



March 6, 2014

USDA, Forest Service
Coronado National Forest
Email: CoronadoNF@fscomments.org

RE: Coronado National Forest Plan Revision Comments - Cochise County and City of Sierra Vista, Arizona

On behalf of Cochise County (County) and the City of Sierra Vista (City), please consider the following comments in this letter including Attachment A regarding the Coronado National Forest Land and Resource Management Plan Revision and Draft EIS (LMP/EIS).

The City and County have standing due to proximity to the Coronado National Forest and potential economic, social, custom and cultural impacts that would be incurred as the result of the proposed LMP Revisions. All previous comments by the City and County including their represented input to the Travel Management Collaborative Alternative Team (CAT) process are herein incorporated by reference.

The key concern of the County and City is that the Coronado National Forest failed to coordinate during preparation of the LMP/EIS. The Forest is planning major federal actions that could have significant adverse impacts to the economies of the local area without the legally required coordination. The CAT process is not deemed "coordination" by the County and City as it was an experimental "consensus" process. Most parties failed to reach consensus on the majority of roads, thus the process failed and decisions were deferred to District Rangers.

The County and City appear to have been treated as part of the "public" in the Forest LMP Revision process, with no consideration of their responsibilities to provide for the health, safety and welfare of their constituents. Major changes in Forest Service policy and management direction regarding roads, sustainability of land uses, fire management, etc. will impact the ability of the County and City to fulfill their legal responsibilities.

Though required by law, no consistency analysis was presented to address differences between proposed Forest LMP actions and local plans, regulations, laws, and policies. The proposed revisions in the LMP are inconsistent with the Cochise County Comprehensive Land Use Plan and City of Sierra Vista plans.

The City and County request Coronado National Forest line officers and planning staff meet with County and City officials including managers, planners, transportation and public works engineers, natural resource consultants and other key personnel to assure the Forest LMP is consistent with

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existing local City and County plans. Any inconsistencies need to be addressed. The Forest Service needs to work with local government before the Revised LMP process continues.

Please contact James Vlahovich at JVlahovich@cochise.az.gov to set up meetings.

Thank you.

Respectfully submitted on behalf of Cochise County and the City of Sierra Vista by:



Mary E. Darling, MS, JD^{1/}

Darling Geomatics

Natural Resource Consultant

^{1/} Acting as a Biologist, not an attorney

Attachment A: Table of Comments



**ATTACHMENT A
 CORONADO NATIONAL FOREST
 PROPOSED REVISED LAND AND RESOURCE MANAGEMENT PLAN AND
 ENVIRONMENTAL IMPACT STATEMENT
 Dated October 2013**

Comments by Cochise County and the City of Sierra Vista, Arizona (Consultants Kim Mulhern, RG, and Mary Darling, MS JD), Dated March 6th, 2014

No.	Chapter/Section/ Page Number	Comments
Land and Resource Management Plan		
1	Roads	<p>We request a meeting as soon as possible to coordinate travel management needs of the County and City with those of the Forest Service. As noted in Item 2 below, the County Comprehensive Land Use Plan has very specific direction on road closure and changes in road maintenance levels. We understand that broad policies on travel management plans will be made at the Forest LMP Revision/EIS level and that more detailed plans will be made during individual NEPA assessments at the District level. Since there are four Coronado National Forest Service Districts that overlap Cochise County, we request a meeting with the Forest Supervisor and District Rangers from each of the four Districts. We also request specific details of how cooperating agency status will be implemented at the District level to review all NEPA documents in administrative draft form in order to provide valuable input to the Forest Service regarding the health, safety and general welfare as well as social, economic and cultural significance of various roads within the County and City.</p>
2	General/Coordination	<p>Please address the following items from the Cochise County Comprehensive Land Use Plan and perform the requisite consistency analysis:</p> <p>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 use of public lands consistent with the following policies: Comment: By becoming a participating and coordinating agency, Cochise County is guaranteed a “seat at the table” in the preparation of</p>



No.	Chapter/Section/ Page Number	Comments
		<p>Environmental Assessments (EAs), Environmental Impact Statements (EISs) and other federal land use considerations that have the potential to affect the cultural, historical, economic and environmental character of the County, and to preserve traditional rural ways of life, including farming, ranching and other agricultural-related activities in the County. In addition, however, the County seeks to require federal agencies to establish plans consistent with County policies by requiring them to coordinate with County government. To that end, the following policy statements were developed regarding various public land management issues:</p> <p><i>A. Wilderness Designation</i></p> <ol style="list-style-type: none"> 1. 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. 2. 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 with the County and the State. 3. Wilderness designation is not always an appropriate, effective, efficient, economic or wise use of land. These lands can be adequately protected through mitigation, minimizing negative impacts and proper reclamation. 4. 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. 5. WSAs released by Congress must be managed based on the principles of multiple use and sustained yield. <p><i>B. Other Designations</i></p> <ol style="list-style-type: none"> 1. Special designations, such as Areas of Critical Environmental Concern (ACEC), critical habitat, semi-primitive and non-motorized travel, etc., result in single-purpose or non-use and may be detrimental to the area economy, lifestyles, cultures, and



No.	Chapter/Section/ Page Number	Comments
		<p>heritage.</p> <p>2. 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.</p> <p>3. Designations must be made in accordance with the spirit and direction of the acts and regulations that created them.</p> <p><i>C. Introduced, Threatened, Endangered and Sensitive Species, Recovery Plans, Experimental Populations and Related Guidelines and Protocols</i></p> <p>1. These designations or reintroductions could grow beyond boundaries and scope and may result in detrimental effects on the area economy, lifestyles, cultures and heritage.</p> <p>2. No such designations or reintroductions should be made until it is determined and substantiated by reproducible scientific data that there is a need for such action, that protections cannot be provided by other methods and the area in question is unique when compared to other area lands.</p> <p>3. Designation or reintroduction plans, guidelines, and protocols must not be developed or implemented without the full involvement of the County and full public disclosure.</p> <p>4. Any analysis of such proposed designations or reintroductions must be inclusive and analyze all needed actions associated with the proposal to prevent growth beyond the scope and boundaries that were analyzed in the proposal.</p> <p>5. Recovery plans must provide for indicators to track the effectiveness of the plan and identify at what point recovery is accomplished.</p> <p><i>D. Public Access, RS 2477 Roads</i></p> <p>1. Access across and to public lands is critical to the use, management, and development of those lands and adjoining private lands.</p> <p>2. No roads, trails, rights-of-way, easements or other traditional</p>



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		<p>access for the transportation of people, products, recreation, energy or livestock may be closed, abandoned, withdrawn, or have a change of use without full public disclosure and analysis.</p> <p>3. Roads covered by RS 2477 should remain open and the County will take any action needed to protect these rights. This includes identification, inventory, and participation in any legal process to protect them.</p> <p>4. Access to all water-related facilities such as delivery systems, monitoring facilities, livestock water and handling facilities, etc., must be maintained. Access routes must be adequately maintained by the owner of that route. Unreasonable restrictions may result in the loss of use of such facilities and property rights.</p> <p><i>E. Land Exchanges, Acquisitions and Sales</i></p> <p>1. The State and Federal Governments hold a sufficient amount of land to protect public interest, so there shall be no net loss of private land base.</p> <p>2. Any affected district within the County must be compensated for any net loss of private lands with public lands of equal value or compensated for any loss of assessed valuation resulting from these exchanges by the appropriate acquiring agency.</p> <p>3. A private property owner has a right to dispose of or exchange his property as he/she sees fit within applicable law.</p> <p><i>F. Recreation and Tourism</i></p> <p>1. The County has outstanding potential for recreation and tourism.</p> <p>2. Resource development, recreation, and tourism are compatible through proper planning and management.</p> <p>3. Potential developments should include family-oriented activities and developments that are accessible to the general public and not limited to special interest groups.</p> <p>4. It supports cultivating recreational facility development and maintenance partnerships with other entities, agencies, and general special interest groups.</p>



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		<p><i>G. Wildlife</i></p> <ol style="list-style-type: none"> 1. Properly managed wildlife populations are important to the recreation and tourism economy and to the preservation of the culture and lifestyles of its residents. 2. With proper management and planning, healthy wildlife populations are compatible with other resource development. 3. No increases in wildlife numbers or the introduction of additional species may be made until the availability of forage or habitat has been determined and the impacts on other wildlife species have been assessed. <p><i>H. Forage Allocation/Livestock Grazing</i></p> <ol style="list-style-type: none"> 1. The proper management and allocation of forage on public lands is critical to the viability of the county’s agriculture, recreation and tourism industry. 2. The viability of a large number of agriculture and livestock operations is dependent on access to grazing on public lands. 3. Forage allocated to livestock should not be reduced for allocation to other uses. Current livestock allocation should be maintained. <p><i>I. Off Highway Vehicles (OHVs)</i></p> <ol style="list-style-type: none"> 1. OHVs have become an important segment of the recreation industry and is an important tool and mode of transportation for farmers, ranchers, and resource development. 2. Public Land Management agencies must implement and maintain an aggressive OHV program to educate users on how to reduce resource impacts. This is to be followed by an aggressive enforcement program. 3. The non-recreational use of OHVs, such as development and livestock operations, should be provided for in all areas unless restricted by law. <p>Please also address the appropriate sections in the City of Sierra Vista planning documents.</p>
3	General/ Management	Throughout this document, sections have Desired Conditions and Objectives, but many of the sections fail to discuss Management



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	Approaches/13 and 14	Approaches. As noted on page 14, management approaches “may illustrate suggestions as to how desired conditions or objectives could be met, convey a sense of priority among objectives, or indicate a possible future course of change to a program” In order to those potentially impacted by these conditions and objectives to understand how and when (based on priority) these desired conditions or objectives will be met, it is important for each section to include management approaches. We suggest that this information be included throughout this document.
4	2/Climate Change/ 19 and 20	<p>Under Management Approaches, we have concerns regarding whether or not preventing fires in non-adapted desert communities is the best approach. We suggest that the background information provided before the Desired Conditions section provide rationale and justification for this approach.</p> <p>Also under Management Approaches, we are concerned about potential follow-up actions that may occur as a result of "identifying the water rights status of water resources". Is there a potential in this process for pursuing litigation to impact current water rights/use? We suggest that this action be clarified by what CNF plans to do with this information once it is collected.</p>
5	2/Vegetation Communities/21 and 22	<p>Under Desired Conditions, we have concerns regarding whether or not well-distributed snags and coarse woody debris would potentially increase fuel load resulting in more high-intensity fires?</p> <p>Under Standards, we suggest that somewhere in the background information you include rationale and justification for using five years following final harvest as the appropriate time for being adequately restocked for regeneration.</p>
6	2/Natural Water Sources/56	Is there a specific reason why the Huachuca water umbel was not included in the list of species under General Description? If so, please state the rationale. If not, please include.
7	2/Natural Water Sources/57	Under Objectives, it is unclear who currently has instream flow water rights for the areas where USFS would apply for the rights. What entities already own or use these water rights? How would they be compensated for the loss of the water rights?
8	2/Natural Water Sources/58	<p>Under Management Approaches, see comment #5 above. Also, please consider including removal of invasive plant species that compete with native plant species.</p> <p>Although it may be mentioned elsewhere, the management of natural water sources should include management for recovery of</p>



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		T&E species. Please consider addition of management approaches for this effort.
9	2/Constructed Waters/59	<p>Huachuca water umbel has been found in association with constructed waters as well as natural waters. Please add this species to the list.</p> <p>In addition to aquatic species, there are a number of native water-dependent plant species (such as Huachuca water umbel) that should be included in management species. Please clarify the need to manage for these species as well.</p>
10.	2/Soil/60	Invasive mesquite can cause hydrophobic soils that cause increased runoff. We suggest that you add removal of invasive mesquite and restoration of native grasslands as a potential management approach to increase infiltration of precipitation and reduce runoff and erosion.
11.	2/Air/62	Under Management Approaches, we suggest that consideration be given to including management of fugitive dust through application of water at areas where USFS actions may result in increases of particulates becoming airborne.
12.	2/Animals and Rare Plants/63	Under General Description, we suggest clarifying text to include plant species that occur closely adjacent to aquatic environments (such as the Huachuca water umbel).
13	2/Invasive Species/66 and 67	Please include Johnson and Bermuda grasses which can outcompete Huachuca water umbel and invasive mesquite that have outcompeted native grasses in areas that were native grasslands prior to the mesquite invasions.
14	2/Scenery/81	Under Management Approaches, we suggest including restoration and reseeding requirements for all projects.
15	2/Special Uses/83	Under Management Approaches, we suggest requiring all high- and low-power communication uses to coordination with the Encroachment Board at Fort Huachuca as required by Arizona SB 1387 that established the 2600 square mile Buffalo Soldier Electronic Test Range. This legislation ensures that there is no significant interference with testing and training activities that would impact missions or National Security at Fort Huachuca.
16	2/Tribal Relations/87	Why is only one area and one tribe called out specifically in the Management Approaches? Numerous other tribes have concerns in other areas, especially the Huachuca and Chiricahua Mountains.
17	2/Range Management/89	Under Management Approaches, we suggest that permit applications for grazing must require that the land be grazed rather than left fallow as some non-ranching organizations have attempted to do. This avoids socioeconomic impacts and environmental justice impacts under the National Environmental

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		Policy Act for historic ranching operations.
18	2/Land Ownership Adjustments and Boundary Management/90 and 91	Throughout this section, we suggest inclusion of how USFS plans to manage to maintain the tax base for the Arizona Counties that would be impacted by withdrawal of land that is currently part of the tax base for the Counties.
19	3/Wild Backcountry/97	Under Management Approaches, we suggest inclusion of efforts to remove trash left by illegal aliens who traverse USFS land.
20	3/Figure 4/101	Please add County boundaries to this figure.
21	3/Fire in Wilderness/103	Under Management Approaches, we suggest inclusion of restoration following wildland fires.
22	3/Wildlife in Wilderness/104	Under Standards, we suggest inclusion in #2 of “and when conditions exist that support re-introduction”. For example, when there is an ongoing upgradient source that continues to provide predatory invasive species, there are not appropriate conditions to reintroduce the native species.
23	4/Huachuca EMA/147	Please add Canelos Ladies Tresses to the list as this species is exclusively located in this area.
Environmental Impact Statement		
A	General	See comments above regarding the need for coordination, cooperation, and collaboration. All previous comments to the LMP Revision and all previous EIS comments are herein incorporated by reference into these EIS comments.
B	General Comment on Travel Management Process	<p>It is our understanding that the LMR Revisions and accompanying EIS provide overall travel management direction and the CNF is completing independent NEPA analysis for actual site specific road closures and other changes in the Forest travel management system. This two tiered approach is a proverbial “Catch 22” for local government including Cochise County and the City of Sierra Vista. The CNF 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. They stated that the County already had input to the Forest Travel Management Plans via the Collaborative Alternative Team and that each CNF District was in the process of finalizing NEPA documents for individual road closures at this time. Cochise County and the City of Sierra Vista would be effectively disenfranchised from effectively coordinating, collaborating or cooperating on travel management decisions on CNF if this is correct.</p> <p>First, the CNF did not fulfill their legal duty to coordinate with the</p>



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		<p>County or City on the LMP/EIS. Second, the Collaborative Alternative Team approach used by CNF for travel management was designed as a consensus process. However, on the majority of roads in Cochise County and possibly some roads within the City of Sierra Vista, the Collaborative Alternative Team failed to reach consensus. Therefore, the CNF defaulted to the position that the District Rangers will make the travel management decisions. To date the County and City have NOT had effective input on the CNF travel management plans. To date the CNF has not cooperated or coordinated with the County and City.</p> <p>The CNF needs to take a step back and involve local government including Cochise County and the City of Sierra Vista in all land management planning and all travel management decisions within the County and City’s jurisdiction. The County and City are responsible by law for the health, safety and general welfare of its citizens. The County and City maintain roads that cross National Forest Management System lands. The County Board of Supervisors, County Manager, County Engineer, County Planner and other key County personnel as well as City Council, City Manager, Mayor, City Department of Public Works, etc must be notified of all CNF travel management changes proposed within their respective jurisdictions and provided the opportunity for coordination, collaboration and cooperating agency status on NEPA document.</p> <p>The following items from the Cochise County Land Use Plan must be included in any travel management process:</p> <p><i>D. Public Access, RS 2477 Roads</i></p> <ol style="list-style-type: none"> 1. Access across and to public lands is critical to the use, management, and development of those lands and adjoining private lands. 2. 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 full public disclosure and analysis. 3. Roads covered by RS 2477 should remain open and the County will take any action needed to protect these rights. This includes identification, inventory, and participation in any legal process to protect them.



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		<p>4. Access to all water-related facilities such as delivery systems, monitoring facilities, livestock water and handling facilities, etc., must be maintained. Access routes must be adequately maintained by the owner of that route. Unreasonable restrictions may result in the loss of use of such facilities and property rights.</p> <p>The CNF must also incorporate the appropriate City of Sierra Vista land use plan content into their LMP Revisions, EIS and Travel Management planning processes.</p>
C	General	<p>A discussion of potential impacts to the electromagnetic (EM) spectrum within the Buffalo Soldier Electronic Test Range (BSETR). The BSETR is a significant natural resource, which has been designated and protected by Arizona Senate Bill 1387. The unique topography and geology of the mountain ranges surrounding the BSETR create an extremely quiet EM spectrum. The EM spectrum within the BSETR is a natural resource that can be severely damaged by an increase in electromagnetic interference just as other natural resources, such as species habitat, can be impacted by projects.</p> <p>Fort Huachuca has included the EM spectrum as a natural resource in its NEPA documentation over the past several years. Their recent EA for Construction of a Photovoltaic System on United State Army Garrison Fort Huachuca, Arizona, demonstrates how this natural resource is evaluated. Construction of communications infrastructure and powerlines that are permitted under the LRMP needs to be evaluated in this EIS.</p>
D	General – Existing rights	<p>The EIS needs to analyze impacts to existing rights under each alternative including the No Action alternative.</p> <p>Existing rights include water rights, exploration and mining rights, special use permit and livestock grazing permit stipulations, RS2477 roads, etc.</p> <p>The EIS fails to address impacts to existing private water rights due to the proposed wilderness under each alternative. The County and City were told that these rights would not be impacted by the proposed LMP Revision. When the CNF was asked about Tombstone water rights in wilderness, the County and City representative were told that Tombstone’s water rights are not impacted by wilderness, including the Town’s ability to utilize mechanized equipment to repair their water sources within</p>



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		<p>wilderness.</p> <p>The issue at hand is disclosure. Private landowners within the proposed wilderness areas within Cochise County need to know the true impacts. What will happen in the future, be in 10, 20 or even 100 years, when they need to maintain their water rights? The issue of whether they will continue to be able to use motorized/mechanized equipment to the same level they use it now is critical to the NEPA analysis. Until that is done, the EIS is legally deficient.</p> <p>The same analysis must be done for all existing rights.</p>
E	<p>2/Land Use Zones Including Wild 2/Land Use Zones/19-20</p>	<p>The below information is quoted from the EIS (highlighted and bolded emphasis added). CNF proposes to manage 91% of the Forest for “quiet recreation” and No OHVs. Motorized vehicles will be allowed on less than 1% of the Forest if the LMP Revision is approved as written.</p> <p>The proposed land use zones are inconsistent with Cochise County and the City of Sierra Vista land use plans. These inconsistencies must be analyzed. We request that CNF meet with local government agencies including the City and County, allow cooperating agency status, attend coordination meetings, and address local plans.</p> <p>Land Use Zones Wild Backcountry The proposed action would designate a Wild Backcountry Land Use Zone of 626,167 acres (35 percent of the national forest) to accommodate various nonmotorized uses while concurrently providing for limited motorized access to the area on National Forest System roads designated as maintenance level (ML) 2.11 The zone comprises inventoried roadless areas, areas adjacent to designated wilderness areas, and other relatively pristine areas. Desired conditions are described, and guidelines are established to maintain desired conditions and visitor experiences. Suitable uses specified for the Wild Backcountry Land Use Zone are livestock grazing, harvesting of timber for restoration purposes, mountain biking, and collection of forest products and fuelwood. Off-highway vehicle (OHV) recreation, developed recreational facilities, and timber production are not suitable uses.</p>



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		<p>Comment: Please explain how this designation and the ones listed below will influence the individual NEPA documents for travel management. Will the District level NEPA documents tier to the Revised LMP by defaulting to the position that OHV use is not suitable within wild backcountry, roaded backcountry, and special areas? This needs to be clarified to readers to assure that local government agencies and the public understand the full force and effect of the Revised LMP and how it plays into the District level travel management NEPA analyses.</p> <p>Roaded Backcountry A proposed 647,013-acre (37 percent of the national forest) Roaded Backcountry Land Use Zone would accommodate a range of dispersed uses and motorized access, with an emphasis on quiet recreation. This area would be managed to retain its natural character and to limit the degree and type of development. Desired conditions are described, and guidelines are established to maintain conditions and visitor experiences.</p> <p>Suitable uses specified for the Roaded Backcountry Land Use Zone include livestock grazing, motorized access, motorized dispersed camping, mountain biking, recreation facilities, harvesting of timber in conjunction with restoration projects, and collection of forest products and fuelwood.</p> <p style="padding-left: 40px;">This zone is not suitable for OHV trails and timber production.</p> <p>Comment: Please explain how the emphasis on quiet recreation and the statement that the zone is not suitable for OHV trails effects existing roads and trails within the upcoming District level travel management decisions. Will District Managers tier to the Revised LMP and prohibit noisy recreation including OHVs within Roaded Backcountry? Many dirt roads are currently considered “OHV trails” by OHV users. Will existing dirt roads be closed during the District travel management process in an effort to make the District level travel management decisions compliment the Revised LMP?</p> <p>Motorized Recreation Approximately 3,251 acres of the Coronado (less than 1 percent)</p>



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		<p>are designated for management as a Motorized Recreation Land Use Zone. This zone includes areas that currently experience heavy use by motorized recreational vehicles. Management direction is focused on providing a wide variety of recreational experiences, including OHV use and vehicular sightseeing, while mitigating effects of motorized use and minimizing conflicts with other users. Desired conditions are described, and guidelines are established to maintain conditions and visitor experiences. Most forest uses, except for timber production, are suitable in this management area.</p> <p>Special Areas Existing Wilderness Areas Eight designated wilderness areas, which add up to 338,294 acres (19 percent of the national forest), are included in the draft revised plan. Generic desired conditions (goals), objectives, standards, and guidelines are defined for the following resource and social elements of designated wilderness areas: wilderness character, scenic quality, vegetation, wildlife, soil and water, recreation and education, trails and signage, fire, insects and disease, and research. In addition, the draft revised forest plan defines wilderness area specific desired conditions, objective, guidelines, standards, and suggested management approaches.</p> <p>In the draft revised plan, wilderness areas are suitable for livestock grazing, nonmechanical harvesting of traditional forest products, and outfitter and guide services compatible with wilderness character. Selected activities not suitable in wilderness areas include motorized and mechanized use, recreation facilities, timber harvest, fuelwood harvest, and commercial uses that are not wilderness dependent (see chapter 4 of draft revised forest plan).</p>
F	1/Decision Framework/10	<p>“A copy of the most recent draft revised forest plan and a wilderness evaluation report are provided as companion documents to this EIS.”</p> <p>Comment: A consistency analysis needs to be performed to address the following requirement within the Cochise County Land Use Plan:</p> <p><i>A. Wilderness Designation</i> 1. 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.</p>



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		<p>2. 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 with the County and the State.</p> <p>3. Wilderness designation is not always an appropriate, effective, efficient, economic or wise use of land. These lands can be adequately protected through mitigation, minimizing negative impacts and proper reclamation.</p> <p>4. 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.</p> <p>5. WSAs released by Congress must be managed based on the principles of multiple use and sustained yield.</p>
G	2/Table/50	<p>“Greatest potential positive effects on water resources because of wilderness restrictions that decrease ground-disturbing activities.”</p> <p>Comment: Please explain the effect of wilderness expansions and additions in relation to use of mechanized equipment to maintain pre-existing water rights. With the proposed expansion of the Chiricahua Wilderness and other wilderness additions, explain whether any permission from the Forest Service would be necessary prior to use of mechanized equipment within each proposed wilderness expansion/new wilderness area. What restrictions might be placed on use of mechanized equipment within the wilderness areas (threatened and endangered species, soils, noise restrictions, etc). Explain the details of any permits necessary, any studies that would be required prior to maintenance activities, the time frames, costs, who bears the costs, etc.</p> <p>How does the “minimum requirements decision guide:” effect the right to use mechanized equipment in emergencies? If a water sources is damaged during a fire, storm or other event, can the holder of the water right enter the wilderness immediately with mechanized equipment? If so, please clearly state this within the Revised LMP and the EIS. If not, please thoroughly explain what</p>



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		notice the water right holder needs to give the Forest, timelines, data necessary prior to the decision, who makes the decision, what restrictions can be places on use of mechanized equipment in wilderness (timing, noise level, size of equipment, types of equipment, number of vehicles/people, etc)
H	2/Table/52	<p>Restriction on motorized uses in new recommended wilderness area would reduce the potential for jaguar mortality from vehicle collisions in recommended wilderness.</p> <p>Comment: How many jaguars have been hit by vehicles on CNF? We believe the answer is “zero”. We suggest the Forest choose a better parameter to evaluate alternatives than potential jaguar mortality from vehicle collisions. Zero is zero and that does not change from alternative to alternative. At this time in history there appears to be one lone jaguar in southern Arizona and it has been photographed only in remote areas, far from potential vehicle collisions.</p>
I.	3/Social Impacts and Environmental Justice/419 and 420	<p>The section on Environmental Justice fails to evaluate the potential inclusion of additional lands currently on the tax rolls within CNF. This would result in a decrease in tax collections for the Counties in Arizona. Although the plan acknowledges federal payments, this needs to be evaluated in the EIS.</p> <p>Fort Huachuca has an economic impact within Cochise County of approximately \$2.4B annually. Impacts to the EM spectrum through additional communications infrastructure and powerlines have the potential to impact the EM spectrum which would impact the number of DOD jobs in the area as well as to national security. Both have socioeconomic and environmental justice impacts that need to be included in this EIS.</p>
J.	References	<p>2008c. Coronado National Forest Social and Economic Sustainability Report. On file at: Coronado National Forest Supervisor’s Office, Tucson, AZ.</p> <p>Comment: This document is cited in the reference section of the EIS, however, the EIS fails to analyze economic sustainability. Though the EIS is replete with ecological sustainability information it is virtually devoid of any economic sustainability analysis. We suggest this be corrected prior to issuance of the FEIS.</p>