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April 4, 2016

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On behalf of Cochise County, Arizona (County) please incorporate the following comments into the Douglas District Travel Management Plan EA dated February 2016. The County has standing in this matter due to overlapping legal jurisdiction of the lands and overlapping land use plans.

We appreciate the opportunity to comment as local government. We value our natural resource, the Forest's management and we appreciate the motorized vehicle roads, dispersed camping areas and other recreational opportunities that are provided to share this resource.

We understand that you are new to the position as District Ranger on the Douglas Ranger District so we have taken time to provide relevant background information so that we can turn the corner and begin working together in a more coordinated manner.

We request that the Forest Service further analyze the proposed travel management decisions in light of this letter and take care not to exclude the general population from the ability to enjoy the forest through restricting access to only those who are capable of hiking great distances. We understand that some existing roads and trails may be decommissioned or obliterated and we request that if this action is taken that the alignment be placed in a status where, once funds are available, the roads and trails may be maintained, or if needed, restored without a lengthy federal land disturbance clearance.

While the USDA Forest Service has many legal responsibilities on the lands they manage, the public health, safety and general welfare responsibilities of local governments, including Cochise County, must also be recognized and addressed.

All previous comments by the County including their represented input to the Coronado National Forest Land and Resource Management Plan Revision and Travel Management Collaborative Alternative Team (CAT) processes are herein incorporated by reference.

The key concern of the County is that the Coronado National Forest (Forest) and its subunit, Douglas Ranger District, are not meeting the intent of numerous laws and regulations as discussed below. The Forest and District failed to meaningfully work with local agencies during the travel management planning process. The Forest and District had numerous personnel changes and the processes for cooperation and collaboration were virtually non-existent during preparation of the EA.

The Forest and its District are planning major federal actions that can have significant adverse impacts to the economies of the local area. As documented below and in past correspondence, the legally required coordination, cooperation and collaboration have not taken place. We request proper consideration of our comments before any decisions are made on the proposed new Travel Management Plan.

On its face, the EA clearly lacks several required NEPA components including but not limited to:

A. Failure to Cooperate with Local Agencies

The Coronado National Forest and its Douglas Ranger District personnel have the responsibility and legal requirement to “*solicit cooperation from other Federal, Tribal, State or local agencies with jurisdiction by law or special expertise on environmental issues that should be addressed in the environmental analysis*”. (40 CFR 1508.5)

Cochise County is clearly a local agency with jurisdiction by law and special expertise on environmental issues that should be addressed in the EA. The County has economic, cultural, health, safety, general welfare and emergency service legal responsibilities, intertwined road maintenance responsibilities, and environmental expertise that would benefit the Forest Service.

The Douglas District as well as the Supervisor’s Office failed to meet the legal requirement to cooperate with Cochise County. The Forest and District merely informed the County of their proposed actions. That informational process is not “cooperation” in legal terms.

The list of agencies at the back of the EA does not meet the legal requirement to “solicit cooperation” from local agencies. Please examine the NEPA record and insert a section in the EA that describes what was done by the Forest Service to “solicit cooperation.” Forest Service personnel attending Cochise County Public Land Advisory Committee meetings and informing Committee members of the fact that the Forest and Ranger District were engaging in plan updates is not sufficient “cooperation” to meet legal standards.

If the Collaborative Alternative Team (CAT) process is what the Forest relied on to meet the legal requirement for cooperation with local governments on travel management, it does not satisfy the requirement for the following reasons:

- Five meetings were scheduled when the Cochise County Representative to the CAT originally joined the team. More than a dozen CAT meetings ensued. The Cochise County representative attended the first five scheduled CAT meetings (Benson, Safford, Nogales, Tucson and Sierra Vista) but not every single unscheduled additional meeting, including some that lasted past midnight.

- As a result, the County representative was told that behind their back the rules were changed and that they were voted off the team by new rules made up during their absence. With persistence and a hard fight, the Cochise County representative was able to get back on the CAT for three of the five districts but only after several unscheduled CAT meetings had occurred without their presence, after the original five scheduled CAT meetings.
- The CAT organizers took a poll at one CAT meeting, told the Cochise County representative and others specifically NOT to take notes. The CAT organizers promised that they would provide a written analysis of the poll results and then recanted on their promise to provide the polling data. That event created confusion and mistrust.
- Each CAT meeting was chaotic because the rules were continually changed, the organizers manipulated the process, and the Forest Service failed to disclose relevant data. A prime example was during the Whetstone Mountains deliberations when the Forest Service showed numerous roads on maps and pretended they were open and available to the public. The maps the Forest Service displayed were intended to lead the CAT members to believe it was acceptable to close other roads. Only after a great amount of pressure from Arizona Game and Fish Department representatives did the Forest Service display the layer of the map showing numerous locked gates that affected CAT members' choices. The deception by the Forest Service was evident and undeniable.
- The CAT meetings were not open to more than a small subset of the public, resulting in the Forest losing the opportunity to learn about the importance of certain roads to the public.
- The CAT representatives were not always provided accurate information by Forest Service personnel concerning travel management rules and guidelines. Example: treatment of existing roads and motorized trails within Inventoried Roadless Areas (IRAs). The Forest Service asserted that existing roads within IRAs would have to be closed. However, we later learned that the Roadless Area Conservation Rule does not require that. In our view, the CAT process was a failure. The Douglas District should take a fresh and serious look at each of the CAT recommendations.
- Local government agencies that took part in the CAT process were treated the same as the public. There was no agency to agency cooperation, coordination or collaboration within the CAT process.

B. Failure to Include Local Agencies on the Interdisciplinary Team

“Whenever invited Federal, State, Tribal and local agencies elect not to become cooperating agencies, they should still be considered for inclusion in interdisciplinary teams engaged in the NEPA process and on distribution lists for review and comment on NEPA documents.” (CEQ Memorandum for Heads of Federal Agencies, 1/30/2002).

In the case at hand, Cochise County made a request to the District Ranger, Kevin Warner, to be a cooperating agency and a member of the interdisciplinary team for the EA. The County was denied cooperating agency status and was not invited to interdisciplinary team meetings regarding the travel management NEPA process. Nor was the County on any distribution lists for review and comment on the early internal drafts of the Travel Management Plan EA, though numerous verbal and written requests were made to the Forest for the County to be made a cooperating agency and receive administrative drafts of Travel Management EAs.

Instead, the treatment of the County the same as the public in relation to their opportunity to review the Draft and Final Forest Land and Resource Management Plan and the Douglas Ranger District Travel Management Plan EA

disenfranchised local county government from meaningful input into decisions where the County has jurisdiction by law and special expertise.

C. Failure to Cooperate in Order to Reduce Duplication

Other provisions of NEPA require cooperating with State and local agencies to the fullest extent possible to reduce duplication.

(40 CFR 1506.2):

“Agencies shall cooperate with State and local agencies to the fullest extent possible to reduce duplication between NEPA and State and local requirements, unless the agencies are specifically barred from doing so by some other law...such cooperation shall to the fullest extent possible include:

(1) Joint planning processes.

(2) Joint environmental research and studies.

(3) Joint public hearings (except where otherwise provided by statute). (4) Joint environmental assessments.

Please add a section on Coronado National Forest and Douglas Range District cooperation with Cochise County “*to the fullest extent possible to reduce duplication*” in your response to this letter and in the next version of the EA. Please list the joint planning processes, joint research and studies, joint public hearings, and joint environmental assessments.

D. Failure to Perform the Required Consistency Review

(40 CFR 1506.2):

“To better integrate environmental impact statements into State or local planning processes, statements shall discuss any inconsistency of a proposed action with any approved State or local plan and laws (whether or not federally sanctioned). Where an inconsistency exists, the statement should describe the extent to which the agency would reconcile its proposed action with the plan or law. (40 CFR 1506.2)”

The County has an approved local plans, regulations, laws, and policies that include economic, cultural, health, safety and general welfare provisions that are inconsistent with the District’s Travel Management EA as discussed below.

The proposed EA is inconsistent with the Cochise County Comprehensive Land Use Plan. The Douglas District is legally required to discuss any inconsistencies of their proposed action with the County plans and laws. Where inconsistencies exist, the Forest Service is legally required to describe the extent to which they will reconcile their proposed action with the County plan and laws. Instead, the EA fails to even mention consistency with local plans and laws.

The majority of the Douglas District is within Cochise County. The County’s plans, laws, regulations and policies must be addressed and any inconsistencies must be reconciled. Cochise County requests that all

relevant elements of their Comprehensive Land Use Plan be included in the EA and analyzed in detail including but not limited to:

“Approximately 26% of land in Cochise County is administered by federal agencies. Policies for managing these lands significantly impact Cochise County's culture, history, economy, environment, and lifestyles. Therefore, it is extremely important for Cochise County to participate in making these policies, with opportunities for the public to be heard. The National Environmental Policy Act (NEPA), the National Forest Management Act (NFMA) and the Federal Land Policy and Management Act (FLPMA) require federal agencies to allow local governments, including Cochise County, to participate in the developing of land use plans, to cooperate and coordinate with local governments in developing such plans, and to ensure that federal policies are consistent with policies of local governments. Furthermore, Arizona Revised Statutes mandate that “[i]f a county has laws, regulations, plans or policies that are less restrictive than a federal or state regulation, rule, plan or policy, the county shall demand by any lawful means that the federal or state government coordinate with the county before the federal or state government implements, enforces, expands or extends the federal regulation, rule, plan or policy within the county's jurisdictional boundaries.”

Goal

1. To ensure that the Federal Government provides Cochise County the opportunity to participate in the development of land use plans, to cooperate and coordinate with Cochise County in developing such plans, and to ensure that federal policies are consistent with local or regional policies.

Policies

a. Public lands, including the SPRNCA (San Pedro Riparian National Conservation Area), shall be managed so as to minimize negative impacts on the regional ground water aquifer.

b. Public access to public lands for recreation should be consistent with multiple use and conservation of a viable conservation area.

c. Agricultural uses, including grazing, should be permitted on all public lands within limits consistent with multiple use and conservation goals.

d. Sub-watershed-wide conservation, reuse, recharge and augmentation policies, and projects must be used to resolve both riparian condition issues and the overall balance of water levels in the aquifer.

e. All water use, including riparian water use, must be carefully managed to help maintain a viable riparian area and protect the economic and social sustainability of Cochise County. ...

By becoming a participating and/or cooperating agency, Cochise County is guaranteed a “seat at the table” in the preparation of Environmental Assessments (EAs), Environmental Impact Statements (EISs) and other federal land use considerations that have the potential to affect the cultural, historical, recreational, economic and environmental character of Cochise County, and to preserve traditional rural ways of life, including farming, ranching and other agricultural-related activities in the county. In addition, however, Cochise County seeks to require federal agencies to establish plans consistent with County policies by requiring them to coordinate with County government.

Goal

3. To protect the culture, history, economy, environment, and lifestyles of Cochise County residents by requiring federal agencies to coordinate land use plans with Cochise County and to establish plans that provide for continued multiple use of public lands consistent with the following policies:

Policies

a. Wilderness Designations

- i. Any consideration of any new wilderness designations of federal lands in Cochise County will be a result of a collaborative process, including federal, state, and county officials.*
- ii. The only legal designations of Wilderness Study Areas (WSA) are those designated under section 603 of the Federal Land Policy and Management Act (FLPMA) and the opportunity to create additional wilderness ended in 1991, except as authorized by Congress; any new wilderness designation must be provided for by Congress and created in cooperation and coordination with Cochise County and the State.*
- iii. Wilderness designation limits potential land uses significantly to those compatible with the designation. Care should be taken to balance the need for resource protection from such designations with potential economic and other impacts. Diverse stakeholder input is critical and consensus is desirable, if not essential, in seeking such designations. In some instances, the lands in question can be adequately protected through mitigation, minimizing negative impacts and proper reclamation, so that wilderness designation is unnecessary.*
- iv. Wilderness management must provide for continued and reasonable access for holders of property rights within the area and provide for full use and enjoyment of these rights.*
- v. WSAs released by Congress must be managed based on the principles of multiple use and sustained yield.*

b. Other Designations

- i. Special designations, such as Areas of Critical Environmental Concern (ACEC), and critical habitat: protect areas by precluding specific intrusive uses like motorized travel. In some cases, these designations can restrict uses in ways that impact the area's economy, lifestyles, cultures, and heritage. Care must be used to balance the value of such designations with the potentially undesirable impacts.*
- ii. No special designations or management plan should be proposed until it is determined and substantiated by reproducible scientific data, that there is a need for the designation, that protections cannot be provided by well-planned and managed development, and the area in question is unique when compared to other area lands.*
- iii. Designations must be made in accordance with the spirit and direction of the acts and regulations that created them.*
- iv. Designations must not be made without the full coordination and cooperation of Cochise County and full public disclosure, and must provide for the continued full use and enjoyment of all existing rights.*

c. Introduced, Threatened, Endangered and Sensitive Species, Recovery Plans, Experimental Populations and Related Guidelines and Protocols

- i. Such designations or reintroductions can have impacts beyond the boundaries and scope that may affect the area's economy, lifestyles, cultures, and heritage, so care should be exercised in both their planning and implementation with stakeholder input.*
- ii. Such designations or reintroductions should be made only after it is determined and substantiated by reproducible scientific data that there is a need for such action, that protections cannot be provided effectively by other methods and the area in question is unique or a scarce resource when compared with other area lands.*
- iii. Designation or reintroduction plans, guidelines, and protocols must not be developed or implemented without the full coordination and cooperation of Cochise County and full public disclosure.*

iv. Any analysis of such proposed designations or reintroductions must be inclusive and provide written details of all needed actions associated with the proposal to prevent growth beyond the scope and boundaries that were analyzed in the proposal.

v. Recovery plans must provide for indicators to track the effectiveness of the plan and identify at what point recovery is accomplished.

d. Public Access, RS 2477 Roads

i. Access across and to public lands is critical to the use, management, and development of those lands and adjoining private lands.

ii. No roads, trails, rights-of-way, easements, or other traditional access for the transportation of people, products, recreation, energy or livestock may be closed, abandoned, withdrawn, or have a change of use without coordination and cooperation with the County and full public disclosure and analysis.

iii. Roads covered by RS 2477 should remain open and Cochise County will take any action needed to protect these rights. This includes identification, inventory, and participation in any legal process to protect them.

iv. Access to all water-related facilities such as delivery systems, monitoring facilities, livestock water and handling facilities, should be maintained taking account of restrictions, if any, associated with public lands. Access routes may be adequately maintained by the owner of that route or the holder of access rights. Unreasonable restrictions may result in the loss of use of such facilities and property rights.”

i. Off Highway Vehicles (OHVs)

Subpara iv. Federal Travel Management Plans should consider the growing popularity of OHV recreation and provide reasonable and responsible opportunities for OHV uses.

The Douglas District must perform a legally adequate consistency review for Cochise County and for each Natural Resource Conservation District within the area affected by the EA. The District must also analyze State level plans in the EA.

E. Failure to Provide an Adequate Programmatic NEPA Document for Tiering

Many of the above comments were made to the Coronado National Forest Supervisor’s Office during the recent Forest Land and Resource Management Plan revision process. The County was assured the District level Travel Management EAs would address consistency with local plans and laws. In order to make sure the Forest level planning staff promises are met, please perform a complete and thorough consistency analysis.

We understand that the Forest Land and Resource Management Plan EIS provides overall travel management direction and the Forest delegated further NEPA analysis for actual site specific road closures and other changes in the Forest travel management system to the Districts. The way the Coronado National Forest implemented the two tiered approach became a proverbial “Catch 22” for local governments including Cochise County.

The Forest stated in the February 13, 2014 meeting with Cochise County and the City of Sierra Vista that no travel management decisions are made at the LMP/EIS level. Coronado Forest personnel stated that the County already had input to the Forest Travel Management Plans via the Collaborative Alternative Team (CAT) and that each District was in the process of finalizing NEPA documents for individual road closures at that time.

Early in 2014 we realized that Cochise County would be disenfranchised from effectively coordinating, collaborating or cooperating on travel management decisions on the Forest if that was correct so we immediately requested meetings to discuss travel management (see the attached letter dated March 6, 2014).

Though some Forest personnel attended County Public Land Advisory Committee meetings in 2014, this did not in any way meet the coordination and cooperation requirements on NEPA. Forest and Douglas District personnel have only had limited attendance at these meetings and provided little to no meaningful information about the content of the EA or how to meaningfully participate in the NEPA process.

F. Additional Specific Requests

1. Wilderness/Nonmotorized Analysis

The District has a large workload ahead to meet minimum NEPA requirements on the Travel Management EA. We hope to work with you to address these legal inadequacies and offer our technical expertise to go forward positively with your travel management plans.

In particular, please describe the collaborative process and decision making tools used to determine that the two large wilderness study areas where motorized travel is prohibited: Whitmire Canyon (12,840 acres) and Bunk Robinson (15,690 acres) should continue to be off limits to multiple use.

Please describe the inconsistencies between the Douglas District Travel Management Plan and the following Cochise County Land Use Plan policies cited above.

As documented on page 20 of the Douglas Travel Management Plan EA, the District covers nearly 433,692 acres of public land. At least 27% of the District is completely off limits to any motorized vehicles:

“No motorized travel is allowed in the Chiricahua Wilderness covering 87,250 acres.... The Peloncillo EMA covers 87,985 acres on the Arizona-New Mexico border.... Access is limited to primitive roads and there are no developed recreation sites.... There are two large wilderness study areas where motorized travel is prohibited: Whitmire Canyon (12,840 acres) and Bunk Robinson (15,690 acres).”

According to the Travel Management EA, there are only 625 visits to wilderness within the entire five districts of the Coronado National Forest per year.

The County recommends releasing the Whitmire Canyon and Bunk Robinson wilderness study areas to multiple use per the above cited Comprehensive Land Use Plan policies.

2. Critical Habitat

Please add a table to the EA and maps that clearly display the 19,426 acres of jaguar critical habitat, 186,842 acres of Mexican spotted owl critical habitat and 574 acres of Chiricahua leopard frog critical habitat, the number of acres within existing roadless areas and the number of miles of roads reduced due to critical habitat in the No Action and Modified Proposed Action alternatives.

3. Cultural Resources

The Travel Management EA, in Table 2-2 states. *“Restrictions on off-road motor vehicle travel on certain District roads would likely result in decreased direct and indirect effects on cultural resources. Potential for vehicular access and subsequent impacts to cultural resources would decrease across thousands of acres of Forest with the proposed limitations on vehicle travel in sensitive areas. Non-vehicular access may also be reduced in some cases.”*

Please provide the maps with the “thousands of acres” affected by cultural resource protection measures and other pertinent details. Language including but not limited to “thousands of acres of Forest” and “Non-vehicular access may be reduced in some cases” does not meet the intent of NEPA to provide a detailed proposed action that can be analyzed in relation to the No Action alternative. Though we understand there are sensitive areas that the Forest Service does not want to map, the miles of road and number of acres of land that is withdrawn from multiple use needs to be documented and analyzed in order for the EA to meet the minimum legal requirements of NEPA.

4. Labor Income

Table 2-2 of the EA states *“The Modified Proposed Action would reduce motorized opportunities on the District. This change would not measurably affect employment; however, it may have a minor effect on labor income.”*

Page 103 of the EA states *“Both study area counties have per capita income and median earnings below their respective states (U.S. Census Bureau 2012b). These data indicate a somewhat higher share of economic vulnerability in the study area relative to the state and nation. Economically vulnerable areas are less able to adapt to change. Changes to employment and income in the study area should be considered within this context.”*

The EA needs to define “minor effect on labor income”, especially in light of the fact that the EA documents a population decrease in Cochise County. These statistics directly correlate to decreased economic activity within Cochise County. We request the Ranger District work directly with the County to assure that labor income remains unaffected or positively affected by the Travel Management Plan final decisions.

5. Persons with Mobility Limitations

Table 2-2 of the EA states *“The reduction in motorized opportunities may disproportionately affect individuals with mobility limitations. Individuals who rely on motorized transportation to visit their favorite sites on the District may have a lower quality of life under the Modified Proposed Action.”*

Page 103 of the EA states both *“Cochise County, AZ and Hidalgo County, NM have higher median ages than their respective states and the nation (U.S. Census Bureau 2010). Furthermore, both counties have a higher share of individuals with disabilities than the state and nation.”*

We request the Ranger District work directly with the County to assure that individuals with limited mobility or other disabilities remain unaffected or positively affected by the Travel Management Plan final decisions.

6. Hunting Income

The EA states that *“hunting expenditures contribute almost \$6 million annually to Cochise County”* and that *“the Modified Proposed Action would create more opportunities for access to hunters since this action would include additions of user created roads which would be legal and legitimate to use by this user group. This also includes areas that have dispersed camping opportunities. This action would create a positive recreation experience.”*

We encourage the District to continue to maintain roads and to leave them open for a variety of recreational uses including hunting.

G. General Travel Management Comments

These following general road comments are supported by land use and development policies contained within the Cochise County Comprehensive Plan Elements. In particular, the Economic Development Goal: Support the preservation and expansion of the Cochise County tourism sector. Any reduction in access to public lands would hamper tourism and marketing efforts in these recreational areas.

1. The Renewable Energy Element Goal:

To protect the culture, history, economy, environment, and lifestyles of Cochise County residents by requiring federal agencies to coordinate land use plans with Cochise County and to establish plans that provide for continued multiple land use plans consistent with the following policies:

d. Public Access

f. Recreation and Tourism. Again reduced access to public lands would have a negative impact on promoting tourism and recreation in these areas.

Based on the maps provided for Alternative 2, the Modified Proposed Action, the Community Development Department has identified certain routes that we recommend consideration other than documented to date in the EA. These routes are identified on the attached maps and the specific concern for an identified route falls within one of three categories:

A. Connectivity

- To provide access to trails and recreation areas
- To connect routes, loops, etc. and otherwise minimize dead-end/backtracking situations.
- To provide alternative access corridors.

B. Dispersed Camping

- To provide camping alternatives that are separate and complement developed (pavement, tables, restrooms, etc) camping areas.
- Instead of removing entire corridors from permitted camping, allow 300' dispersed camping in areas away from private property or other sensitive areas.

C. Off main travel way access

- To provide safe parking and pull off access.
- To minimize congestion of main thoroughfare.

H. Specific Travel Management Comments

Further, we concur with comments submitted by Cochise Trails Association, including but not limited to the following general and specific comments pertaining to the proposed changes to the motorized transportation system within the Douglas Ranger District:

1. Changes from early draft EA to current draft EA

Please detail the reasons for changes between the earlier draft EA in 2012 and this more restrictive version. The new draft proposes to decommission historic routes that provide public access and recreational opportunities for a variety of forest users. It appears that the value of public access and recreation in large portions of the forest was not fully considered.

2. Off-Highway Vehicles

The current version of the Draft EA also fails to recognize the growing popularity and use of off-highway vehicles by not designating motorized trails where meaningful opportunities exist. This further exacerbates user conflicts by placing motorized users on the main forest roads instead of a separate class of motorized trails. Other forests have successfully used the Travel Management Process to designate motorized trails by converting old logging or mining roads to motorized trails. We request analysis of this concept within the next draft of the EA.

3. Vehicle Length Restrictions

Another major concern is the vehicle length restriction placed on motorized dispersed camping along certain roads. The proposed restriction places car campers too close to the road. Safety, especially for small children, is compromised by this rule. The danger this restriction places on families will discourage compliance.

4. Motorized Trails

It should be noted that the Douglas District, unlike the other Districts in the Coronado National Forest, has virtually no proposals for designating motorized trails. This is a major deficiency. Motorized trails can be designated in appropriate locations to provide better opportunities for dirt bikes, ATVs and other recreational OHVs and to minimize conflicts with other users. The Douglas Ranger District serves a growing population of residents in Cochise County who value both non-motorized and motorized trail opportunities. The Douglas Ranger District has expansive areas suited for non-motorized recreation, including wilderness areas, wilderness study areas, and inventoried roadless areas. However, in terms of balance, the availability of areas for motorized recreation is much more limited. We believe that the District has some good opportunities to designate motorized trails in this travel management process and help support the need for responsible places to enjoy motorized recreation. We suggest the District re-evaluate roads proposed for closure or decommissioning to ensure their recreational values are fully considered. We also recommend that motorized trails be re-defined to include vehicles less than or equal to 65 inches in width. This is needed to accommodate a growing class of recreational vehicles such as utility terrain vehicles or side x side vehicles (e.g., Rhinos and RZR) that exceed the 50-inch width limitation.

5. Chiricahua Mountains EMA

(a) Route 74-spur. The proposed change would decommission this road.

Comment: The 74-spur road provides access to the boundary of an inventoried roadless area and offers opportunities for dispersed camping. We recommend the District reconsider the proposed change and retain the road as “open to all vehicles” unless it has serious resource issues.

(b) Route 721. The proposed change would decommission 1.55 miles of this NFSR road.

Comment: This road should be retained as “open to all vehicles” or else designated a motorized trail as it has recreational value. This portion of route 721 forms a loop by connecting other NFSR roads and offers motorized access to the area of High Lonesome Canyon and the western boundary of a nearby inventoried roadless area. This access and connectivity has recreational value for hunters and a variety of forest users.

(c) Route 357. The proposed change would redesignate this NFSR road from “open to all vehicles” to “closed to all vehicles” (3.55 miles).

Comment: We understand the District’s concerns about public safety and erosion. However, this road traverses a large swath of the national forest and forms a loop with other NFSR roads. We believe the District has an opportunity to create a venue for off-highway vehicle (OHV) enthusiasts who enjoy a challenging motorized trail. We recommend the District designate this portion of route 357 as a motorized trail and consider applying for an OHV grant from Arizona State Parks to rehab portions of the road where erosion or safety issues exist.

(d) Route 4253. The proposed change would redesignate this NFSR road from “open to all vehicles” to “closed to all vehicles” (1.03 miles).

Comment: This historic road is shown on topo maps and provides important access to the forest for hunters and other recreational users. It has public recreational value in addition to the access it provides to range improvements. We recommend the road be retained as “open to all vehicles”.

(e) Route 360-6.39R-1. The proposed change would designate this road as “closed to all vehicles” (.96 miles).

Comment: This historic road is shown on topo maps and provides access into and along upper John Long Canyon. It ends near the wilderness boundary where it provides access to a non-motorized trail that enters the wilderness and connects to other trails near Pole Bridge Canyon. This road provides important motorized access to a wilderness trailhead and has high recreational value. We recommend it be retained as “open to all vehicles”.

6. Peloncillo Mountains EMA

(a) Route 707. The proposed change would decommission about 2.76 miles of this NFSR road from “open to all vehicles” (from Blackwater Hole to Maverick Spring).

Comment: This portion of route 707 is historic and shown on topo maps as a primitive route. It provides important motorized access to a large area of the forest that otherwise would be inaccessible and provides connectivity between the northern and southern portions of route 707. Though primitive, it is an established NFSR road, is important for hunters and other forest users, and has high recreational value. We recommend the road either be retained as “open to all vehicles” or else designated as a motorized trail. If it needs to be rehabilitated, recommend the District consider applying for an OHV grant from Arizona State Parks.

7. Dragoon Mountains EMA

(a) Route 2002 and Route 4390. The proposed change would decommission .96 miles of NFSR road 2002 and .72 miles of NFSR road 4390.

Comment: These are historic roads that are shown on topo maps. They provide motorized access to mining prospects and higher elevations in the Dragoon Mountains. These roads offer scenic, far-reaching views of the Dragoon Mountains and surrounding country. They have important recreational value and should either be retained as “open to all vehicles” or else designated as motorized trails. The area to and south of China Peak is a popular area for motorized access and recreation.

(b) Route 697-0.30R-1. The proposed change would decommission this road (.84 miles).

Comment: While the District may consider this an unauthorized road, it is shown on topo maps as a historic route to China Peak. It offers a rare opportunity for motorized access to the higher elevations of the Dragoons. This route together with routes 2002 and 4390 is a great venue for OHV enthusiasts to enjoy a challenging ride in the scenic higher elevations of the Dragoon Mountains. We recommend the road be retained as “open to all vehicles” or else designated a motorized trail. The area to and south of China Peak is a popular area for motorized access and recreation.

(c) Route 4226 and Route 4231. The proposed change would decommission route 4226 (.43 miles) and route 4231 (.81 miles).

Comment: These historic roads are shown on topo maps and provide important motorized access to recreational destinations in the southern area of the Dragoon Mountains. They have high recreational value for hunters, hikers, campers, rock climbers, and other forest users. We recommend these roads be retained as “open to all vehicles”.

8. Dispersed Camping along Various Routes in the Dragoon and Chiricahua EMAs.

The Draft EA states: “Change 300-foot corridor for 21.84 miles of NFSRs to eliminate off-road travel up to a distance of 300 feet for dispersed motorized camping for protection of natural resources. Reduce pull-off distance to a vehicle car length for safe passage of traffic.”

Comment: The proposed change would eliminate the 300-foot corridor for dispersed motorized camping and reduce the pull-off distance to a vehicle car length. The proposed change would place dispersed campers too close to the roadway where they will be exposed to excessive dust and noise and this would discourage compliance.

Elimination of the 300-foot corridor creates a new, unanalyzed safety hazard, particularly for families with children. We believe that a more reasonable pull-off distance is 100 feet or more from the road centerline. Logically, the terrain around the road corridor may limit pull-off distances to some degree as well. A more effective option may be to replace the 300-foot corridor by designating and signing existing or proposed dispersed campsites along the road corridor that are in suitable locations (an example: designated campsites similar to those along the Happy Valley Road in the Santa Catalina District). This would minimize the risk of continued expansion of the dispersed camping footprint.

It should be noted that these roads are located in popular areas in the southern Dragoon and Chiricahua Mountains where families enjoy overnight visits to the forest via dispersed motorized camping. Rather than discourage camping due to overly restrictive rules, the District should encourage families and children to enjoy the forest by providing a family friendly and family safe camping environment.

In addition, Forest Roads 687 and 688 provide good opportunities for dispersed camping on the west side of the Dragoons and should be re-evaluated as they can accommodate a 300-foot corridor along most of their length. The District in our view is proposing unnecessary, unsafe and burdensome restrictions to dispersed camping in this area.

Summary

Thank you for the opportunity to provide meaningful input to the NEPA process. Please incorporate our recommendations in the NEPA analysis. We hope to meet with you to review the next draft EA. We understand that our recommendations may or may not be incorporated into the final decision. However, we want to make sure we are involved in the process and our recommendations are considered and analyzed.

We look forward to working with you as this process goes forward to ensure the Travel Management Plan EA meets the needs of both of our respective agencies and all relevant laws, regulations and policies.

Sincerely,



Richard R. Searle
Chairman

Attachments: March 6, 2014 Letter from Cochise County to the Coronado National Forest
Travel Management Map with Comments – Dragoons
Travel Management Map with Comments – Peloncillos
Travel Management Map with Comments – Chiricahua1
Travel Management Map with Comments – Chiricahua2
Travel Management Map with Comments – Chiricahua3