

March 12, 2020

Tonto National Forest  
Attn: Forest Planner  
2324 E. McDowell Road  
Phoenix, AZ 85006

**Re: Federal Land Hunting, Fishing and Shooting Sports Roundtable Comments on the Tonto National Forest Draft Land Management Plan**

To Whom it May Concern:

The undersigned organizations appreciate the opportunity to comment on the U.S. Forest Service's (USFS) draft land management plan for the Tonto National Forest (TNF) covering over 2.9 million acres in central Arizona that among many uses of the federal public lands, addresses future management of hunting, fishing and recreational shooting. Our organizations (NGOs) have a long-standing and vested interest in access and opportunities on federal public lands for our members to enjoy these activities. The NGOs are signatories to the Federal Lands Hunting, Fishing and Shooting Sports Roundtable (Roundtable) Memorandum of Understanding (MOU) with the USFS. The purpose of the MOU is to build a partnership with the signatory organizations, the USFS, and the other signatory federal agencies "for planning and implementing mutually beneficial projects and activities related to hunting, fishing, and the shooting sports conducted on federal lands."

Specific Recommendations:

**Chapter 1 – Introduction**

**Social, Cultural, and Economic Sustainability (Page 10)**

- We support the statement that acknowledges the "...need to include plan components for sustainable recreation management, including flexible and efficient management of special uses, to ensure that recreational resources are integrated into all resource management decisions" because the type of integration described paves the way for better management of all recreation activities and a more secure future for recreational shooting.

**Chapter 2 – Forestwide Plan Direction**

**Recreational Shooting (REC-DIS-RS) (Pages 30 – 32)**

- We support the USFS's recognition of hunting and fishing's role in funding fish and wildlife conservation through excise taxes collected via the Pittman-Robertson and Dingell-Johnson Acts (Pg. 32). With a significant portion of Pittman-Robertson Act revenue also derived through excise taxes on firearm and ammunition sales, we recommend incorporating a similar statement about the shooting sports' role in conservation funding into the narrative summary of the Forest Plan Direction for recreational shooting on Pages 30-31.
- *Desired Conditions (REC-DIS-RS-DC):*

- We support the USFS's stated desire to provide recreational shooting opportunities consistent with user demand.
- *Standards (REC-DIS-RS-S):*
  - We encourage the USFS to incorporate and acknowledge Sec. 4102 and Sec. 4103 of P.L. 116-9 into this section of the Forest Plan Direction to make the public aware that any prohibitions on recreational shooting will be limited to the "smallest area for the least amount of time that is required for public safety, administration, or compliance with applicable laws" consistent with the John D. Dingell, Jr. Conservation, Management, and Recreation Act .
- *Guidelines (REC-DIS-RS-G):*
  - (03): We encourage the USFS to consider whether the mandatory minimum discharge distances noted in Guideline 03 are consistent with the intent of Sec. 4102 and Sec. 4103 of P.L. 116-9. In addition, we encourage the USFS to further define "occupied private property". For example, it is unclear as to whether this term would include the presence of a person occupying a contiguous parcel of private property adjacent to a national forest boundary while standing more than one quarter mile from this boundary.
  - We ask that the USFS explain why the proposed minimum distances (one quarter mile) referenced in the proposed Forest Plan Direction (and subsequently in Chapter 3 of the Draft Environmental Impact Statement) deviate from those found at 36 C.F.R. §261.10 (i.e. "In or within 150 yards of a residence, building, campsite, developed recreation site or occupied area"). In addition, we also request an explanation as to how and why the proposed one quarter mile minimum distance was chosen.
- *Management Approaches for Recreational Shooting*
  - (01): We support the USFS's stated desire to work with partners to identify recreational shooting opportunities, additional public needs, and improve recreational shooting opportunities on the TNF. We encourage the USFS to incorporate communication and cooperation with the MOU Roundtable into this management approach.
  - (02): We support the USFS's language that considers the use of designated shooting areas, permitted and developed shooting ranges, special permit zones, and other management tools to meet demands for recreational shooting while ensuring public safety and natural resource protection and where compatible with other TNF uses and objectives.
  - (03): We recommend that the USFS incorporate communication and cooperation with the MOU Roundtable into this management approach. In addition, we recommend that Tread Lightly's Respected Access is Open Access campaign be incorporated into the Forest Plan Direction. Resources associated with this campaign provide education and stewardship materials specifically tailored to the management of recreational shooting.
  - (04): We also recommend that the USFS incorporate communication and cooperation with the MOU Roundtable and the Arizona Game and Fish Department into this management approach.

**Wildlife-Related Recreation (REC-WR) (Pages 32 – 34)**

- *Guidelines (REC-WR-G)*

- (03): We suggest modifying this guideline to incorporate the word “habitat” between “Wildlife” and “connectivity”.
- *Management Approaches for Wildlife Recreation*
  - (01): We recommend changing “Work in collaboration with Arizona Game and Fish Department to” to “Work cooperatively with Arizona Game and Fish Department to”.
  - (01) We recommend the incorporation of a management approach that specifically references working cooperatively with the Arizona Game and Fish Department to meet state-approved wildlife population management objectives.
  - (01 – d.): We support the USFS’s stated desire to plan and prioritize projects that achieve desired conditions for hunting, fishing, and watchable wildlife species and habitats on the TNF.

#### **Lands and Access (LA) (Pages 61-62)**

- Generally, we encourage the USFS to use the Forest Plan Direction as an opportunity to standardize the access information that is provided to the public. We suggest providing the public with access to electronically available data that includes: all federal interests, including easements and rights-of-way on private land to which the USFS does not have a fee title interest and that is used to provide recreational access to the TNF; status information with respect to whether roads and trails on the Forest are open or closed; the dates on which roads and trails on the TNF are seasonally open and closed; the types of vehicles that are allowed on each segment of the roads and trails on the TNF including the permissibility of off highway vehicles, motorcycles, bicycles, and passenger vehicles; the boundaries of areas where hunting or recreational shooting is regulated or closed on the TNF; and the boundaries of any portion of a body of water on the TNF closed to entry, closed to watercraft or has horsepower limitation for watercraft.
- *(Guidelines (LA-G):*
  - We recommend that the USFS include a discussion of how the Forest Management Direction will facilitate completion of the requirements prescribed by Sec. 4105 of P.L. 116-9.

#### **Appendix B – Proposed Probable and Possible Future Actions**

##### **Recreational Shooting (Pg. 189)**

- (03): We recommend that the USFS incorporate communication and cooperation with the MOU Roundtable into this management approach. In addition, we recommend that the USFS incorporate Tread Lightly’s Respected Access is Open Access campaign into the Forest Plan Direction. Resources associated with the campaign provide education and stewardship materials specifically tailored to the management of recreational shooting.
- (04): We also recommend that the USFS incorporate communication and cooperation with the MOU Roundtable and the Arizona Game and Fish Department into this management approach.

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#### **Lands and Access (Pg. 193)**

- We encourage the USFS to provide the public with access to electronically available data that includes: all federal interests, including easements and rights-of-way on private land to which the USFS does not have a fee title interest and that is used to provide recreational access to the TNF; status information with respect to whether roads and trails on the TNF are open or closed; the dates on which roads and trails on the TNF are seasonally open and closed; the types of vehicles that are allowed on each segment of the roads and trails on the TNF including the permissibility of off highway vehicles, motorcycles, bicycles, and passenger vehicles; the boundaries of areas where hunting or recreational shooting is regulated or closed on the TNF; and the boundaries of any portion of any portion of a body of water on the TNF that is closed to entry, is closed to watercraft or has horsepower limitation for watercraft.
- (02): We encourage the USFS to include a discussion of how the Forest Management Direction will facilitate completion of the requirements prescribed by Sec. 4105 of P.L. 116-9.

### **Draft Environmental Impact Statement**

#### **Chapter 3 – Affected Environment and Environmental Consequences**

##### **Recreation**

##### **Cumulative Effects (Pages 105-106)**

- On page 106, the DEIS suggests that additional hunting and fishing could result in impacts to wildlife health and populations. We recommend striking this reference unless there are specific and quantifiable examples of regulated hunting and fishing resulting in detrimental impacts to wildlife health or wildlife populations on the TNF.

##### **Environmental Effects – Alternative A Effects (Page 109)**

- *“The nature and extent of closure orders do not allow creative solutions to provide safe and responsible shooting opportunities in these areas. The user conflict is generally resolved, if it is addressed at all, by excluding recreational shooters entirely from a particular area. These closure orders’ temporary nature also not allow consistency of management by area or forestwide.”*
  - Comment: Since its inception, the Roundtable has pursued creative solutions to issues associated with recreational shooting short of closures, which often seems the only tool in the toolbox that is used. Hence, we applaud the TNF’s stated goal of working with the Arizona Game and Fish Department and local shooter-partners in more creative management decision making. Again, we recommend including the MOU Roundtable as a potential partner in seeking these creative solutions.

In summary, we appreciate the TNF’s recognition that hunting, fishing and recreational shooting are valued activities deserving of consideration throughout the management planning process. As noted in

the DEIS (Page 107), recreational shooting has grown in popularity since the Forest Plan was implemented in 1985 and the population centers around the forest have also grown significantly. Along these same lines, we agree with the TNF's recognition (Page 86) that wildlife-related recreation – including hunting and fishing – contributes substantially to the planning area's social, cultural, economic and ecosystem services. Given these factors, we also agree with the TNF's statement that there is a need to proactively and positively work with partners to meet the demand associated with these activities.

We appreciate the TNF's consideration of these comments. If there are opportunities for the MOU Roundtable to provide clarification or background information, please contact Andy Treharne at (202) 594-7973 or [atreharne@congressionalsportsmen.org](mailto:atreharne@congressionalsportsmen.org).

Sincerely,

American Sportfishing Association

Boone & Crockett Club

Congressional Sportsmen's Foundation

Delta Waterfowl

Houston Safari Club

National Rifle Association

National Shooting Sports Foundation

Safari Club International