

MØ7-08033207



THE STATE OF ARIZONA
GAME AND FISH DEPARTMENT

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September 10, 2007

Mr. Jim Beard
Coconino National Forest
1824 S. Thompson Street
Flagstaff, Arizona 86001

Re: Proposed Action for Managing Motorized Travel on the Coconino National Forest

Dear Mr. Beard:

The Arizona Game and Fish Department (Department) has reviewed the Proposed Action for Managing Motorized Travel on the Coconino National Forest (Forest). In general, the Department supports the Forest in their efforts to balance reasonable public uses and conserve natural resources through a travel management planning effort. However, the Department has concerns with respect to Motorized Big Game Retrieval (MBGR), camping designations, and ATV and motorcycle trails, both within the Forest boundaries, as well as from a statewide perspective. We also have site specific road recommendations listed as an attachment to this letter.

The Department supports a general prohibition against unregulated cross-country travel. Over the last several decades, increased creation and use of unauthorized roads has led to degradation and fragmentation of important habitats for a variety of wildlife including elk, mule and whitetail deer, pronghorn, turkey and black bear. Establishing a designated road network may help to improve habitats, reconnect populations of wildlife improving genetic viability, allow for conservation of wildlife movement corridors, and provide better hunting opportunities and experiences for the people of Arizona.

The Department also recognizes that in certain limited instances, cross-country travel may be necessary to accommodate administrative uses and to carry out goals and objectives of various programs. In that respect, the Department requests the Forest recognize and provide allowances for MBGR. The Travel Management Implementation Guidelines identify additional management needs for MBGR in the state of Arizona. In order to meet big game harvest and management objectives, the Department requests the Forest adopt the following rule for MBGR:

Motorized Big Game Retrieval will be allowed for elk, deer and bison, per the Implementation Guidelines, for the maximum timeframes permitted. CHAMP hunters will have permission to recover any legally taken big game, including bear, bison, elk, and deer during their respective permitted seasons.

The reason we have recommended this is;

- **In order to meet Arizona big game harvest and management objectives.**

In reaction to requests from the Coconino National Forest and our own data, the Department has lowered elk populations on the Coconino Forest over the last 16 years and tried to maintain the populations at lower levels. This has proven to be difficult. When bad weather, wet roads or other problems impacted hunters we have seen reductions in harvest combined with road damage. In response we have added permits, increased numbers of hunts, and split units. Staff from the Coconino Forest have complained about how many hunts there are and how many hunters are in the field already. It has not been easy to achieve the harvest levels required to attain the desired population levels, and further restrictions on motorized game retrieval will predictably lower hunt success.

Every year the Region flies aerial hunt patrols looking for violations such as hunting from a vehicle and vehicles traveling cross-country in the current vehicle closures. During these aerial hunt patrols we often see elk concentrated in the areas between roads. Knowing that the elk have already learned to avoid hunters by moving away from roads, we are very concerned that any disincentive for hunters to get further from roads will have an effect of lowering hunt success and reduce our ability to meet the Departments harvest objectives and control elk populations.

- **Need to avoid spoilage of big game.**

Warm weather and slow retrieval can lead to spoilage of big game meat. Even at high altitudes we have warm days unpredictably in our coldest months. Not only is spoilage wrong, but wasting game meat is in fact unlawful in Arizona.

- **Need to provide for State programs related to disabled hunters.**

CHAMP hunters have a greater need for utilizing motorized vehicles for big game recovery because of handicaps. We propose allowing CHAMP hunters permission to recover all legally taken big game, including bear, bison, elk, and deer during their respective permitted seasons.

- **Need for fairness**

Regulations up to this point have allowed everyone to drive cross-country. We are supporting a change to prohibit unregulated or unpermitted cross-country travel. The Forest proposes to discriminate against hunters while still allowing ranchers and fuel wood permit holders the ability to drive cross-country. For the ranchers especially, the proposed rule does not limit activities from traditional uses of the past. We are not arguing that ranchers should be limited but rather that similar exceptions should be provided to hunters, also permitted Forest users, therefore providing an element of fairness, which will not exist if all game retrieval is restricted. All three groups are traditional users operating under a permit even though the Forest does not issue the hunt permits.

As mentioned above, the Department requests MBGR be incorporated into the Proposed Action as the Forest moves into the Environmental Impact Statement (EIS) process. A larger issue facing the Forest, the Department, and the people of Arizona is a potential inconsistent application of the MBGR guidance across the state. This is of particular concern across Forests with shared boundaries, including the Coconino, Apache Sitgreaves, Kaibab, Prescott, and Tonto National Forests. Sportsmen and women are faced with an unpleasant future of having to interpret a variety of rules applied across Forest boundaries. This will certainly impact public use of the Forests, and may even result in individuals committing offences, where they were not aware of a rule difference, or that they crossed Forest boundaries. Thus, the Department requests that the Coconino Forest adopt the language as written above, and coordinate closely with the other Forests, along with the Regional Office to apply these same rules consistently.

Similarly, the Department is concerned about different approaches of providing for dispersed camping across Forest boundaries, and recommends similar coordinated management between Forests. This will ensure ease of interpretation about rules and camping opportunities, easing the need for additional enforcement along Forest boundaries. The Department supports a reasonable rule to regulate the distance a vehicle should be allowed to pull off a road. It is understood that camping will be allowed adjacent to open roads either by designating a zone or by designating sites. However, the method to be used as described by the Proposed Action is ambiguous and not clearly defined. This must be clarified in the EIS process, and applied consistently across Forests.

The Forest must also ensure that there are sufficient sites for the maximum number of hunter camps that could be permitted in a single hunt. It appears that sufficient campsites will result from this process but we would like to remind the Forest of this need. To reiterate, the Department encourages the Coconino Forest to coordinate with bordering Forests to ensure consistency on how campsites are designated in order to minimize confusion among members of the public.

In addition to the ATV and motorcycle trails including in Proposed Action, the Department recommends including an Off-Highway Vehicle (OHV) trail system throughout the Forest. Such a trail system could be based off existing roads and could require nothing beyond signage and designation on the roads maps. Loops could be based off existing roads such as 09141, 09141A, 09141F and other roads in Cinder Hills ATV area, 09043 on Anderson Mesa, 00132Q in Pine Grove Area, and 09359H near Soldier Lake.

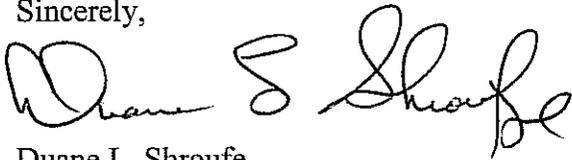
The Department understands that through this scoping period, the Proposed Action may be modified and additional alternatives analyzed through an EIS process. We recommend that that process engage the public as fully as possible to ensure adequate representation of public concerns and requests in the final plan and product.

The Department has provided specific recommendations to the proposed open and closed road system, shown on the attachment and maps.

Mr. Jim Beard
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The Department appreciates the opportunity to work with the Coconino National Forest, and we look forward to continued cooperation through the EIS process. For any questions regarding Department comments, please contact Larry Phoenix, Field Supervisor - (928) 774-7901 or Richard Miller, Habitat Program Manager (928) 214-1252 at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "Duane L. Shroufe". The signature is fluid and cursive, with the first name "Duane" being the most prominent.

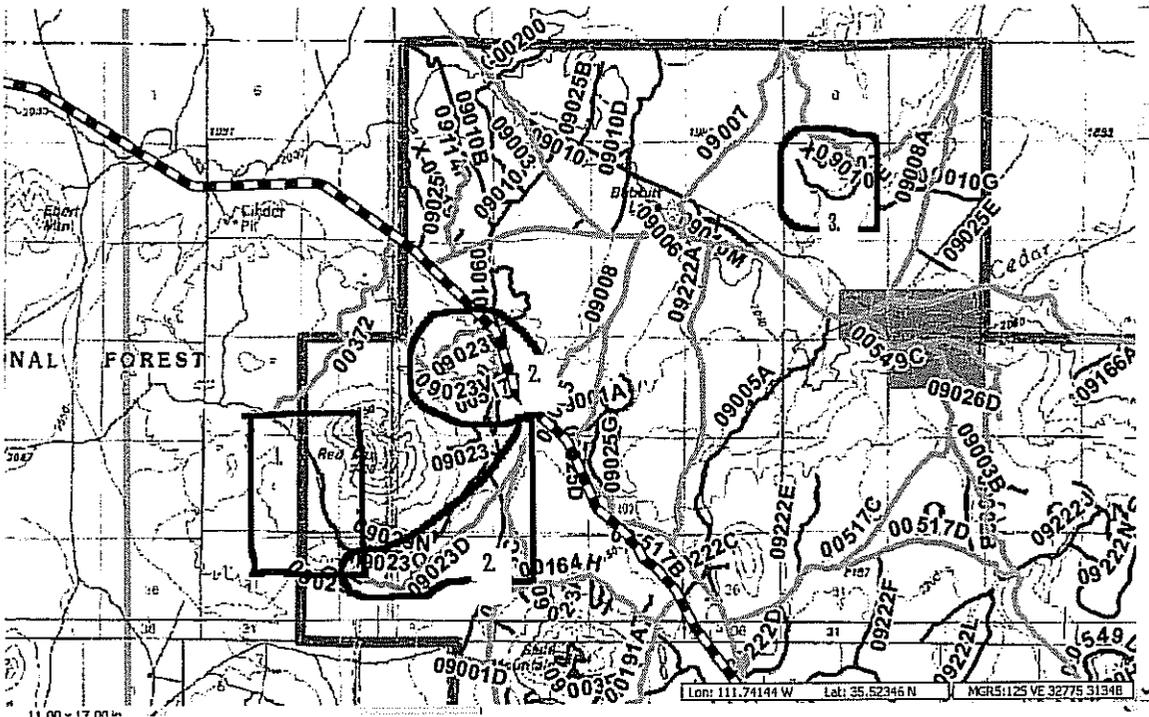
Duane L. Shroufe
Director

DLS:rm:rd

cc: Ron Sieg, Regional Supervisor, Region II
Josh Avey Habitat Branch Chief
Rick Miller, Habitat Program Manager, Region II
Larry Phoenix, Field Supervisor, Region II

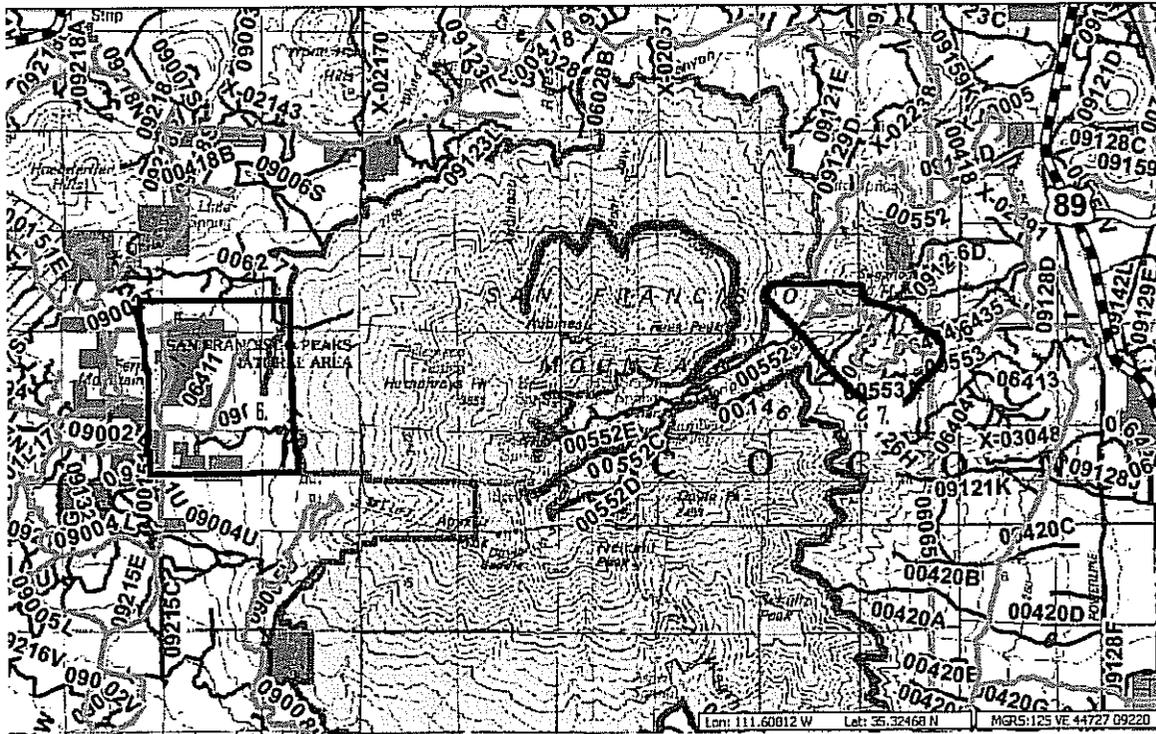
Attachment

Attachment
Arizona Game and Fish Department
Recommended Changes to the Proposed Action
Open and Closed Road System



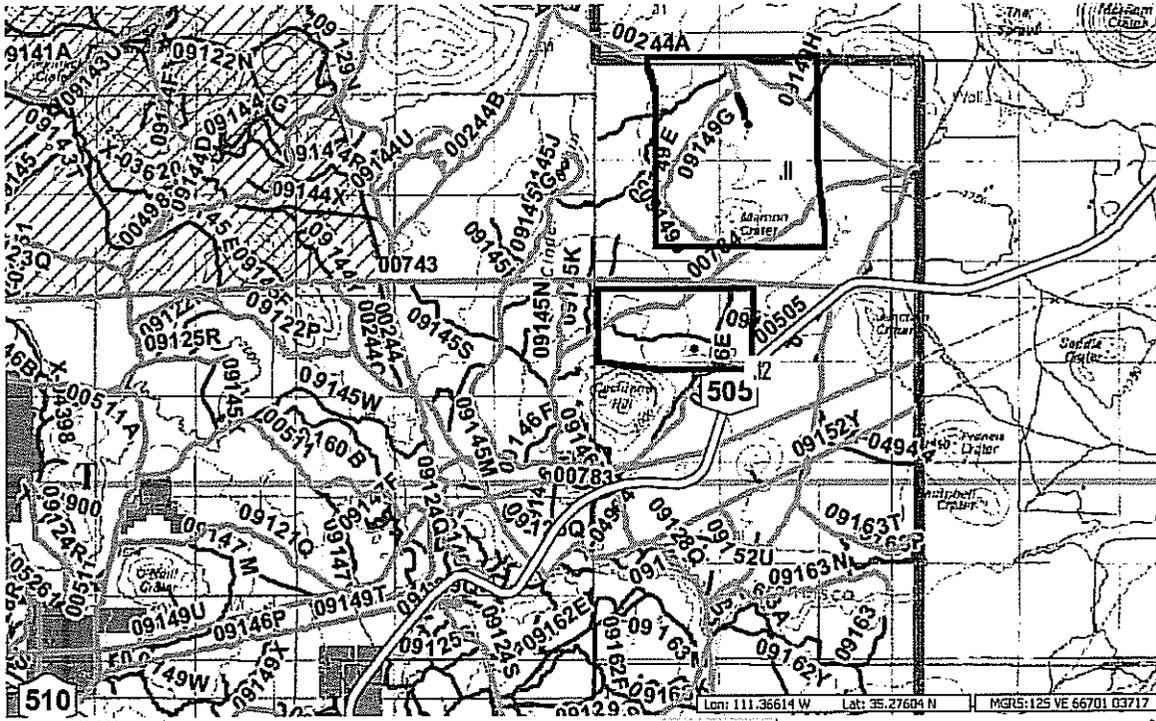
1. FR 9023O off FR 372 - Open and/or allow administrative vehicle access to Game and Fish Catchment #652.
2. FR 9023, 9023D, 9023C and 9023V – Currently closed, but shown open. Recommend to remain closed.
3. FR 307 – Open for administrative vehicle access to FS Trick Tank #52.

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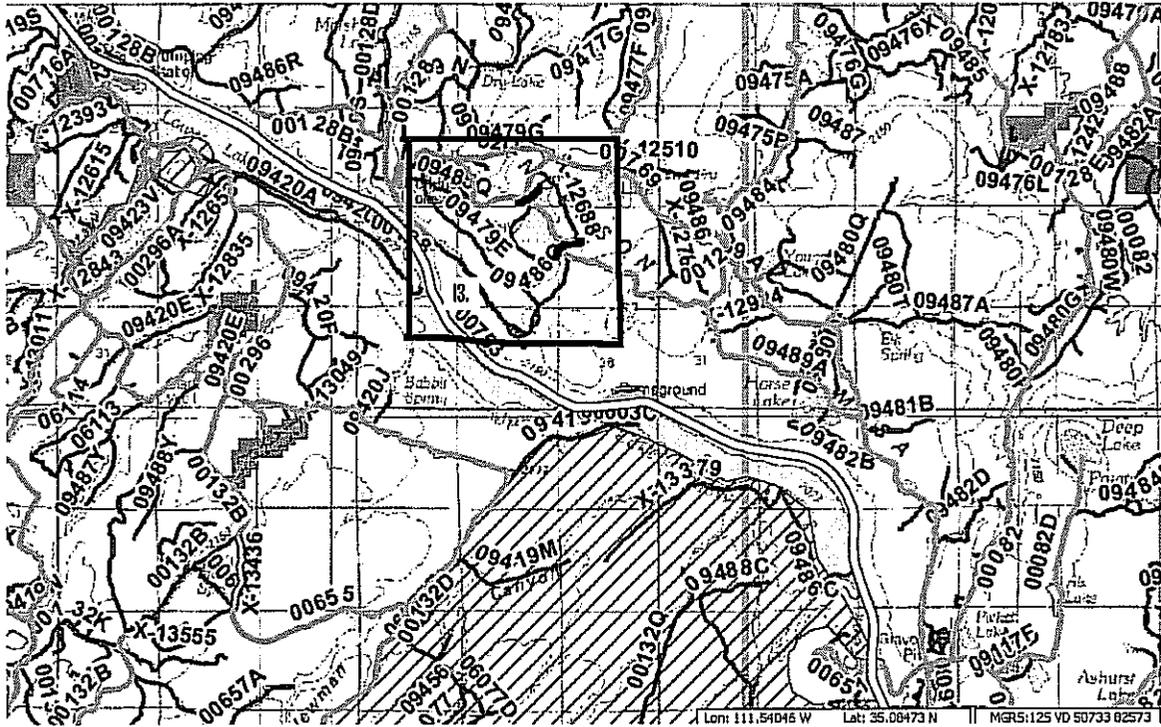
1. FR 6411 and FR ? along the east and west sides of the San Francisco Peaks natural Area - Currently closed, but shown open. Recommend to remain closed.
2. FR 553 along the west side of the San Francisco Peaks - Currently closed, but shown open. Recommend to remain closed.

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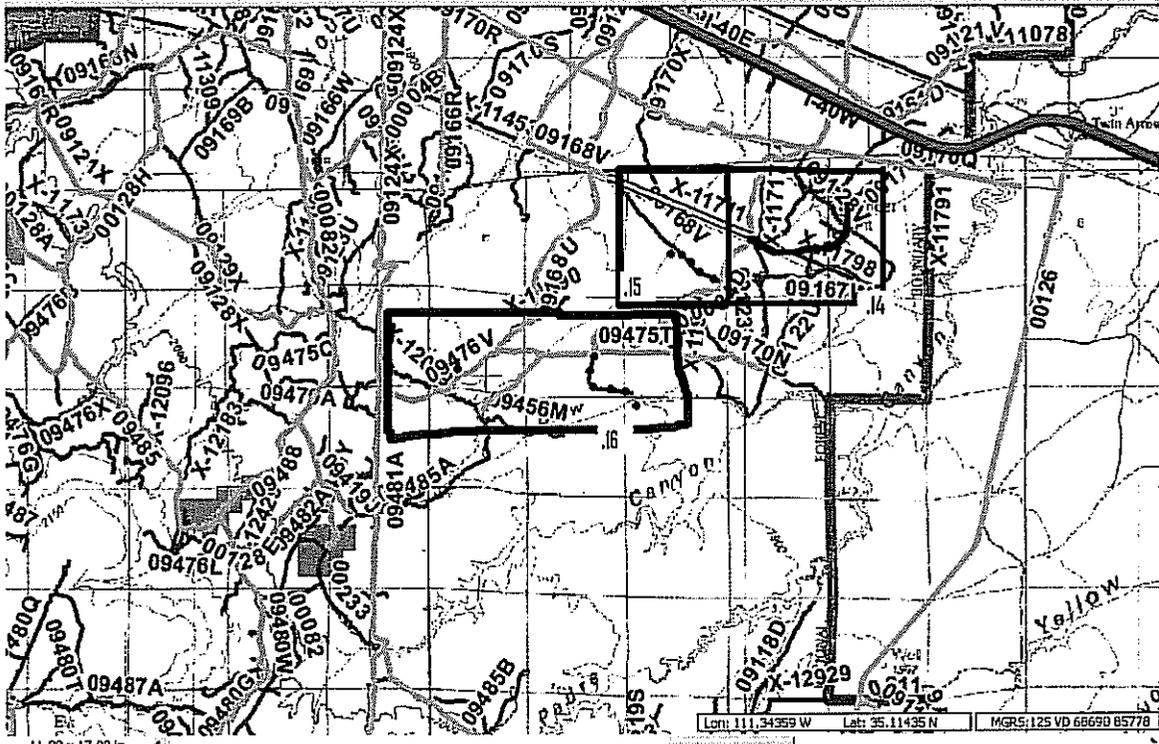
1. Maintain vehicle access to Game and Fish Catchment #662. Indicted by black line and dot inside box.
2. Maintain vehicle access to Forest Service Trick Tank #51. Indicted by black dot inside box.

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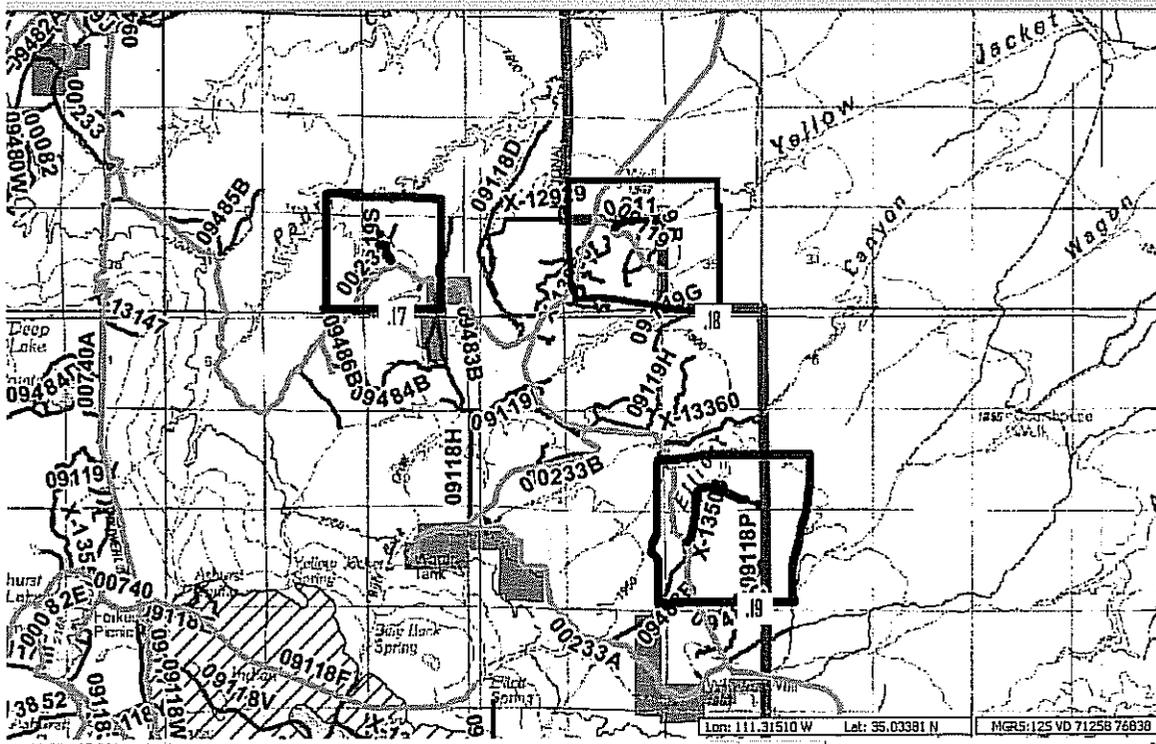
1. Road along the northeast side of Vail Lake does not exist. People are traveling along the shoreline. Recommend closing the wildcat road along the shoreline and opening FR X-12688 to allow for access past Vail Lake.

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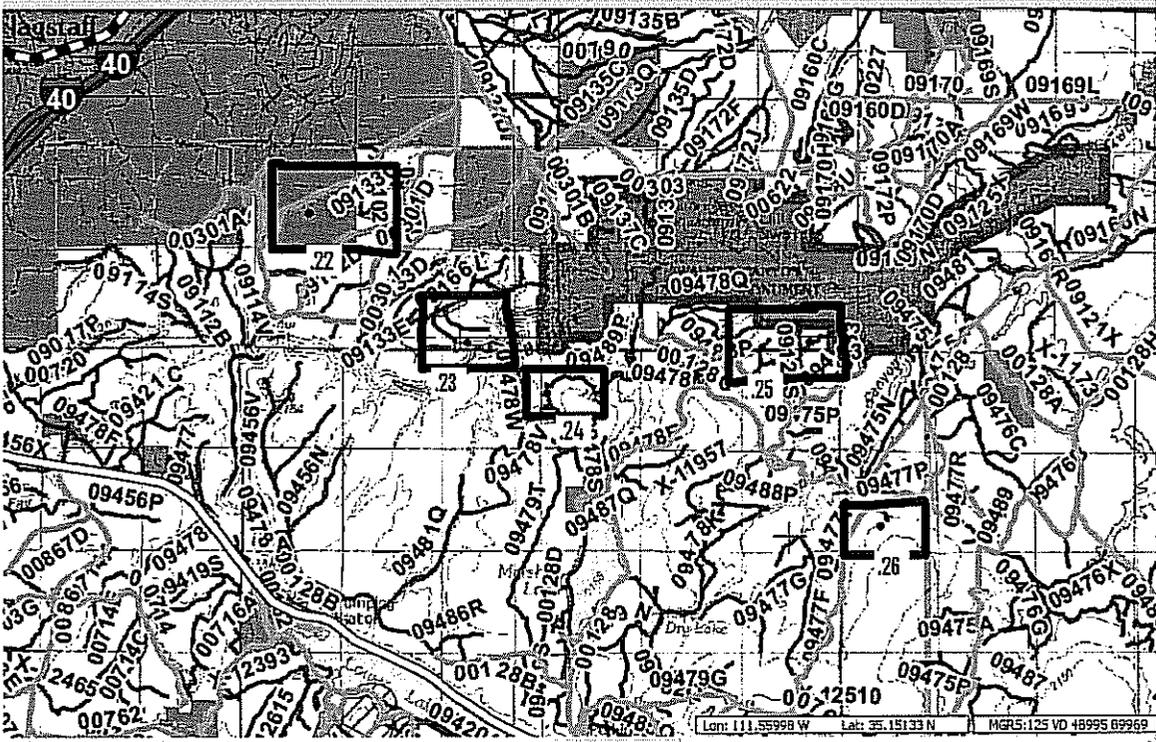
1. Open unknown # road to hill west of gravel pit to allow forest access for recreation and hunting. Indicated by black line inside box.
2. Open FR 9168V from FR 4D to maintain vehicle access to USFS Trick Tank "Rabbit" (N34 08-628 W111 20.583.) Indicated by black dots along the road within the box.
3. Open unnamed forest road south from FR 9476V to maintain vehicle access to USFS Trick Tank "Angell" (N35 07.218 W111 21.028.) Indicated by black dots along the road within the box. Also maintain vehicle access to USFS Trick Tank "Padre" along FR 9476V (N35 07.431 W111 23.057).

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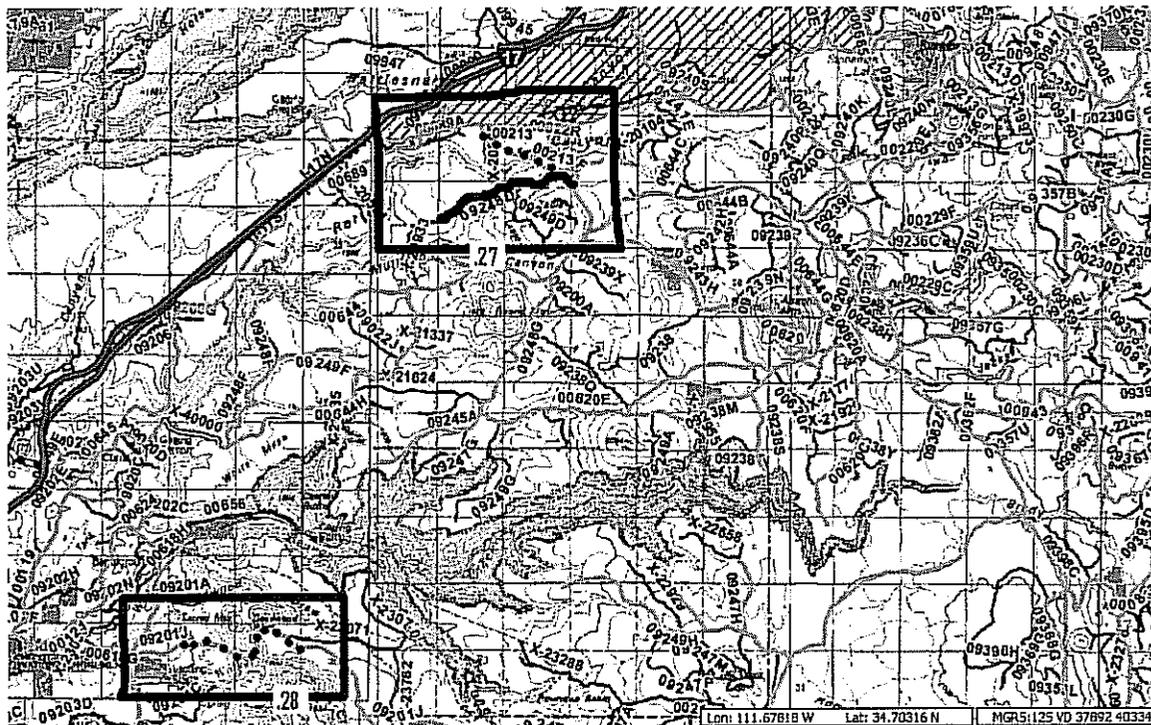
1. Maintain vehicle access to Game and Fish Water Development #644. (N35 04.403 W111 21.019). Indicted by black line and dot side box.
2. Maintain vehicle access to Game and Fish Water Development #641. (N35 04.468 W111 17.901). Indicted by black line and dot side box.
3. Maintain vehicle access to Game and Fish Water Development #642. (N35 02.141 W111 16.807). Indicted by black line and dot side box.

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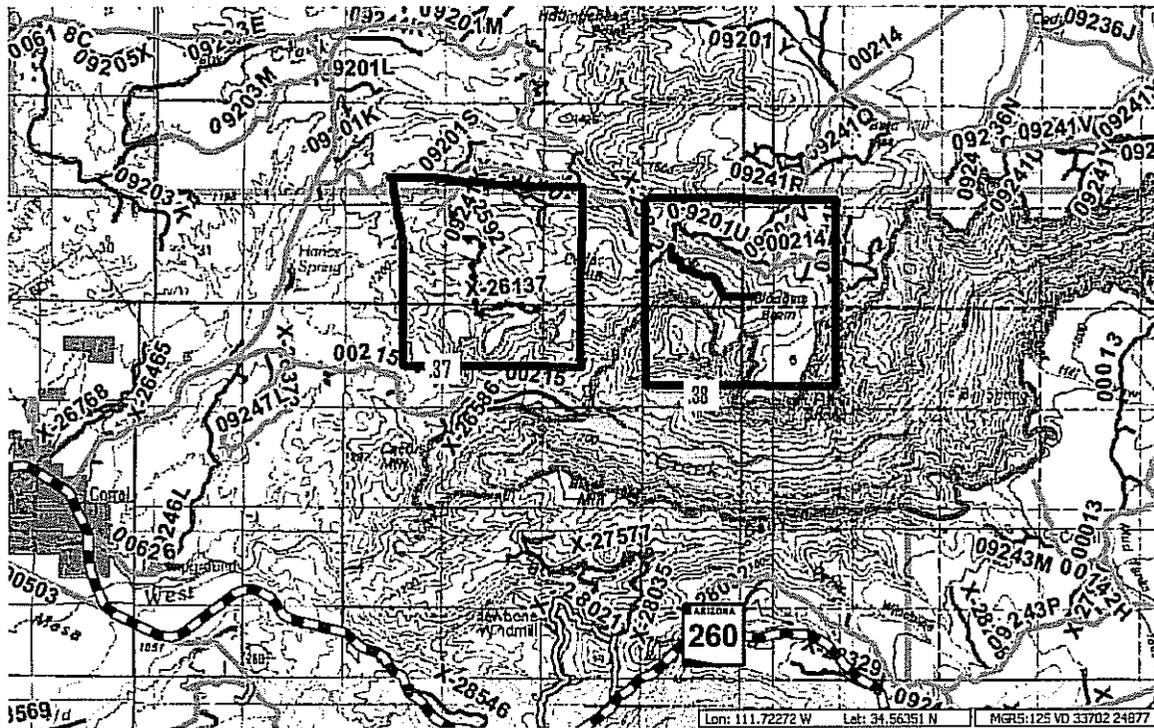
1. Maintain vehicle access to Game and Fish Water Development #1026. (N35 10.248 W111 35.258). Indicated by black dot inside box.
2. Maintain vehicle access to Game and Fish Water Development #625. (N35 09.166 W111 34.003). Indicated by black dot inside box.
3. Maintain vehicle access to USFS Trick Tank "Walnut". (N35 09.400 W111 31.449). Indicated by black dot inside box.
4. Maintain vehicle access to USFS Trick Tanks "Marshall" (N35 08.974 W111 30.314) and "Sherman" (N35 09.194 W111 29.756). Indicated by black dots inside box.
5. Maintain vehicle access to USFS Trick Tank "Point". (N35 07.759 W111 29.014). Indicated by black dot inside box.

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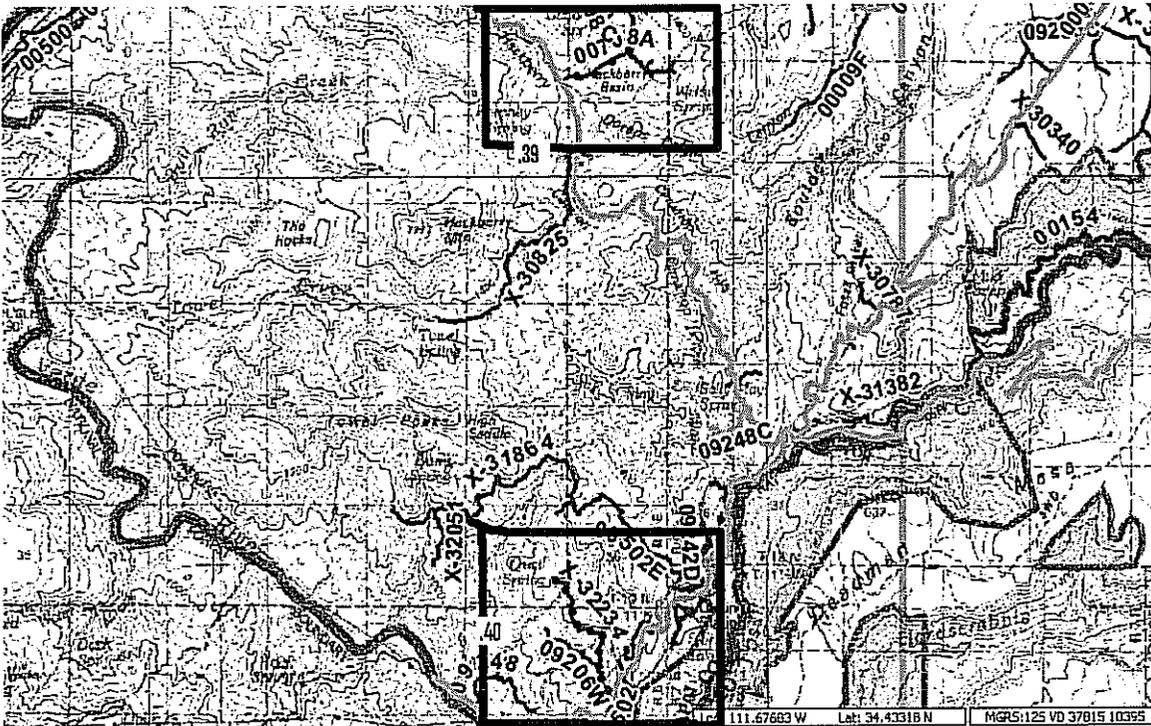
1. Close FR 213F from Stoneman Lake Road to the intersection with FR 9248D. The road is very poor in wet conditions and does not cross the canyon as indicated on the map. This section is indicated by black dots along the road with in the box.
2. Open FR 9248D from intersection with FR 213F for approximately 2 miles to allow forest access for recreation and hunting. Indicated by black line along the road with in the box.
3. FR 9201J is with in a vehicle closer area and is currently closed. Recommend to remain closed. Indicated by black dots along the road with in the box.

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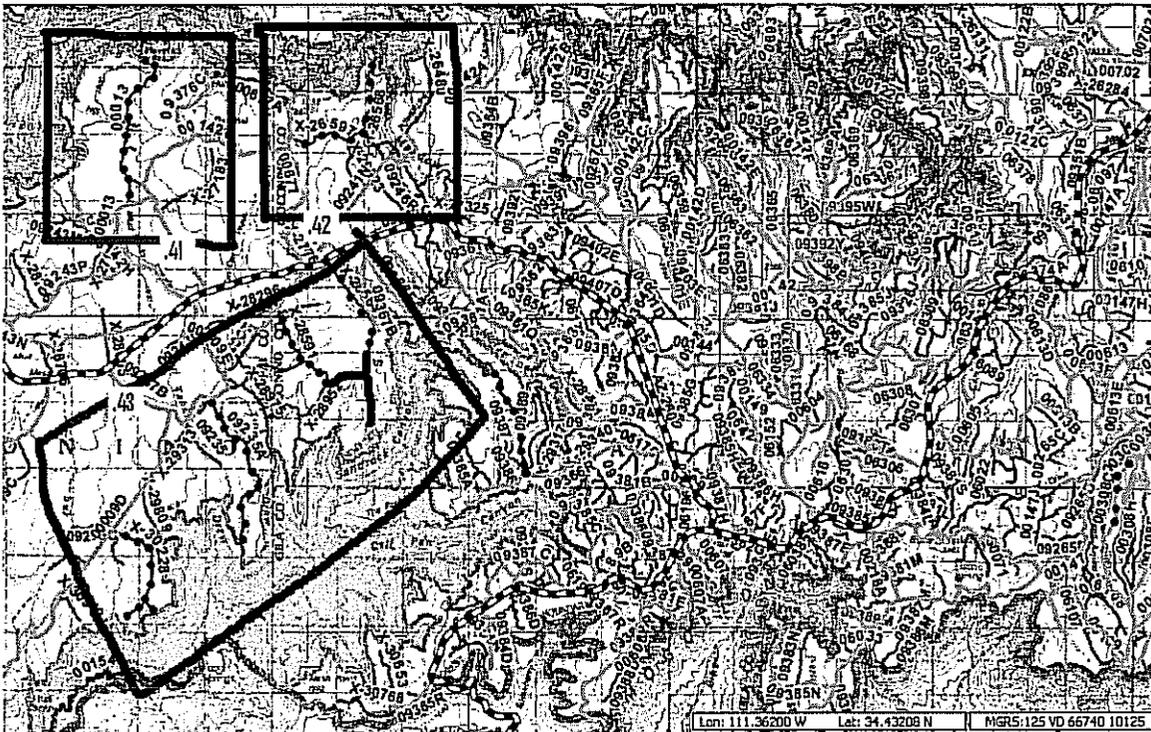
1. Open user created FR X-26137 for vehicle access to allow forest access for recreation and hunting. Indicated by black dots along the road with in the box.
2. Open unnamed user created road for vehicle access to allow forest access for recreation and hunting. Indicated by black line with in the box.

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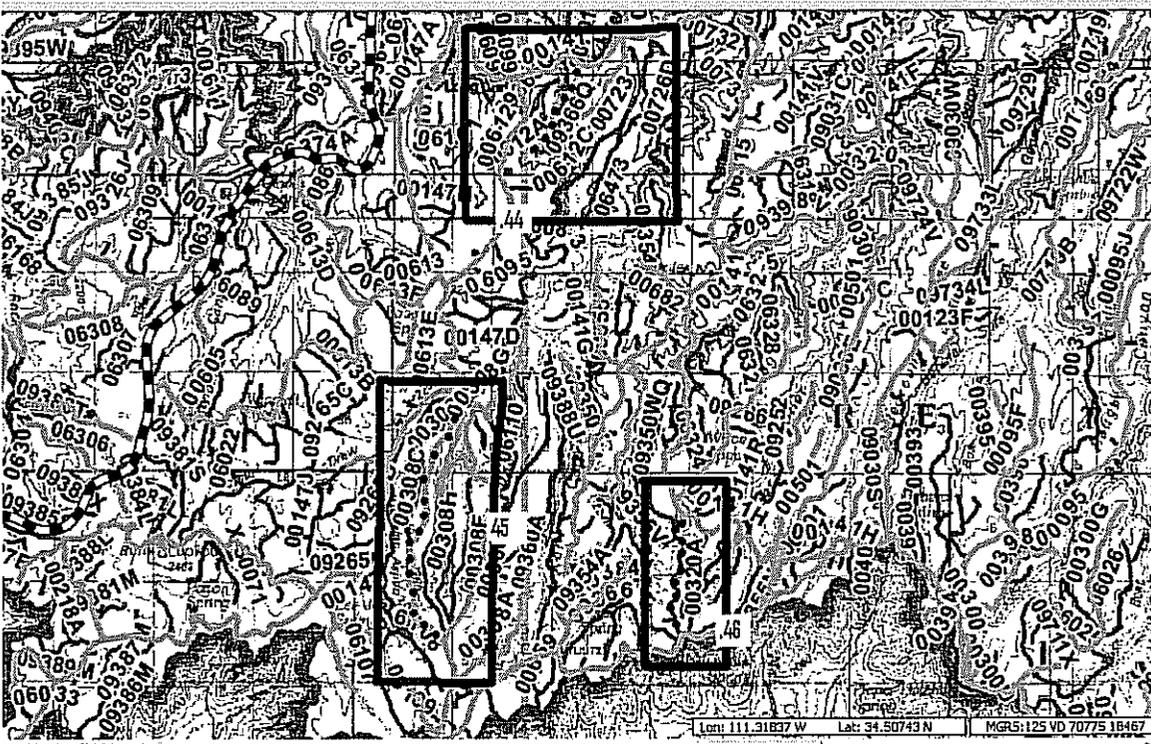
1. Open FR 708A for vehicle access to allow forest access for recreation and hunting. Indicated by black dots along the road with in the box.
2. Open user created FR X-32234 for vehicle access to allow forest access for recreation and hunting. Indicated by black dots along the road with in the box.

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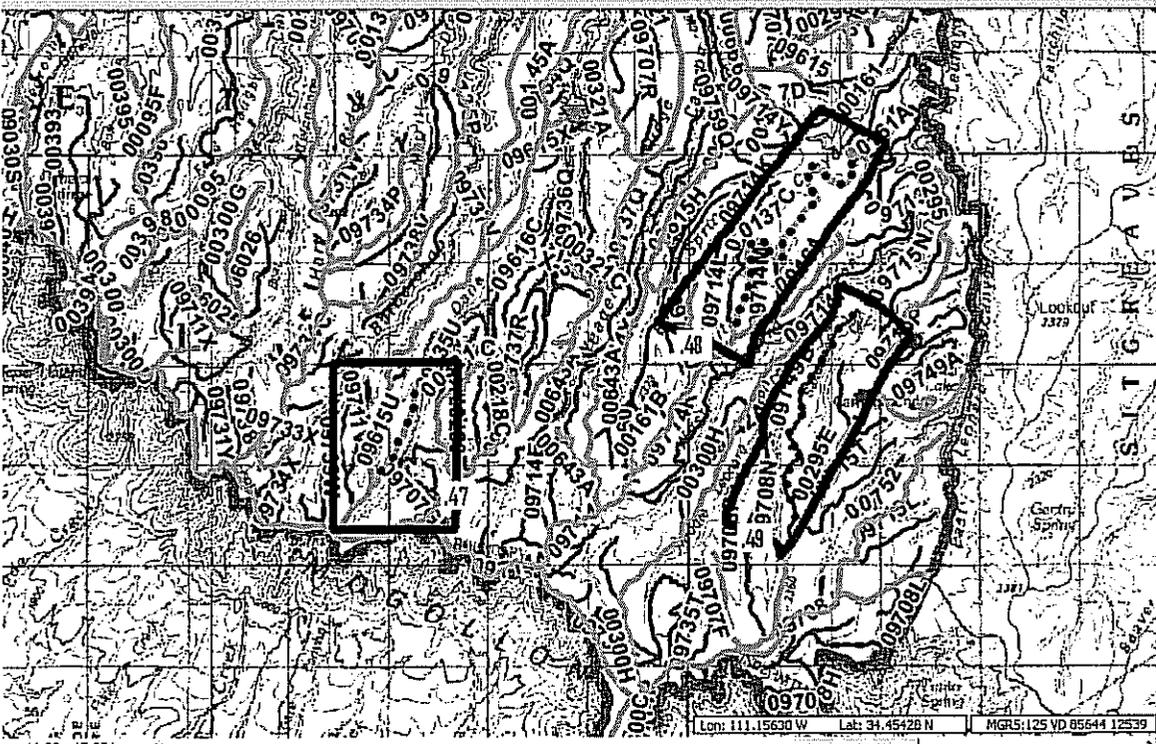
1. Open FR 13 for vehicle access to allow forest access for recreation and hunting. Indicated by black dots along the road with in the box.
2. Open user created forest road X-26597 and X-26568 for vehicle access to allow forest access for recreation and hunting. Indicated by black dots along the road with in the box.
3. Open user created forest road X-30228, FR 9235A, user created forest roads X-28591 and X-28564 for vehicle access to allow forest access for recreation and hunting. Indicated by black dots along the road with in the box.

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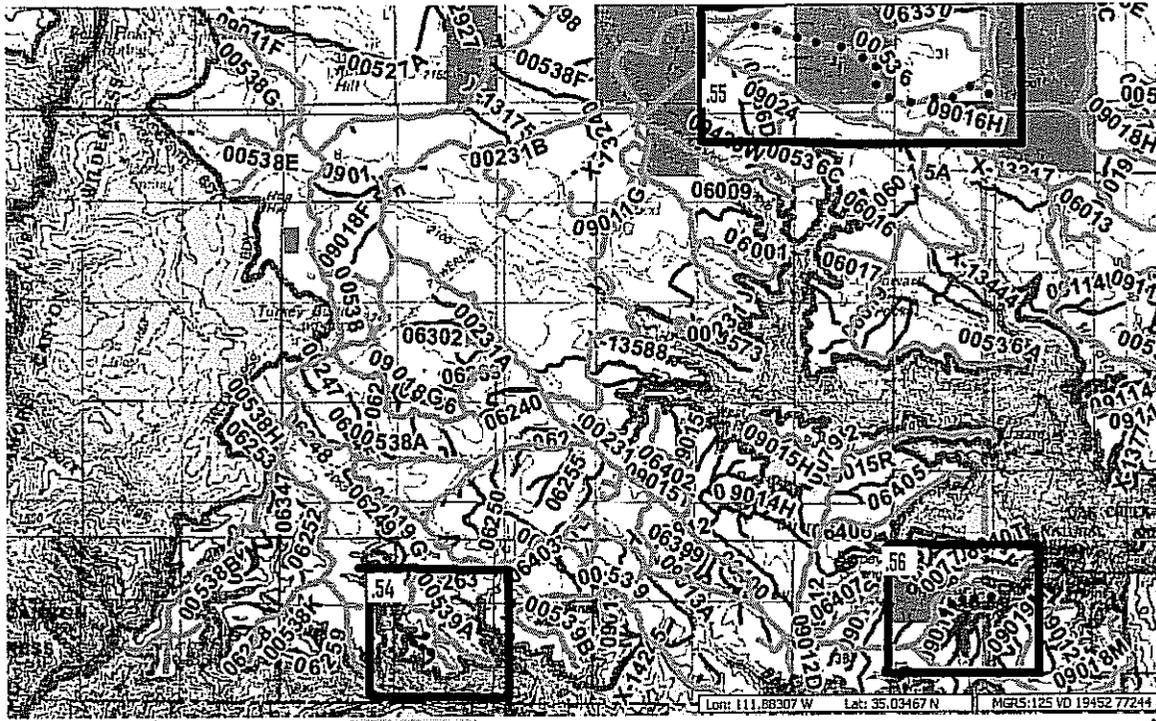
1. FR 9366Q - Currently closed, but shown open. Recommend to remain closed.
2. Close FR 308C to protect critical wildlife/riparian habitat.
3. Open FR 302A for vehicle access to allow forest access for recreation and hunting. Indicated by black dots along the road with in the box.

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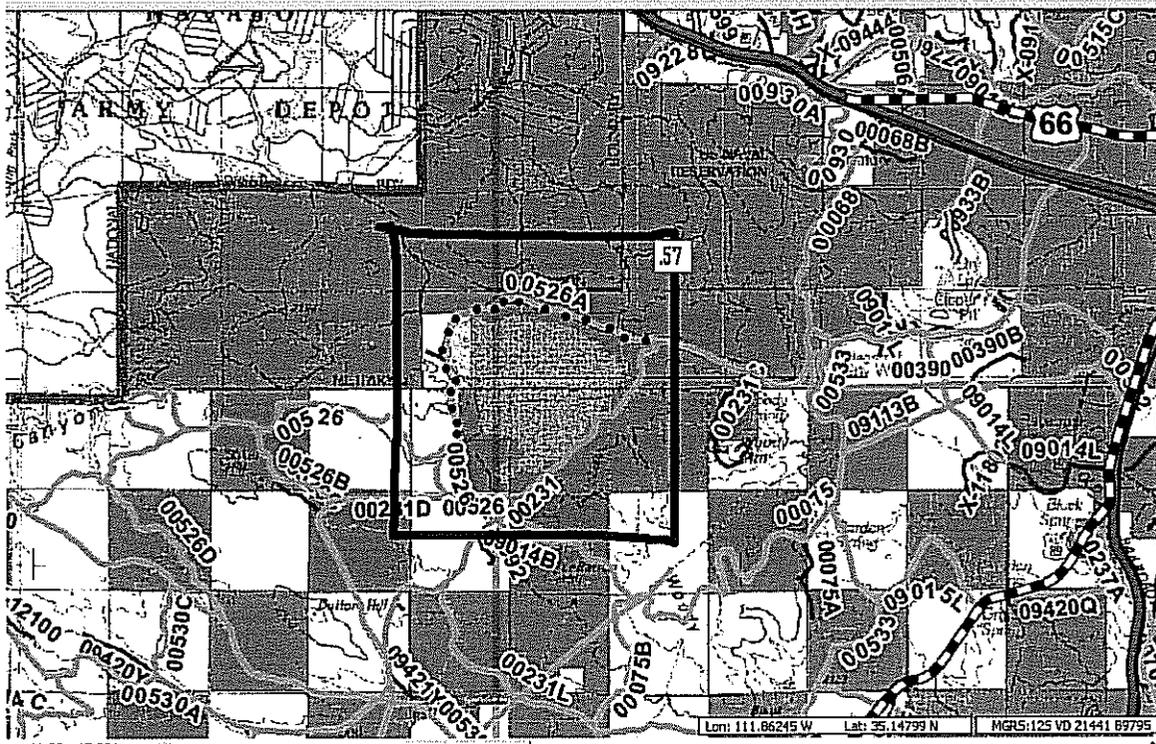
1. FR 9615U - Currently closed, but shown open. Recommend to remain closed.
2. FR 9366Q - Currently closed, but shown open. Recommend to remain closed.
3. FR 137C - Currently closed, but shown open. Recommend to remain closed.
4. Open FR 9749B for vehicle access to allow forest access for recreation and hunting. Indicated by black dots along the road with in the box.

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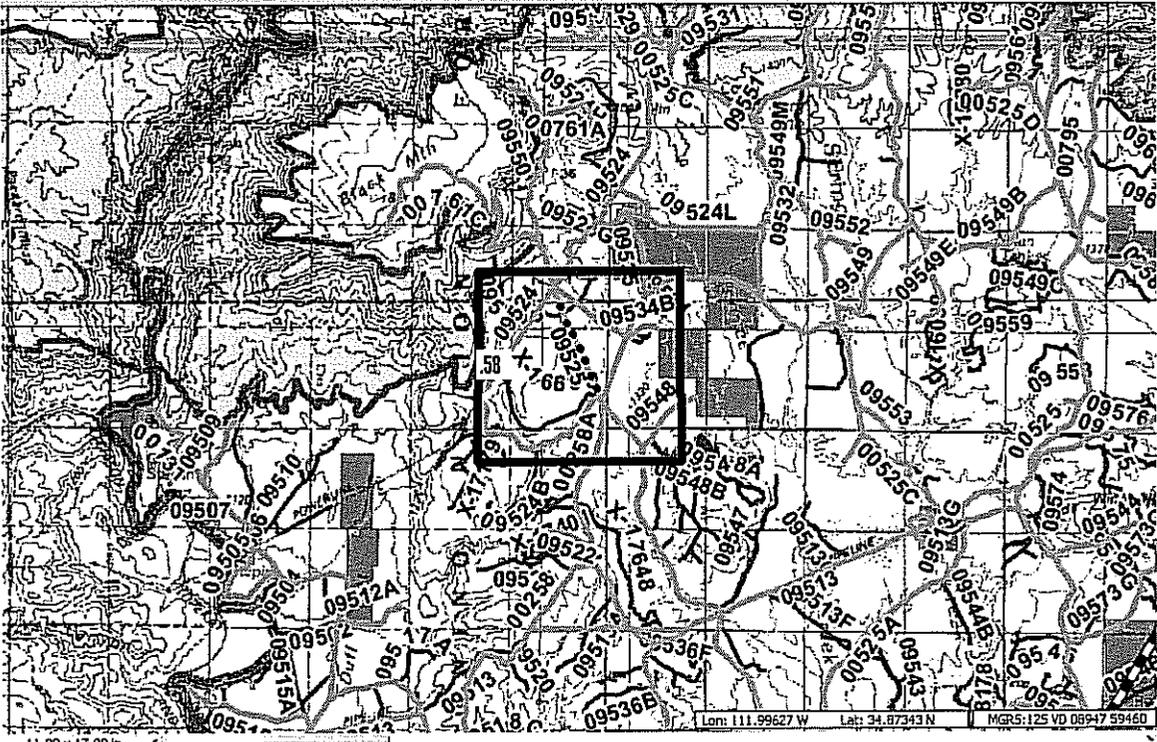
1. Open unnamed forest road west of FR 539A on Dave Joy Point to maintain vehicle access to unnamed USFS Trick Tank that the Game and Fish Dept. hauls too. Indicated by black dots along the road with in the box.
2. Close FR 536 between the intersections with FR 535 at Fry Park and FR 231 to protect critical wildlife habitat and reduce redundant access. Indicated by black dots along the road with in the box.
3. Close FR the south portion of FR 778 (Flathead Loop) and the spurs that access off of it to protect key turkey nesting habitat and reduce redundant access. Indicated by black dots along the road with in the box.

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1. Close FR 526A along the north side of Rogers Lake to protect critical wildlife habitat and reduce redundant access. Indicated by black dots along the road with in the box.

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1. Close FR 9525 to protect critical pronghorn fawning habitat and reduce redundant access. Indicated by black dots along the road with in the box