

*This is a Notice of Appeal to  
USDA Forest Service  
Chief Thomas L. Tidwell  
Attn: Appeal Reviewing Officer  
1400 Independence Ave., SW  
EMC-LEAP, Mailstop 1104 Washington, DC 20250*

Filed pursuant to the Optional Appeal Procedures 36 CFR 219.7(b)(3) (2012 planning rule),  
and 36 CFR 219.35, Appendix A (2000 planning rule, as amended July 2010)

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FOREST PLAN PARTICIPANT	)
BLUE RIVER, PROPERTY OWNER	)
MARY VANDER PLOEG	)
	)
APPELLANT	)
	)
	)
Calvin N. Joyner	)
within the	)
Regional Forester	)
USDA Forest Service	)
Southwestern Region	)
	)
Responsible Officers	)

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In RE: Appeal of Record of Decision  
Dated July 30, 2015 and Published  
September 25, 2015  
Concerning the Land Management  
Plan for the Apache-Sitgreaves NFs  
abandonment of lawfully enabled and  
established Wildland-Urban Interface  
and other proper Land Management Areas

Apache National Forest and  
Greenlee County, Arizona

APPELLANTS NOTICE OF APPEAL;  
DESCRIPTION AND STANDING OF APPELLANT;  
STATEMENT OF REASONS; AND  
RELIEF REQUESTED

Dated this 24<sup>th</sup> day of December, 2015

For Appellant:

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P.O. Box 85  
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## NOTICE OF APPEAL

The "Land Management Plan for the Apache-Sitgreaves National Forests" (the Plan) has recognized by text and maps the official Wildland-Urban Interface (WUI-Community-Forest Intermix) Management Areas (pp 112-115 of the Plan) in Apache, Coconino and Navajo counties but not those in Greenlee County (see Plan map included).

The upper Blue River Community is a canyon geography with very high rugged cliffs to the west. As embers from fires up above carried by prevailing winds have rained down upon the community (Hannagan Meadow, Wallow Fire etc.) and thus our WUI was expansive a few miles to the east in that area.

The "Blue Road", Greenlee County Rd. 67004 has considerable infrastructure, and services the energy corridor, an average of about two homesteads (farms, ranches etc.) per mile, and is one of the two roads servicing all AZGF Unit 27 hunter traffic plus additional recreation traffic. The road also services a County school, County Library and a Post Office.

As you can see on the included ASNF "Management Areas" map the Plan has included an inappropriate "Natural Landscape" Management Area has swallowed much of our established Blue River WUI area (see GCWPPP map) while none of our designated WUI Management Area is being shown as existing at all.

The "Energy Corridor" for the Blue, Arizona community has also not been recognized in the Plan (missing on ASNF Management Area map).

Regarding "Energy Corridors" The ASNF Forest Plan states:

"Within and adjacent to energy corridors, vegetation should be managed similarly to the Community-Forest Intermix Management Area so that facilities stay operational and reduce the hazards of human caused damage, damage from wildland fire, and falling trees"

Blue River/Greenlee County WUI Management Areas were enabled and created by law and signed onto by the ASNF. WUIs are not policy. The Blue River and Greenlee County Community Wildfire Protections must be recognized within the ASNF Land Management Plan

### Some background on the Greenlee County Community Wildfire Protection Plan

The Greenlee County Community Wildfire Protection Plan (GCCWPP) with inclusive Wildland-Urban Interface Management Areas was signed in Declaration of Agreement and Concurrence by the Chairman of the Greenlee County Supervisors, the Mayor of Clifton, the Mayor of Duncan, the Clifton Fire Chief, the Duncan Fire Chief, Elaine Zieroth, Forest Supervisor, Apache Sitgreaves National Forests, Kirk Rowdabaugh, Arizona State Forester and Bill Cicish, Bureau of Land Management, Gila District.

The GCCWPP was published in 2005

Wildland Urban Interface management areas were created under the Healthy Forests Restoration Act (HFRA) which was signed into law in 2003 by the 108<sup>th</sup> Congress:

**“To improve the capacity of the Secretary of Agriculture and the Secretary of Interior to conduct hazardous fuels reduction projects on National Forest System lands and Bureau of Land Management lands aimed at protecting communities, watersheds, and certain other at-risk lands from catastrophic wildfire, to enhance efforts to protect watersheds and address threats to forest and rangeland health, including catastrophic wildfire, across the landscape, and for other purposes.”**

HFRA enabled affected communities to participate in the Community Wildfire Protection Plan Process in a meaningful way by collaboration with local, State, and federal governments.

I commented on the DRAFT EIS for the Plan about the fact that the Greenlee County (incl. Blue, Arizona ) WUIs were included in the draft text along with all other counties in the ASNF, but were a lacuna on the draft map. This resulted in the WUIs for Greenlee County being absent in both text and maps in the final Plan!

Proper WUI management areas must be returned to Greenlee County including the Blue River Community “Wildland-Urban Interface” management areas and “Energy Corridor” management area. These areas were lawfully created, and must be recognized in the Plan as they are essential to the health and safety of those in the community.

Kindest regards,



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P.S. The Greenlee County Community Wildfire Protection Plan can be downloaded at the Arizona State Forestry Website. Maps included for clarification.