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December 15, 2015

USDA Forest Service
Attn: Appeal Reviewing Officer
1400 Independence Ave., SW
EMC-LEAP, Mailstop 1104
Washington, DC 20250

*Received on
12/30/2015
at 8:18 AM
Jef*

Subject: Appeal of the August 2015 decision made for the management of the Apache-Sitgreaves National Forest, pursuant to the July 2013 "Optional Appeal Procedures Available during the Planning Rule Transition Period"1.

Dear Appeal Reviewing Officer:

The Apache County Board of Supervisors respectfully requests your review and consideration of our appeal of the Apache-Sitgreaves National Forest (ASNF) revised management decision, plan and Final Environmental Impact Statement contained in the following (hereinafter collectively referred to as "Planning Record"):

- Record of Decision ("ROD") for the Apache-Sitgreaves National Forest Land Management Plan (MB-R3-01-09), dated August 2015;
- Land Management Plan for the Apache-Sitgreaves National Forest ("Plan") (MB-R3-01-10) dated August 2015;
- Apache-Sitgreaves National Forest Land Management Plan, Programmatic Final Environmental Impact Statement ("FIS") (MB-R3-01-11) dated August 2015;
- Specialist Reports and other documents produced or used to complete the latest Apache-Sitgreaves National Forest planning.

This appeal is submitted as a means of bringing the future management of the ASNF more in line with the needs of the majority of citizens who live, work and recreate in Apache, Coconino, Greenlee, and Navajo Counties in Arizona.

A number of environmental groups in Arizona have made an effort to influence the development of future management direction for the ASNF, however the vast majority of local citizens and the visitors who come to enjoy the many recreational opportunities found on the Forest are not in agreement with the future management direction found in the ROD and Plan. The Apache County Board of Supervisors ("Apache County") has invested considerable time and money in reviewing and assessing the large volume of information during this planning process. We offer the following comments and points of appeal in an effort to ensure that the needs of the humans who rely on the Forest for work and recreation are fairly represented in the Plan, as is required by law.

1 Accessed 12/01/15 <http://www.fs.fed.us/emc/appl/tit/includes/201307PlanAppealProceduresDuringTransition.pdf>

COMMENTS

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Overall:

Issue: The Plan has failed to achieve its intended purpose

It is obvious that little if any effort was made to make the information presented in the ASNF Land Management Planning process understandable to the general public. The entire record for the planning process is so filled with agency jargon and the latest politically correct terminology that only a few highly involved elite planners could decipher what is meant by what is presented. It is doubtful that even the majority of Forest Service employees on the ASNF could explain the meaning of much of what is presented.

Figure 1 (right) clearly shows that the Forest Service once knew what it was that the agency was created to provide for the public, and that the agency could communicate its mission to the public very well. However, when reviewing the record for the revised Plan it is not clear what the agency is looking to accomplish in the near future, other than making planning documents the most idealistic and politically correct documents ever written.

The revised Planning Record is loaded with idealistic, judgmental and politically correct statements that serve to confuse rather than to clarify. Examples include but are not limited to the following:



Figure 1 Forest Service shield clearly showing what the agency was created to manage.

“Recurring natural ecological disturbance”
“Natural ecological processes”
“Interdecadal climatic variability”
“Abiotic and biotic stress”
“Fire regime condition class”
“Departure from desired PNV1”
“Properly functioning watersheds”
“Recreation Opportunity Spectrum”

“Potential natural vegetation type”
“Fire adapted ecosystems”
“Habitat fragmentation”
“Sustainability of PNVTs”
“Ecosystem sustainability”
“Species viability”
“Ecological context”
“ROS Classes”

"Community-Forest Intermix"

"General Forest"

While the use of these and hundreds of other intellectually impressive statements in the Planning Record may indicate a high level of education of the authors, this kind of impressive sounding language does not translate easily into defining a clear and concise management direction for the ASNF.

Along with the complicated language used in the ASNF Land Management Planning process there appears to be a totally different tone and philosophy of management presented in the updated Plan. This change in management philosophy is evident in the use of the concept of potential natural vegetation type (PNVT) and the statement that "Thirteen of the 14 PNVTs on the ASNF vary (sometimes substantially) in structure, composition, function, and natural disturbance from desired conditions."

It was not that long ago that forest and rangeland conditions (now called "health") were objectives measured in terms of current and sustainable production of timber and forage, as well as conditions such as the amount of erosion that was occurring and use of the area by various wildlife species. Recreation values were measured by the number of people who actually came and used the National Forest lands along with evaluation of what they preferred to do when visiting their National Forest.

The measurable objectives that once were used to determine how National Forest lands were to be cared for and managed have become secondary to an effort to change the vegetation and other characteristic of the public lands back to what is imagined they looked like and supported prior to settlement by European man. This imagined ideal condition, which is based upon having no interference by man and his activities, has led to a strong and unrealistic preservation or protectionism philosophy that ignores the fact of climate change and further ignores (and thereby demeans) the presence of the native peoples who lived on these lands and used the resources before Europeans settled in the area.

While it is not directly stated in the Planning Record, it is easy to conjecture that if the public would not harvest and consume forest products and would engage in only "*Leave No Trace*" recreation activities, the "*desired and potential*" conditions ("*ecosystem health*") of the ASNF could be achieved. Overstocked forest stands would be thinned by wildfire, only low levels of natural erosion would occur, nature would create and properly distribute all necessary wildlife habitat so no species would decline below viable population levels, and ample quantities of clean unpolluted water would flow year around in the Forest streams. The inference is clear that it is only due to (European) man's interference that the ideal desired conditions are not being realized.

Thus the statement "Sustainable supplies of resources such as timber, recreation, and forage are byproducts of healthy, functioning ecosystems" (Last sentence, paragraph 6, page 16, ASNF LMP), while true, nevertheless does not address the realistic management scenario that once was practiced on the ASNF, and does not realistically provide for implementing successful future management of the ASNF. The above quoted statement and others like it should be amended to read "Healthy, functioning ecosystems are the byproducts of managing for sustainable supplies of resources such as timber, recreation, and forage." Producing valuable renewable resources from National Forest like the ASNF not only can restore healthy, functioning ecosystems but can

also provide the wealth and manpower to get the restoration and proper management of National Forest lands accomplished.

Including human needs as a critical component of forest management has proven to be successful and was what made the Forest Service one of the most prestigious and respected land management agency to have ever existed. It was not until National Forest management started to be driven by emotions, litigation and politics that forest health started to decline and the public lost faith in the Forest Service's ability to manage the National Forest. (cite)

It is a shame the updated Plan has been loaded with emotion-driven feel-good ideas like *Wildlife Quite Areas*, and *Natural Landscape Areas* so people can feel like wildlife and "mother earth" are a priority. The amount of boiler-plate jargon that is included to make the Plan more litigation proof is over whelming. The level of political maneuvering incorporated into the planning process and resulting record so the agency can appease the radical environmental community is obvious and unconscionable. It must have cost several million dollars to produce such a document, but the result is not a Forest Management Plan.

Appeal Issues

Issue 1: Motor Vehicle Use Restrictions

Illegal implementation of motor vehicle use restrictions and requirements in the Plan are in conflict with and/or usurp existing laws and regulations. This overstepping of authority is presented as management direction in multiple Plan Management Areas: Energy Corridor, Wildlife Quiet Areas, Natural Landscapes, Recommended Research Natural Areas, and Recommended Wilderness.

Discussion: While there is a clearly defined process in Forest Service regulations (36 CFR Part 212 Travel Management) to address motor vehicle use, the ASNF has not been successful in following that process. It appears the ASNF is trying to implement desired motor vehicle use restrictions and requirements by making them components of Management Area prescribed management direction rather than as clearly directed in 36 CFR §261.13 that prohibited motor vehicle use requirements will be implemented after the "Travel Management" planning process is completed.

It is apparent that the ASNF used a process similar to Community Planning and Zoning to develop the Plan's Management Areas. The idea of regulating the development and use of property in a community setting has long been used to make the growth of communities an orderly process that reduced conflict, made a community a safer place, and protected property values. The regulation of property use in communities is authorized through local ordinances and is something where local residents influence the decisions being made through their elected local officials. While the Community Planning and Zoning process has worked well in the local government urban setting there is no authority for managers of National Forests to arbitrarily adopt this process and apply it as a means to facilitate Land Management Planning.

It is obvious that the ASNF Planning staff took it upon themselves to "Zone" motor vehicle uses on the ASNF by identifying and placing motor vehicle use requirements and restrictions on a large portion of ASNF (approximately 472,000 acres) through the revision of the Plan. While

several in-place special management areas on the ASNF have existing restrictions on the use of motorized vehicles (Wilderness and Primitive Areas) a large portion of the ASNF will become off limits to motor vehicle use without following the requirements of 36 CFR, Part 212.

Requested Action: The ASNF should withdraw the August 2015 decision to implement the updated Plan and reinitiate the Land Management Planning Process so that motor vehicle use direction is determined following the regulations found in 36 CFR Part 212.

Issue 2: Designation of land use restrictions not authorized under current law or regulation.

The implementation of the special "Wildlife Quiet Areas" and "Natural Landscapes" as Plan Management Areas is an attempt to implement unnecessary and overly restrictive management requirements to portions of the ASNF. The implementation of both of these special Plan Management Areas is being done without clearly sharing with the public the need for this management direction or what laws and/or regulations authorize this special management being implemented on National Forest System lands.

Discussion:

"Wildlife Quiet Areas" The stated intent of this Plan Management Area is to provide various wildlife species a place they can go where they will not be disturbed. No law or regulation could be found that authorizes the ASNF to set aside large portions of National Forest System lands for this purpose. What does come close to this type of action for the benefit of wildlife is found in the Endangered Species Act where federal agencies are directed to protect listed threatened and endangered (T&E) species and their habitat from disturbance and destruction by humans. The stated targeted wildlife species that benefit from "Wildlife Quiet Areas" are mainly big game species. It appears the ASNF has arbitrarily decided to implement special management direction that involves approximately 50,000 acres to resolve a problem that is not found on any other National Forest in the Region and not recognized in any law, regulation, Forest Service Manual or Forest Service Handbook.

In the 1980's the ASNF and Arizona Game and Fish Department worked to implement Wildlife Habitat Areas, which later became "Wildlife Quiet Areas". These special management areas have been in place for a number of years and the latest Closure Order No.01-14-564 places motor vehicle use restriction on a number of areas on the ASNF citing 36 CFR §261.54 (a) as the authorizing authority. This Closure Order fails to consider the requirements of 36 CFR §261.13 as explained above.

The use of special closure orders to prohibit various land uses on National Forest System lands was never intended to give Forest Service Officers the authority to arbitrarily restrict public use of NF lands. The use of special closure orders is intended to be used to implement specific requirements or needs defined in the various laws and regulations that direct the management of National Forest such as the Endanger Species Act, Clean Water Act or Clean Air Act.

It should also be noted that this Wildlife Quiet Area Plan Management Area management direction discriminates against members of the public who are disabled and/or elderly, and who would be unable to enter and enjoy these areas. It appears this Plan Management Area is another attempt by the ASNF to create pseudo wilderness that will be enjoyed by a limited number of people.

"Natural Landscapes" The stated intent of this Plan Management Area is to retain a natural-appearing character of the areas. The Desired Conditions for these Plan Management will be managed very similar to those of designated Wilderness Areas are managed and will be treated as pseudo Wilderness without the process of law that creates a true Wilderness Area.

Wilderness Areas are designated by the Wilderness Act, which requires Congressional approval, yet the areas that make up the "Natural Landscape" Management Areas are being designated and will have management requirements that are arbitrarily developed by the ASNF. The special management for these areas will for the most part mimic "Wilderness" management, but this management is not being implemented following the procedures of the Wilderness Act. If pseudo Wilderness can be created by just setting up Plan Management Areas, there is no reason for going through the procedures and processes required in the Wilderness Act.

It is stated that the "Natural Landscape" Plan Management Area includes the inventoried roadless areas (IRAs) on the ASNF that were identified in the 2001 Roadless Area Conservation Rule. It is also stated that IRAs are managed to protect and conserve their roadless character. It needs to be noted that the 2001 Roadless Area Conservation Rule has been challenged multiple times in various court cases and is not well accepted by most commodity producers. It appears the ASNF is implementing the 2001 Roadless Area Conservation Rule without specifically stating that is what they intend to do. Again the public has not been clearly informed of the intent of the ASNF actions and management direction, which are unnecessary for maintenance of healthy watersheds and ecosystems. These ASNF actions and management direction are being implemented on a large portion of the ASNF (approximately 404,000 acres). The only plausible reason that the "Natural Landscape" Plan Management Area designation was created and included in the ASNF updated Plan is to implement "Wilderness" preservation requirements on lands that are not included in a designated "Wilderness Area".

Requested Action: The ASNF should withdraw its August 2015 decision to implement the updated LMP and reinitiate the Land Management Planning Process. Plan Management Areas should not be used to implement questionable land use direction that is not clearly explained and disclosed to the public during the Planning process.

Issue 3. The updated Plan does not comply with the Clean Water Act

The Plan does not comply with the Clean Water Act (Federal Water Pollution Control Act and Amendments). Sec. 101, Declaration of Goals and Policy, (a), *"The objective of this Act is to restore and maintain the chemical, physical, and biological integrity of the Nation's waters"*.

The following points identify where the ASNF fails to comply with the Clean Water Act (CWA) by not taking specific action to meet the Goals and Policies of the CWA when developing and approving their August 2015 updated Land Management Plan:

- The ASNF has failed to disclose the change in baseline conditions of the watersheds located on the ASNF due to the recent Rodeo/Chediski and Wallow Fire.
- The ASNF has not addressed the potential for severe erosion on thousands of acres of denuded land (much of which is made up of steep slopes). The total removal of ground

cover from thousands of acres of land on the ASNF recently occurred due to the Rodeo/Chediski and Wallow mega-wildfires. The significant level of non-point water pollution that has, and will continue to occur, due to these mega-wildfires is not addressed in the updated Plan.

- The ASNF has not addressed the adverse impacts to off Forest water quality, downstream flooding, movement of large quantities of sediment and the swamping of water bodies and wetlands with sediments due to the recent mega-wildfires. This significant level of sediment removal and discharge is not addressed in the updated Plan.
- The ASNF has not addressed the flooding and scouring of stream channels that has occurred, and will continue to occur, resulting in the destruction of riparian and wetland plant communities. This destruction of critical riparian and wetland habitat has adversely and will continue to impacted multiple threatened and endangered species of wildlife and plants. This significant level of stream channel and riparian plant community destruction along with the adverse impacts to threatened and endangered species is not addressed in the updated Plan.
- The ASNF has not addressed the release of nutrients into the streams and lakes located on the Forest due to the mega wildfires. This release of elevated levels of nutrients has and will continue to have significant adverse impacts on the aquatic ecosystems located on the Forest and downstream. This significant level of nutrient loading along with the adverse impacts to the aquatic ecosystems is not addressed in the updated Plan.
- The ASNF has not adequately identified the need for implementation of soil and watershed protection measures and accelerated watershed restoration efforts to be carried out due to the recent mega wildfires in the updated Plan.
- The ASNF has downplayed and misled the public as to the adverse effects of the recent mega wildfires and continues to ignore the threat of potential flooding in the updated Plan. The current and on-going damage to downstream property and ecosystems has been ignored throughout the current Land Management Planning process.

There are more adverse effects that have and will continue to occur due to the recent mega wildfires, and which have not been mentioned. The drastic changes in the vegetative, watershed and soil conditions due to these mega wildfires will continue to adversely impact the environment, both public and private property, and human welfare. The adverse impacts from the Rodeo/Chediski and Wallow wildfire, while not totally preventable, could be reduced and mitigated if ASNF had an interest in doing so.

Discussion: The *Wallow Fire Changed Condition Assessment* report was based entirely on changes in forest vegetation (density of forest canopy cover), which was derived from remote sensing and a rapid on-the-ground assessment of burn intensities immediately after the fire. This broad scale attempt to identify the burn severity of the Wallow wildfire is just one tool that should have been used to determine the current and future potential adverse effects of this wildfire. When reading the report, it is obvious that things such as areas of denuded soils (especially on steep slopes), areas where extreme heat removed all organic material and reduced the soil surface to a state where it was (is) highly erosive and numerous other important factors used in determining the potential for elevated rates of soils erosion were not documented and not mentioned in the report.

On page 6 of the *"Wallow Fire Changed Condition Assessment"* report it is stated *"the team briefly considered whether to create a new management area for the Wallow Fire burned area, but chose not to pursue further. Earlier in plan development, we had considered this as an option for managing the area burned by the Rodeo-Chediski and decided not to make it a separate management area."* From this statement it is clear that the "team" recognized the importance of placing emphasis on managing the areas of the Rodeo/Chediski and Wallow wildfires to protect and restore soil and watershed conditions, but dismissed that idea for unknown reasons.

This same "team" recommended that *"Forest-wide Direction for Landscape Scale Disturbance Events"* be included in the ASNF Plan to deal with future events. This management direction is included in the ASNF updated Plan, but is not being followed to address the current landscape scale disturbance events such as the Rodeo/Chediski and Wallow wildfires.

On page 7 of the *"Wallow Fire Changed Condition Assessment"* report it is stated *"Focus watersheds is still a valid emphasis area—these will be specifically identified during plan implementation based on watershed condition class ratings, management emphasis, and forest capacity. Restoration needs in the Wallow Burn Area could be identified (as they are currently) through focus watersheds."* From this statement it is clear that the "team" did not feel that any special emphasis should be given to the devastation of soil and watershed conditions caused by the Wallow wildfire during the ASNF Land Management Planning process and that any activities to protect and restore the functions of the watersheds impacted by the Wallow wildfire are just part of the ordinary daily watershed management function carried out on the ASNF

It doesn't take much time driving the major highways that cross the ASNF to figure out that there are thousands of acres where all of the forest canopy was (and is still) removed. This is significantly obvious on many very steep slopes. It is also obvious that the only ground cover left on the soil on thousands of acres is annual weed species and a few annual grass species that either survived the fires or were planted following the fires.

In some places there is the usual re-sprouting of various shrub species and alligator juniper, neither of which is good at preventing soil erosion. These sprouting species of trees and shrubs will become the PNVF for thousands of acres on the ASNF that once supported climax or near climax stands of non-sprouting tree species such as ponderous pine and other *"dry mix conifer"* species. This conversion to a disturbance (fire) driven new climax condition, while being a natural process, does not fit with the PNVF desired condition described in the updated ASNF Plan. Again the public is being misled concerning the future conditions they will experience on the ASNF.

Local citizens are very concerned that lives and property are still at risk from flooding if a major precipitation event were to occur. The Arizona Highway Department is still battling gully erosion and sediments deposited on the highways or plugging up culverts. The public is not blind or stupid and recognizes that politically correct dogma, not the reality of the situation found on the lands that makes up ASNF, is what is presented in the ASNF updated Plan.

Requested Action: The ASNF should withdraw its August 2015 decision to implement the

updated Plan and reinitiate a Land Management Planning Process in which management direction is included to deal with the adverse effects of the Rodeo/Chediski and Wallow wildfires.

Issue 4: The updated Plan does not comply with the Clean Air Act

The effects of smoke on human health and the environment when using fire as a management tool are not clearly addressed and displayed in the updated ASNF Plan as required by the Clean Air Act. The Clean Air Act of 1972 (Public Law 92-500) and its subsequent amendments assign Federal land managers the responsibility to protect air quality related values in Class I airsheds and to protect human health and basic resource values in all areas. While there is some information concerning smoke management found in the Fire Specialist Report and the Final Environmental Impact Statement, the updated ASNF Plan appears to lay the responsibility for meeting Clean Air requirements for smoke production on the State of Arizona as is evident in the following statements:

"All prescribed fires are conducted in accordance with the Arizona Smoke Management Plan, administered by ADEQ, to comply with the Clean Air Act." (Page 108, Land Management Plan)

"During extended periods of burning, smoke should be monitored, in cooperation with the Arizona Department of Environmental Quality, for levels that may have impacts to human health from fine particulates." (Page 19, Land Management Plan)

Discussion: Throughout the updated ASNF Plan, the use of prescribe fire and wildfire as a management tool, and the need to return fire to its natural role of shaping the characteristics of various PNVTs are components of Goals, Objective and Management Direction sections of the Plan. The following are examples of the direction to allow and use fire as a management tool:

Restoration methods, such as thinning or prescribed fire, should leave a mosaic of untreated areas within the larger treated project area to allow recolonization of treated areas by plants, small mammals, and insects (e.g., long-tailed voles, fritillary butterflies). (Page 30, Land Management Plan)

Wildland fires may be used to meet desired resource conditions, maintain or promote desired vegetation species, and enable natural fires to return to their historic role. (Page 30, Land Management Plan)

The use of wildland fire to burn large areas is expected to be an important tool to manage some aspen and insect and disease populations. (Page 39, Land Management Plan)

The updated ASNF takes the approach that the issues of smoke production and suppression actions need not be addressed in the Plan but rather be managed according to objectives identified in other applicable decision documents as stated in the following:

Human-induced impacts (e.g., smoke production, suppression actions) to natural processes, resources, or infrastructure attributable to wildland fire activities should be managed towards achieving objectives as identified in the applicable decision document. (Page 10, Land Management Plan)

The ASNF Plan is strikingly void of information that provides the public with the magnitude of, and effects from, smoke production when fire is used as a treatment tool and when fire is again allowed to play its natural role on the Forest in the future. This failure to address the level of smoke that will fill the air in the future (as the use of and tolerance of wildfire increases) can only mean the ASNF does not want the public to realize some of the adverse effects of the planned future management that will be carried out on the ASNF.

It is somewhat ironic that the ASNF Plan contains approximately 35 pages dealing with the effects of global warming, which will be realized well in the future (20+ years from now in most cases), but fails to clearly and adequately address the effects and the future management of smoke generated from the proposed future use of fire. It also is ironic that one of the causes of global warming, (generation of carbon dioxide from the burning of forest fuels) is the very thing the ASNF has dismissed as not being important enough to clearly address and display in the updated ASNF Plan. It is difficult to understand why, when there is so much concern for global warming, the ASNF is limiting mechanical treatments of fuels through implementing a major increase in restriction on motor vehicle use, and increasing the acres on the Forest that will have to be treated with either a prescribed fire or a "managed" wildfire.

The following statement is important enough to be included in the updated ASNF Plan, but little attention is given to the fact that the desired conditions and future management direction found in the updated Plan calls for and will result in a dramatic increase in smoke production coming from the ASNF in the future:

"Climate scientists agree that the Earth is undergoing a warming trend, and that human-caused elevations in atmospheric concentrations of carbon dioxide (CO₂) and other greenhouse gases (GHGs) are among the causes of global temperature increases. The observed concentrations of these greenhouse gases are projected to increase. Climate change may intensify the risk of ecosystem change for terrestrial and aquatic systems, affecting ecosystem structure, function, and productivity." (Page 179, Appendix A, ASNF Land Management Plan)

Requested Action: The ASNF should withdraw its August 2015 decision to implement the updated LMP and reinitiate a Land Management Planning Process in which the dramatic increase in smoke production from the ASNF in the future will be recognizes and fully addressed.

Issue 5: The Plan fails to address the impacts of increased primitive recreation

The effects of increasing primitive recreation opportunities and use are not clearly addressed and displayed in the updated ASNF Plan. The adverse effects on water quality and thus the health of Forest users in the areas of concentrated primitive and dispersed recreation use due to the

inappropriate disposal of human waste is not discussed. As required by the Clean Water Act, Sec. 101. Declaration of Goals and Policy. (a) *The objective of this Act is to restore and maintain the chemical, physical, and biological integrity of the Nation's waters.* Water pollution and the spread of diseases due to human waste contaminating stream and springs must be addressed.

Discussion: It is recognized in the Recreation Specialist Report that all types of recreation uses are increasing on the ASNF. It is also shown in this report that primitive and dispersed recreation activities are becoming a more desired use on the ASNF. This increase in recreation use is coupled with increased restrictions on motor vehicle use across the Forest due to the creation of Natural Landscape areas, Recommended Research Natural Areas, and Recommended Wilderness, along with additional acres designated as Wildlife Quite Areas. This can only lead to an increase in the amount of primitive and semi-primitive camping taking place where proper facilities to deal with human waste are lacking.

While it is not well publicized, concerns about contacting and becoming sick from contaminated water while camping in remote areas is an increasing concern that has prompted many National Forest and/or land management agencies to issue warning about the potential of becoming sick due to using water from springs and streams on federal lands. Many National Forest and other land management agencies are developing and providing guideline to hikers and campers on how to properly camp in remote areas.

It is noted in the Water Resource Specialist Report that there was an exceedance for E. Coli bacteria in the lower Blue River and Chase Creek. Giardia and other highly contagious water-borne parasites have been documented in the Gila and San Francisco Watersheds. There is no reason to think the ASNF is immune from experiencing these problems at other locations on the Forest in the near future.

The only reference to guidance for dealing with this matter in the Water Resource Specialist Report is as follows:

In the action alternatives, there is guidance to locate dispersed campsites away from streams or sensitive areas, and facilities or developments could be provided for protection of the environment rather than the convenience of visitors. Alternative A does not contain this guidance and would allow campsites to be located in close proximity to the forests' waters. This concentrated unmanaged recreation use would continue to cause damage to vegetation; soil compaction and erosion; and water pollution from human and animal waste, dishwashing, trash, and vehicle fluids. (Page 25, Water Resource Specialist Report)

There is a lot more to developing management direction for prevention of the spread of diseases and parasites than just locating dispersed campsites away from streams and sensitive areas. The updated ASNF Plan needs to include management direction for the various Management Areas that provides guidelines for the monitoring of dispersed and primitive camping use levels and implementing actions that deal with concentrated dispersed and primitive recreation. Along with monitoring of use levels, favorite remote springs and stream segments that serve as a water source for hikers and backpack campers should be monitored for contamination.

Currently due to budget constraints, properly designed and well maintained recreation facilities are being shut down on the ASNF and the public is left to deal with their need for restroom facilities and a source of safe drinking water by whatever means they can. This current decrease in properly designed and well maintained recreation facilities along with the need to provide the critical restroom facilities and a source of safe drinking water at trailheads and in areas where Forest users are being forced to concentrate due to limited vehicle access is not considered or properly addressed in the updated Plan. The Plan should be the document where Forest level recreation use and Forest-wide public health issues are recognized and the emphasis for future management direction to resolve these issues is defined.

Requested Action: The ASNF should withdraw its August 2015 decision to implement the updated Plan and reinitiate a Land Management Planning process in which the management direction for primitive and dispersed recreation as well as the management of key recreation user concentration areas is addressed and will be sufficient to prevent the contamination of stream and spring due to human waste.

Issue 6: The updated Plan fails to adequately address or deal with economic impacts

While it may be argued that NEPA does not require that the economic effects of a federal action have to be analyzed and displayed prior to an agency making a decision, The National Forest Management Act (NFMA) *"directs the development, maintenance, amendment, and revision of land and resource management plans for each unit of the National Forest System. These plans help create a dynamic management system so an interdisciplinary approach to achieve integrated consideration of physical, biological, economic, and other sciences will be applied to all future actions on the unit (16 U.S.C. 1604(b), (f), (g), and (h))."*

Discussion: The listing of facts pertaining to the income levels, employment types and levels and cost of living for the area surrounding the ASNF in a specialist report and the FEIS do not meet the requirement for consideration of economic sciences as directed in the NFMA quote above. The return of income to local citizens is a critical and key element when determining the well-being or welfare of local citizens. Almost all of the issues the public have with the updated ASNF Plan link back to the economic effects. The biggest social problems the local governments will deal with in the future are linked to the economic impacts that will result from the implementation of the ASNF Plan. It should not be surprising that the failure of the ASNF to come to the table in order to address and mitigate local economic concerns with local government officials has been, and will be, the primary factor leading to the distrust of ASNF leadership.

Local governments are responsible for the well-being and welfare of the local citizens. While the ASNF may not be directly responsible for this task, the agency needs to at least make an effort to honestly address and display the economic effects of its actions. This economic analysis could have easily been done if the updated ASNF Plan had made a reasonable attempt to present the future levels of commodity production from the Forest, but instead the ASNF planning team chose to analyze and display how the ASNF will limit the use of commodity production from the Forest in the future.


Requested Action: The ASNF should withdraw its August 2015 decision to implement the updated LMP and reinitiate a Land Management Planning process in which the economic effects of implementing the updated ASNF Plan are honestly addressed and disclosed. The ASNF should not only consider economic impacts on the local economy, but also develop and analyze an alternative that builds environmentally sustainable levels of commodity production to support local economy. This production could also add much needed funding for the ASNF to achieve the desired objectives for watershed and ecosystem health without the Forest having to wait in line for funding to come from the taxpayer's pocket.

Conclusion:

After years of trying to work with the ASNF on the update of the Plan the Apache County Board of Supervisors finds it necessary to appeal the decision to implement the updated Plan and to request that the above issues that are identified in this appeal be reconsidered. There are many more issues that have been voiced by the citizens of Apache, Coconino, Greenlee, and Navajo Counties that have not been included in this appeal document; while they are not specifically discussed here, they must be addressed by the ASNF.

The citizens of Apache County have brought forth before the Board of Supervisors a number of issues that may well become the subject of citizen appeals of the Plan. These range from use-specific or site-specific restrictions on Forest use to distrust of the agency and/or the federal government in general. It is hoped that through this appeal process many of the issues with the updated ASNF Plan can be resolved, and that a well-thought-out and meaningful ASNF Plan can be developed and supported by the local citizens of Apache, Coconino, Greenlee, and Navajo Counties.

Sincerely,


Joe Shirley, Jr.
Chairman of the Board