Most projects and activities are developed specifically to maintain or move conditions toward one or many of the desired conditions of the plan; consequently, it is not likely that a project or activity can maintain or contribute to the attainment of all desired conditions. In addition, it should not be expected that, in every instance, a project could clearly point to a specific desired condition as the reason the project was proposed.
>
> There will also be instances when negative effects related to achieving a specific desired condition are appropriate, either for long-term progress toward that same desired condition or for progress toward or maintenance of another desired condition. In this situation, the responsible official for the project needs to identify and disclose these effects in the project documentation and make a decision that balances these considerations.

Draft Plan at 124. Desired conditions and objectives are not enforceable in project-level decisions. *See id*. 7 (desired conditions "are aspirations and not commitments or final decisions which approve projects or activities, and they may only be achievable over a long period"); *id*. ("Objectives are concise projections of measurable, time specific intended outcomes. Objectives are the work that we think needs to be done and the means of achieving or maintaining desired conditions"). In contrast, only standards are enforceable in project-level decisions. *See id*.

("Standards are constraints that apply when an action is being taken to make progress toward desired conditions. The direction in a standard must be followed exactly, including the intent of the standard. Deviation from a standard requires a plan amendment"); 125 ("A project or activity is consistent with a standard if the project or activity is designed in exact accord with the standard"). More, guidelines afford some level of accountability insofar as the Draft Plan would require the Forest Service to acknowledge them in project decisions even if not follow them to the letter. *See id*. 7 ("Guidelines are also constraints that should apply when an action is being taken to make progress toward desired conditions. A guideline must be followed, however, unlike a standard, it may be modified somewhat for a specific project if the intent of the guideline is followed and the deviation is addressed in a decision document with supporting rationale").

Threatened Mexican spotted owls exist on the Prescott National Forest. *See* DEIS at 69 ("Known nesting sites on the Prescott NF include areas near Mingus Mountain, in Prescott Basin, and at Crown King for a total of 15 protected activity centers…"). The DEIS states, "Existing habitat on the Prescott NF totals 26,448 acres," but it is not clear how the Forest Service arrived at that estimate of suitable habitat. The forest contains more than 112,000 acres of mixed conifer and pine-oak habitats that may be suitable for Mexican spotted owl. *See* DEIS at 37 (Table 3 – potential natural vegetation type acreage); *also see id*. ("The Mixed-Conifer with Frequent Fire PNVT (6,600 acres) was combined with the Ponderosa Pine Forest PNVT because they are described by the same biophysical setting model (e.g., vegetation structure and disturbance regime) developed by the Nature Conservancy3. The Ponderosa Pine Forest PNVT was later renamed as Ponderosa Pine-Gambel Oak PNVT"). Moreover, about 44,814 acres of designated Critical Habitat exists on the national forest. *Id*. 70.

The Draft Plan would replace existing standards and guidelines affecting management of Mexican spotted owl habitat with "Coarse filter plan components (various desired condition statements) plus fine filter plan components [that] are necessary to reduce viability to a level of no or low risk." *Id*. 68 (Table 12). The "fine filter" plan components "that address terrestrial species viability concerns" are Wildlife Guidelines 1, 2, 4, 5 and 7. *Id*.; *also see* Draft Plan at 69-70 (shown below). Only "Guide-WL-1" specifically mentions "federally listed species habitat," and it states that the Forest Service "should" apply objectives and measures of "approved recovery plans" to "activities." The guideline is discretionary, lacking any mandatory language, and it is unenforceable. According to the Forest Service, under this guideline, "[D]esigning and implementing projects using both the MSO recovery plan and best available science would be expected to lead to improved habitat conditions for the species. This combination of approaches would provide the flexibility necessary to manage for the recovery of the species, which could eventually have beneficial effects for individual MSO." DEIS at 81.

The proposed "Guide-WL-1" shown below would replace <u>all</u> of the standards and guidelines that currently affect management of Mexican spotted owl habitat (USDA 1996a). It uses the permissive word "should," rather than action-forcing words such as "will" or "shall." *See U.S. v. UPS Customhouse Brokerage, Inc.*, 575 F.3d 1376, 1382 (Fed. Cir. 2009) ("'Will' is a mandatory term, not a discretionary one"); *New England Tank Indus. of N.H., Inc. v. United States*, 861 F.2d 685, 694 (Fed. Cir. 1988) (difference between mandatory term "will" and discretionary term "should"). The same is true for every one of the proposed wildlife guidelines.

Guide-WL-1	Habitat management objectives and terrestrial species protection measures from approved recovery plans should be applied to activities occurring within federally listed species habitat[1].
Guide-WL-2	• Design features and mitigation measures should be incorporated in all Forest Service projects as needed to ensure that Southwestern Region sensitive species do not trend toward listing as threatened or endangered species. • Design features and mitigation measures should be incorporated in all Forest Service projects as needed to ensure compliance with other Federal laws governing wildlife such as, but not limited to, Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act.
Guide-WL-4	For cavity nesting birds: Snags should be retained at levels indicated in PNVT desired condition statements, if available, and replaced at natural recruitment rates.
Guide-WL-5	For raptors as each nest site (e.g., stick nest, cliff, ledge, cavity) is identified: • Size and structure of raptor species' nest stands[2] should be maintained. • Disturbance at nest sites during the breeding season should be minimized.
Guide-WL-7	Where goshawks exist: • A minimum of six nest areas (known and replacement) should be located per territory. Goshawk nest and replacement nest areas should generally be located in drainages, at the base of slopes, and on northerly (northwest to northeast) aspects. Nest areas should generally be 25 to 30 acres in size. • Goshawk post-fledgling family areas (PFAs) of approximately 420 acres in size should be designated surrounding the nest sites. • Human presence should be minimized in occupied goshawk nest areas during nesting season of March 1 through September 30. Management activities and human uses for which the Forest Service issues permits (excluding livestock permits) should be restricted within active nest stands during the active nesting period unless disturbance is not likely to result in nest abandonment.

In *Ecology Center v. Castaneda*, 574 F.3d 652, 660-61 (9th Cir. 2009), the Ninth Circuit held that the language of guidelines incorporated into a forest plan did not "create a mandatory standard." Instead, the guidelines were not enforceable under NFMA, because they were cast in "suggestive" language using the word "should," and "merely recommended" a particular practice "when possible." *Id.* at 661 (internal quotation omitted). As such, the proposed wildlife guidelines above merely invite forest managers to consider applying those measures. They would <u>not</u> require implementation of recovery plans for federally listed species in site-specific management activities.

The U.S. Fish and Wildlife Service ("FWS") opined that continued implementation of discretionary management guidance under the pre-1996 Forest Plans would have jeopardized the existence of Mexican spotted owl:

> The Service finds that continued implementation of the existing forest plans will jeopardize the continued existence of the Mexican spotted owl and will adversely modify the species' critical habitat. This biological opinion is based on the results of our analyses of the effects of continued implementation of the management direction contained in the existing forest plans for the National Forests of the Forest Service's Southwestern Region. The Service believes that aspects of the existing forest plans do not provide for the physical and biological requirements of the Mexican spotted owl or its critical habitat. Additionally, the Service recognizes that much discretion exists on the part of forest managers at the project level in the implementation of forest plan guidance and direction. The broad range of effects that could result from the implementation of the management direction of the existing forest plans is suggested by the discretion forest managers use in their implementation of plan-level direction. As can be seen in the attached list of forest projects (Appendix A), the existing forest plans lack the management direction to prevent the development of forest project-level activities that are likely to adversely affect the Mexican spotted owl.

(USDI 1996a: 39). The FWS further stated that the amended Forest Plans containing standards that require implementation of the Mexican spotted owl Recovery Plan (USDI 1995) form a basis to "remove jeopardy" and "avoid adverse modification" of critical habitat. Crucially,

> The definition of standards and guidelines as given in the FEIS is assumed for this analysis. That definition states that standards and guidelines are, "the bounds or constraints within which all management activities are to be carried out in achieving forest plan objectives." In the future, all forest activities carried out under the existing forest plans will be reviewed by the Service pursuant to Section 7 of the Endangered Species Act in terms of their conformity with these elements.

USDI (1996a: 39). Indeed, the FWS now largely bases its Section 7 consultations on federal actions that may affect spotted owl on whether, and to what degree, the actions comply with standards and guidelines in the amended Forest Plans. After the Forest Service amended the Forest Plans to formally adopt those mandatory standards and guidelines, the FWS found,

> [I]mplementation of the forest plans, as amended by the new standards and guidelines of Alternative G in the FEIS, is not likely to jeopardize the continued existence of the Mexican spotted owl or result in the destruction or adverse modification of the species' critical habitat. Project-level actions and activities planned and implemented under these standards and guidelines, taken together, should promote the recovery of the owl.

USDI (1996b: 29). The DEIS contains no explanation why a return to unlimited management discretion that pre-existed the 1996 Forest Plan Amendments (USDA 1996a) will avoid jeopardizing the continued existence of Mexican spotted owl or adversely modifying its critical habitat. Nor does it explain how unlimited management discretion would maintain the viability of sensitive species that use similar habitat. *See* DEIS at 43 ("Healthy pine forests provide important habitat for a variety of wildlife species and are essential to maintaining bird populations such as the northern goshawk and Mexican spotted owl").

In addition to rolling back the mandatory standards and guidelines affecting management of Mexican spotted owl habitat, the Draft Plan also would rollback standards and guidelines for managing ponderosa pine forest habitat of northern goshawk, a sensitive species. *Compare* USDA (1996a: 91-94); Draft Plan at 70. "Guide-WL-7," shown above, is the only direction in the Draft Plan for activities in goshawk habitat. It contains discretionary language and, like Guide-WL-1, it is not enforceable.

Reliance on non-binding aspirational statements of desired conditions and suggested guidelines to "inform" project-level decisions and site-specific management in lieu of enforceable standards was held to be unlawful. *See Citizens for Better Forestry v. U.S. Department of Agriculture*, 08-1927 (N.D. Cal., June 30, 2009). The absence of enforceable standards affecting wildlife in the Draft Plan contradicts NFMA and the 1982 planning regulations. *See* 16 U.S.C. §§ 1604(c) and (g); 36 C.F.R. §§§§ 219.1(b), 219.11(c), 219.12(f)(9)(iii) and 219.15 (1982).

(2) Grazing

Regulations implementing NFMA require the Forest Service to determine "the suitability and potential capability of National Forest System lands for producing forage for grazing animals and for providing habitat for management indicator species." 36 C.F.R. § 219.20 (1982). "The present and potential supply of forage for livestock, wild and free-roaming horses and burros, and the capability of these lands to produce suitable food and cover selected wildlife species shall be estimated." *Id*. § 219.20(a). Where the agency identifies lands that are "in less than satisfactory condition," it "shall" plan for their restoration. *Id*. The agency must consider, among other things, "possible conflict or beneficial interactions among livestock, wild free-roaming horses and burros and wild animal populations, and […] direction for rehabilitation of ranges in unsatisfactory condition…" *Id*. § 219.20(b).

To inform analysis of grazing suitability, the Center requests that the Forest Service consider and analyze the following criteria for designating lands as <u>unsuitable</u> for grazing:

- High or severe soil erosion hazard identified by Terrestrial Ecosystem Survey.
- Slopes steeper than 30 percent.
- Lands within 200 feet of perennial or intermittent streams or wetlands.
- Occupied and/or critical habitat of threatened or endangered species or species proposed for listing.
- Designated conservation areas for sensitive or management indicator species.
- Occupied locations of endemic species.
- Lands impacted by high-severity fire effects to vegetation or soil.

All of the alternatives in the DEIS designate the same 920,779 acres as suitable for grazing. *See* DEIS at 34 (Table 2 comparing alternatives); 95 ("Currently active grazing allotments do not vary across alternatives…"). It is not clear how the Forest Service estimated present and potential forage supply or the capability of those lands to produce food and cover for wildlife. *See id.* 118 ("The capability of the lands on the Prescott NF to produce forage for

grazing animals was determined in the 1980s during the first round of forest planning"). Prior estimates were based on an assumption that suitable rangelands were "full capacity," *i.e.*, "those which can be used by grazing animals under proper management without long-term damage to the soil resource or plant communities" (USDA 2011a: 3-6).

Most lands designated as suitable for grazing are in less-than-satisfactory (*i.e.*, unsatisfactory or impaired) condition. *Id*. 92 (Table 24 shows 91 out of 97 subwatersheds impaired or at-risk due to soil condition and only two of 97 exhibiting satisfactory condition for rangeland vegetation); 260 (Table 20 – same); 93 (Table 25 shows uplands within 15 of 22 watersheds have reduced watershed condition integrity due to departed soil and/or vegetation conditions); 91 ("The indicators soils, fire regime or wildfire, forest cover, and rangeland vegetation best illustrate the effects of management activities such as prescribed fire use, vegetation treatments, and livestock grazing"); 94 (three Piñon-Juniper PNVTs comprising more than half of the Prescott NF have relatively low percentage of satisfactory soil conditions). Less-than-satisfactory conditions persist despite changes in range management enacted under the current Forest Plan:

> Of the 69 grazing allotments on the Forest, 29 are exhibiting resource degradation because of overstocking, lack of proper management or both and are classified as unsatisfactory. Many of the other grazing allotments require improved management. Of the 977,934 acres of full capacity range, 54 percent of the acres are in satisfactory range condition and 46 percent in unsatisfactory condition.

USDA (1986: 97). Indeed, the record points to a sustained downward trend in range capability on the Prescott National Forest, as updated analysis indicates more lands in unsatisfactory condition than in the 1980s. Effects of livestock grazing on the environment under the Draft Plan are likely to be significant and must be disclosed in an EIS. 40 C.F.R. § 1502.16.

Prior estimates of range capability did not account for synergistic effects of livestock grazing and climate change on soil, water, vegetation and fire regimes (Beschta et al. 2012). The 2011 *Determination of Livestock Grazing Suitability and Capability Report* (USDA 2011a: 1) supporting the Draft Plan contains this unsupported statement: "Current drought conditions and trends have not been shown to be outside of historical norms for the Southwest." Even if that statement were true, it is unlikely that rangelands in the Prescott National Forest will ever again return to "historical norms" that supported forage production capacity over the past century.

> Despite ample uncertainties in model projections of hydroclimate change, and the continuation of natural climate variability on all timescales, it seems very probable that SWNA will be drier in the current century than in the one just past. Skillful prediction of the magnitude and timing of this drying will require prediction of the rate of anthropogenic change and prediction of the evolving natural variability for which currently there is scant evidence of any predictability beyond the interannual timescale. Another likely outcome is a continuing decline in winter snowpack and earlier onset of snow melt that will add to the stress on regional water resources. The implications of these hydroclimate changes will vary across the region. For Mexico, though winter precipitation is expected to decline, the future of the North American monsoon, important for water resources and agriculture, will be critical and remains uncertain.

Seager and Vecchi (2010: 21282). Historically, "interglacial climates in the southwestern US can experience prolonged periods of aridity, lasting centuries to millennia, with profound effects on water availability and ecosystem composition. The risk of prolonged aridity is likely to be heightened by anthropogenic forcing" (Fawcett et al. 2011: 520). Williams and others (2012) noted that while average winter precipitation totals in the Southwest have not been exceptionally low in the recent past, average summer-fall evaporative demand since 2000 is the highest in the past 1,000 years. Forest drought stress over much of the past 13 years, including in 2011 and 2012, matched or exceeded the recorded "megadroughts" of the 13th and 16th centuries. The only other 13-year periods when similar conditions occurred with such frequencies in the past 1,000 years were during the megadroughts themselves. The strongest megadrought occurred during the second half of the 1200s and is believed to have played an important role in the abandonment of ancient Puebloan cultural centers throughout the Southwest. The observed trends in drought stress on forest conditions coincide with strong climate model agreement on anthropogenic greenhouse warming. Model projections indicate that megadrought-level stresses on water availability and vegetation production will be regularly exceeded by the mid-21st century, and even the wettest and coolest years of the late-21st century will be more severe than the driest, warmest years of the past millennium (Williams et al. 2012). The EIS must disclose uncertainty in grazing capacity estimates that originate from the 1980s, and NFMA requires such estimates to be reasonably accurate. 40 C.F.R. § 1508.27(b)(5); 36 C.F.R. § 219.20 (1982).

The Draft Plan does not propose to rehabilitate or restore all lands considered suitable for livestock grazing but exhibiting less-than-satisfactory conditions. It would only rehabilitate unwanted roads and impacts of recreation activities – no rehabilitation of degraded upland soils is proposed. At most, "restoration treatments" would affect up to 253,000 acres with managed fire, up to 90,000 acres with "habitat improvement," and up to 65,000 acres with mechanical thinning over the 10-year life of the plan. *See* DEIS at 18-25 (extent of restoration and habitat improvement under each action alternative); *also see id*. 36 ("The planning period is 10 years…"); 225 (same). Therefore, under the Draft Plan less than half of suitable rangelands that exhibit less-than-satisfactory condition would be rehabilitated or restored, yet grazing would continue to be allowed under capability estimates from the 1980s, contrary to NFMA.

(3) Timber

A forest plan must assure suitability of lands where timber production is allowed. *See* 16 U.S.C. § 1604(e). Timber suitability determinations "shall … be embodied in appropriate written material, including maps and other descriptive documents, reflecting proposed and possible actions, including the planned timber sale program and the proportion of probable methods of timber harvest within the unit necessary to fulfill the plan." *Id.* § 1604(f)(2). The Forest Service's responsibility under NFMA to plan for multiple uses necessarily means that not all lands are available for all purposes. *See id.* § 1604(g)(3)(E) (Forest Service must ensure that timber will be harvested from national forest lands only where, for example, "(i) soil, slope, or other watershed conditions will not be irreversibly damaged…"); *also see Southeast Conference v. Vilsack*, 08-1598 (D. D.C., Feb. 17, 2010). In developing forest plans, the Forest Service:

> shall identify lands within the management area which are not suited for timber production, considering physical, economic, and other pertinent factors to the extent feasible, as determined by the Secretary, and shall assure that, except for salvage

> sales or sales necessitated to protect other multiple-use values, no timber harvesting shall occur on such lands for a period of 10 years. Lands once identified as unsuitable for timber production shall continue to be treated for reforestation purposes, particularly with regard to the protection of other multiple-use values. The Secretary shall review his decision to classify these lands as not suited for timber production at least every 10 years and shall return these lands to timber production whenever he determines that conditions have changed so that they have become suitable for timber production.

Id. at 1604(k). Furthermore, the NFMA regulations state that timber suitability designations in Forest Plans must apply cost-benefit analysis and "stratify" national forest lands by allowable timber management intensity:

> For the purpose of analysis, the planning area shall be stratified into categories of land with similar management costs and returns. The stratification should consider appropriate factors that influence the costs and returns such as physical and biological conditions of the site and transportation requirements. This National Forest System Land Management Planning Environmental Impact Statement analysis shall identify the management intensity for timber production for each category of land which results in the largest excess of discounted benefits less discounted costs and shall compare the direct costs of growing and harvesting trees, including capital expenditures required for timber production, to the anticipated receipts to the government, in accordance with Sec. 219.12 and paragraphs (b)(1) through (b)(3) of this section.

36 C.F.R. § 219.14(b) (1982). Historically, the Forest Service has met this requirement by dividing national forests into discrete land use zones, or "management areas," each of which set forth standards and guidelines governing site-specific multiple use activities. This approach accords with the Forest Service's statutory responsibility under NFMA to "provide for multiple use and sustained yield of the products and services of units of the National Forest System." 16 U.S.C. § 1604(e). The agency has further engaged in cost-benefit analysis of stratified timber management strategies to assure "the largest excess of discounted benefits less discounted costs."

In addition to determining suitability for sustained yield timber production on specific portions of the national forest in a new management plan, the Forest Service also must review previous classification of lands as unsuitable for timber production. *See* 16 U.S.C. § 1604(k); 36 C.F.R. § 219.14(b) (1982). It is not sufficient merely to list lands that previously were deemed suitable or unsuitable and carry forward those designations into a revised plan. Further analysis and comparison of alternatives is required.

To inform analysis of timber suitability, the Center requests that the Forest Service consider and analyze the following criteria for designating lands as <u>unsuitable</u> for sustained yield timber production:

- High or severe soil erosion hazard identified by Terrestrial Ecosystem Survey.
- Slopes steeper than 30 percent.
- Lands within 200 feet of perennial or intermittent streams or wetlands.

- Contiguous areas larger than 1,000 acres without roads in all vegetation types.
- Occupied and/or critical habitat of threatened or endangered species or species proposed for listing.
- Designated conservation areas for sensitive or management indicator species.
- Occupied locations of endemic species.
- Lands impacted by high-severity fire effects to vegetation or soil.

Regarding the last criterion above, and as discussed below, logging and planting conifers for timber production in snag forests created by severe fire poses a different benefit-to-cost analysis from management of unburned forest with uneven-aged silviculture. Long-term losses of soil productivity resulting from synergistic fire and subsequent mechanical disturbances, as well as bypassing of nutrient cycling dynamics in self-organized systems through artificial planting, particularly where noxious weed spread is a risk, must be considered and analyzed in a timber suitability determination for fire-adapted forest lands (Perry et al. 1989, Perry et al. 1995, McIver and Starr 2000, Beschta et al. 2004, Lindenmayer et al. 2004, McIver and McNeil 2006, Lindenmayer et al. 2008). Even with landscape-scale fuel management intended to reduce the extent of high-severity fire effects to vegetation and soil, severe fire effects on timber suitable lands are reasonably foreseeable (Swetnam and Betancourt 1998, Grassino-Mayer and Swetnam 2000, Gedalof et al. 2005, Westerling et al. 2006, Littell et al. 2009). Therefore, we propose adding a caveat to any timber suitability designation for capable lands stating that forests affected by severe fire will be managed for natural recovery rather than for economic production.

(4) Wildlife

Regulations implementing NFMA require the Forest Service to determine "the suitability and potential capability of National Forest System lands for […] providing habitat for management indicator species." 36 C.F.R. § 219.20 (1982); *also see* DEIS at 261 ("In the 1982 Planning Rule Provisions, national forests are required to manage for viable populations of native and desired nonnative vertebrate species in the planning area (Sec. 219.19)"); 264-265 (management indicator species requirements and selection criteria); 265 ("Management indicator species are vertebrate or invertebrate species whose population changes indicate the effects of management activities included in plan components").

The Draft Plan would designate pronghorn antelope as the management indicator species ("MIS") for grassland vegetation communities and northern goshawk as the MIS for ponderosa pine forest. *See* DEIS at 266-267. Those grassland and forest potential natural vegetation types ("PNVT") together comprise just 256,015 acres (20.5 percent) of the 1,247,328-million-acre Prescott National Forest. *See id*. 37 (Table 3). The Draft Plan also would designate "aquatic macroinvertebrates (various species)" as MIS for aquatic habitat. *Id.* 267-268. Aquatic habitats comprise an estimated 863 acres of the national forest (USDA 1986: 95 (Table 26)).

The Draft Plan would not designate any MIS associated with the juniper grassland (137,274 acres), piñon-juniper evergreen shrub (463,296 acres), interior chaparral (315,445 acres), piñon-juniper woodland (36,263 acres) or desert (5,919 acres) vegetation communities. *Id*.; 38-39. There also appear to be 12,439 acres in a "Riparian Gallery Forest" PNVT for which no MIS is to be designated. *Id*. 38 (Table 4). The DEIS does not explain why the Forest Service

declines to identify MIS that would indicate management effects on nearly 80 percent of the national forest.

In contrast, the current 1986 Plan designates MIS for all major vegetation communities including Abert squirrel, pygmy nuthatch, turkey, hairy woodpecker, mule deer, plain titmouse, rufous-sided towhee and Lucy's warbler (USDA 1986: 95 (Table 26)); *also see id*. ("In cooperation with the Arizona Game and Fish Department, 19 terrestrial indicator species were identified to monitor the conditions of the environment. By establishing baseline population date for these species, resource managers can monitor the existence of the prescribed diversity standards needed to accomplish the Forest Plan"); 205 (describing MIS as "wildlife species whose presence in a certain location or situation at a given population level indicates a particular environmental condition. Population changes are believed to indicate effects of management activities on a number of other wildlife species"). In particular, the Forest Service considered mule deer and titmouse populations to be indicators of management effects of piñon-juniper habitats, mule deer and towhee as indicators of effects to chaparral habitats, and Lucy's warbler an indicator of riparian habitat (USDA 1986: 95 (Table 28). Furthermore, some MIS indicate specific seral states of vegetation communities. For example, Abert squirrel uniquely indicated early-seral ponderosa pine forest habitat, and pygmy nuthatch and turkey both indicated late-seral ponderosa pine forest conditions. *Id*. Only pronghorn antelope is considered an indicator of all seral stages in grassland habitats. *Id*.

The Southwestern Region of the Forest Service outlined five criteria and seven steps for selection of MIS in revised Forest Plans, none of which preclude selection in the Draft Plan of any of the species mentioned above (USDA 2010). The planning record should demonstrate that the Forest Service followed those procedures, one of which is to prepare a "MIS Report" documenting reasons for MIS selection (USDA 2010: 9). On May 14, 2011, the Prescott National Forest finalized a report titled *Management Indicator Species Selection Process* (USDA 2011b). It lists many potential MIS, including several that were not previously designated as MIS in the 1986 Plan, and concluded, "At day's end, there was consensus for selecting pronghorn, northern goshawk, and aquatic macroinvertebrates as the top three MIS. Turkey was considered as a possible alternative representing pine forest ecosystems" (USDA 2011b: 7). The report omits several species that are currently designated MIS in the 1986 Plan. It also fails to supply any factual reasoning or analysis supporting the "consensus" to designate three MIS as indicators of management effects on just ~20 percent of the national forest.

Furthermore, it is not clear how the Forest Service intends to maintain viable populations of the few species that the Draft Plan would designate as MIS. As explained *supra*, the Draft Plan would rollback existing mandatory standards and guidelines affecting management of ponderosa pine forest habitat of northern goshawk. Proposed "Guide-WL-7" states:

> Where goshawks exist:
>
> • A minimum of six nest areas (known and replacement) should be located per territory. Goshawk nest and replacement nest areas should generally be located in drainages, at the base of slopes, and on northerly (northwest to northeast) aspects. Nest areas should generally be 25 to 30 acres in size.

> • Goshawk post-fledgling family areas (PFAs) of approximately 420 acres in size should be designated surrounding the nest sites.
>
> • Human presence should be minimized in occupied goshawk nest areas during nesting season of March 1 through September 30.
>
> Management activities and human uses for which the Forest Service issues permits (excluding livestock permits) should be restricted within active nest stands during the active nesting period unless disturbance is not likely to result in nest abandonment.

Draft Plan at 70. The proposed guideline quoted above would replace current standards and guidelines that require home range establishment and limits on human activities in nest areas. *See* USDA (1996a: 91-92). It also supersedes current standards that require surveys to locate goshawks prior to habitat modifying activities, management for old age trees "such that as much old forest structure as possible is sustained over time across the landscape," and maintenance of satisfactory soil conditions. *Id*. 91. It further supplants existing guidelines calling for uneven-aged management of vegetation structural stages ("VSS") at multiple spatial scales and retention of minimum levels of canopy cover in VSS 4 (mid-aged), 5 (mature) and 6 (old) forests. *See id.* 92-93.

The existing standards and guidelines affecting management of northern goshawk habitat in the current Forest Plan originate from management recommendations of Reynolds and others (1992). The Forest Service adopted those recommendations in a 1996 Record of Decision ("ROD" – USDA 1996a) and Final Environmental Impact Statement ("FEIS" – USDA 1995) amending all Forest Plans in the Southwestern Region, including the Prescott National Forest. *See* FEIS at 24 ("Currently, the best guidelines we have for desired conditions for the distribution of structural stages are the goshawk guidelines. These guidelines recommend for a foraging area a vegetation structural stage distribution of 20% in early, 40% in mid and 40% in late structural stage). The Forest Service intended to provide wildlife habitat associated with herbaceous and shrub-dominated vegetation communities within a matrix of interspersed VSS patches:

> Some species totally depend on one or more of these cover types and respective vegetation structural stages (VSS), while others are casual uses. Regardless of the degree of use, it is important to maintain a diversity of cover types and vegetation structural stages across landscapes to sustain healthy wildlife populations and communities.
>
> This programmatic analysis of the alternatives is primarily based on three broad habitat characteristics that can be evaluated at the programmatic EIS level. These three wildlife habitat characteristics are cover type, vegetation structural stages (VSS), and forage production. Cover type and VSS represent the overstory characteristics of the habitat and forage production represents the understory. The structural stages are grouped by early, mid and late stages (VSS 1&2, VSS 3&4, and VSS 5&6, respectively).

Id. at 28-29. It accounted for environmental effects of implementing the Forest Plans on wildlife species that require "forage production" as a critical element of habitat. *See id.* 30. ("The alternatives that would produce the most forage, in decreasing order, are E, A, F, C, D and G. Since understory habitat is important for many of the non-TES wildlife species and there is a need to increase understory habitats" [sic]). The Forest Service carried forward that analysis into

the ROD (USDA 1996a) with the following management standard for goshawk habitat: "Sustain a mosaic of vegetation densities (overstory and understory), age classes and species composition across the landscape. Provide foods and cover for goshawk prey." In support of that standard, the ROD explicitly incorporated the *Management Recommendations for the Northern Goshawk in the Southwestern United States* (Reynolds et al. 1992), which state on page 15:

> We designed foraging areas consisting of forest conditions that would provide a high overall diversity and abundance of prey […] Sufficient prey habitats are provided so there is food to support goshawks in all seasons, especially during winter when fewer prey are available, and in years when prey populations are low due to factors such as drought or deep snow cover. Because no single species will be abundant enough to support goshawks, especially during the winter, habitats for all 14 prey species are provided.

In PFA, "prey habitat should be intermixed with dense hiding cover," and features of prey habitat in PFA include "small (<2 acre) openings in the tree canopy to produce herbaceous and shrubby foods for the herbivorous prey" (Reynolds et al. 1992: 15-16). Those "openings" constitute VSS 1. *See* ROD at 92 (defining VSS 1 as "grass/forb/shrub"). In forage areas outside of PFA, the Forest Service applied the management recommendations to provide for a diversity of habitat conditions required by goshawk prey species. *See* Reynolds and others (1992: 16-17) (summarizing "the importance of snags, downed logs, openings, large trees, herbaceous and shrubby understories, and interspersion of VSS to the selected prey species of the goshawk"). The management recommendations and the ROD amending the Forest Plans assumed that "Openings, and associated herbaceous and shrubby vegetation, provide important food and cover for a number of goshawk prey species." *Id.* at 17. The recommendations also acknowledge that "Interspersion measures the degree of intermixing of vegetation structural stages. Only the red squirrel responds negatively to interspersion of structural stages; its populations reach a maximum in unbroken old forests." *Id.* at 18. Recognizing the importance of "closed forests" to red squirrel and six other goshawk prey species, the management recommendations further state:

> [G]oshawk foraging habitat in the three forest types consists of forests with relatively open understories and large trees. Large trees are required for hunting perches, and openness provides opportunity for detection and capture of prey by goshawks. These forests have small to medium openings (<4 acres) and patches of dense mid-aged forests. Openings are scattered to:
>
> 1) enhance the availability of food and habitat resources of prey that use them, and
> 2) limit the effect of large openings on the distribution and abundance of prey species that use interior forests.

Id. According to the Forest Service, "Alternative G incorporates the needs of the Mexican spotted owl and northern goshawk. The science behind the needs are contained in two publications, 'Mexican Spotted Owl Recovery Plan' and 'Management Recommendations for the Northern Goshawk in the Southwestern United States' (GTR RM-217, 1992)." USDA (1995: 27). Therefore, the amended Forest Plans incorporating the recommendations discussed above provide for goshawk prey species with an assumption that approximately 20 percent of forests will consist of relatively open, early-seral vegetation, including created openings. The

Forest Service stated in NEPA analysis that intermixing of the six VSS classes, as prescribed by the amended Forest Plan standards and guidelines, will maintain viable populations of goshawk and its 14 prey species.

The DEIS does not address any prior scientific analysis or management recommendations relevant to viability of northern goshawk or prey species. It acknowledges that the raptor exhibits specialized habitat needs for its essential life histories and that it is present on the Prescott National Forest:

> Habitats – Northern goshawk nesting habitat consists of mature and old growth forest stands with relatively high canopy closure. The northern goshawk is associated with the ponderosa pine PNVTs and tree features for every aspect of its life history from nesting, to roosting, to foraging. Goshawks are known to occur on all three of the ranger districts of the Prescott NF including areas near Mingus Mountain, Camp Wood, Prescott Basin, and Crown King. Existing nesting habitat for this species is estimated at 50,489 acres, consisting of ponderosa pine stands with medium and large trees with open and closed canopies. Existing foraging habitat for goshawks includes approximately 3,522 acres of seedling/sapling and small trees with open canopies in both ponderosa pine PNVTs.

DEIS at 73; *also see id*. 79-80 (same); 79 (Table 16 indicates ~54,000 acres of occupied goshawk habitat); *id*. ("On the Prescott NF, six to eight sites were monitored from 2002 to 2005, with nine post-fledgling family areas … monitored in 2009"). The analysis further describes "risk factors" affecting northern goshawk:

> Primary threats to northern goshawks include activities that remove older, larger trees and simplify stand structure; removal of dead and down trees; and stand-replacement wildfire. Management concerns also include grazing that reduces or eliminates understory vegetation and human disturbance during nesting (Arizona Game and Fish Department, 1999).

Id.; *also see id.* 80 (same). And it identifies northern goshawk as a management indicator species associated with ponderosa pine forest:

> Northern goshawk was chosen as an indicator because it demonstrates a strong and/or predictable response to proposed management activities within the ponderosa pine PNVTs including prescribed fire; timber harvest; shrub and tree thinning/removal; and road and/or trail maintenance. By monitoring Northern goshawk habitats and populations, the health and productivity of ponderosa pine forest ecosystems can be assessed.

Id. at 78. The only specific mention in the DEIS of the management recommendations (Reynolds et al. 1992) that underlay the 1996 Forest Plan Amendments (USDA 1996a) is as follows:

> All 14 prey species listed for the northern goshawk in the "Management Recommendations for Northern Goshawks" (MRNG) (Forest Service, 1992) are associated with medium/large tree vegetative structural stages. Medium/large trees are important habitat components to 13 of the 14 prey species for maintaining sustainable populations. Canopy openings are important for maintaining sustainable populations for 8 of the 14 prey species listed in the MRNG. Herbaceous and shrub components are

> important for 13 of the 14 prey species. Ten of the 14 prey species listed in the MRNG are associated with early seral stages including seedling/saplings and small trees. All 14 prey species need an interspersion of vegetative structural stages to maintain sustainable populations.

Id. at 80. Notably, the analysis does not mention that one goshawk prey species, red squirrel, exclusively uses closed-canopy forest habitat, or that six of the 14 prey species exhibit life histories that need or prefer "closed forest" (Reynolds et al. 1992: 18). Indeed, the canopy cover guidelines in the existing 1986 Plan, as amended, exist to provide for the viability of "all 14 prey species" that associate with "medium/large tree vegetative structural stages," as well as goshawk itself:

> PFAs provide the young hawks with cover from predators, and sufficient prey to develop hunting skills and feed themselves in the weeks before juvenile dispersal. Thus, forests in the PFAs should contain overstories with a canopy cover greater than 50% and well-developed understories and habitat attributes (e.g., snags, nest trees, foods) critical in the life-histories of goshawk prey species.

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Reynolds et al. (1992: 14). The DEIS ignores the best available science regarding viability of goshawk and prey species, and concludes that reduced canopy cover will benefit those species:

> All alternatives would provide increases in the amount and quality of goshawk habitat available on Prescott NF lands. Over the next 20 years, additional nesting habitat for the goshawk would occur from increases in the abundance and distribution of medium to large trees growing within the ponderosa pine PNVTs. Proposed vegetation treatments (Objective-5) that reduce canopy closure and increase understory vegetation would improve habitat for goshawk prey species across the landscape. Improving these two facets of the goshawk habitat would be expected to have beneficial impacts to the species on the Prescott NF.
>
> For all of the alternatives, the various guidelines for sensitive species would be expected to maintain or improve tree features associated with goshawk habitat needs. Sensitive species guidelines include developing breeding season timing restrictions and other project design features to alleviate impacts from disturbance from timber harvest, prescribed burning, and other resource management activities.

DEIS at 85. The DEIS fails to explain its stated expectation that "additional nesting habitat for the goshawk would occur from increases in the abundance and distribution of medium to large trees."[1] Even if vegetation treatments successfully reduce tree density and improve growing conditions on all acres of ponderosa pine forest under Alternative B, large tree recruitment will be more limiting over time as chronic drought imposes widespread tree mortality (Diggins et al. 2010, Seager et al. 2007, Seager and Vucchi 2010, van Mantgem et al. 2009, Williams et al. 2010, Williams et al. 2012). The Draft Plan is not specific about proposed treatments in ponderosa pine forest habitat: it merely proposes managed fire, mechanical thinning and "habitat improvement" on up to 408,000 acres over 10 years.

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[1] The DEIS likewise fails to explain similar statements regarding effects of new management direction under the Draft Plan to habitat of Mexican spotted owl. *See* DEIS at 80-81.

In addition, the DEIS fails to explain its theory that proposed rollbacks of mandatory standards and guidelines affecting management of ponderosa pine forest would "improve" the viability of northern goshawk or its prey:

> Reducing canopy cover and increasing understory vegetation would improve habitat for goshawk prey species including small mammals and small birds across the landscape. Moving acres into the seedling/sapling and small tree vegetative structural stages would create an interspersion of structural stages across the landscape. The diversity of habitats associated with the assortment of vegetative features would support a greater selection of prey species. This would provide conditions supporting a full complement of prey species and habitat less susceptible to catastrophic fire and insect and disease impacts. By providing a diverse suite of prey species, the goshawk prey base would be more consistent and resilient to impacts from climate, disease, predation, and prey species population fluctuations.

DEIS at 86. The Forest Service previously stated in NEPA analysis that the 1986 Plan, as amended by the 1992 management recommendations discussed above, will maintain viable populations of goshawk and its 14 prey species by interspersing the six VSS classes with approximately 20 percent of ponderosa pine forest consisting of relatively open, early-seral vegetation including created openings (USDA 1995). The DEIS contains no explanation why the Draft Plan will accomplish viability better than the current 1986 Plan, as amended. Indeed:

> Alternative A continues the current management as directed in the 1986 plan. An estimated fivefold increase in prey species habitat (seedling/sapling and small tree with openings vegetation stages) would provide an increase in goshawk nestling condition, parental protection, and juvenile survival.
>
> *Implications for population trends* – The anticipated increase in acres and improvement in habitat quality for prey species would be expected to result in a positive population trend for the goshawk.

Id. at 86. The current 1986 Plan provides for viability of goshawk and its prey species. According to the DEIS,

> An estimated fivefold to sixfold increase in prey species habitat (seedling/sapling and small tree with openings vegetation stages) would provide a greater increase in goshawk nestling condition, parental protection, and juvenile survival than compared to alternative A.
>
> *Implications for population trends* – The larger increase in acres and more extensive improvement in habitat quality for prey species under alternatives B, C, and D would be expected to result in a more positive population trend for goshawk compared to alternative A.

Id. 87. At best, the proposed alternatives would increase prey species habitat from the "fivefold increase" expected with continued implementation of the 1986 Plan to "an estimated fivefold to sixfold increase in prey species habitat." The DEIS does not consider or disclose any reduction in habitat for goshawk or prey species that prefer closed-canopy or old forest structure.

NEPA Requirements

NEPA is "our basic national charter for protection of the environment." 40 C.F.R. § 1500.1(a). The statute "is intended to help public officials make decisions that are based on understanding of environmental consequences, and take actions that protect, restore, and enhance the environment." *Id*. at 1500.1(c). In light of these purposes and policies, the Forest Service must address and disclose threats to national forest lands that result from changes in climate and implications for natural resource availability for multiple uses over the life of the revised plan. *See* 42 U.S.C. § 4331(b) (federal agencies have a continuing responsibility to use all practicable means to "fulfill the responsibilities of each generation as trustee of the environment for succeeding generations.").

(1) Environmental impact statement

"NEPA requires federal agencies to prepare an environmental impact statement for any action that will significantly affect the environment." 42 U.S.C. § 4332(C). The EIS must consider (1) the environmental impact of the proposed action, (2) any adverse environmental effects which cannot be avoided should the proposal be implemented, (3) alternatives to the proposed action, (4) the relationship between local short-term uses of the environment and the maintenance and enhancement of long-term productivity, and (5) any irreversible and irretrievable commitments of resources which would be involved in the proposed action would it be implemented. *Id*. The EIS "ensures that the agency, in reaching its decision, will have available, and will carefully consider, detailed information concerning significant environmental impacts; it also guarantees that the relevant information will be made available to the larger [public] audience that may also play a role in both the decision-making process and implementation of that decision." *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 349, 109 S.Ct. 1835, 1845 (1989).

Forest plan standards and guidelines directly affect site-specific project design and indirectly affect implementation of project-level activities. *See* 36 C.F.R. § 219.3(b) (1982); Forest Service Handbook ("FSH") 1909.12.11.13 and 1909.12.11.16 (W.O. Interim Directive No. 1909.12-2008-2, Nov. 17, 2008). Plans governing subsequent actions are environmentally meaningful decisions and result in effects that must be considered and disclosed under NEPA. *See Idaho Conservation*, 956 F.2d at 1516; *Salmon River Concerned Citizens v. Robertson*, 32 F.3d 1346, 1355 (9th Cir. 1994); *Resources Ltd. v. Robertson*, 35 F.3d 1300, 1303 (9th Cir. 1994).

(2) Purpose and need

The EIS must clearly state and justify a purpose and need for changing the existing forest plan, as amended, including reasons why current direction is inadequate to meet desired conditions and objectives. *See* 40 C.F.R. § 1502.13; *also see* 36 CFR § 219.12(b) (1982). The *Ecological Sustainability Report* (USDA 2009) notes several changes in ecological conditions post-dating adoption of the current 1986 Plan, several of which were addressed by the 1996 Forest Plan amendments (USDA 1996a). Changes that now merit consideration in plan revision include consequences of climate change, altered fire regimes, impaired soil productivity, reduced

water availability, wildlife population viability, and the collapse of an integrated forest products industry whose existence is necessary to justify management of timberlands as "suitable" for sustained yield of wood products, among other factors. The DEIS does not specifically consider impaired soil and vegetation conditions that result from livestock grazing and climate change, nor does it factor climate effects on water availability, range capability or tree growth.

(3) Alternatives

The alternatives section is the "heart" of an EIS. 40 C.F.R. § 1502.14; *see also* 42 U.S.C. § 4332(2)(E). Even as it considers and analyzes foreseeable impacts of the proposed action, the Forest Service must "[r]igorously explore and objectively evaluate all reasonable alternatives." *Id*. at § 1502.14(a); *see also* 36 C.F.R § 219.12(f) (1982). The EIS must present environmental impacts of the proposed action and reasonable alternatives "in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision-maker and the public." 40 C.F.R. § 1502.14. The NEPA process must "identify and assess the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the human environment." *Id*. at § 1500.2(f).

The Forest Service should consider and fully analyze environmental impacts of an action alternative that responds to changes in global and regional climate due to increasing atmospheric concentrations of greenhouse gases (Alley et al. 2007, Clark and Weaver 2008). Climate change will have significant if uncertain indirect and cumulative impacts to national forest lands and resources over the life of the revised Forest Plan, regardless of what course of action the Forest Service selects (Seager and Vucchi 2010, Williams et al. 2012).

At a minimum, one reasonable alternative should provide a substantial increase in protection for plant and animal species that exist on national forest lands responding to scientific uncertainty regarding the magnitude of climate change impacts on habitat and water availability. NFMA requires provision for the diversity of plant and animal communities based on the suitability and capability of the land. 16 U.S.C. § 1604(g)(3)(B). Scientists including Forest Service researchers acknowledge climate change as a key threat to biodiversity (Malcom et al. 2006, Matthews et al. 2004). Due to uncertainties regarding impacts of climate change on biodiversity, and the clear mandate of NFMA to provide for diversity, the Forest Service must consider and fully analyze an action alternative that errs on the side of ecological caution (a "no-regrets strategy") by managing national forest lands as a safe harbor and refuge for fish and wildlife, even at the expense of competing multiple use activities, such as programmed livestock grazing, timber production or motorized recreation. None of the alternatives considered in the DEIS reflect this proposed course of action. All of them consider the same acreage to be "suitable" for livestock grazing despite significant new information that invalidates analysis carried forward from the 1980s. All of them would maintain the existing transportation network. And all of the alternatives, other than Alternative A, would remove protective standards and guidelines for wildlife. The range of alternatives in the DEIS is not adequate to meet NEPA.

(4) Affected environment

The EIS must "describe the environment of the area(s) to be affected or created by the alternatives under consideration." 40 C.F.R. § 1502.15. This should include, at a minimum:

- Analysis of population and habitat status, distributions, and trends of threatened, endangered, proposed, sensitive, and management indicator species that use or depend on national forest lands.

- Analysis of ecological conditions in rivers, perennial and intermittent streams, wetlands, and other aquatic ecosystems on national forest lands, as well as implications for viability and recovery of associated fish and wildlife.

- Quantitative and spatially-based discussion of the extent, distribution, and structural qualities of remaining old growth forest (see discussion below regarding old growth definition).

- Quantitative and spatially-based discussion of the extent, distribution, and impacts of noxious weed spread.

- Quantitative and spatially-based assessment of the forest transportation network and its impact on physical, chemical, and biological forest properties and processes including watershed function, water quality, habitat connectivity, and wildlife viability.

- Quantitative and spatially-based analysis of livestock grazing allotments and direct, indirect and cumulative impacts of past and ongoing range management on physical, chemical, and biological forest properties and processes including soil productivity, vegetation communities, fire regime, water quality, and wildlife viability.

- Qualitative discussion of direct, indirect and cumulative impacts of suppressing unplanned fire ignitions on physical, chemical, and biological properties and processes including forest structure and composition, fire regime, soil productivity, water quality, and wildlife viability, as well as to worker safety.

- Quantitative and spatially-based analysis of past timber management and the extent, distribution and magnitude of impacts to forest structure and composition, fire regime, soil productivity, and wildlife viability.

No portion of the planning record, including the DEIS, contains the information described above. It appears that the Forest Service is working toward a patently uninformed decision affecting management of all resources in the Prescott National Forest for at least the next decade.

A. Climate change

In assessing and describing the affected environment, the Forest Service must consider and disclose the degree to which climate change affects national forest lands and resources.

Climate change likely will have significant if unknown effects on biodiversity, forests and water availability (Malcolm et al. 2007, Millar et al. 2007). It already has begun to influence the survival, abundance and distribution of forest vegetation at community and landscape scales in the southwestern United States (van Mantgem et al. 2009, Williams et al. 2012). Anticipated temperature increases that are "locked in" due to existing atmospheric greenhouse gas concentrations may shift the geographic range of some forest species and undercut the viability of others (Jones et al. 2009, Stephenson et al. 2006).

One implication of this phenomenon is that ecological restoration activities oriented to reference conditions based solely on historic ranges of variability ("HRV") may not be appropriate or sustainable (Flannigan et al. 2000, Frederici 2003, Johnson and Duncan 2007). Indeed, climate change, landscape fragmentation, and noxious weed invasions preclude forest ecosystems from realizing settlement-era structural or compositional patterns even with active restoration that intends to re-create an HRV in ecosystem structure, composition or disturbance regime (McGlone et al. 2009, Noss et al. 2006). Johnson and Duncan (2007) proposed updating the HRV concept to a "future range of variability" that accounts for inevitable ecological change as disturbance regimes and vegetation pattern track climate. Understanding how ecosystems adapt to climate over longer timescales than are commonly used in an HRV-focused approach can inform management strategies that support adaptation to uncertain future conditions imposed by changes in climate and landscape pattern (Choi et al. 2008, Stephenson et al. 2006).

The future range of conditions that would sustain adapted ecological functions and biological diversity, including an active fire regime, would constitute appropriate "reference conditions" that frame goal setting and "desired conditions" (Falk et al. 2006). Explicitly framed reference conditions account for desired forest structure, composition and function at multiple spatial and temporal scales help to (1) determine what factors cause ecological degradation, (2) identify what needs to be done to restore an ecosystem, and (3) inform criteria that measure success of restoration treatments (SER 2004).

B. Fire ecology

Climate change affects the extent and severity of wildland fires (Westerling et al. 2006). Increased frequency, extent and severity of unplanned fires may attend climate warming and drought (Gedaloff et al. 2005, Running 2006, Littell et al. 2009). The EIS must assess more than the degree of fire regime departure from a narrowly-defined historical condition ("fire regime condition class") and disclose implications of climate change on wildland fire effects and management options in the future. Natural fire process is centrally important to restoration of ponderosa pine and mixed conifer forests (Allen et al. 2002, Cortina et al. 2006, Falk 2006, Fischer et al. 2006). The active function of natural fire process in the future can regulate ecosystem structure and composition to "re-establish a new dynamic equilibrium" and track climate effects on vegetation and landscape pattern in real time (Falk et al. 2006:142). The EIS should disclose the specific need for proposed "restoration treatments" other than managed fire.

C. Aquatic ecosystems

The Forest Service should disclose in the EIS what it knows about the existing condition of aquatic ecosystems and associated species on national forest lands, particularly at-risk fish and amphibians, as well as their food resources. The Forest Service must take a hard look at the success or failure of the existing Forest Plan and so-called "best management practices" at meeting statutory and regulatory requirements to provide for fish and aquatic wildlife. The agency also must take a hard look at the success or failure of the existing Forest Plan at meeting statutory and regulatory requirements to provide for water quality, fisheries and wildlife species.

(5) Environmental consequences

The "environmental consequences" section of an EIS "forms the scientific and analytic basis" for the comparison of alternatives. 40 C.F.R. § 1502.16. This discussion must include "the environmental impacts of the alternatives including the proposed action, any adverse environmental effects which cannot be avoided should the proposal be implemented, the relationship between short-term uses of the environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources which would be involved in the proposal should it be implemented." *Id*. This section must include discussions of both direct and indirect effects and their significance, along with the environmental effects of the alternatives. *Id*.; *also see* 36 C.F.R. § 219.12(g) (1982). The level of detail in an EIS may depend on the nature and scope of the proposed action (*see California v. Block*, 690 F.2d 753, 761 (9th Cir. 1982)), but must provide sufficient detail to foster informed decision-making. *See Citizens for Better Forestry v. U.S. Dep't of Agriculture*, 481 F. Supp. 2d 1059, 1086 (N.D. Cal. 2007). An EIS must include a "reasonably thorough discussion of the significant aspects of the probable environmental consequences." *N. Alaska Envtl. Ctr. v. Lujan*, 961 F.2d 886, 890 (9th Cir. 1992) (quoting *Block*, 690 F.2d at 761).

Forest Plan revision will result in an actual, physical effect on the environment. *Citizens for Better Forestry v. U.S. Dept. of Agriculture*, 341 F.3d 961, 973 (9th Cir. 2003). Lowering or repealing environmental standards in a Forest Plan will result in lesser or no environmental standards at the site-specific project level. *Id*. at 975. Pursuant to NEPA, the Forest Service must analyze and disclose the direct, indirect and cumulative environmental effects of the action.

A. Fish and Wildlife

The 1982 NFMA regulations provide for the persistence of fish and wildlife on national forest lands. They require the Forest Service to manage fish and wildlife habitat to maintain viable populations of existing fish and wildlife species. *See* 36 C.F.R. § 219.19 (1982). In order to ensure viable populations, the agency must provide for a minimum number of reproductive individuals and the habitat required for well distributed individuals to interact with others in the planning area. *Id*. Moreover, in order to estimate potential effects on fish and wildlife populations, the Forest Service must identify MIS and monitor their population trends. *Id*. Additional protection is required for threatened and endangered species and their habitats. *Id*.

The revised Forest Plan must apply the 1982 viability requirement as a starting point to develop mandatory protections for fish and wildlife species that exist on national forest lands.

To be useful and meaningful, the Forest Service's analysis of the environmental consequences of the proposed action should explicitly apply the viability requirement of the 1982 planning rule.

The Forest Service indicates in the Draft Plan and the *Ecological Sustainability Report* ("ESR" – USDA 2009) that it will attempt to meet its obligations to ensure fish and wildlife viability by managing habitat at broad spatial scales. The ESR proposes a novel "screening" process and avoids focused analysis of particular fish and wildlife species, their populations, and prospects for viability or recovery. A "species diversity focus group" of agency personnel and certain invited stakeholders applied unspecified methods of unknown efficacy and without scientific justification to "screen" species from detailed analysis based on "known occurrences," presumed habitat associations, and other factors. A careful reader of the ESR cannot determine from the information provided what terrestrial vertebrate species are present on the Prescott National Forest, let alone how any were selected for "risk analysis," or how the "desired conditions" and "design criteria" presented in the Draft Plan may affect any vertebrate species or critical habitats.

According to the ESR, if the Forest Service associates a group of species with a specific "ecosystem diversity characteristic," then risk to those species is assumed to be the same as risk for that potential natural vegetation type ("PNVT"). The PNVT concept invoked here as a proxy for viable fish and wildlife populations evolved from Kuchler (1964), which assumes that plant community succession is a unidirectional process leading to an equilibrium or steady-state condition in the absence of disturbance. Kuchler's (1964) plant ecology model merits skepticism because so-called "climax" conditions do not exist in reality. Fire is an intrinsic natural disturbance process in most vegetation communities on the Prescott National Forest that influences plant adaptations to abiotic environmental conditions and destabilizes community succession patterns at variable and unpredictable spatial and temporal scales. The arbitrarily selected successional trajectory assumed to develop without disturbance is unverifiable conjecture that has never been tested by observation. Foresters sometimes claim that current conditions in fire-adapted forests display successional development trending toward climax, and this presumption often informs site-specific proposals to manage vegetation. However, plant species respond individualistically to environmental conditions, creating irregular gradients in floristic communities over space and time (Gleason 1937, Whittaker 1975, White 1979). Communities simulated by PNVT are "the same" only in the sense that they are arbitrarily categorized as such, not because they are identical in species composition or physiognomy at any particular scale. Use of PNVT as a proxy for viability of individual species or groups of species in a revised forest plan therefore would be subject to significant scientific uncertainty.

Furthermore, spatial distribution of PNVT should be field verified and mapped with a high degree of precision and then monitored continuously if it is to factor into Forest Service analysis as a proxy for fish and wildlife viability. Professional opinion of agency workers is not a sufficient basis to revise the forest plan relying on PNVT for this purpose. As vegetation communities change over time, succession and growth dynamics should be accounted for using widely available models combined with field evaluations. Vegetation communities intermix at fine scales as interactions among plants vary between sites and over time. Nevertheless, it is reasonable to expect that individual plant species in a given area will experience optimal development under site conditions of moisture and nutrient availability consistent with their

unique life history characteristics (Barnes et al. 1988, Minore 1979). Recognition of gradients in floristic composition and disturbance regime at multiple scales yields more defensible characterizations of the environment than arbitrary attempts to distinguish PNVT as a monolithic "ecosystem diversity characteristic" subject to generic "desired conditions," especially where plant associations intermix on transitional slope aspects (White 1979).

The Forest Service's proposed use of a habitat-proxy approach to managing target species has rarely been tested in any context (Martino et al. 2005). Lawler and others (2003) compared the ability of seven indicator groups (freshwater fish, birds, mammals, freshwater mussels, reptiles, amphibians, including at-risk species of those taxa) to provide protection for other species in the Middle Atlantic region of the United States. No taxonomic group provided protection for more than 58% of all other at-risk species (Lawler et al. 2003 – Table 2). This failure to cover at-risk species through a taxon-based or habitat-proxy approach is linked to their rarity. Species with more restricted ranges are less likely to be protected by management of habitat at taxonomic scales than more widespread species. Lawler and others (2003) found that at-risk species themselves performed relatively well as an indicator group, but still covered an average of just 84% of other species. "The test for whether the habitat proxy is permissible … is whether it reasonably ensures that the proxy results mirror reality." *Gifford Pinchot Task Force v. U.S. Fish and Wildlife Serv.*, 378 F.3d 1059, 1066 (9th Cir. 2004). In addition to this overlap problem and uncertainty regarding the effectiveness of a target species approach to conserving ecosystem diversity in general, and species population viability in particular, other sources of uncertainty in the Forest Service's screening approach also must be accounted for in its wildlife risk analysis, including: (1) species-specific habitat association assumptions, (2) validity of potential natural vegetation modeling discussed above, and (3) cumulative effects of nonfederal activities. Examples of the latter consideration include competition from and genetic impacts of non-native and hatchery fish, and habitat conditions on state and private lands, which generally are inadequate to support well-distributed and robust populations of fish and wildlife.

Consultation with the U.S. Fish and Wildlife Service on effects of the revised Forest Plan to federally-listed species will partially address uncertainty regarding habitat proxies and contribute to adaptive management that can help forestall extinctions and support population viability and recovery as climate change alters habitat availability and suitability (Schultz 2008). The Center suggests that the Forest Service avoid grouping endangered, threatened, sensitive and indicator species with more common or less specialized animals in an analysis that uses "ecosystem diversity characteristics" as a proxy for population viability. The ESR and its factual presentation of the basis for this habitat-proxy approach lacks basic information about what species exist on the Prescott National Forest, what their habitat requirements are, or how management may affect their recovery or viability.

The 1982 NFMA regulations also require the Forest Service to prepare "regional guides" for each Forest Service region to "provide standards and guidelines for addressing major issues and management concerns which need to be considered at the regional level to facilitate forest planning." 36 C.F.R. § 219.8(a) (1982). This provision of the 1982 regulations was eliminated by the Forest Service's attempts in 2000, 2005 and 2008 to revise the NFMA regulations.

> The 1982 Planning Rule Provisions at 219.12(f)(6) require land management plans to respond to and incorporate the Renewable Resource Planning Act of 1074 (RPA) (P.L.

> 93-378) program objectives for each national forest as displayed in regional guides. There is no longer a regional guide for the Southwestern Region. This was withdrawn as required by the 2000 Planning Rule (Section 219.35(e)). The last RPA Program was developed in 1995. In lieu of the RPA Program, the "USDA Forest Service Strategic Plan FY 2007-2012" (Forest Service, 2007a) provides broad overarching national guidance for land management planning and national objectives for the Agency as required by the Government Performance Results Act of 1993 (P.L. 103-62). All of the alternatives in this EIS address these broad strategic objectives.

DEIS at 27. The Forest Service must disclose in the EIS the content of its national-scale "strategic plan," and explain why the agency now considers it adequate to meet the requirements of the NFMA and RPA. It also should disclose potential consequences to migratory species that need to be considered and addressed at the regional level, and were excluded from selection as MIS specifically because they are migratory.

The Draft Plan would remove many standards and guidelines affecting management of habitat for federally-listed and sensitive wildlife species, old growth forest and livestock grazing. Removal of binding standards for wildlife management in the Draft Plan can be viewed as a negative effect on species that the DEIS fails to disclose. The plan revision will result in an actual, physical effect on the environment. *Citizens for Better Forestry v. U.S. Dept. of Agriculture*, 341 F.3d 961, 973 (9th Cir. 2003). Lowering or repealing environmental standards in a Forest Plan will result in lesser environmental standards at the site-specific level. *Id*. at 975.

B. Old Growth Forest

Past timber harvest destroyed nearly all ponderosa pine and mixed conifer old growth forests throughout Arizona and New Mexico, where regeneration silviculture and fire exclusion established even-aged forest lacking structural diversity and adapted ecological functions (Covington and Moore 1994). Old growth forests differ functionally from younger forests in the habitat they offer to wildlife, carbon storage, water filtration and flow regulation and nutrient cycling (Covington 2003, Kaufmann et al. 1992). The ecological significance of old growth featuring large trees is amply documented, whereas a scientific basis for logging large trees in pursuit of forest health or fire management objectives generally is lacking (Friederici 2003).

The persistence of large trees that survived past fires is a key barometer of ecological health and fire resilience in ponderosa pine and mixed conifer forests (Arno 2000).[2] Large trees possess autecological characteristics including relatively thick bark and insulated buds that resist heat injury (Weaver 1951). Self-pruning mature ponderosa pines also feature tall branch structure, which discourages torching (Keeley and Zedler 1998). Large ponderosa pines, in particular, have a high capacity to survive and recover from crown scorch (McCune 1988). Shade provided by a closed canopy in large tree clumps and groups shields the ground surface from direct solar radiation, reduces ground temperature and horizontal wind speed, and increases ambient relative humidity as well as fuel moisture compared to relatively open stands

[2] A size threshold of 16-inches diameter at chest height consistently defines "large" trees in the literature on ponderosa pine and mixed conifer forests in the planning area (Abella et al. 2006, Friederici 2003, Hampton et al. 2007).

(Amaranthus et al. 1989, Countryman 1955). Thus, the existence of large tree structure where it enhances ecosystem fire resilience, particularly where fire effects to vegetation and soil are relatively severe (Arno 2000, Pollett and Omi 2002). Indeed, conservation of large trees is fundamentally important to restoration of fire-adapted forest ecosystems (Brown et al. 2004, DellaSala et al. 2004). Furthermore, large trees supply critical habitat for a number of threatened, endangered, proposed, candidate, sensitive and indicator species.

The species viability requirement of the 1982 planning regulations require the Forest Service to adopt quantitative standards in Forest Plans that protect old growth forests and associated wildlife, including northern goshawk and Mexican spotted owl, as currently exist in the amended Forest Plans (USDA 1996a). The Game and Fish Departments of Arizona and New Mexico jointly commented to the Forest Service, "The conservation of spotted owl and goshawk habitats is closely related to the conservation of old growth forest ecosystems" (USDA 1996a: 8). Any change to existing standards and guidelines must include analysis of impacts to old growth forest and associated species, including how the Forest Service will satisfy the NFMA diversity requirement and ESA prohibition against species jeopardy.

Old growth forest habitat already has been identified by the Forest Service in past planning efforts as a significant issue for comparison of alternatives in NEPA analysis. The EIS should provide a scaled analysis of the current status and projected future structure, composition, extent and distribution of old growth forest in the planning area and compare effects of management alternatives on this basis. The Center strongly recommends deferral of <u>all</u> old growth forest currently meeting standards and guidelines as VSS 6 from active management. Such deferral would apply a process-centered approach to restoration in old growth ecosystems emphasizing use of naturally-adapted fire disturbance, rather than a structurally-oriented approach that presumes to replicate spatial patterns of old growth that may have existed at any given time in history (Falk et al. 1996).

The revised Forest Plan also should include standards and guidelines that require assessment and designation of old growth habitat at site, watershed, and ecosystem scales, and allow management treatments within identified old growth only to enhance old growth characteristics, such as primary ecological functions mediated by fire. Standards and guidelines should specifically address the problem of fragmentation of old growth habitat caused by past even-aged timber management and road construction, and apply spatially-explicit analysis demonstrating that functional old growth ecosystems will be sustained over time under any chosen management alternative. We recommend, consistent with the position of the state Game and Fish Departments presented above, that the revised Forest Plan should contain goals and standards for maintaining and developing well-defined blocks of old growth forest in each project-level assessment area, in each Ranger District, and throughout the national forest to insure a broad spatial distribution of old growth ecosystems across the landscape.

C. Impacts of Eliminating or Revising Prior Standards

The 1982 planning regulations include a number of mandatory and quantitative standards referred to as "management requirements," including numeric limits on the size of management-created forest openings and stream side buffers. 36 C.F.R. § 219.27 (1982); *also see* 16 U.S.C. §

1604(g)(3). If any of these standards would be eliminated or changed in a revised forest plan, the EIS must assess environmental impacts, including potential jeopardy to ESA-listed species and/or violation of state or federal water quality standards. The Forest Service must analyze the proposed action and alternatives in relation to existing standards and guidelines, and fully consider the purposes for which the agency initially adopted the standards and guidelines that it now proposes to repeal. In proposing new guidelines, the Forest Service also proposes to eliminate, replace, or revise previous direction for site-specific management, and this requires specific justification.

(i) Northern goshawk and prey species

The Draft Plan omits standards and guidelines affecting management of ponderosa pine forest habitat of northern goshawk, a sensitive species. Two environmental impact statements on forest planning in the Southwestern Region have based action alternatives on those standards and guidelines which the Forest Service now chooses to disregard (USDA 1995, 2006). In those analyses, the agency established and defended a habitat-proxy relation of ponderosa pine forest structure and the viability of northern goshawk and 14 of its vertebrate prey species.

Under the Draft Plan, forest managers merely would be invited to consider that they "should" locate nest areas and PFA in site-specific projects, retain reserve trees, and minimize human presence in the nesting season. *See* Draft Plan at 70. It contains no quantitative standards and guidelines for retention ponderosa pine forest structure. It does not even require surveys to determine goshawk presence or establish home ranges prior to habitat modifying activities. The Forest Service continues in the DEIS to affirm that ponderosa pine forest habitat and prey availability affect goshawk populations, but as explained *supra*, it sweeps under the rug its own prior analyses of relevant science calling for management of habitat as a proxy for viability of northern goshawk and 14 prey species (USDA 1996b, 2006).

Scientific uncertainty and controversy persist regarding the validity of habitat-proxy assumptions, and the Center consistently has raised this issue in comments on site-specific project proposals. In our view, even if forest managers were required (rather than merely invited) by a revised Forest Plan to locate nest areas and PFA within known goshawk territories, this direction by itself would not insure the viability of goshawk or the 14 prey species, particularly those whose preferred habitats and adapted life histories are closely associated with mature and old growth forest structure including closed canopies at multiple spatial scales (Beier et al. 2008, Reynolds et al. 1992). Nor would it provide for dispersing juveniles that establish new nesting areas because the Forest Service no longer would require pre-disturbance surveys.

D. Impacts of Multiple Uses on Climate Change

The Intergovernmental Panel on Climate Change, made up of over 1,000 scientists from over 100 countries, recently concluded that it is "very likely" (90 percent probability) that human activities are the main cause of global warming (Alley et al. 2007). Potential environmental consequences that may be caused by climate change are highly significant (Malcolm et al. 2007, Millar et al. 2007, Seager et al. 2007). In its EIS on the plan revision, the Forest Service must assess and disclose the potential contribution of multiple resource uses and management

activities that may contribute to or compound ongoing changes to the regional and global climate system including, but not limited to: (1) groundwater extraction; (2) surface water diversions and withdrawals; (3) continued use of existing roads and trails; (4) development of new roads and trails; (5) livestock grazing; (6) fire and fuel management; (7) minerals development; (8) logging; and (9) spread of invasive species.

Forests are the most significant terrestrial stores of carbon, and in fact may slow global warming by storing and sequestering carbon. "Forest plants and soils drive the global carbon cycle by sequestering carbon dioxide through photosynthesis and releasing it through respiration." *See* Union of Concerned Scientists, "*Recognizing Forests' Role in Climate Change*," www.ucsusa.org. Through photosynthesis, plants capture carbon dioxide and convert it to plant matter that then feeds the base of the entire planetary food chain (Heiken 2009). Old-growth forests are able to store massive amounts of carbon in their trunks as well as in the soil (Luyssaert et al. 2007). When forests are degraded or logged in timber sales or fuel reduction projects, their stored carbon is released back into the atmosphere during harvest and through respiration, thus becoming net contributors of carbon to the atmosphere (North et al. 2009).

Forest management can help to mitigate global warming in at least two key ways: (1) conserving existing forests to avoid emissions associated with forest degradation or clearing; and (2) sequestration by increasing forest carbon absorption capacity primarily by planting trees or facilitating the natural regeneration of forests (North et al. 2009). In other words, to help our forest store more carbon, and thereby alleviate the leading cause of global warming, we need to let forests grow. The Forest Service must consider and disclose the potential environmental consequences and climate change implications resulting from any anticipated continued commercial harvest of timber.

The Forest Service must also consider the synergistic effects of livestock grazing and climate change on forest resources. A recent report from the Food and Agriculture Organization of the United Nations found that livestock are responsible for eighteen percent of greenhouse gas emissions, representing a larger share than that of transport. *See* Steinfeld, H.; Gerber, P.; Wassenaar, T.; Castel, V.; Rosales, M.; Haan, C., "*Livestock's Long Shadow, Environmental Issues and Options*," (2006). Livestock grazing is widespread on national forest lands, and grazing intensifies effects of climate change (Beschta et al. 2012). The DEIS only addresses effects of mechanical treatments, prescribed fire, fence relocations, water developments, "habitat improvement," recreation and private land activities to vegetation (45-62), wildlife (80-88), watersheds (95-101), riparian areas (102-104), water quality (105-106), resilience (107-109) and aquatic species (140-156). It mentions in passing that livestock grazing occurs on the Forest (*id*. 95-96) and that it degrades water quality. *Id*. 106 ("On the Prescott NF, the largest contributors to water quality degradation in clued past mining activities, livestock grazing, roads, and ground disturbances created by inappropriate and illegal OHV use such as cross-country travel and motorized use of nonmotorized trails. There is no change from current management direction proposed for mining or livestock grazing in any of the alternatives that were considered in detail"); *id*.("[T]here are also risks to water quality associated with agricultural uses such as accelerated erosion, increased sediment, or biological contamination from livestock grazing in riparian areas"). Grazing also occurs in critical habitat of southwestern willow flycatcher, loach minnow and spikedace. *Id*. 131-132. No other specific mention of livestock grazing occurs in

discussion of environmental consequences. Specific details about consequences including context and intensity are lacking.

Fire is a fundamental component of Earth's natural carbon cycle, with a functional role that pre-dates human existence. Ecosystems on national forest lands are adapted to the active functioning of natural fire process. In those ecosystems, fire exclusion may not yield long term reduction of greenhouse gas emissions compared to re-establishment and maintenance of a functional fire regime (AFE 2009). Prescribed burning is a risk-reduction management tool that can be used to mitigate undesirable impacts of unplanned wildfires. Carbon emissions from prescribed burning typically are much lower than those stemming from unplanned wildfires (AFE 2009). Therefore, the Forest Service should consider and disclose benefits and potential liabilities of using prescribed fire at broad spatial scales to reduce risk, provide ecosystem services and regulate greenhouse gas emissions from forest management activities.

ESA Requirements

The Draft Plan will affect threatened and endangered plants and animals. Therefore, the Forest Service is obligated to consult with the FWS to ensure that plan revision "is not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of [critical] habitat of such species." 16 U.S.C. § 1536(a)(2); 50 C.F.R. § 402.14(a). Revision of standards and guidelines for management of Mexican spotted owl, for example, may result in jeopardy to the bird and/or adverse modification of critical habitat. This would be especially likely if the revised Forest Plan fails to implement (rather than merely reference) the applicable Recovery Plan. Prior amendments to Forest Plans, including the Prescott National Forest, included standards and guidelines for spotted owl habitat (USDA 1996a) and underwent formal ESA consultation to verify that no jeopardy to the bird or adverse modification of critical habitat would result (USDI 1996b). The Ninth Circuit Court of Appeals holds that Forest Plans are subject to ESA consultation if they "may affect" listed species. *Pacific Rivers Council v. Thomas*, 30 F.3d 1050, 1051-52 (9th Cir. 1994); *Citizens for Better Forestry*, 481 F. Supp. 2d at 1095 ("The Ninth Circuit has undeniably interpreted ESA to require consultation on programmatic actions and rules, including consultation at the planning stage, not just the site-specific stage.").

Need for Change

(1) Climate

Abrupt climate change is imminent or underway in the southwestern United States (Cook et al. 2008, Seager et al. 2007, Seager and Vucchi 2010, Williams et al. 2012). It is caused primarily by the release of greenhouse gases (*e.g.*, carbon dioxide ("CO^2")) as humans burn fossil fuels, and it is likely to accelerate if fossil fuel consumption is not substantially reduced (Alley et al. 2007). Climate changes historically alter forests (Whitlock et al. 2003, Williams et al. 2012) and inevitably will cause further changes through the direct responses of trees to altered temperature and moisture, and indirectly by shifting natural disturbance regimes, which can be expected to increase in extent, duration and severity (Bachelet et al. 2007, Dale et al. 2001, Field et al. 2007, Running 2006, Westerling et al. 2006). Some changes may prove beneficial to

human utilitarian values, but many will adversely affect nutrient cycling, soil productivity, water flows and biological diversity. Early actions taken to mitigate climate change or adapt to it will be more beneficial than later efforts.

Forests will be affected by climate change, but they also may help to mitigate it. Forests influence the rate and extent of climate change by absorbing CO2 from the atmosphere and storing it in wood and soils, or by releasing CO2 to the atmosphere (Barnes et al. 1998). CO2 is released whenever land is converted to nonforest uses or disturbed by logging, burning, or outbreaks of insects and disease (Luyssaert et al. 2007). All forests both absorb and release CO2, and the relative balance between the two processes determines whether a forest is a source or sink of CO2. Forests are not the solution to the potential threat of runaway and catastrophic climate change, but they can make important contributions. They will be most effective in mitigating emissions in the near term (*i.e.*, the next decade or two, or the approximate life of the revised Forest Plan), which climate scientists have identified as a crucial period if catastrophic climate changes are to be avoided at a global scale (Clark and Weaver 2008, Hansen 2008).

The most important thing forest managers can do to mitigate climate change is to protect large trees and old growth forest from timber harvest and associated soils from mechanical disturbance (Carey et al. 2001, Luyssaert et al. 2007, Paw U et al. 2004). Preservation of what little old growth forest remains may have a larger effect on atmospheric carbon cycles than promotion of regrowth (Schulze et al. 2000). Although increased atmospheric concentrations of CO2 may, under certain conditions, enhance rates of photosynthesis, tree growth, and soil carbon storage (Houpis et al. 1999, Xu et al. 2009), prolonged and intensified drought conditions likely to prevail in the foreseeable future (Seager et al. 2007) also may limit ponderosa pine recruitment (Savage et al. 1996). “There remains uncertainty in how strong the projected drying in the Southwest will be, an uncertainty that includes the possibility that it will be more intense than in the model projections” (Cook et al. 2008:199-200; *also see* North et al. 2009). Therefore, removal of large, mature or old growth trees may constitute an irretrievable commitment of resources.

North and others (2009) compared fuel treatment effects on carbon stocks and releases in replicated plots before and after treatment, and against a reconstruction of stand conditions for the same forest in 1865. Total live tree carbon was substantially lower in modern fire-suppressed conditions (and all of the treatments) than the same forest under an active fire regime. Although fire suppression has increased stem density, current forests have fewer very large trees, reducing total live tree carbon stocks and shifting a higher proportion of those stocks into small-diameter, fire-sensitive trees. Thinning followed by prescribed burning released 70% more carbon into the atmosphere than prescribed burning alone and contributed significant additional emissions in subsequent milling waste of wood products. All treatments reduced fuels and increased fire resistance but most of the gains were achieved with understory thinning with only modest increases in the much heavier overstory thinning. North et al. (2009) suggest modifying current treatments to focus on reducing surface fuels, actively thinning the majority of small trees, and removing only fire sensitive species in the merchantable, intermediate size class. These changes would retain most of current carbon pool levels, reduce prescribed burn and potential future wildfire emissions, and favor stand development of large, fire-resistant trees which can better stabilize carbon stocks.

(2) Aquatic ecosystems

Water diversions, groundwater depletion, management impacts to riparian and upland habitats, and general declines in physical and biological conditions including water temperature, hydrologic flows and sediment regimes contribute to current degraded conditions of aquatic ecosystems. Such radical physical alterations to the aquatic environment cause changes in ecosystem organization. Key ecosystem components and functions may be eliminated and processes leading to ecological recovery may be arrested (Steedman and Regier 1986). There may be reduced efficiency of nutrient cycling, changes in productivity, reduced species diversity, changes in the size distribution and life-history traits of certain fauna, increased incidence of disease, and increased population fluctuations with increasing levels of stress (Woodwell 1970, Odum 1985, Rapport et al. 1985, Moyle and Leidy 1992). Climate change poses additional potential to reduce water availability and habitat suitability for aquatic organisms (Seager et al. 2007, Seager and Vucchi 2010, Williams et al. 2012).

An ecosystem approach is warranted to stop habitat degradation, maintain habitat and ecosystems that are currently in good condition, and to aid recovery of at-risk aquatic species and their habitat. Although federal land management cannot arrest all sources of fisheries decline and degradation of aquatic habitats, the Forest Service can implement binding standards and guidelines to maintain and restore aquatic and riparian habitats in project-level management of national forest lands. This approach is both prudent and necessary given the current perilous state of most native fish populations and other aquatic organisms.

Key physical components of a fully functioning aquatic ecosystem include complex habitats consisting of floodplains, banks, channel structure (*i.e.*, pools and riffles), water column and sub-surface waters. These are created and maintained by rocks, sediment, large wood and favorable conditions of water quantity and quality. Upslope and riparian areas influence aquatic systems by supplying sediment, large wood and water. Disturbance processes such as floods are important delivery mechanisms. Over time scales of one-to-1000 years, streams are clearly disturbance-dependent systems (Pringle et al. 1988). To maintain community viability throughout a large drainage basin, it is necessary to maintain features of the natural disturbance regime (*i.e.*, frequency, duration and magnitude) in different portions of a basin. Aquatic ecosystems consist of a diversity of species, populations and communities that may be uniquely adapted to these specific structures and processes (USDA 1993).

Spatial and temporal connectivity within and between watersheds is necessary for maintaining aquatic and riparian ecosystem functions (Naiman et al. 1992). A large river basin can be visualized as a mosaic of a terrestrial "patches" (Pickett and White 1985) or smaller watersheds linked by stream, riparian and sub-surface networks (Stanford and Ward 1992). Lateral, vertical and drainage network linkages are critical to aquatic system function. Important connections within basins include linkages among headwater tributaries and downstream channels as paths for water, sediment and disturbances; and linkages among floodplains, surface water and ground water systems (hyporheic zones) as exchange areas for water, sediment and nutrients. Unobstructed physical and chemical paths to areas critical for fulfilling life history

requirements of aquatic and riparian-dependent species must also be maintained. Connections among basins must allow for movement between refugia (USDA 1993).

The Forest Service adopted an ecosystem approach to management of aquatic habitat and at-risk fisheries on federal lands in the Pacific Northwest. The Aquatic Conservation Strategy ("ACS") of the Northwest Forest Plan designates "key watersheds" in large drainage basins that offer the highest quality aquatic habitat to support recovery of fish populations. Key watersheds tend to be free of dams or host large areas of upland terrestrial habitat without roads, where aquatic organisms enjoy the greatest likelihood of persistence. Key Watersheds are withdrawn from programmed timber harvest and increases of road density are prohibited. The ACS further designates "riparian reserves" as a discrete land allocation within specified distances from streams or wetlands where the management must maintain or restore aquatic habitat. Standards and guidelines for active management of riparian reserves require proposed action to meet or "not prevent attainment" of nine discrete "ACS objectives" related to physical, chemical and biological properties of aquatic ecosystems (USDA 1993).

In addition to establishing management areas, or land allocations, the ACS compels the Forest Service to undertake watershed analysis at the scale of large drainage basins (~50,000 acres) to account for critical factors affecting aquatic habitats including road density, vegetation cover, and geologic stability, among others. Active forest management in key watersheds and riparian reserves, as well as site-specific designation of riparian reserves, is preceded and informed by watershed analysis (USDA 1993).

Moreover, the ACS calls for restoration of aquatic ecosystems where past management activities have degraded indicators of ecological function expressed by nine ACS objectives. Examples include road density reduction, removal of in-stream structures, and cessation or regulation of livestock grazing in floodplains and wetlands, as well as a prohibition on use of mitigation or planned restoration in site-specific project activities as a substitute for preventing degradation of existing high-quality aquatic habitat (USDA 1993).

The Center strongly recommends that the Forest Service adopt an ecosystem approach to management of aquatic habitats in this Forest Plan revision similar to what the agency did nearly two decades ago in the Pacific Northwest. It is clear that existing standards and guidelines and best management practices, even if fully funded, implemented and monitored, are inadequate to meet statutory and regulatory requirements to provide for viable fish and wildlife populations that depend on aquatic habitats.

The Draft Plan would roll back virtually all of the standards and guidelines pertaining to aquatic habitat conservation and replace them with discretionary guidelines and desired conditions. Clearly, more protective standards are required. Carrying forward or modifying existing standards and guidelines to make them more protective of aquatic ecosystems would help to demonstrate that the Forest Service is serious about meeting statutory and regulatory requirements under NFMA rather than maximizing foresters' discretion to do anything, anywhere, anytime and to any effect.

Road location, design, construction and engineering practices have improved over time, but few studies systematically and quantitatively evaluate whether newer practices result in lower erosion rates (Gucinski et al. 2001). Even with improved practices and mitigation, total accelerated erosion and sediment yields are still at least 50 percent or more than natural yields over time (Gucinski et al. 2001). This is a best-case scenario. Roads contribute more sediment to streams than any other land management activity (Gibbons and Salo 1973, Meehan 1991). Substantial increases in sedimentation are unavoidable even when the most cautious road construction methods are used (Gucinski et al. 2001, McCashion and Rice 1983). Roaded and logged watersheds in the same basin also feature significantly higher channel bed substrate embeddedness than do undeveloped watersheds (Gucinski et al. 2001).

Road-stream crossings inevitably cause major sedimentation, largely resulting from channel fill around culverts and subsequent road crossing failures (Furniss et al. 1991, Trombulak and Frissell 2000). Plugged culverts and fill slope failures frequently happen and lead to "catastrophic increases" in stream channel sediment (Weaver et al. 1995). Road-stream crossings create unnatural channel widths, slope and streambed form both upstream and downstream from the crossings, and these alterations of channel morphology can persist for long periods (Heede 1980). Channelized stream sections resulting from rip-rapping roads adjacent to stream channels are directly affected by sediment from side casting and road grading, and such activities can trigger fill slope erosion and failures (Gucinski et al. 2001).

Therefore, the Forest Service should consider and analyze an alternative in the forthcoming EIS that prohibits new road construction and requires road density reduction in each fifth-field watershed to less than two miles per square mile. In addition, it should prioritize road removal in riparian areas associated with aquatic ecosystems.

(3) Vegetation

Restoration is an appropriate management objective for national forest lands, and we would apply the Society for Ecological Restoration's definition of "restoration" as "the process of assisting the recovery of an ecosystem that has been degraded, damaged, or destroyed" (SER 2004:3). The word "assisting" is central to the definition. Fire exclusion, livestock grazing and logging in some ponderosa pine and mixed conifer forests of the Inland West may have altered ecological function such that existing systems are vulnerable to catastrophic loss and require active management to reduce fuels and restore adapted ecological processes including fire (Arno and Fiedler 2005, Hann et al. 1997). However, this idea is controversial because historical fire regimes are poorly understood, particularly where fire disturbance patterns vary in extent, timing, intensity and biological effects (Baker et al. 2006, Veblen 2003). In many cases, passive restoration including cessation of activities that degrade ecosystems (e.g., fire exclusion) may be sufficient to accomplish restoration (DellaSala et al. 2004). The EIS should establish criteria for active and passive restoration of forest vegetation accounting for the "future range of variability" (Johnson and Duncan 2007) of sustainable ecological conditions that necessarily attend climate change (Choi et al. 2008, Millar et al. 2007).

The Forest Service routinely uses coarse-scale fire regime condition classification of vegetation, fuel and disturbance to index landscape departure from historical fire regimes and

identify lands at-risk of uncharacteristically severe fires that may impair ecosystem function (Hann and Bunnell 2001, USDA 2008:9). Such assessments characterize most ponderosa pine and mixed conifer forests, for example, as "condition class 3," or severely altered from historical conditions (Schmidt et al. 2002). However, fire regime condition class poorly predicts actual wildland fire effects (Odion and Hanson 2006), and researchers demand convincing evidence of ecosystem departure from adapted disturbance regimes before ecologically unprecedented restoration interventions are undertaken (Gutsell et al. 2001).

Given that ecosystem management based on natural disturbance regimes "will always be somewhat uncertain" (Landres et al. 1999), conservation biologists urge precaution in decision-making about ecological restoration when systems thought to be degraded are not well understood (Noss and Cooperrider 1994). The precautionary principle counsels against actions than cannot be reversed later if the decision is wrong (Meffe and Carroll 1997). In this view, restoration should target areas most likely to benefit from active intervention (Brown et al. 2004). Need for restoration depends on ecological scale, disturbance history, vegetation characteristics and current conditions (Lindenmayer and Franklin 2002). The EIS on Forest Plan revision is the appropriate vehicle for a science-based, landscape-scale assessment of forest restoration needs.

Ecologists stress the importance of defining locally specific reference conditions to justify restoration goals and outcomes (White and Walker 1997). Descriptions of natural variation in ecosystems derived from historical ecology and their application as reference conditions to land management are matters of controversy (Swetnam et al. 1999). However, it is generally accepted that understanding historical ecosystem dynamics, structures and functions can provide useful information to guide restoration efforts (SER 2004). For additional discussion regarding reference – or desired – conditions for forest vegetation management, please refer to our comments on "Affected Environment" *supra*.

The inherent complexity and dynamism of ecological systems render impossible accurate prediction of all consequences of restoration activities. Therefore, such projects initially should be confined to small spatial scales and accompanied by monitoring and evaluation sufficient to inform adaptive management (DellaSala et al. 2004). Monitoring facilitates impact assessment and tactical adaptation if treatments produce unintended or inadequate results (Lee 1993). Monitoring also empowers restoration practitioners to demonstrate contract compliance, educate stakeholders and elevate restoration discourse above faith-based forestry. Funding, complexity, training and commitment can pose formidable barriers to reliable effectiveness monitoring of ecological restoration (Elzinga et al. 1998). Consequently, there exists a need for streamlined monitoring protocols that simplify and improve efficiency of the task without compromising defensibility. The EIS on forest plan revision is an appropriate vehicle for proposing monitoring protocols that can be reliably implemented to support restoration-focused adaptive management.

Stems larger than 16" dbh comprise only approximately three percent (3%) of live ponderosa pines in Arizona and New Mexico, according to Forest Inventory and Analysis (FIA) data (USDA 1999, USDA 2007). The same data indicate that more than eighty-two percent (82%) of ponderosa pine trees in Region 3 are currently smaller than 11" dbh; approximately ninety-six percent (96%) of ponderosa pines are smaller than 15-inches dbh; and less than one-tenth of one percent (.01%) of pines are larger than 21" dbh. Large snags, which provide critical wildlife habitat, comprise less than three percent (3%) of total snags on the landscape, and average about one large snag per eight acres (Nowicki and George 2004). Clearly, the size distribution of trees in the southwest is heavily skewed toward small-diameter trees and is dramatically different than historical conditions (Fulé et al. 1997). Given the extreme rarity of large-diameter trees and the overabundance of small trees, the harvest of trees larger than 16" dbh cannot be justified on ecological grounds (Allen et al. 2002).

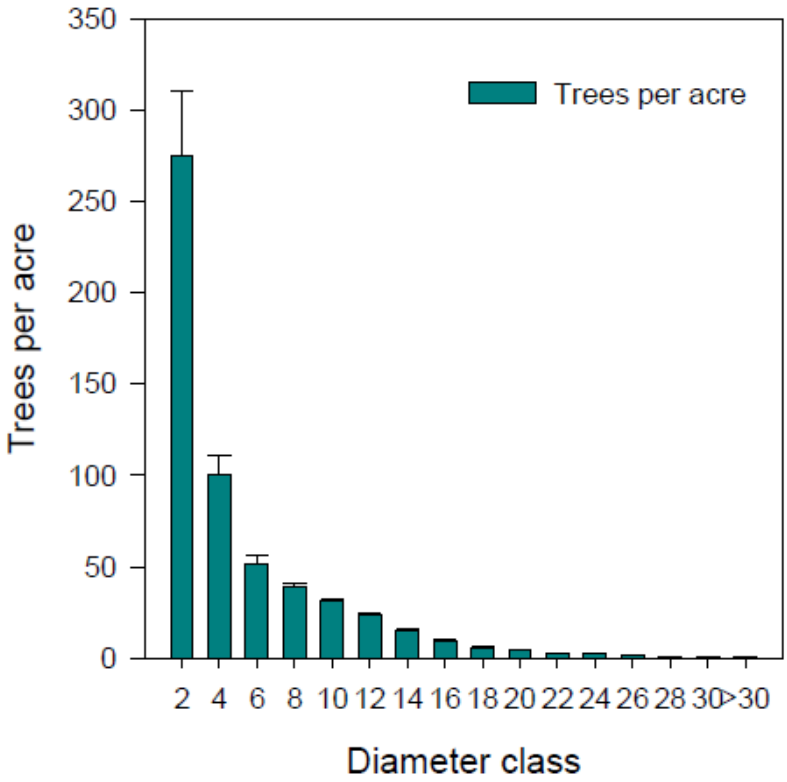

Figure 1. Tree size class distribution in southwestern ponderosa pine forests. Source: USDA (1999, 2007).

A variety of factors other than logging threaten the remaining large trees in southwestern ponderosa forests. Prescribed fire treatments can damage tree roots and cause high levels of mortality among large trees (Sackett et al. 1996). Burning of pine stands with high surface fuel loading also can result in tree mortality (Hunter 2007), and fire treatments may leave trees susceptible to bark beetle infestation (Wallin et al. 2003). Additionally, large tree mortality has unintentionally resulted from mechanical thinning projects (Hunter 2007). Large snags and downed logs, which provide critical habitat for cavity-nesting birds, bats, small mammals, reptiles, amphibians and insects, are often destroyed by fuel reduction treatments (Hunter 2007). Any gains in new snags and downed logs as a result of vegetation treatments generally do not offset their loss at a landscape scale (Randall-Parker and Miller 2002). Hence, the continued existence of large trees and snags for purposes of old-growth function and adapted ecological processes is by no means assured. Considering their scarcity, as well as the unique services they provide, large trees should be preserved whenever possible. Because large trees are the most difficult of all forest structural elements to replace, logging them constitutes an irreversible

environmental impact that is scientifically controversial in regards to its efficacy in fire hazard reduction and forest restoration (Covington 2000, Cortner 2003).

An upper diameter limit of 16-inches diameter on trees to be cut and removed in projects with purpose and need statements related to fuel management and ecological restoration is necessary to ensure preservation of rare large tree structure, critical wildlife habitat, forest health, and general aesthetics. Unless it is shown to be absolutely necessary to attain the purpose and need for action, no trees larger than 16" dbh should be harvested — this limit is simple to observe and widely accepted (Friederici 2003). Cutting and removal of large-diameter trees consistently proves to be a deal-breaker for many stakeholders, and we suggest that adopting a diameter cap will expedite fuel reduction and forest restoration treatments. Please refer to the series of Forest Service reports on *Small-Diameter Success Stories* (Livingston 2004, 2006, 2008) demonstrating social consensus and market opportunities for stewardship activities, including the White Mountains Stewardship Project, focused on small-diameter thinning as a vital element of hazardous fuels reduction and ecological restoration.

(4) Fire

Increased atmospheric concentrations of greenhouse gases are likely to change the potential extent and severity of wildland fires in many forests (Westerling et al. 2006). Increased frequency, extent and severity of unplanned fires may attend climate warming and drought (Running 2006, Gedaloff et al. 2005). The EIS must assess more than the degree of fire regime departure from a narrowly-defined historical condition ("fire regime condition class") and disclose implications of climate change on wildland fire and management options in the future. Natural fire process is centrally important to restoration of ponderosa pine and mixed conifer forests (Allen et al. 2002, Cortina et al. 2006, Falk 2006, Fischer et al. 2006). The active function of natural fire process in the future can regulate ecosystem structure and composition to "re-establish a new dynamic equilibrium" and track climate effects on vegetation and landscape pattern in real time (Falk et al. 2006:142). In the absence of fire use on relatively short rotations compared to the suppression era, the Forest Service effectively manages the landscape for large scale, high intensity fires during extreme weather, creating unnecessary taxpayer expense and unacceptable risk to human life and resource values.

A distinguishing feature of ecologically resilient conifer forests is a prevalence of large trees that possess autecological characteristics (*e.g.*, thick bark, tall canopies) that predispose them to resist heat injury from fire (Arno 2000). Forests dominated by large trees also feature structural characteristics in the form of large down logs that tend to inhibit intense fire behavior (Graham et al. 2004). Large down trees can slow sub-canopy horizontal wind movement and fire spread (Countryman 1956), and their tendency to retain moisture can deprive fire of heat energy (Amaranthus 1989). Removal of large woody structure can diminish ecosystem resilience to fire (Brown et al. 2004, Omi and Martinson 2004, Agee and Skinner 2005, Noss et al. 2006).

The intensity of fire behavior and the severity of its effects partly depend on fuel properties and their spatial arrangement, in addition to local topography and prevailing weather. Fuel bed structure plays a key role in fire ignition and spread potential, and it is a central consideration in an effective fuel management strategy (Graham et al. 2004). The bulk density

(weight within a given volume) of surface fuel consisting of grasses, shrubs, litter and dead woody material in contact with the ground influence frontal surface fire behavior (heat output and spread rate) more than fuel load (weight per unit area) (Agee 1996, Sandberg et al. 2001). High surface fireline intensity increases the likelihood of tree crown ignition and torching behavior (Scott and Reinhardt 2001).

The shrub and small tree fuel stratum also influences crown fire ignition and spread because it can feed surface fire intensity and serve as "ladder fuel" that facilitates vertical movement of fires from the ground surface into the forest canopy. The size of the spatial gap between the ground and tree crowns is a key determinant of crown ignition from a surface fire (Graham et al. 2004). Van Wagner (1977) demonstrates that crown fires ignite only after surface fires reach critical fireline intensity relative to the height of the base of crown fuels. In turn, crown ignition (*i.e.*, torching) can become a running canopy fire if its spread rate surpasses a canopy fuel density threshold that varies with slope angle and wind speed. Reducing hazard of active crown fire that spreads among trees independent of surface fire behavior generally requires heavy thinning of overstory trees to reduce canopy fuel density, depending on stand structure and degree of acceptable risk. The effectiveness of active management of forest structure to reduce hazard of active crown fire depends on the validity of crown bulk density calculations and estimates of extreme fire behavior conditions (Perry et al. 2004).

Omi and Martinson (2002) sampled several areas in the western United States where active vegetation management preceded wildfire to describe the effectiveness of fuel treatments on subsequent fire severity. The strongest correlation they report exists between crown base height and "stand damage," which they describe as a measure of severity. Importantly, crown bulk density does not strongly correlate with fire severity. According to the study,

> height to live crown, the variable that determines crown fire initiation rather than propagation, had the strongest correlation to fire severity in the areas we sampled... [W]e also found the more common stand descriptors of stand density and basal area to be important factors. But especially crucial are variables that determine tree resistance to fire damage, such as diameter and height. Thus, "fuel treatments" that reduce basal area or density from above (i.e., removal of the largest stems) will be ineffective within the context of wildfire management (22).

Omi and Martinson (2002) do not report information about fuel profiles that existed before the fires studied, and the spatial scale of events they considered confounds replication. However, the authors claim that management implications can be applied to other sites. A key implication is the importance of treating fuels "from below" in order to minimize likelihood of ignition and spread of crown fire. Keyes and O'Hara (2002:107) agree that raising stand-scale canopy base height by "pruning lower dead and live branches yields the most direct and effective impact" on crown ignition potential. They further note incompatibility of open forest conditions created by crown bulk density reduction treatments with conservation of threatened wildlife populations and prevention of rapid understory initiation and ladder fuel development, especially in the absence of an institutional commitment to stand maintenance treatments over time.

Perry and others (2004) investigated the relationship of forest structure and severe fire effects in ponderosa pine forest. Their data show, even where the historical fire regime is

significantly altered by management, "a great deal of landscape heterogeneity in the degree of risk and the treatments required to lower risk" (Perry et al. 2004:923). Simulated treatments that reduced surface fuel load by 50 percent without any tree removal prevented torching behavior in 13 of 14 experimental plots, even with wind speeds exceeding 90th percentile conditions; thinning from below (<12" dbh) coupled with surface fuel reduction prevented torching in the last plot (Perry et al. 2004). Those results agree with observations of the 2002 Hayman fire in Colorado, where crowning fire behavior ceased upon encountering large areas (several thousand acres) that had been treated with management-ignited prescribed fire (Graham 2003).

Other research demonstrates that removal of small-diameter trees in ponderosa pine forests affected by fire exclusion is more effective at reducing hazard of active crown fire than removal of larger trees (*e.g.*, Hunter et al. 2007, Arno and Fiedler 2005, Fiedler and Keegan 2002, Graham et al. 1999, Scott 1998). Forest Service research in New Mexico indicates no difference in short-term hazard comparing effects of "comprehensive" thinning in all size classes to treatments with a 16-inch upper diameter limit on tree removal (Fiedler and Keegan 2002). Moreover, thinning with a 16-inch limit was more effective at reducing long-term fire hazard than treatments without a diameter cap (Fiedler and Keegan 2002).

The direction of fire spread relative to local topography (*e.g.*, backing, flanking, heading) is an important aspect of fire behavior and potential effects that should inform fuel management (Graham et al. 2004). Steep slopes can facilitate wind-driven convection currents that drive radiant heat upward and bring flames nearer to adjacent, unburned vegetation, thus pre-heating fuels and amplifying fire intensity as it moves upslope (Whelan 1995). As a result, severe fire effects may be relatively common at upper slope positions and on ridges, but less common on the lee side of slopes that do not receive frontal wind (Finney 2001).

Fuel treatments should be distributed with spatial patterns of fire spread in mind. Overlapping treatments that reduce horizontal fuel continuity can fragment severe fire effects into small patches if they disrupt heading fire potential and increase area burned by flanking fires as they move upslope (Finney 2001). Treatments on slope aspects facing away from frontal or diurnal winds are a lesser priority because backing fires are the most likely to exhibit mild intensity. The Forest Service should develop fire management standards and guidelines calling for analysis of spatial dimensions of local fire regimes and lay-out of fuel treatment actions that maximize the strategic impact on fire behavior and effects.

An additional approach to strategic location of treatments is to identify landscape features that are currently resilient to fire disturbance and use them to anchor landscape "compartments," or discrete fire management areas. This may include natural openings, meadows, relatively open ridges, moist riparian areas, mature forest patches with shaded and cool microclimates, and areas where fuel reduction work already has been completed. Such areas can facilitate appropriate fire management responses including confinement and containment as alternatives to control, as well as provide safe areas for workers to ignite prescribed fires for hazard reduction and ecological process restoration. Identification of such areas does not equate to actively treating them.

The Forest Service should prioritize active fuel management where relatively little resource investment may facilitate ecosystem fire resilience. This may include low-productivity

sites where small tree encroachment is minimal (*e.g.*, dry southerly aspects) and relatively open stands dominated by large conifers. Targeting initial work in these areas will maximize the area to be treated with available funds and personnel, and thereby provide the greatest opportunity to quickly reduce fuels and restore ecosystem function at larger spatial scales.

Thanks for taking comment. Please keep me informed of all further developments in the planning process. The Center wishes to participate at every opportunity.

Sincerely,

Jay Lininger, Ecologist
P.O. Box 25686
Albuquerque, NM 87125
Tel: (928) 853-9929
Email: jlininger@biologicaldiversity.org

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Ltr#0107

From:	Paul Katan
To:	FS-prescott-forest-plan-comments
Subject:	Comments Draft Forest Plan
Date:	Wednesday, November 28, 2012 9:27:12 PM
Attachments:	PNF Plan Letter.docx

To Whom it May Concern,

Attached and below are my comments about the PNF Draft Forest Plan.

Please let me know that you will be considering my comments, and that I can count on you in this regard.

Thank you for your consideration,

Paul Katan
Cell (928)273-1783

"When I see an adult on a bicycle, I do not despair for the future of the human race." H.G. Wells

To Whom It May Concern,

I am writing as resident of Prescott and a lifelong Arizona outdoorsman, to offer my input on the Prescott National Forrest's draft Land and Resource Management Plan.

For your consideration, I regularly hike and bike on the Prescott National Forrest, alone and with a number of groups. I am an employee of Yavapai County Community Health Services, which co-sponsors the Trek-About club. I also helped to found, and currently volunteer as the Board Chair for the Prescott Mountain Bike Alliance. That said, please consider that while I spend hundreds of hours each year enjoying the PNF by myself, with friends, family, and groups, as well as talking with residents and visitors alike about our expanses of preserved natural areas in Yavapai County, the following are my thoughts on the PNF's draft plans.

In reading the plan, I only have one overarching concern. It may be a problem of semantics however, my research leads me to believe that the Forrest Service's use of "Wilderness" designations would preclude mechanized equipment (i.e. bikes) on natural areas that are currently, or could be enjoyed by bikers while maintaining the area's natural integrity. While I am all for preserving as many miles of natural areas as possible, I am not supportive of any plan that would eliminate bicyclist access on any area that is currently used, or planned for use by proven, local user groups (i.e. Prescott Mountain Bike Alliance, Verde Valley Cyclists Coalition, Yavapai Trails Association.)

Please consider the following specific concerns and suggestions, with respect to the details enumerated in your proposals:

The goals listed in a number of the Wilderness options are to improve non-motorized experience opportunities in certain identified areas of the PNF. That said, I am not sure why a Wilderness designation would then be proposed, which would simultaneously preclude non-motorized opportunities. Again, this may have been a type-o, or a problem of semantics. However, I would ask you to consider modifying your proposed designation to one that reflects your stated goal, and respects the stewardship and enjoyment of local trail bicyclists and our organized efforts to sustain such opportunities on public lands. Please research and/or consider an existing designation (i.e. the James Peak Special Use Area in Colorado), which would allow for non-motorized opportunities (e.g. mountain biking) while preserving the area's natural integrity.

Again recognizing a number of the Wilderness options identified, the PNF's stated goal of promoting "extended backcountry wilderness experiences" should allow for those of us who "bike-pack", and enjoy extended trips using our bikes to enjoy natural areas throughout the region. Once again, I may be off-base if there was a type-o or mistake in the plans, but am concerned that the "Wilderness" designation contradicts the proposed goal of expanding backcountry wilderness experiences by prohibiting access for wilderness trail bicyclists.

If the Wilderness designation moves forward as proposed, how will recreational use be limited? I have heard from friends in other areas that once the Wilderness designation is recognized as propose, the local FS would treat it as such (e.g. barring bikes.) That said, how would our local Forest Supervisor approach the issue, in maintenance of current recreational uses, and partnerships with local trails groups? How would this change if the current supervisor moved-on to a different district?

In consideration of the "needs for change" items (especially as identified in Wilderness Alternative D) the FS also identifies the need to "provide sustainable and diverse recreation opportunities." However, there are no specific proposals of how to increase these opportunities for the increasingly larger user group of mountain bikers. Quite the contrary, I can only see where opportunities (existing and future) to mountain bike are at risk of being limited.

Probably the most concerning example of threating the existing (and future) recreation opportunities for mountain bikers are the areas that include the Black Canyon Wilderness and Mingus Mountain. If the area were to be considered as Wilderness, this would end the current recreational use (counter to the proposal of increasing recreation opportunities) as a popular mountain biking destination for locals and visitors alike. In addition to the obvious elimination of access to popular mountain biking trails, this designation would also have a negative economic consequence for lost mountain bike tourist revenues to the surrounding towns (i.e.

Clarkdale,

Additionally, please consider that many see the opportunity to expand non-motorized trails in these areas as pivotal in the expansion of trail-related tourism. As representatives of a federally funded agency, I hope you understand that Arizona communities, especially those in and around the PNF, live or die by tourism which you support.

All of that said, of the proposed plans I am most in favor of Alternative C. However, if more Wilderness areas are important to the Forest Service (which was not made clear based on the goals enumerated in the plans provided) I would be supportive of Alternative B only if it did not include Mingus Mountain and the Black Canyon Trail in the Wilderness designation (e.g. did not eliminate existing mountain biking recreation opportunities.)

Thank you for your consideration of my input on the future of the Prescott National Forest. I look forward to hearing how I can count on you to maintain, and expand non-motorized recreational opportunities in the PNF, as well as expanded preservation of the beautiful natural areas that we call home.

Please feel free to contact me if I may be of further assistance in this regard.

Sincerely,

Paul Katan

741 Gail Gardner Way Unit D.

Prescott, AZ 86305

(928) 273-1783

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Please feel free to contact me if I may be of further assistance in this regard.

Sincerely,

Paul Katan

741 Gail Gardner Way Unit D.

Prescott, AZ 86305

(928) 273-1783

Ltr#0108

From: Tim Flood
To: FS-prescott-forest-plan-comments
Subject: FW: Draft Forest Plan and Draft EIS
Date: Wednesday, November 28, 2012 10:33:49 PM

Dear Prescott Forest Planners,

I must admit that I had difficulty in reviewing the documents online. I was only able to briefly review some of the sections. Nonetheless, I offer these comments on the draft Plan.

I urge that the final decision for a management plan include strong measures for protecting the soil and riparian resources of the forest. These two resources have suffered greatly in the past from the adverse effects of grazing. I was heartened to see that proposed alternative specifically states its intent to protect the riparian resources. It also makes sense to plan now for predicted effects of climate change. The riparian resources may well become more vulnerable to climate stresses. So, it becomes even more important to assure healthy runoff into the streams in order to boost their resiliency against the change. Equally important, and for much the same reason, is assuring healthy soil conditions at the tops of the watersheds.

Also to protect the riparian resources I urge that vehicular traffic be excluded from riparian corridors where possible.

I support the eight new wilderness management areas in the proposed alternative. I believe that protection of the wilderness qualities of these areas will highly support the intended overall goals of the Plan, especially in protecting the soils, watersheds, and riparian resources. Having the wilderness areas protected in the uplands will create positive impacts in the waterways below.

Tim Flood
Friends of Arizona Rivers

Ltr#0109

From: Rasmussen, Mary C -FS
To: FS-prescott-forest-plan-comments
Subject: FW: Forest Plan
Date: Thursday, November 29, 2012 9:01:02 AM
Attachments: Forest Plan Comments.doc

Not sure if Henry's comments were forwarded in October to the Plan Revision Comments Inbox. This may be a duplicate.

From: Henry Dahlberg [mailto:dahlberg@northlink.com]
Sent: Saturday, October 13, 2012 7:03 AM
To: Rasmussen, Mary C -FS
Subject: Forest Plan

Hi Mary,
Well, we could have hiked yesterday but it would have been cold! We need to try for another date soon.
There is something in my comments on the Forest Plan to make just about everyone dismiss me as a lunatic. You have done a great job - do people realize how important this Plan is? It has the potential to focus human and financial resources on the most important tasks.
Consider this a draft. If you would like to see changes or other areas included - let me know! Henry

Comments on the PNF Forest Plan

Henry Dahlberg, 1890 Woods Trail, Prescott, AZ 86305

General Comment:

A survey by American University's Partnership for Public Service ranked the USFS 204 out of 223 federal agencies as the best place to work – with 1 being the best. I am sure that theories abound as to why this is so. But it will lead (has led?) to failure to attract and retain the best and that should concern us all. The Forest Plan can provide focus, achievable and measurable objectives, and accountability. If the Plan has these traits it should help attract and retain the competent employees.

Monitoring Table 5 Pages 110-105

Almost everything in this plan relies on monitoring. The table lists 65 items under the heading "Action, Effect or Resource to be Measured." Some 48 are to be monitored annually and many represent multiple sites. Who is going to do the monitoring? That is not a column in Table 5. Whose resources are allocated to monitoring? That is not a column in Table 5.

I am concerned about the statement on page 108. "Monitoring is not performed on every single activity, nor does it need to meet the statistical rigor of formal research." Who makes that decision and why monitor if it is not rigorous enough to provide actionable data? Every decision made is subject to challenge by environmental groups, ranchers, off-road vehicle organizations and other interest groups. If the PNF's monitoring is not defensible, the tendency will be not to make changes because of the likelihood of law suits.

How will the results of monitoring feed back into Forest Plan objectives? Who will be accountable and <u>how will they be held accountable</u>? If the history of the USFS is any guide, sufficient monitoring to facilitate effective "adaptive management" is unlikely. It requires rigorous monitoring, a willingness to implement changes based on those data and the confidence to confront special interest groups. Many in the FS agree (and state publically) that "adaptive management" is a canard.

Control or eradicate at least 75-95% of nonnative invasive plant species populations within 1 to 2 years of identification. P. 54

Comment. Nothing is impossible, but this comes pretty close. Which "nonnative invasive plant species" does the PNF propose to control or eradicate in two years? Dalmatian Toadflax? Red Brome? Scotch Thistle? I have no objection to the emphasis on invasive species but this is a complex issue that deserves a more careful exposition and a more reasonable plan of action than set forth here. And as worthy an objective as it is, your target will require every employee working full time on this one objective and there are other things to do.

Under Desired Conditions for Ecosystem Resilience to Climate Change
"Ecosystems retain ALL of their components, processes, and functions" (Caps mine)

Comment: I think that this may be impossible. Avoid definitive words like "all" when referencing climate change or "resilience."

DC- Veg 3 p. 25
…sustainable amounts of forage for AUTHORIZED livestock. (Caps mine)

Comment: This assumes that fences are in good condition – and they are often not. Pasture rotation is not possible when pasture fences and allotment fences are down. It assumes that monitoring is in place to provide a science-based rationale for proper rotation of livestock – which it is largely not. The PNF has over 60 allotments with untold pastures and maybe three or four folks (all of whom have additional responsibilities) assigned to monitor range condition. And it assumes that the rancher follows the guidelines – which many do not chose to, or are not able to because their fences are down.
The "dirty little secret" is that cattle ranching on many allotments does not make enough money to pay for the maintenance of fences, now that cheap illegal Mexican labor is no longer widely used. Many ranchers are queuing up for additional federal subsidies to pay for fence work. Given tight federal agency budgets, this funding will always be too little too late. How about retiring the permits on some of the allotments located in very rugged terrain where fences are not maintained and cattle roam riparian areas at will? If the Forest Plan is serious about protecting watersheds, riparian areas, seeps and springs, then removing cattle from a few critical allotments would be a good place to start.

And also in DC – Veg 3 p.25 "Livestock grazing contributes to aspects of the social, economic, and cultural structure and stability of rural communities."

Comment: How did this speculative statement slip into a section called "Desired Conditions for All Vegetation." How about this?: "Livestock grazing, mining and church camps contribute to aspects of the social, economic, and cultural structure and stability of rural communities."

Obj. 23 Maintain or enhance 25-55 seeps and springs…
"Sometimes the spring source is fenced and a portion of the flowing water is piped to a trough…"

Comment: I am absolutely in favor of Objective 23. Seeps and springs are the life blood of a watershed and deserve this emphasis in the forest plan. However, the East Ash Spring experience has not been encouraging. The fencing materials were provided at no cost by the Wild Turkey Federation on the understanding that the PNF would build the fence excluding cattle from the spring box and guzzler but leave the trough for use by livestock. These materials have been lying on the ground at East Ash Spring for 28 months. The fence has still not been built.

P. 84 Std-Range-2 "Year-long livestock grazing in riparian areas shall be avoided to prevent adverse impacts in water quality and riparian habitat…"

Comment: If "year-long grazing shall be avoided," will 364 days be okay? The statement is meaningless as written. Limitation of grazing in such critical habitat is too important to dismiss with this vague statement. The word "shall" implies that it will be avoided. Who is doing the monitoring, who is paying for the monitoring and how will these findings result in prevention of "adverse impacts?"

p 105 guidelines for the VV management area
"Management actions should discourage unsafe and inappropriate winter recreation on Mingus Mountain."

Comment: The PNF wins on this one – at 71, my life is just way too short. But how about this positive statement? – "Management actions should encourage safe and appropriate winter recreation on Mingus Mountain." Except for the above negative statement in the VV guidelines, winter recreation is notably absent from the entire "Recreation" goal. I am surprised that the USFS lawyers think the PNF has avoided its legal responsibility for snow-play accidents on the summit of 89A by locking the parking lot, locking the bathroom and posting no parking signs. The situation there appears more dangerous with children running between parked cars on icy roads, folks having to relive themselves in the woods, and people sledding down slopes littered with trees dropped perpendicular to the slope. (But….please refer to sentence one.)

"Ten to 40 percent of functionally impaired riparian areas would be treated to improve conditions within 4 to 5 years of detection."

Comment: After four or five years there may well be nothing left to improve. 10%?! And "watershed restoration and health" is one of the five goals in this Forest Plan? This forest has no more valuable resource than its riparian corridors. And these riparian areas make up less than 1% of the Prescott National Forest. The PNF was established to protect the Prescott watershed. And protection of watersheds needs to be its major emphasis now and in the years to come. Again 10%? Four or five years? Please give this critical goal the resources and emphasis it deserves.

P. 103. Black Canyon Recommended Wilderness Area

Comment: I strongly support the creation of this new Wilderness Area in Black Canyon.

Ltr#0110

From:	Rasmussen, Mary C -FS
To:	FS-prescott-forest-plan-comments
Subject:	FW: Documents
Date:	Thursday, November 29, 2012 1:54:18 PM
Attachments:	112912-FriendsofArizonaTrails.pdf 112912-Cathy-Schultz.pdf

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Two sets of comments received as hard copy.

From: Maneely, Debbie -FS
Sent: Thursday, November 29, 2012 12:22 PM
To: Rasmussen, Mary C -FS
Subject: Documents

Debbie Maneely
Public Affairs
Prescott NF
(928) 443-8130 (office)
(928) 925-1111 (cell)

Ltr#0110

FRIENDS OF ARIZONA TRAILS

SAFE TRAILS FOR ARIZONA!

Dedicated to preserving safe hiking & equestrian trails.

November 27, 2012

Prescott National Forest
Attention: Plan Revision
344 South Cortez St.
Prescott, AZ 86303-4316

Thank you for giving us the opportunity to comment on the Plan Revision.

As the new president of Friends of Arizona Trails, I am supplying the following comments for your review and hopefully for inclusion in the Plan Revision.

We are very adamant that Trail Safety should be the primary concern in all facets of any trail usage planning discussions and subsequent decisions. As such, we have combined our concerns from prior meetings and the ensuing dialog with Forest Service personnel into this document. Further, for specific information on some of the following topics, please refer to "Friends of Arizona Trails" document presented to Prescott National Forest (PNF) on October, 12, 2012.

As previously discussed and agreed upon, we are pleased that our previous suggestion that a Trail Access and Safety Committee will be formed in the near future. We also are pleased that you agreed that Mr. Bruce McKeeman should chair the committee and set up an incident reporting system. We feel that Bruce's background with the National Park Service makes him extremely well qualified for this assignment.

Another interest to us is the formulation of "Trail Zones" which emphasize specific trail uses for future development, based on attributes for differing trail uses as proximity to

populations engaging in specific trail uses, water for horses, proximity to town, and clustering or trails serving a similar activity. With the advent of increasing usage of PNF trails by a variety of users, trail zones would help to avoid conflict among users and mitigate safety concerns.

It appears that in the past Trail Standards have been more or less tailored to IMBA standards which, in our opinion, are not suitable for multiuse trails. There is an excellent document published by the California Equestrian Trails & Lands Coalition titled, "Safety Consideration for Multi-Trails" that recommends Trail User Guidelines for all trail users. We feel that this document provides superb guidelines that could be used by PNF in new trail design and for modifying existing trails. Please see attachment.

As for specific trails, we are fortunate to have our trails maintained by PNF personnel in the Granite Basin area. Trails 347, 345, 352 and 348 are excellent candidates for implementing a trail zone system by designating them for hiker and equestrian use. In addition trails 307 and 383 in the Groom Creek area should also be so designated. In our opinion, the aforementioned trails are the heart and soul of hiker and equestrian country, therefore, should be of primary concern to PNF.

We are also interested in seeing an overall travel management plan be explored specifically addressing mountain bike use similar to what has been done with motorized trails. We believe that it is in the best interests of all users of PNF trails to establish speed limits of 15 mph for wide open spaces and 5 mph for areas where trails are obscured due to terrain or otherwise and near hikers or equestrians.

Sincerely,

John N. Pogledich
Friends of Arizona Trails
President
foatprescott@gmail.com

Attachment

California Equestrian Trails & Lands Coalition

June 2005

Safety Considerations for Multi-use Trails

CET&LC is continuing to develop specific design and enforcement standards for proposed and designated multi-use trails. The primary concern of our member organizations regarding multi-use trails is the safety of these trails for equestrians. The recent need (since about 1985) for multi-use trails is primarily to accommodate the addition of mountain bicycle use. **In order to safely accommodate bicycles that travel much faster than equestrians or hikers, specific trail design standards and safety guidelines are required to provide safe use for all.**

The CET&LC represents most organized recreational equestrian groups in California with 46,000 members. It is estimated that there are over 400,000 recreational riders in California. Many of these people ride trails as part of their recreational enjoyment.

The CET&LC offers general comments on conditions necessary to make the trail use experience positive, safe and enjoyable for all users. Also included is a set of **Trail User Guidelines** for issuance to every user at the trailhead.

1. From the equestrian user's perspective, mountain biking use has become a safety issue and needs to be addressed on all trail conversion decisions, as well as new trail construction, to help alleviate the conflict among users. The CET&LC supports multiuse trails where appropriate. In recent discussions with California State Parks staff in Sacramento on how best to define safe practices that will allow users to continue enjoying multiuse trails, we have recommended a number of safety provisions. The term "appropriate" means trail portions where terrain and slope do not limit the safe passage between equestrian and bike users. Inappropriate trails should not be designated multi-use until corrected. CET&LC is committed to working with State Parks, other agencies and other users to develop a set of safety guidelines that is acceptable to all users.

2. Some users have commented that it is a "perception of safety" when considering conversion of trails to multi-use. To the equestrian community, it is more than a perception; it is a true evaluation of the safety circumstances, including the likelihood of increased risk to other trail users. Speed by other users is a major problem for horses, especially around blind or limited visibility curves. Trails can be designed to mitigate this problem, coupled with additional training for equestrian animals. It still remains that the primary user for which speed is part of the use is the mountain biker. If all users were to travel no more than 4 to 5 mph, as most trails are designed to be used, then most of the interface problems would be solved. Horses react to fast moving objects with their natural instincts and can only be trained to a point. Equestrian users have asked why should a well established user group be asked to significantly retrain their animals to meet a user that has brought a completely new use to the trail system? CET&LC is committed to developing a set of safety guidelines that all users can accept as long as the users consider the innate survival reaction of the horse. We accept the need to accustom our animals to meet bikers on multi-use trails so long as the biking community will do the same in adjusting their use patterns accordingly. The enclosed draft safety guidelines should be accepted by all agencies as part of the trail plan; otherwise, it is predictable that conflict will continue. Often, in defining the conflict problem, it seems that the emphasis is focused on equestrian "behavior"

rather than a focus to resolve problems by urging all the users (bikers, equestrians and hikers) to work together for a solution.

3. In the new update of the State Park Trail Policy there is reference made that "design, education, signage, and enforcement can be effective in controlling conflict." The CET&LC totally supports this approach, and our member organizations in California join in this support. Noted below is what was recently presented to the California State Parks Director and Staff:

Design Considerations:

a. a. **Develop a set of trail construction standards** that take into consideration each user's needs. Obviously, these will have compromises but will use safety as the primary objective. Some specific suggestions are:

- Visibility: Switchbacks and curves need 50 ft visual clearance on either side so users can see others.

- Trail width: Wide trails can create maintenance and drainage problems. This topic includes old roads and whether they should continue to be used and be an exception. Some agencies cons

~~b. c.~~ **Trail Grade:** This factor is directly proportional to the downhill speed of some users. There does not appear to be incidents among the users when bicyclists are going uphill. Cyclists going downhill are sometimes not able to stop in time to avoid startling horses

- ider wide trails as an erosion problem. Forest Service believes bikers and equestrians will often ride side by side if the trail is too wide, while many equestrians consider a 6 ft wide trail as a minimum in order to safely pass cyclists.

- Trail slope: Keep slope as low as possible (< 12% if possible) for safe places for passing and visibility.

- Separate Trails: Where terrain is steep, visibility is limited and safe passage is hazardous, consider having separate parallel trails, one for equestrians/hikers and one for mountain bikers.

c. b. **Line Of Sight:** Visibility is a major factor in the safety issue. Switchbacks and blind curves severely limit all users. Limited visibility reduces reaction time of trail users to gauge other user's speed and control so as to move out of the way where possible. Limited visibility also reduces the user seeing others approaching from behind or in front, thereby not slowing nor giving a warning call before reaching them.

d. c. **Trail Width - Slope & Drop-off:** Safety on narrow trails requires that one be able to move off the trail to avoid an accident. If there is no way to go up a steep slope or if the drop-off is too extreme, one literally has nowhere to go. Blind curves and switchbacks in conjunction with narrow trails along sides of mountains with steep drop-offs and slopes increase the chances of accidents when trail users of different speeds are using the same trail.

e. d. **Startle Factor**: Cyclists are relatively silent and can appear suddenly thus startling and alarming others. On narrow trails with reduced line of sight, the risk of collision between fast approaching, silent cyclists and other users rises dramatically.

f. f. **Trail Surface**: Surfaces that are slippery with sand or excess scree diminish traction for most users and raise the chances of injury. When such a trail is also narrow, or has no escape route or reasonable visibility, it becomes a hazard for multiple users.

g. g. **Quality of Outdoor Experience**: Safety and peace of mind should be a primary consideration in establishing policies for multi-use trails. Policies should enhance the positive experiences that outdoor recreation provides. For most, the trail experience is a relaxing endeavor. Mountain biking, requiring a vehicle, is fundamentally a different experience from hiking and horseback riding. These experiences may be compatible where there is sufficient physical trail space to allow each user a sense of freedom and safety without interference. However, when physical space diminishes on a trail, then compatibility disappears and conflict intensifies. Perceived risk becomes real for hikers and equestrians, and injury is a predictable experience. Thus, when the quality of a trail experience is markedly reduced, many will choose to not repeat it to avoid the possibility of conflict. They are then displaced or disenfranchised from enjoying a quality trail experience.

Education:

a. a. The education of trail users is a key factor in the creation of a safe trail system for all to use. Not everyone understands the nature of a horse or appreciates the incredible survival skills with which they are born. We are offering to develop some suggestions for all trail users to adopt as a way of increasing the comfort level of both the trail horse and non-equestrian trail user.

b. b. The education of the equestrian user is also a vital area for multi-use trails. The CET&LC is recommending to its member organizations to improve the "startle factor" training of riders and animals as part of the adjustment to becoming multi-use trail users. Several Equestrian Clubs have adopted training clinics to teach the horses and riders to meet cyclists in varying situations. This greatly improved the animal's awareness that a cyclist is not a threat. However, even with training, "sudden appearance situations" requires an exceptional horse to handle and is not in the usual scope or ability of many equestrian trail riders (reference Police and Sheriff Posse training and horse dropout ratio).

Signage:

The CET&LC is recommending that California State Parks and other agencies with trail systems adopt the classic triangle yield sign as a standard for all multiuse trails. Enclosed with this letter is an example of the sign used by several other States, as well as some California park systems. It works quite well to alert users to a certain protocol and trail etiquette when meeting others on multi-use trails. Likewise, there should be good signage to make users aware of who is permitted or not on various trails.

Enforcement:

Having an enforcement process is vital for today's multitude of users. There is reference to volunteer patrols in the pending State Parks Trail Policy, but no mention is made of law enforcement; and that is a critical element in maintaining a safe recreational environment. If State Parks or any other agency adopts multiuse trails over special use trails, some type of rules enforcement on the trails must be in place and will need a significantly high priority.

Conclusion:

CET&LC is recommending for all trail system users the guidelines listed above as a way to make riding, hiking and biking an enjoyable trail experience. As stated before, our intent is to support multi-use trails as long as the safety concerns and terrain conditions are addressed. **If an existing trail cannot meet these standards, then it should not be designated multi-use.** CET&LC looks forward to working with all user groups and agencies in developing safety guidelines.

Signed: Charles (Toby) Horst, Chairman
Email easyrider@netptc.net
Tel. 559-855-7765

Ltr#0111

From:	Rasmussen, Mary C -FS
To:	FS-prescott-forest-plan-comments
Subject:	FW: Documents
Date:	Thursday, November 29, 2012 1:54:18 PM
Attachments:	112912-FriendsofArizonaTrails.pdf 112912-Cathy-Schultz.pdf

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Two sets of comments received as hard copy.

From: Maneely, Debbie -FS
Sent: Thursday, November 29, 2012 12:22 PM
To: Rasmussen, Mary C -FS
Subject: Documents

Debbie Maneely
Public Affairs
Prescott NF
(928) 443-8130 (office)
(928) 925-1111 (cell)

Ltr#0111

November 28, 2012

Prescott National Forest
344 South Cortez St.
Prescott, AZ 86303

RE: Prescott National Forest Land Management Draft Plan Revision
Trails Concern

Dear Prescott National Forest Staff:

Below are general comments regarding the new plan, followed by my plan preference, and then some comments on an Objective by Objective basis. My first concern is that this plan is being revised from the 1987 plan, which started with meetings in 2007; a twenty (20) year timeframe. You refer to a 10 yr. timeline for most of the trail items as well as other items having a 'Need for Change'. The 1987 plan has been in place for over 25 years now. As such, due to the significant time delays, I would like to see other items included that will be of major concern in the upcoming TWO decades.

One additional item of concern is additional motorized vehicles impacting the forest water, wildlife, and flora. Specifically, I am concerned about the upcoming use of aerial vehicles such as drones and hovercraft - referred by the FAA as Unmanned Aircraft Systems. Most of the vehicular concerns are on the west portion of the PNF. The past response to OHV's was somewhat slow and then directed. The past and current response to smaller fast vehicles (motorbikes and 15+ mph mountain bikes), has been just as slow as OHV's and those issues will not be resolved before the wildlife and slow moving humans will have to deal with aerial concerns - already being used for animal monitoring, wild and domestic. I am also addressing my concerns to the FAA and the Dept. of the Interior directly.

Additionally, the east side of PNF has major water concerns, from the headwaters of the Verde at 'Lake Sullivan', incoming waterways from seasonal runoff, the 'wild and scenic' portion, and the Verde Valley section. All these areas are being impacted by random use which causes disruption to the riparian habitat and wildlife in/egress for survival. There is so much concern about human homes being exposed to fire (a significant concern that should be dealt with by the local municipalities and building codes) but little buffer given to the waterways that supply both the wildlife and humans, up and downstream.

Finally, my preference for the new plan is **ALTERNATIVE C**! I guess I believe the preservation of the forest for the water, flora, and fauna is what makes it a remarkable resource that we hope to continue to enjoy.

Below is my input and concerns from Chap. 3 - Objectives of the Draft Land and Resource Management Plan, by objective, under the RECREATION section.

Obj - 07: in developing campgrounds, the areas should continue to have sufficient boundaries so that vehicles move onto vehicular tracks and those on foot can move onto single track.
Obj - 08: dispersed camping will allow for less localized impact but again, sufficient boundaries should be established so that indiscriminate movement by vehicles and foot traffic does not become the norm for users.
Obj - 09: a comprehensive trail plan will be greatly appreciated but should not reduce the single track system for those on foot. Perhaps instituting an upper speed limit will help direct those wishing to 'own' the trail onto double track areas where 15 - 20 mph speeds and greater do not cause bodily harm. Additionally, those wishing a unique 'other' experience could work with the forest to create that area that they need. Having worked on trails for all users, it is rewarding creating trails that connect roads for the OHV's, without taking away from the hikers, slow riders, and slow bikers. Note: sharing a single track trail while moving at 3 mph with something moving 12 mph, is like sharing Hwy 89 with vehicles moving 240 mph - 4x's faster.
Obj - 10: I hope most shooters are aiming at targets as those doing dispersed shooting cannot hear vehicles and those on foot.
Obj - 11: Physically separating users can be done with an upper speed limit on current well marked trails. There are plenty of miles of road/trail for the OHV's, motorcycles, fast bikers, and running horses; more miles of road and only 800 miles of trail.
Obj - 12: Signage for trail use is very critical. Enforcing the correct use of the signage is a whole other matter. The current signs are well labeled - there are just not enough, especially where trails (trails and their numbers), emerge and converge.
Obj - 13: This is an area I will enjoy and look forward to your combined efforts with AZGFD.
Obj - 14: All of our local communities with diverse recreation opportunities is why we have moved in relative proximity to the forest. It will be good to have input to multiple avenues of communication.
Obj - 15: I am interested in the means of maintaining the boundaries of the wilderness areas as the ground use is increased and aerial vehicles become common.
Obj - 16: I am interested in how the sites will be effectively closed and making sure users are directed to the new locations.
Obj - 17: I agree with the perspective but find most trails are used by someone and simply eliminating those in existence will create additional trails that may not be sustainable.
THANK YOU FOR ALL OF YOUR HARD WORK!!!

Thank you

Cathy Schultz, concerned citizen and daily user
hoofnhorse@hotmail.com

Ltr#0112

From: Rasmussen, Mary C -FS
To: FS-prescott-forest-plan-comments
Subject: mailed comments_BobRothrock
Date: Friday, November 30, 2012 12:57:16 PM
Attachments: LMP comments_Bob_Rothrock.pdf

Mary C. Rasmussen, Forest Planner
Prescott National Forest
Phone: 928.443.8265
Email: mcrasmussen@fs.fed.us

Ltr#0113

From: Rasmussen, Mary C -FS
To: FS-prescott-forest-plan-comments
Subject: mailed public comments: Verde Valley Land Preservation
Date: Friday, November 30, 2012 12:58:07 PM
Attachments: comments_VerdeValleyLandPreserv.pdf

Mary C. Rasmussen, Forest Planner
Prescott National Forest
Phone: 928.443.8265
Email: mcrasmussen@fs.fed.us

VERDE VALLEY LAND PRESERVATION

"...to preserve and enhance the natural open space setting of the Verde Valley."

Verde Valley Land Preservation welcomes the opportunity to comment on the Prescott National Forest Draft Land Management Plan and Environmental Impact Statement. To begin, we appreciate the effort of the PNF to gather citizen ideas and opinions for the plan. VVLP's mission is "to preserve and maintain the open space of the Verde Valley through a collaborative public process". We feel that our input into your collaborative process was given careful consideration. Thank you.

The draft presents four alternatives. We believe that Alternative B aligns best with our stated mission. For example, Objective 29 states the Forest will acquire riparian habitat and lands with open space value. VVLP has identified some of these areas and are in the process of landowner contact, which could result in other candidate parcels. We will welcome opportunities to assist the PNF in this objective. Alternative B also offers the most protection for scenic integrity and improved visual quality near communities. This is stated in the document "Comparison of the response to needs for change by alternative". Scenic integrity and visual quality are vital to our region as tourism is an economic driver.

Finally, we are pleased to see Black Canyon included as a recommended Wilderness Area in Alternative B. VVLP has already expressed support for this action in a previous letter. As wilderness it will preserve the natural habitat and watershed as well as maintain the Upper Verde Valley viewshed.

We hope you agree that Alternative B is the best choice. Thank you.

Bob Rothrock – President
Verde Valley Land Preservation

Bob Rothrock

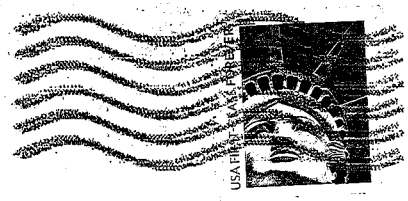
Ltr#0113

Our Beautiful Valley – Let's keep it that way!
P.O. Box 3356 Cottonwood, AZ 86326 www.verdevalleylpi.org

Ltr#0113

VERDE VALLEY LAND PRESERVATION INSTITUTE
VVLPI
P.O. BOX 3356
COTTONWOOD, AZ 86326
WWW.VERDEVALLEYLPI.ORG

PHOENIX AZ 852
28 NOV 2012 PM 5L1



Prescott NF Attn. Plan Revision
344 S. Cortez St.
Prescott, AZ 86303

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Ltr#0114

From: Rasmussen, Mary C -FS
To: FS-prescott-forest-plan-comments
Subject: mailed comments: AZ game & fish dept
Date: Friday, November 30, 2012 12:58:53 PM
Attachments: FPR&DEIS_comments_AZGFD.pdf

Mary C. Rasmussen, Forest Planner
Prescott National Forest
Phone: 928.443.8265
Email: mcrasmussen@fs.fed.us

Ltr#0114

THE STATE OF ARIZONA
GAME AND FISH DEPARTMENT
5000 W. CAREFREE HIGHWAY
PHOENIX, AZ 85086-5000
(602) 942-3000 • WWW.AZGFD.GOV

GOVERNOR
JANICE K. BREWER
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JACK F. HUSTED, SPRINGERVILLE
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KURT R. DAVIS, PHOENIX
DIRECTOR
LARRY D. VOYLES
DEPUTY DIRECTORS
GARY R. HOVATTER
BOB BROSCHEID

November 28, 2012

Prescott National Forest
Attention: Plan Revision Team
344 South Cortez Street
Prescott, Arizona 86303

Re: Prescott National Forest Draft Environmental Impact Statement and Draft Land and Resource Management Plan

Dear Plan Revision Team:

Thank you for providing the Arizona Game and Fish Department (Department) with the opportunity to comment on the Prescott National Forest Draft Environmental Impact Statement (DEIS) and Draft Land and Resource Management Plan (DLRMP). The Department appreciates the opportunity to have been involved in this important planning process, and recognizes the vital role lands administered by the Prescott National Forest (Forest) currently play in providing wildlife habitat as well as opportunities for wildlife-related recreation in Arizona. As Arizona's human population continues to grow throughout the life of the DLRMP, it is anticipated that wildlife and the public will become increasingly dependent upon Forest lands. It is therefore essential the DLRMP not only address current wildlife habitat and recreational needs, but also provide for the high quality habitat and the maintenance of wildlife connectivity within the Forest and between the Forest and other public and private lands – both now and into the future. The Department offers the following *general comments* relating to the DEIS and DLRMP as a whole, with *specific and final comments* to follow.

GENERAL COMMENTS RELATING TO THE DEIS AND DLRMP

Special Land Use Designations (Proposed Wilderness Areas)

Current Land Status and the Department's Ability to Manage Wildlife in Arizona
Federal lands comprise 42% of Arizona's lands. More than 43% of those lands have special land-use designations, upon which significant restrictions exist relating to recreation and the management of wildlife and habitat resources. Only 23% of Arizona's lands remain free of special land designations and open for public use, meaning 77% of lands in Arizona possess restrictions to public access and recreation through ownership (private, state, and tribal) or federal special land use designations.

Conservation of wildlife resources upon all lands within Arizona is the trust responsibility of the Arizona Game and Fish Department. It involves managing wildlife and habitat to ensure abundant wildlife resources are available for present and future generations.

Currently, 4.5 million acres in Arizona have a wilderness designation. With an additional 5.8 million acres of special land-use designations in the form of National Monuments, Parks, Wildlife Refuges, Conservation Areas, Areas of Critical Environmental Concern, Wild and Scenic Rivers, and Wilderness Characteristics Areas, the state has experienced a systematic loss of recreational opportunities and an erosion of the Department's ability to proactively manage wildlife. Due to special designations on these roughly 10 million acres, the Department experiences extensive and widespread project delays, elevated costs, increased man-hours, and legal challenges - resulting in decreased efficiency in the conservation and management of Arizona's wildlife resources.

The Department finds that a level of protection which maintains wildlife habitat values, provides flexibility in wildlife management, and allows adequate recreational access is often the best strategy for public land use. Due to historical challenges that have impeded its ability to achieve its mission in designated wilderness areas, the Department has concerns with assigning a wilderness designation to the lands identified in the preferred Alternative B of the DEIS. No matter how carefully the wilderness designation language is crafted, a wilderness designation inevitably hampers or precludes the Department from achieving its management objectives. At the very least, wilderness designations result in substantive and costly compliance hurdles which must be addressed before wildlife management actions can be implemented.

Based upon its long history of wildlife management in wilderness areas, the Department anticipates challenges, complications, or obstructions in its ability to implement the following types of management activities in areas with wilderness designations:

- Creation and improvements of alternate access routes.
- Aquatic management and stream renovations, which might include physical removal of noxious weeds and non-native fish, reintroduction of native fish, construction and maintenance of aquatic habitat structures, and monitoring of fish populations.
- Wildlife management, including aerial and motorized ground surveys, transplant of species, marking or collaring of animals, radio tracking of animals, placement of wildlife cameras and scent poles, as well as the development and maintenance of physical structures such as bat gates or riparian habitat.
- Habitat management, including the development and maintenance of wildlife waters, removal of exotic plant species, creation of wildlife corridors through prescribed burns and mechanical removal of timber and brush.

One might believe activities such as these could be provided for in the construction of overt language for their provision in the wilderness designation documents. However, it has been the Department's experience that regardless of the care taken in drafting such language, future management efforts will be more difficult in areas with wilderness designations. This may sometimes be attributed to the diverse perspectives of federal employees applying their differing interpretations of a wilderness designation to proposed management actions. In other instances, challenges may arise due to an inability on the Department's part to accurately forecast all

management actions necessary in a wilderness area, and to capture those actions in the enabling documents associated with a wilderness.

Rather than wilderness, the Department advocates the Forest develop management prescriptions in cooperation with the Department for areas such as these, and recognized as possessing important ecosystem values. If developed in cooperation with the Department, these prescriptions would provide a greater level of resource protection, while still providing for the beneficial management of wildlife - without the challenges created within designated wilderness areas.

Conclusions and Request: Special Land Use Designations (Proposed Wilderness Areas)
Both the Multiple-Use Sustained-Yield Act of 1960 and the Federal Land and Policy Management Act of 1976 (FLPMA) legally prohibit federal land management agencies from affecting the State's jurisdiction and responsibilities. Managers of public lands are mandated by FLPMA, the "Organic Act", to provide multiple-use recreational opportunities on public lands to both present and future generations. The Department perceives the conversion of public lands to a special use status as a breach of the FLPMA mandate. In spite of existing legislation, neither the United States Forest Service (USFS) nor Bureau of Land Management (BLM) have established objectives for the scope of public lands in Arizona to be administered in full multiple-use status, and free from restrictive designations.

The Department supports public land use that provides Arizona's public and resources with a net benefit. It does not support the conversion of public lands from multiple-use to land-use designations that are anticipated to result in a net loss of wildlife resources, wildlife-related recreational opportunities, and/or wildlife dependent economic benefit. For these reasons, **the Department does not support an expansion of wilderness on the Prescott National Forest, and requests that a full analysis of the cumulative impacts of further loss of public lands that provide for multiple-use and wildlife related recreational and economic opportunities be conducted before an expansion of wilderness is approved. Further, the Department requests that prior to approval of a wilderness designation for any new lands the Forest first fully analyze that decision's impact to the Arizona Game and Fish Department's ability to fulfill its trust responsibility to manage the state's wildlife resources.**

Resolution Regarding New Proposed Wilderness Areas
Given that wilderness designations impede the Department's ability to fulfill its trust responsibility to manage wildlife and habitat for current and future generations, the Department cannot offer support for preferred Alternative B, wherein eight wilderness expansion areas totaling approximately 43,400 acres are proposed for new wilderness designations.

Motorized Big Game Retrieval (MBGR)

MBGR Background
For many years the Department has participated in the Land and Resource and Travel Management Rule Planning efforts on the Kaibab, Prescott, Coronado, Tonto, and Apache - Sitgreaves National Forests. In these efforts, the Department has advocated for uniformity across the forests in the rules relating to Motorized Big Game Retrieval.

The Department supports the need to generally prohibit cross-country motorized travel to protect wildlife habitat and other resources, as well as the restriction of cross-country motorized travel for game scouting or accessing hunting sites. However, the Department has sought, and continues to seek the following MBGR provisions in the Travel, and Land and Resource Management Planning (LRMP) documents for all of Arizona's Forests:

- Allowing MBGR of all big game (deer, elk, bear, and bison) within one mile of roads designated as open during, and for 24 hours subsequent to designated hunting seasons
- Allowing one trip in – and one trip out
- Restricting access during wet/muddy conditions or across wetland/riparian areas
- Allowing older, less agile, or CHAMPS hunters with service-connected disabilities (*See* A.R.S. §17-336) to make use of a motorized vehicle, within a specified distance of routes designated as open, to retrieve legally-taken big game animals – as provided for in Regulation 36 C.F.R. 212.51, which grants this authority to the Forest Responsible Official.

It is the hope of the Department, that by adopting the above-referenced provisions, and by avoiding blanket prohibitions of MBGR for the big game species referenced above, the Prescott National Forest will avoid the potential abuse of discretion as described in *Neighbors of Cuddy Mountain v. U.S. Forest Service,* 137 F. 3d 1372, 1380 (9th Cir. 1998), and avoid appeal of this decision by the Department, as was recently necessitated by the TMR decision issued for the North Kaibab Forest's North Kaibab Ranger District. *(Please reference North Kaibab Ranger District TMR Appeal letter included in accompanying electronic enclosure)*

Current and Proposed Status of MBGR on the Forest

Currently, the Coconino, Kaibab, Prescott, Coronado, Tonto, and Apache/Sitgreaves National Forests have Travel Management Rule (TMR) and LRMP provisions lacking consistency across the Forests of Arizona. Of particular concern to the Arizona Game and Fish Department, are those provisions relating to Motorized Big Game Retrieval which impact the constituents of the Department engaged in lawful hunting activities. This lack of clear direction pertaining to when, where, how, whom, and what species of downed game may lawfully be retrieved by motorized vehicle creates widespread confusion and fear for the recreating public, and challenges the Department's ability to provide fair and uniform enforcement of the law as it relates to these activities.

On page 74 and 75 of the Prescott National Forest's DLRMP, in the section entitled "Social and Economic Resources – Recreation, Transportation, and Facilities," Std-Rec-2 states, "Only designated roads, motorized trails, and motorized use areas as depicted and described on the motor vehicle use map are open for motorized big game retrieval. Motorized big game retrieval is precluded in areas where motorized travel is prohibited, such as wilderness." On the same page, Guide-Rec-1 goes on to state, "For the purpose of motorized big game retrieval: Use of motor vehicles should be limited to within one mile of designated trails to retrieve a legally hunted and tagged elk during elk hunting seasons as designated by the Arizona Game and Fish Department, and for 24 hours following the end of the season. Only one vehicle (i.e., one trip in and one trip out) per harvested animal should be operated off of designated roads and motorized

trails. Hunters should use the most direct and least ground-disturbing route to accomplish the retrieval. Motorized big game retrieval should not occur when conditions are such that travel would cause damage to natural and/or cultural resources. Motor vehicles should not cross riparian corridors, streams, and rivers, except at hardened crossings or crossings with existing culverts."

The Department has the statutory authority to manage wildlife in Arizona. Because hunting is a key desire of the public, and is a principal means by which the Department manages the dynamics of the State's game populations, the Department offers the following recommendation relating to the preceding MBGR standards and guides:

Recommendations Relating to MBGR

The Department requests the Standards and Guides associated with MBGR in the "Social and Economic Resources – Recreation, Transportation, and Facilities" component of the DLRMP, be expanded in scope to allow MBGR for deer, elk, bear, and bison - bringing the Prescott National Forest's MBGR policy in compliance with the uniform MBGR provisions the Department is seeking Forest-wide in Arizona. Those provisions being:

- **Allowing MBGR of all big game (deer, elk, bear, and bison) within 1 mile of roads designated as open during, and for 24 hours subsequent to designated hunting seasons.**
- **Allowing one trip in – and one trip out.**
- **Restricting access during wet/muddy conditions or across wetland/riparian areas.**
- **Allowing older, less agile, or CHAMPS hunters with service-connected disabilities (*See* A.R.S. §17-336) to make use of a motorized vehicle, within a specified distance of routes designated as open to retrieve legally-taken big game animals – as provided for in Regulation 36 C.F.R. 212.51, which grants this authority to the Forest Responsible Official.**

The consumptive use of wildlife (hunting) is central to the conservation of wildlife in the United States, with conservation of the nation's wildlife resources vested largely in the state wildlife agencies. The funding for this conservation is rooted in the contributions of hunters and anglers, with hunting on public lands in the west playing an essential role in the fiscal health of western wildlife conservation agencies. **In the absence of revision to the MBGR component of the Forest's DLRMP and DEIS as described above, the Department requests the DEIS analyze the cumulative effects of this proposed decision (as well as allied travel management decisions) on the programmatic provision for wildlife conservation by the Department, and further, that the Forest analyze the individual and cumulative effects of this proposed decision (and allied decisions), on the North American Model for Wildlife Conservation.**

DEIS and DLRMP Alignment with Department Strategic Plans

Arizona Game and Fish Department Strategic Documents Currently Referenced in the DEIS

In the DEIS released with the DLRMP, it should be noted that on pages 17-21 (and Table 4) of DEIS Appendix C, the Forest references, and provides detailed documentation of the specific

DLRMP provisions whereby the Forest provides support for the following Department Strategic Plans:

- The 2005-2015 "Comprehensive Wildlife Conservation Strategy (CWCS)"
- The 2007-2012 "Wildlife 2012 Strategic Plan (WL 20/20)"

It should be noted the preceding documents are obsolete, having been superseded by the newly approved Department Strategic Plans: *"State Wildlife Action Plan (SWAP)"* and *"Wildlife 20/20 Strategic Action Plan (WL 20/20)"* described under the sub-heading that follows.

Arizona Game and Fish Department's Current Strategic Plans

- *State Wildlife Action Plan:* On May 16, 2012, the Department adopted its current "State Wildlife Action Plan" which provides strategic guidance for the Department's wildlife management for the years 2012-2022. The SWAP, approved earlier this year by the United States Fish and Wildlife Service, replaces the now defunct CWCS document.
- *Wildlife 20/20 Strategic Action Plan)*: Earlier this month (November, 2012), the Department released a draft copy of its current *"Wildlife 20/20 Strategic Action Plan"*. This plan, WL 20/20, replaces the now defunct Wildlife 2012 Plan.

Request Relating to DEIS and DLRMP Alignment with Department Strategic Plans

Based upon the information provided above, **the Department requests the Forest remedy this inconsistency by correcting pages 17-21 and Table 4 of DEIS, Appendix C, to accurately document alignment between the Forest's Plans and the current Department Strategic Plans:**

- ***"State Wildlife Action Plan (SWAP)"***
- ***"Wildlife 20/20 Strategic Action Plan (WL 20/20)"***

In conjunction with this comment letter, please find the enclosed CD containing the Department's *"State Wildlife Action Plan" and the "Wildlife 20/20 Strategic Action Plan"*, as well as the data layers and resources associated with our State Wildlife Action Plan (SWAP).

SPECIFIC COMMENTS RELATING TO THE DLRMP

(Page 5, Item 2): **Needs for Change**

The Plan states, "Retain or improve watershed integrity to provide desired water quality, quantity, and timing of delivery. Addressing this need would provide improved water quality for human health and safety; move watersheds toward maintaining water quantity for both municipal watersheds and maintenance of aquatic and riparian species habitat; and provide timing of delivery that is commensurate with healthy soil and biological function and natural geomorphology."

Recommendation: Consideration to include a properly functional watershed, providing stable habitats for both biological diversity and human recreational uses.

(Page 5, Item 4): **Needs for Change**

The Plan states, "Provide desired habitat for native fish species. Native fish and other aquatic species are in decline in some watersheds. Furthermore, native aquatic species are no longer known to be present in five watersheds, where historically they were present. In order to assist in responding to the decline in native fish species, the PNF can provide habitat and watershed

characteristics that will support these species. It could also partner with the State of Arizona in addressing control of non-native species.
Recommendation: Even if the primary desire is for native fish habitat, a simple statement regarding the improvement of the watershed characteristics would increase the value for native fish and wildlife habitat. In addition, these characteristics (i.e. riparian areas) function to provide important wildlife corridors, along with enabling safer and more efficient wildlife migrations. Habitat and watershed characteristics are important in providing internal habitat and structural diversity, in turn providing increased stability. Additionally, consideration should be given to changing "could also partner" to "will partner with the State of Arizona" in addressing the control of nonnative species, while continuing to provide angler opportunity for both native and non-native species.

(Page 6, Item 5): **Needs for Change**
The Plan states, "Enhance the value of open space provided by the Prescott NF by defining the visual character with areas near or viewed by those in local communities. Retention of open spaces is highly valued by citizens for its scenic value and contribution to low population density. The Prescott NF has a unique opportunity to enhance value and identify desired visual character on its lands as population density may increase on other ownership."
Recommendation: This discussion should also address the importance of incorporating wildlife linkages into the values of open space. Open spaces provide for a multitude of public benefits, ecosystem services, and products we all need and enjoy such as water, economic prosperity, wildlife, recreation and wildfire protection (USFS http://www.fs.fed.us/openspace/faq.html#n2).

(Page 7): **Social and Economic Values (Missing in Description of Desired Conditions)**
Comment: The values do not seem to reflect fish and wildlife related recreation as it would also impact these values and generates a large contribution to the PNF.
Recommendation: The social and economics portions of this document, including the actual analysis in the DEIS should incorporate fish and wildlife related recreation. Below is a compilation of data from available sources indicating significant economic contributions as they relate to the state overall, USFS lands in the state, PNF lands specifically, and AGFD license sales in the States Game Management Units (GMUS) located on the Forest. (The following data has been provided for incorporation into the DEIS Economic Analysis...)

2012 National Survey, Outdoor Industry Association

- 2011 Arizona:
  - Hunting - $337,759
  - Fishing - $755,027
  - Wildlife viewing - $935,880
  - Total: $2,048,666

2012 License Sales Report

- 2011: GMU's identified on PNF: 8, 17A/B, 19A/B, 20A/B, 21
  - Estimated total permit tag sales (based on the cost of each tag and total tags available for those units): $665,599.0
  - Estimated total minimum hunt license sales (to purchase total tags available for those units): $1,248,646.75
  - Hunter days available on request

- % of each GMU on the PNF
  - 8 - 33%
  - 17A – 69%
  - 17B – 97%
  - 19A – 50%
  - 19B – 17%
  - 20A – 68%
  - 21 – 22%

2007 American Sport fishing Association for the USDA – USFS
- Total for AZ: $417,5634,259 (wildlife associated recreation)

2006 American Sport fishing Association for the USDA – USFS
- Prescott = $129,544,151.0 (wildlife associated recreation)

Other:
- PNF = 18% forest land in AZ
- PNF= 50% land in Yavapai Co.
- Yavapai County (Consumptive) – 2002. Silberman, Jonathan
  - Fishing and Hunting Expenditures: $40.0 Million
  - Total Multiplier: $ 49.9 Million
  - Salaries and Wages: $ 9.8 Million
  - Full and Part time jobs: 811
  - State tax revenues: $ 2.3 Million

- Yavapai County (Non-Consumptive) – May 2003. Southwick Associates
  - Retail Sales: $38,924,040.0
  - Total Multiplier: $72,969,878.0
  - Salaries and Wages: $20,403,548.0
  - Full and Part time jobs: 692
  - State tax revenues: $507,205.0

(Page 12, Statement 5): **Needs for Change *(Concepts for Understanding)***
Comment: Wildlife as a value to scenic integrity is not included within the SMS system and should be considered, as open spaces should incorporate wildlife linkages and identify the scenic importance of wildlife. The Yavapai and Coconino Wildlife Linkages Assessments further identify and discuss these areas in more detail and should be incorporated into the Plan. (Please note that the linkage reports referenced above may be found in the attached CD enclosed with this comment letter.)

(Page 37-38): **Forest-wide Desired Conditions, Grasslands**
Comment: Consideration should be given to including the tie to landscape scale collaborative efforts that continue to make large scale improvements, such as the Central Arizona Grasslands Conservation Strategy.

(Page 46-47): **Forest-wide Desired Conditions, Open Space, Lands and Scenic Values**
Comment: Open spaces are important from a wildlife linkage, wildlife movement and migratory corridor perspective as well, not exclusively for providing habitat. Please refer to previous comments relating to open space and scenic values for consideration to provide appropriate expansion within this section.

(Page 55, 56, Obj. 8; Page 44, DC-Rec-1): **Background and Rationale (Dispersed Camping)**
The DLRMP States, "In the absence of specific restrictions, a person can camp in any location on the forest outside of a developed recreation site; this is often called dispersed camping."
Comment: At the November 5, 2012 Board of Supervisors Meeting in Yavapai County, Forest Supervisor Betty Mathews provided an update to the public on the status of the DEIS and DLRMP. At that public meeting, Ms. Mathews stated, "Dispersed Camping is permitted within 300 feet of all roads designated as open on current Motor Vehicle Use Maps ... "
Recommendation: Please rephrase this bullet point to state, "In the absence of specific restrictions, a person can camp in any location on the forest outside of a developed recreation site, and within 300 feet of all roads designated as open on current Motor Vehicle Use Maps..." (Please note the "Dispersed camping" description in Table 8; page 121 should be modified in the same manner.)

(Page 56, Objective 10): **Recreation, Background and Rationale (Shooting Ranges)**
The DLRMP States, "Create one designated target shooting area during the 10 years following Plan approval" to replace the current range, for which the Forest will not renew the lease."
Comment: With only one designated shooting range, people will likely find their own locations to shoot, with a potential increase in unsafe shooting behavior and possible littering. While 1 Range is a good start, comments included in the draft LMP state that the original plan called for 2-5 ranges - but that this was deemed unfeasible by the Prescott Leadership Team. (Note: This was previously recommended in the 052611 AGFD comment letter to the Forest re: Draft IV of the DLRMP).
Recommendation: The Department still advocates the development of additional recreational shooting sites with lower cost and manpower requirements than full-service shooting ranges. Appropriate wording for this section might be "... create and operate one formal target shooting range, and create 2-5 additional informal recreational target shooting areas (pocket ranges)". (Note: This would require modification to page 9 of the DEIS).

(Page 69, Guide-WL-2): **Terrestrial Wildlife**
The DLRMP States, "Design features and mitigation measures should be incorporated in all Forest Service projects as needed to ensure Southwestern Region Sensitive Species do not trend toward listing as threatened or endangered."
Recommendation: This paragraph should be modified to include the Arizona Game and Fish Department's Species of Greatest Conservation Need (SGCN)." (Please note SGCN file in attached CD included with this comment letter)

(Page 69, Guide-WL-3): **Terrestrial Wildlife**
The DLRMP lists provision for the benefit of pronghorn habitat and populations.
Recommendation: This paragraph should be modified, by additionally making reference to the Department's Central Arizona Grassland Strategy (CAGS)." (Please reference the CAGS file in attached CD included with this comment letter)

(Page 77, Guide-Lands-2): **Terrestrial Wildlife**
Recommendation: As with the recommendation for page 69, Guide-WL-2 above, this paragraph should be modified to include the Arizona Game and Fish Department's Species of Greatest Conservation Need (SGCN)." (Please note SGCN file in attached CD included with this comment letter)

(Page 84-85): **Standards and Guidelines, Range**
Recommendation: The WS-4 should be considered for this section as it provides the concept for adaptive management regarding watershed function. An additional guide should incorporate grass reserve banks.

(Page 111, Table 5): **Monitoring Questions**
Recommendation: In the final row of the table on page 111, under the heading "Monitoring Question," the question at this intersection in the table should be modified to not only reflect Federally listed species, but include the Arizona Game and Fish Department's "Species of Greatest Conservation Need (SGCN") as well. (Please note SGCN file in attached CD included with this comment letter.)

Final Comments and Conclusions Relating to DEIS Alternatives

Prescott National Forest's Preferred Alternative (Alternative B)
The Department understands information gathered from citizens and the public during the development of Community Vision Statements, the "Ecological Sustainability Report" (ESR), the "Economic and Social Sustainability Assessment" and the "Analysis of the Management Situation" (AMS) influenced the alternative themes developed for the DEIS, which have been developed in part based upon the potential environmental, social, and economic consequences of implementing each alternative.

Additionally, the Department understands Alternative B, with its suite of proposed management actions, is the proposed revised plan and was developed iteratively in a collaborative manner to address the needs for change identified in chapter 1 of the DEIS.

The Department met with and repeatedly provided feedback to the Forest in the draft developments of the proposed revised plan. The Department agrees with members of the public who felt *viability and habitats* should have greater emphasis in all possible plan alternatives, and finds existing designated wilderness areas to be adequate. Consequently the Department does not support the Forest's preferred choice of Alternative B.

Arizona Game and Fish Department Preferred Alternative (Alternative C)
The Department understands Alternative C was developed to address the issues specific to species viability and habitat, by providing a greater focus on the improvement of ecological conditions and wildlife habitats. It provides additional emphasis on restoring the vegetation types most severely departed from desired conditions, provides for increased restoration treatment activities within the Ponderosa Pine and Grasslands Potential Natural Vegetation Types (PNVT's), and places additional emphasis on management actions providing benefit to

native fish habitat and management indicator species such as pronghorn. In addition to these considerations, with Alternative C being the sole alternative in which there are no additional areas recommended for wilderness designation (contrasting the eight Wilderness Expansion Areas totaling approximately 43,400 acres identified in Alternative B), it is Alternative C with which the Department most closely aligns, and for which it offers its support.

The Department appreciates the tremendous effort, monumental investment of manpower, and outreach employed by the Forest in this planning effort. The Department wishes to again express its appreciation for the opportunity to provide comment in this important process. If you have any questions related to this letter or the comments, requests or recommendation that it contains, please feel free to contact me by phone at 928-692-7700, ext. 2300, or by email at tfinley@azgfd.gov.

Sincerely,

Tom Finley

Tom Finley
Supervisor, Region III

TPF:tb

cc: Laura Canaca, Supervisor, Habitat Project Evaluation Program
Trevor Buhr, Habitat Program Manager, Region III
Larry Riley, Assistant Director and Acting Habitat Branch Chief

Enclosure: CD containing the following: 2012-2022 State Wildlife Action Plan, Wildlife 20/20 Strategic Action Plan, Species and Habitat Conservation Guide, Species of Greatest Conservation Need, Species of Economic and Recreational Importance, Data Layers Associated with the Department's Habimap Planning Tool, Arizona's 2006 Wildlife Linkages Assessment, Arizona Missing Linkages Reports, Yavapai and Coconino County Stakeholder Linkages Reports, Arizona Game and Fish Department Wind and Solar Energy Guidelines, Central Arizona Grassland Strategy, November 2, 2012 Letter: North Kaibab Ranger District Travel Management – Appeal of pursuant to 36 CFR 2015

Ltr#0115

From:	Rasmussen, Mary C -FS
To:	FS-prescott-forest-plan-comments
Subject:	FW: Scanned Documents
Date:	Tuesday, December 04, 2012 11:49:19 AM
Attachments:	11262012-Vernam.pdf 11232012-Ross.pdf

These are paper copy public comments that arrived today with 11/28/2012 postmarks.

From: Maneely, Debbie -FS
Sent: Tuesday, December 04, 2012 10:50 AM
To: Rasmussen, Mary C -FS
Subject: Scanned Documents

Debbie Maneely
Public Affairs
Prescott NF
(928) 443-8130 (office)
(928) 925-1111 (cell)

Ltr#0115

November 26, 2012

TO: Prescott National Forest Attn: Plan Revision

FROM: Deb Vernam, Board Member

Friends of Arizona Trails

Subject: Comments on Prescott National Forest Strategic Plan

I have reviewed your plan and would like to comment and offer recommendations for your review.

1. Safety is the highest priority for trail users. It has become evident that extreme sport of high-speed mountain biking is a dangerous factor for equestrians & hikers that could & eventually will cause s serious injury or death if the PNF does not plan on addressing the "speed" issue. With the increased efforts of the City of Prescott to promote mountain biking in the PNF the safety to equestrians and hikers is at an even higher risk
2. It has become apparent that the PNF would prefer that the equestrians, hikers and bikers resolve this issue amongst themselves. The PNF has a responsibility to take leadership in acknowledging that biker speed is the core of the safety problem. A reevaluation of the multi use trail standards is imperative in considering trail user interactions. IMBA standards are not the correct standards for multi use trails since it only accommodates bikers.
3. Hiker and equestrian users are incompatible with high-speed downhill biking. Designating various trails to hikers and equestrians would eliminate the dangerous risks involved in multi use with the high speed extreme sport of mountain biking. The Williamson Valley – Granite Mountain and Groom Creek areas are the highest use of equestrian and hiking trails and should be the first considerations.

Thank you for your consideration and look forward to working with the PNF and other user groups to resolve the safety issue.

Debra J Vernam

Lt#0115

O Vernam
PO Box 4284
Chino Valley, Az
86323

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Prescott National Forest
attn: Plan Revision
344 S. Cortez St.
Prescott, Az 86303

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Ltr#0116

From: Rasmussen, Mary C -FS
To: FS-prescott-forest-plan-comments
Subject: FW: Scanned Documents
Date: Tuesday, December 04, 2012 11:49:19 AM
Attachments: 11262012-Vernam.pdf
11232012-Ross.pdf

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Sent: Tuesday, December 04, 2012 10:50 AM
To: Rasmussen, Mary C -FS
Subject: Scanned Documents

Debbie Maneely
Public Affairs
Prescott NF
(928) 443-8130 (office)
(928) 925-1111 (cell)

Ltr#0116

November 23, 2012

TO: Prescott National Forest, Attn: Plan Revision, 344. S. Cortes St., Prescott, AZ 86303.

FROM: Clare G. Ross Vice President

Friends of Arizona Trails

Subject: Comments on Prescott National Forest Strategic Plan

We appreciate this opportunity to comment on the PNF strategic plan. I have reviewed your comprehensive plan and would like to share the following comments and recommendations regarding trails, for your consideration.

1. The PNF rates safety as one of its highest priorities for trail users. It is clear that the extreme sport of high-speed mountain biking is incompatible with the safety of the slower hiking and equestrian usage putting all users at high risk for serious injury or death. There is no mention in the plan addressing or acknowledging the significant impact on the safety of hikers and equestrian users from the increased mountain biking usage resulting from the City of Prescott efforts promoting the PNF as a mountain biking destination. On page 121, Table 8, the Recreation Suitability Matrix under non-motorized dispersed recreation includes hiking, back packing, hunting, wildlife viewing, rock climbing and mountain biking. I suggest that Equestrian use should also be included in that matrix.
2. The Prescott National Forest is counting on the Hiker, Equestrian and Bikers to resolve the trail safety issue for the PNF. The PNF should assume active leadership responsibility and use input from the user groups as part of the process. There is a need to acknowledge that BIKER SPEED is at the core of the safety issue on single track, multi-use trails and that high speed biking use is incompatible with the safety of other users on these trails. Also, not

all trails currently designated as multiuse, are suitable for multiuse. Current trail standards are a static model based on spatial requirements of trail users in a vacuum and does not consider the dynamics of different trail users passing one another, nor the line of sight and stopping distances needed when trails users may be travelling at a high rate of speed and encountering others. The PNF needs to develop a trail standard suitable for multiuse trails that considers safety in trail user interactions. The trail standard must consider trail width, slope, line of sight, speed limits and stopping distances. Review existing PNF trails for compliance with trail standard and designate trails accordingly. IMBA trail standards are not suitable for multiuse trails.

3. Since hiker and equestrian uses are clearly incompatible with high-speed downhill biking, the solution is to designate separate trails for the extreme sport of downhill biking and for hikers/equestrians. Designate trails # 347, #345, #352 and#348 in Granite Basin for hiker & equestrian use. That's where the accidents have happened and that's where the horses and hikers are. These trails are accessible from the Williamson Valley Trailhead. Demographically the vast majority of horses in the County are located in Williamson Valley & nearby Chino Valley. Granite Mountain Stables, which has numerous horses boarded there and has a commercial trail ride operation into Granite Mountain, is across the street. Many area boarders lack horse trailers to travel elsewhere. Additionally this is one of the few areas having reasonable trailhead parking for rigs and year round water for horses. Also Designate trails #307 and #383 in the Groom Creek area for hiker & equestrian use. There are numerous youth camps with equestrian programs in that area using those trails. In addition, the only horse camp in the Prescott National Forest, Groom Creek Horse Camp, is located there.

We look forward to working with the Prescott National Forest staff and other trail user groups to make the forest experience an enjoyable and safe experience for everyone.

Dave Ross

Lt#0116

CERTIFIED MAIL

Clare Ross
PO Box 4560
Chino Valley, AZ 86323

7012 1640 0001 0261 6638

UNITED STATES POSTAL SERVICE

1000

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PRESCOTT NATIONAL FOREST
344 S. CORTEZ ST
PRESCOTT, AZ 86303

RETURN RECEIPT REQUESTED

ATTN: PLAN REVISION

86303439899