



ARIZONA WILDERNESS COALITION

Working Together to Protect Arizona's Wild Lands and Waters

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Tonto National Forest
c/o Forest Plan Revision
Attn: Ms. Beth Rumpza
2324 E. McDowell Road
Phoenix, AZ 85006

Submitted via email to: tontoplan@fs.fed.us and erumpza@fs.fed.us

RE: Wilderness Inventory and Evaluation Criteria

Dear Ms. Rumpza:

Arizona Wilderness Coalition and the undersigned organizations provide the following comments on the draft Wilderness Inventory and Evaluation Criteria for the Tonto National Forest Plan Revision.

Arizona Wilderness Coalition's (AWC) mission is to permanently protect and restore wildlands and waters in Arizona for the enjoyment of all citizens and to ensure that Arizona's native plants and animals have a lasting home in wild nature. Our nearly 2,000 members and supporters enjoy a broad range of activities on the Tonto National Forest (TNF). Our membership includes hikers, hunters, fishing enthusiasts, photographers, equestrians, naturalists, educators, history buffs, and many other groups and individuals who value the special natural retreats afforded by wilderness and backcountry areas on the TNF. We also cooperate extensively with the TNF to complete stewardship and restoration projects with volunteers.

Wildlands Network is an international organization dedicated to reconnecting nature throughout North America. We provide the science and vision necessary to preserve large-scale ecosystems for species that need space to migrate, disperse, and adapt to climate change.

Sierra Club's Grand Canyon Chapter and more than 60,000 members and supporters in Arizona have a significant interest in and are directly affected by the

Tonto National Forest Plan. 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 environments." Our members have long enjoyed and explored the Tonto and advocated for its protections. Sierra Club was involved in the previous Forest Plan process and has been engaged consistently since the Tonto reinitiated the planning process. Our members hike, backpack, camp, raft, kayak, watch wildlife, hunt, and fish, as well as many other recreational activities on the Tonto. Our members also consistently assist with service projects including assisting with invasive species removal, wildlife research, trail maintenance, trash cleanups, and numerous other activities to help steward the Tonto National Forest.

Inventory Criteria:

The current draft criteria appear to generally exclude from inventory all areas with Level 2 roads. The Road Improvements Criteria need to be revised to reconcile with provisions of Chapter 70, 71.22a, that retain in inventory areas with Level 2 roads, as long as the areas do not meet the exclusion criteria of 71.22a 2.(c).

In addition, the current draft criteria need to be revised to include in inventory areas "Areas with forest roads that have been proposed by the Forest Service for consideration as recommended wilderness as a result of a previous forest planning process; or areas with forest roads that the Responsible Official merits for inclusion in the inventory that were proposed for consideration through public involvement during the assessment or other public or intergovernmental participation opportunity", per 71.22a 1.e.

Item 2. under the "Roads carried forward in inventory and considered in evaluation" needs to be revised to reconcile with 71.22a 1.(b) by adding "or identified as likely unneeded in a travel management plan (36 CFR 212.51) or a travel analysis (36 CFR 212.5(b));". Additionally, user-created routes should not exclude an area from inventory.

The criteria for "Other Improvements" appear generally well-reasoned. It will be important during the inventory phase to apply the criteria in a manner that carries forward for evaluation a very inclusive range of potential wilderness areas, so that areas are not prematurely excluded from further consideration. As stated in 71.22.b, "After identifying lands within the plan area that meet the size criteria (sec. 71.21 of this Handbook) and the road improvement criteria (sec. 71.22a of this Handbook), determine whether those lands contain other improvements. Include such lands in the inventory where the other improvements or evidence of

past human activities are not substantially noticeable in the area ***as a whole, including when the area contains the following, also recognizing the potential need to provide for passive or active restoration of wilderness character in previously modified areas***, consistent with the intent of the Eastern Wilderness Areas Act¹:

1. Airstrips and heliports.
2. Vegetation treatments that are not substantially noticeable.
3. Timber harvest areas where logging and prior road construction are not substantially noticeable.
4. Permanently installed vertical structures, such as electronic installations that support television, radio, telephone, or cellular communications, provided their impacts, as well as their maintenance and access needs, are minimal. ...” (emphasis added).

While the inclusion criteria for vegetation treatments have merit, the exclusion criteria are too strict. A significant reason to be very inclusive with respect to vegetation treatments is that a more natural appearance can return over time, and in some areas, within a season or two. The exclusion criteria should more appropriately focus on areas where a manipulated, unnatural appearance dominates over a significant portion of the study unit. Merely a noticeable “edge” should not exclude an area if once past the edge, the general appearance is more natural.

Portions of the permanently installed vertical structure criteria are too strict. In Arizona, isolated towers may occasionally occur in very remote areas, and it would be common for there to be simply an annual maintenance visit. These isolated towers should not exclude an area from inventory, as a visitor might not observe them while exploring the majority of the unit.

The criteria for Areas of Mining Activity appear generally sound, with one exception. As noted by several participants at the June 22, 2107 public input meeting, some historic mining structures – potentially including headframes, flumes or other historic structures - should be retained in inventory, as such structures add to the visitor experience by providing visible lessons in local history.

¹ It is important to note that there is only one Wilderness Act, that sets “the fundamental policies for one unified National Wilderness Preservation System...Using the erroneous name ‘Eastern Wilderness Act’ creates the false impression that separate criteria apply to wilderness in the East. “ Reference: Scott, Doug. 2001. Eastern Wilderness Areas Act: What’s in a Name? *Wildearth* 11(1);24 [Spring 2001].

The criteria for Watershed treatment areas appear too strict, and need to conform with the breadth and inclusivity of 71.22.b.: "9. Watershed treatment areas (such as contouring, diking, channeling) that are not substantially noticeable. Areas may include minor watershed treatments that have been accomplished manually such as small hand-constructed gully plugs." In Arizona, there may occur remnants of former water diversion or management structures, including rock dams, terracing, isolated concrete remnants, and the like. Particularly if such treatments are in remote or isolated areas, they should not exclude an area from inventory. Additionally, some water treatments may occur as part of traditional ranching infrastructure and should not be excluded; and water treatments that are part of historic or prehistoric cultural resources also should be retained in inventory.

All previous citizen wilderness proposal areas should be inventoried, along with Uninventoried Roadless Areas. All Inventoried Roadless Areas (IRAs) should be carried forward for evaluation – see attachment A for a list. There should be a strong presumption that IRAs should be managed to preserve wilderness character.

Evaluation Criteria:

Portions of the Evaluation Criteria details are clearly linked to 72.1, "Evaluation of Wilderness Characteristics," which is helpful.

Care should be used in application of the "Improvements" criteria to not unduly exclude areas from wilderness consideration, particularly if the improvement has historic or interpretive value, is in a remote or isolated area, or is an element that could naturalize over time (such as user-created routes or vegetation treatments); or where remediation is planned or possible (such as some areas of mining activity or decommissioned roads). Additionally, this Evaluation Criterion should have added the consideration from the Inventory Criteria that improvements "similar in type and appearance to improvements that exist in current Tonto National Forest Wilderness" should not exclude an area from wilderness recommendation. This can help provide consistency when some improvements like ranch fencing or wildlife waters are found elsewhere in designated wilderness.

The "pervasive impacts" criterion should incorporate the consideration that wilderness areas may exist adjacent to urbanized or developed areas, yet still provide exceptional, outstanding and extremely valuable opportunities for wilderness enjoyment through solitude and primitive recreation. As an example, the Pusch Ridge Wilderness that is surrounded by urban Tucson-area development on three sides still provides extremely valuable solitude and primitive recreation for thousands of visitors who explore trails through small canyons and across ridgelines in this designated wilderness. Proximity to "high use areas, trailheads, private

lands, roads ..." should not be used as a single factor to exclude an area from wilderness recommendation.

The types of Primitive Recreation activities considered potentially available in an area should include the full range of research and nature study, in addition to the examples provided in 72.1.2(b). In Arizona, individuals and groups enjoy a variety of specialty nature-based activities, including botanizing, photography, arch hunting, geology study, birding, herpetology study, viewing of cultural sites and more. Because the TNF includes such a large range of ecological types, cultural resources and geology, a number of areas on the TNF possess special appeal for those seeking to learn more about such specialty topics. Climbing potential should also be considered, as that quiet recreation activity can be compatible with wilderness and is quite popular in western states.

The Unique and Outstanding Qualities Criteria are formulated in too strict a fashion in several respects. The "presence of rare species or ecosystems" should also be determined on a local scale and within the system of protected designations, and not restricted to rarity on a national or regional scale, pursuant to 72.1.4(a): "Rare plant or animal communities or rare ecosystems. Rare can be determined locally, regionally, nationally, or within the system of protected designations."

The consideration of density and extent of landscape features, historic and cultural sites, or other features of value should be used only as one of multiples measures of the significance of such features. The "density" and "extent" considerations should not be used to diminish an area's consideration for wilderness recommendation. For example, a potential wilderness area may meet the primary wilderness criteria and possess one iconic waterfall to which individuals hike from various parts of the wilderness. Preservation of wilderness experience as individuals travel to the waterfall amplifies the overall outstanding experience, and the area should not require multiple waterfalls (or multiple cultural sites, or a particular extent of water resources, and so forth) for the feature to substantiate consideration of the area for wilderness management.

The Manageability Criteria should not be applied to unduly exclude areas where alternative or creative approaches might address questions of manageability. For example, a commonly expressed concern is that wilderness management impairs actions to manage wildlife, undertake vegetation treatments or advance wildfire mitigation strategies. Yet with approaches that emphasize non-mechanized and non-motorized treatments, use of trained volunteers, and appropriate process to ensure the "Minimum Tool" is used for necessary actions in wilderness, all these actions can be effectively undertaken. Indeed, Arizona Wilderness Coalition specializes in tapping trained volunteers to conduct maintenance and restoration in

wilderness areas, which has included treatment of invasive species, riparian restoration in remote canyons, and considerable trail work. Additionally, multiple National Forests are working through “Firescape”-type strategies that incorporate prescribed burning and prudent forest thinning in wilderness areas, to address wildfire risk and to return vegetation communities to a more natural state.

We appreciate your careful consideration of our comments, and are grateful for the opportunity to provide input on the Wilderness Inventory and Evaluation Criteria. Please feel free to contact us for further elaboration on any of these comments.

Sincerely,

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ATTACHMENT A INVENTORIED ROADLESS AND RELATED AREAS

The Tonto National Forest should consider the following areas as being suitable for future wilderness consideration:

- 1) Lime Creek Inventoried Roadless Area
- 2) Mazatzal Contiguous Inventoried Roadless Areas. There appear to be four of these areas.
- 3) Mazatzal Contiguous Uninventoried Roadless Areas. There are two of these that are adjacent to the western boundary of the Mazatzal Wilderness Area. The first of these is centered around Tangle Creek and the second one is centered around North Red Creek. Both of these are significant riparian areas.
- 4) There is an Uninventoried Roadless Area centered around Squaw Creek and the north end of the New River Mountains.
- 5) There are two contiguous IRAs that are adjacent to the Pine Mountain Wilderness Area.
- 6) Boulder Inventoried Roadless Area
- 7) There are two small contiguous IRAs that are adjacent to the north boundary of the Hellsgate Wilderness Area
- 8) There is one small contiguous IRA that is adjacent to the northwest boundary of the Salome Wilderness Area.
- 9) Cherry Creek Inventoried Roadless Area
- 10) There are five small contiguous IRAs that are adjacent to the northern, eastern, southern, and western boundaries of the Sierra Ancha Wilderness Area.
- 11) Goldfield Inventoried Roadless Area
- 12) Black Cross Butte Inventoried Roadless Area
- 13) Horse Mesa Inventoried Roadless Area
- 14) Picacho Inventoried Roadless Area/Ash Creek Wilderness Study Area. The Ash Creek WSA is simply an expansion of the Picacho IRA.