

Tonto Forest Plan Revision – Objection Resolution Meeting Notes

February 21, 2023 - Day 1

0830-0900: Welcome and Introductions – Regional Forester Michiko Martin, Forest Supervisor Neil Bosworth, Facilitator Shawn Johnson

- Review meeting agenda and objectives
- Meeting roles and best practices
- Objection review process

Notes:

Shawn Johnson: Clarification of objection review process terminologies. Objectives of the meeting – clarify understanding of objection concerns, clarify processes. Explained who is on the call along with objectors and interested persons – planners from various levels of the Forest Service. Shared technological tips for the virtual meeting. Requested people honor time commitments, be concise, don't repeat objections, and focus on areas needing more clarification. Reviewed agenda and noted availability of handouts. Introduction of Regional Forester Michiko Martin and Forest Supervisor Neil Bosworth.

RF Michiko Martin: Welcome and appreciation for the value of public participation. She has reviewed all the objections and identified areas where she would like additional clarification. Reviewed the objection process and clarified that we are discussing just a subset of objections today. Clarification for expectations – she will not be making any decisions today. The objection response will not be point by point but will group similar objection concerns.

FS Neil Bosworth: Welcome. Noted they started the revision process in 2014 and he's been a part of it since the beginning. There are unique features on the Tonto NF, and he is hoping the revised plan reflects that. This meeting will help shape the final decision.

Shawn Johnson: Clarified process around the structure of the agenda.

Ariel Leonard: Checked to make sure everyone has handouts.

0900-0945: Watershed and Riparian - Arizona Mining Association, Freeport McMoRan, Pinto Valley Mining Corporation, Sierra Club et al., Interested Persons

- Framework for watersheds and riparian resource management
- Restoration objectives (WAT -8)

Framework for watersheds and riparian resource management

RF Michiko Martin: Introduction of topic and objector concerns. Sierra Club – concern area and potential remedies. Clarify if the understanding was correct – Sandy Bahr confirmed. Asked Sandy Bahr to describe what a desired framework would look like for Sierra Club.

Sandy Bahr (SC): The FS watershed framework identifies a suite of management activities to restore watershed health. Referred to the comments they provided on the DEIS.

RF Michiko Martin: Any specific indicators or actions that the Sierra Club is interested in?

Sandy Bahr (SC): Some examples may include specific acreage for stable desert willow habitat, actions addressing the impacts of livestock grazing for riparian areas. Stated removal or limiting livestock grazing will have significant impacts for restoration and, for example, propose removing cattle from x acres of riparian habitat.

Interested persons on the Framework for watersheds and riparian resource management?

Dawn Meidinger (Pinto Valley Mining Company): The framework for watersheds is expressed pretty well. It is expressed in a collaborative manner. Encourage focusing on that as a theme as required in the 2018 Farm Bill. Recognizes the functioning and functioning at risk terminology was probably best available science 10 years ago, but it is now required to be collaborative in the 2018 Farm Bill.

Restoration objectives (WAT 8) – Freeport McMoRan (Amanda Reeve) and Sierra Club (Sandy Bahr).

RF Michiko Martin: Clarify if our understanding of concerns is correct. Confirmed. Freeport McMoRan asked us to completely remove RMZ-0-01. Is there an option to make it less ambiguous without completely removing it?

Amanda Reeve (FM): Needs clarification of terms, too vague.

RF Michiko Martin: Providing additional definitions would address this concern?

Amanda Reeve (FM): There are already definitions in law. Understanding what the baselines are would be needed.

RF Michiko Martin: Make sure we have consistent definitions and provide clarification of baselines?

Amanda Reeve (FM): Correct.

RF Michiko Martin: Sierra Club – You believe our acre target is inadequate and your remedy is to include a higher mileage of restoration. Given the objective is based on what we think we can accomplish, do you have ideas of how we can do more?

Sandy Bahr (SC): Reminder of the significance of the riparian habitat – high percentages of riparian habitat are located on the Tonto compared to the total across Forests. Livestock grazing impacts these areas and its proper functioning. The Forest Service could prioritize riparian areas which are so critical to wildlife etc. The Forest Plan should prioritize and increase the number, at least triple it, to get where it is needed for restoration.

FS Neil Bosworth: Would like to talk more when we get into implementation. Feels we did emphasize the importance of riparian habitat in the plan.

Interested persons on restoration objectives:

Dawn Meidinger (PVMC): The hard part of this objective is the ability to accomplish this. There is a need to focus on budget from a water management and riparian management zone point for accomplishing this with partnerships. A collaborative process should be used. Proper functioning/functioning at risk is not a defined term. Forest Service should probably use a different term. There is a set of criteria for riparian areas that should be used – consider all the regulations and don't use a non-functioning or functioning at risk scale. Sustainability needs to include social and economic sustainability along with ecological sustainability. Recognizing the inherent capability of an area needs to be considered along

with social and economic sustainability. CFR 219.8 requires the Forest Service to package together social, economic, and ecological sustainability and inherent capability. Feels functioning/non-functioning is a riparian term, not a watershed term.

1000-11:45: Range - Jeffrey Burgess, Sierra Club et al., Interested Persons

- Grazing assessment methodology and site-specific grazing analysis
- Grazing monitoring and adaptive management
- Management approaches for grazing (Annual Operating Instructions)
- Livestock management in riparian areas

Grazing assessment methodology and site-specific grazing analysis

RF Michiko Martin: Sierra Club et al – The forests cannot rely on past monitoring efforts to manage livestock grazing. Remedy proposed is to withdraw the ROD and conduct a “reality-based” analysis of the impacts of livestock grazing. Confirming if we captured the objection and remedy?

Cyndi Tuell, Western Watersheds Project: Confirmed. Noted negative impacts of grazing for the benefits to a small industry vs. the long-term benefits to many more people that could be achieved by removing livestock - “cost benefit”.

RF Michiko Martin: clarifying questions.

Cyndi Tuell, WWP: Yes, cost benefit for both economic and ecological. Feels a gaping hole in the analysis is trespass grazing. Cattle getting out of their permitted area happens consistently and isn’t addressed. Also, the cost of managing the livestock grazing program isn’t addressed.

RF Michiko Martin: Confirming: You would like a more thorough cost benefit analysis, both ecological and economic, and would like to see how we use trespass data in the analysis.

Interested persons on Grazing assessment methodology and site-specific grazing analysis? None.

Grazing monitoring and adaptive management

RF Michiko Martin: Inviting Cyndi Tuell and Jeffrey Burgess – Objections state that the plans didn’t set clearly defined metrics (?).

RF Michiko Martin: Question to Cyndi with Sierra Club et al: What other metrics could be included?

Cyndi Tuell, WWP: It would have been helpful to have these questions ahead of time. They have submitted those metrics previously. Example: Identify that if an allotment is utilized to a level above what it should, then grazing must be ended for a certain amount of time, based on scientific literature. Looking for the Forest Service to use the science provided. Reduce or eliminate grazing. This will require extensive monitoring, but they don’t have confidence this will occur. Concerns about climate change compounds this concern.

RF Michiko Martin: When considering these metrics, do you consider them Forest-wide or site specific?

Cyndi Tuell (WWP): A combination. Riparian areas will have a different metric. Site specific but include a baseline which the Forest Service won’t let an area go below.

RF Michiko Martin: Could she follow-up to provide a few metrics after this meeting? Cyndi – yes. Does she know of any other Forest plans that have these metrics included? Cyndi – no.

- Follow up information: Received, will add.

RF Michiko Martin: Please send those metrics to Ariel Leonard.

Ariel – Question: Are you looking for percentage utilization real time?

Cyndi Tuell (WWP): That would be a great start. There are probably others.

RF Michiko Martin: Question to Jeff Burgess. One remedy was to not allow grazing in the hot Sonoran Desert in the summer. What are the triggers he would recommend for removal?

Jeffrey Burgess: The three hottest months of June-August would be the easiest. No herbaceous vegetation is left. The livestock just eat seed pods and shrubs.

RF Michiko Martin: So use the calendar?

Jeffrey Burgess: Seems it would be a simple resolution.

RF Michiko Martin: Short of removing them, are there other mitigations or remedies?

Jeffrey Burgess: No. If you go to a non-grazed Sonoran Desert, you see some herbaceous vegetation.

Interested persons on this topic? None.

Management approaches for grazing (Annual Operating Instructions)

Michiko: Sierra Club et al – Interactions between predators and livestock. Confirm we captured objection correctly. Cyndi confirmed.

Michiko: What would it look like?

Cyndi Tuell (WWP): Something like having the annual operating instructions (AOI) state that there are predators and that permittees are expected to manage their livestock accordingly. Also noting endangered species as well as predator conflicts. The forest plan management approach should state that AOIs will talk about this. They recognize that the AOI will be more site specific than the forest plan. They would also like the AOIs to discuss dealing with dead livestock. Direct operators to do the “right thing” when one of their animals dies on the allotment.

RF Michiko Martin: Understands that they are concerned about permittee awareness. How much of the remedy relies on the AOI or is the objection met if permittee awareness is achieved through other methods?

Cyndi Tuell (WWP): Believes it needs to be in the Forest Plan. Just hoping that the AOI will include it isn't enough.

RF Michiko Martin: Does the remedy have to be included in the AOI? Regulations impact what can/cannot be in the AOI due to NEPA etc. Is it more important that it occurs somehow or through the AOI?

Cyndi Tuell (WWP): Cares that it happens. Where it happens could vary if it can't be in the AOI.

RF Michiko Martin: So somewhere in the plan, increase the permittee awareness of the concerns.

FS Neil Bosworth: Asked for more specificity of what permittee awareness looks like. What is the end goal?

Cyndi Tuell (WWP): End goal, ranchers manage their livestock with awareness of predators and endangered species. We know they are aware of predators, but they don't always act like it.

Neil - Document they have, responsibilities?

Cyndi Tuell (WWP): Yes.

Interested persons on this topic? None

Livestock management in riparian areas

RF Michiko Martin: Inviting Cyndi Tuell and Jeffrey Burgess back for this section. Their objection asserts the plan fails to adequately protect riparian areas. Remedies – Identify utilization guidelines and prohibit grazing in riparian areas recently damaged by floods; take a hard look at the impacts of grazing and remove all grazing from riparian areas.

RF Michiko Martin: To Jeff, asks what utilization guidelines he would recommend.

Jeffrey Burgess: The 2002 plan had a lot of metrics. The revised plan has vague management guidelines. Assumes the riparian areas will have enough time to recover. Not sure why the current riparian guidelines, which aren't that great, are being discarded. Recognizes that the Tonto AOIs include a lot of this info, but you can only get them by a FOIA. The Prescott has them all on a web page. Why isn't this info available for the Tonto? Noted himself that he diverged from topic.

RF Michiko Martin: Understands that the info he wants to see is in the AOI?

Jeffrey Burgess: Yes.

RF Michiko Martin: Asked if the 2002 document guidelines is what he'd like to see?

Jeffrey Burgess: Yes. He'd like to see it be stricter, but it is better than nothing.

RF Michiko Martin: To Cyndi Tuell - The remedy suggested is for the hard look and revise the plan to remove all livestock grazing from riparian areas. What does the "hard look" look like to her?

Cyndi Tuell (WWP): They provided a lot of scientific info regarding to livestock grazing in riparian areas. Hasn't found any literature supporting grazing in southwestern riparian areas. Would like to see a clear current assessment and then a plan showing this is what we think needs to be done. There are areas that should be off limits to grazing that are critical for endangered species and recreation. It doesn't seem fair on the cost benefit comparison. No rationale. No areas identified that should be off limit to grazing. The hard look is looking at the conditions on the ground and proposing what should be done.

RF Michiko Martin: In addition to the hard look, also noted that we should look at peer reviewed literature addressing grazing in riparian areas? Cyndi yes.

RF Michiko Martin: In lieu of eliminating grazing totally from riparian areas, are there any other remedies that might be considered.

Cyndi Tuell (WWP): Believes the science indicates it should be totally removed.

RF Michiko Martin: If there is science to back it, would there be other remedies?

Cyndi Tuell, WWP: also agreed that having AOIs online would help, separate topic.

Jeffrey Burgess: Agree about posting the AOIs online.

Interested persons on this topic?

Jim Unmacht, executive director for AZ Sportsmen for Wildlife Conservation (AZSWC): Does getting unauthorized livestock out include horses as well as cattle?

FS Neil Bosworth: Salt River is unique. Yes, horses that are trespassing are included.

Don Steuter: An example of a frustration is with livestock grazing in riparian areas. FS authorized the building of a corral about 100 feet from a creek. Why was it necessary to locate it in that area? No good background on that. In the early 1990s, there was a conference on public land grazing. The takeaway was that it was okay to graze in riparian areas no more than 2 weeks in a 3-year period.

RF Michiko Martin: Follow-up question for Don Steuter about the corral. Is there a specific utilization guideline about how far a corral should be located near a riparian area?

Don Steuter: it already exists, but it doesn't seem it was followed.

FS Neil Bosworth: Noted Don Steuter joins the quarterly meeting; he will provide some additional info at the next meeting.

Jeffrey Burgess: We didn't get to the objection point that the cattle growers are asking for getting all vacant allotments back into production. Concerned how this possible evaluation will be done publicly. It doesn't say so in the plan.

RF Michiko Martin: Regarding the schedule for analyzing vacant allotments. Asking Neil to address.

FS Neil Bosworth: There would be a public process for analyzing them through the NEPA process. However, some already have NEPA completed. He'll need to get back to Jeff. Usually, NEPA is the public process. So, if NEPA is already done, we may need to come up with something different.

Jeffrey Burgess: The Superstitions haven't had an allotment management plan for decades. Reauthorizing grazing in the desert in areas it hasn't occurred for decades seems unwise.

RF Michiko Martin: We'll go back to that objection. If we didn't capture it previously, he wants to confirm that there is public process for reinitiating grazing in vacant allotment?

Jeffrey Burgess: Correct.

Cyndi Tuell (WWP): Appreciates that the forest supervisor will look at each allotment. If you were doing the reverse, closing allotments, you would do NEPA. Wants the same attention to opening closed allotments.

FS Neil Bosworth: Wants to clarify terminology. Closed vs vacant allotments are two different things. There is only one closed allotment on the forest. Vacant just means there isn't a current permit on it. Understands that they want a public process for re-permitting them.

1245-1330: Minerals - Arizona Mining Association, Freeport McMoRan, Pinto Valley Mining Corporation, Sierra Club et al., Interested Persons

- Approaches for reclamation actions
- Restrictive guidelines and access (ex AZNST and scenery)
- Groundwater management and mining activities

Approaches for reclamation actions

RF Michiko Martin: Confirming we understand objection points. Invite Freeport McMoRan – Amanda Reeve. The statement about using vegetation as a desired condition is impractical.

Amanda Reeve (FM): We already have a lot of laws regulating mine land reclamation. Stay within the laws. These components don't fall within these laws. That is their main concern.

RF Michiko Martin: This component is stating a desired condition. What would they recommend if we didn't use vegetation?

Amanda Reeve (FM): Use what is in the existing laws. Not sure what she means by referring to vegetation.

RF Michiko Martin: 6 has to do with reclamation of large scale mine sites. 2 requires reclamation activities to (?). She is trying to understand if they don't like those as standards to return lands to pre-disturbance conditions if it is not ecological conditions.

Amanda Reeve (FM): They have to do that under existing regulations. We shouldn't do more than what is required under existing regs. Stay within the regulations.

RF Michiko Martin: They don't want something that is inconsistent with existing mining laws. If it is consistent, it would be, okay?

Amanda Reeve (FM): Would want to see how it is written. Don't want them to go above and beyond.

Chris Franks: Reclamation is fluid. Companies have to post bonds. Dollars can be significant 6-7 figure amounts. If there is suddenly a change in a defined process, it could change what has already been approved and underway. Reclamation can take decades. Consistency with existing regs is critical to be able to operate. Not opposed to a resilient ecosystem but needs to know if it is achievable.

FS Neil Bosworth: Question on 6. Understands 2 but feels like something additional was added. 6 we talk about reclaiming a site – finding another use if it isn't reclaimable, ie. solar panels. Is that part of the problem?

Amanda Reeves (FM): Concern is with the "ecological response unit" terminology not being in existing laws and how it impacts industry. Trying to understand it. Ambiguous. It is above and beyond what is in existing law.

FS Neil Bosworth: Opportunity for forest and mining company to try to find a different use that would benefit the public in a different way. The purpose of the term is because we may not ever be able to reclaim to pre-mined condition.

Amanda Reeve (FM): That is part of the purpose, but if you go above and beyond, that is the problem.

RF Michiko Martin: Amanda, please look at 2. What could be acceptable with her position?

Amanda Reeve (FM): “resilient post mining ecosystem” isn’t defined in current laws. Concerned with things that go beyond existing statute. Need to work within the confines of existing laws. We already have it covered, don’t need to go beyond it.

Ariel Leonard: Share with Amanda that we also have NFMA and 2012 planning rules that require us to manage for resilient ecosystems. Trying to provide direction within multiple laws. Nothing in the plan can supersede existing mining rights.

Amanda Reeve (FM): Understands that, but also can work within the mining laws because it is already covered. Appreciates Ariel’s points. The plan is not clear that it shouldn’t exceed existing mining law. Maybe provide clarifying language.

Interested persons on this topic.

Dawn Meidinger - #2 is a problem. Agree a preamble that nothing can supersede law would help. #6 should be a goal – in many cases it is never practicable. Maybe a goal instead of a management approach.

FS Neil Bosworth: It is a standard for the Tonto to come up with a reclamation plan. Is there a way to rephrase it or delete?

Amanda Reeve (FM): #2 maybe change it to a desired condition instead of standard?

Don Steuter, Sierra Club: Forest Service has a lot of conflicting obligations and responsibilities that it has to carry out. There are opportunities to go beyond. Forest Service has considerable authority to go beyond. Objective 1 – put it over a specific time period instead of “over the life of the plan” which is uncertain.

Michael Ford, AZ Mining Assn: on Standard #02 – options to make it consistent with 228 mining laws. Getting rid of a sentence... Reclamation standards within the 228 regs – use “encourage reuse”.

RF Michiko Martin: Trying to understand if the hesitation is trying to return it to a “pre-mining picture” which may be impossible. Is there another way to define that pre-disturbance area and the benefits that come out of that area? How could you return it to those benefits, maybe not the same ecological pre-disturbance condition, but return those benefits?

Michael Ford (AZMA): The terminology isn’t familiar. Use terms such as runoff etc...

FS Neil Bosworth: What we’ve done on the Tonto in the past is to reclaim it to “good enough”, knowing we can’t return it to pre-disturbance conditions. This current management approach is more of an encouragement to instead of just doing that “good enough” work, look at opportunities to put it to more beneficial use.

Michael Ford (AZMA): Open to opportunities, just not clear with terminology and responsibilities.

Chris Franks: Standard O2 – “shall be designed” to xxx. Too vague. Who determines what is achievable? A vague mandate is not good. Be very careful with a recommendation vs. a “shall be”.

RF Michiko Martin: Same topic, asking a different question, but to Sierra Club – Don Steuter. When working with abandoned mines, the original owners aren’t around, no money, and Forest Plan needs to be what we think we can achieve. How could we rewrite it but also address current financial constraints?

Don Steuter (SC): Forest Service needs to see what funds they have and plan for it for a particular time period.

RF Michiko Martin: So he would prefer we look at historic budget trends and project what we could do over x amount of time? Don Steuter (SC): Yes. Does he have any different remedies to address this? Don Steuter (SC): Use and maybe tweak Forest Service prioritization system to address the ones with the greatest need first, recognizing the ones that need it most may be the most expensive to address.

FS Neil Bosworth: Would love to spend time with Don the next time they meet in person to discuss this.

Chris Franks: Would also love to chat with Neil and partner with agencies within the ability of laws to do so.

Interested persons on this topic: None.

Restrictive guidelines and access (ex AZNST and scenery)

RF Michiko Martin: Three mining companies concerned about laws being exceeded and a concern about access to their mine lands. Desired conditions speak to future desires. Trying to understand why some are problematic to them.

Dawn Meidinger: DC 04 – problem is the difference between what is in 228 and this desired condition. Conform the language between the two. They have a right to access and want that to come through all the sections.

RF Michiko Martin: How about #3?

Dawn Meidinger: Recognize “unless it is needed to support mineral operations”.

Michael Ford (AZMA): Two scenery desired condition and goal. Similar to what Dawn explained. 228 language vs. forest plan. For mining operations, must be consistent with 228. Can add language to clarify that.

RF Michiko Martin: Question to Amanda Reeve (FM) – Does she have something different or is it similar?

Amanda Reeve (FM): DC05 – it is a desired condition and should be a management approach.

RF Michiko Martin: Sierra Club et al Don Steuter – Question - Is there a management approach that they could include to encourage mining companies to get better results?

Don Steuter (SC): We do that already. NEPA process with Pinto Valley Mining Co – form working groups that can address particular issues, i.e., tailings and instream flow... Made some inroads working together.

RF Michiko Martin: Is there another forest plan with the new planning rule that he knows about that addresses this in a way to address the impacts more adequately.

Don Steuter (SC): Not that he is aware of. They all keep working at it together. Discouraged that this plan has so little. Feels the Forest Service has more tools in its belt to address.

RF Michiko Martin: Not sure she understands the remedy. What is the language he'd like to see us introduce?

Don Steuter (SC): They did make one suggestion. Believes it would fit in perfectly on page 57.

FS Neil Bosworth: Instream flow water rights. What practices can we both do to improve flows? Understands he would like to see more. Wants to assure that we aren't held to the least common denominator.

Chris Franks: "Tools in the toolbox", is this going to guide a travel management plan? How will that work? Overall management plan vs. travel management plan. Intersectionality?

FS Neil Bosworth: Travel management plan for the Tonto was already completed two years ago. It is more dynamic and is updated annually along with MVUMs. If a project needs to change it, it would change the travel management plan.

Dawn Meidinger: Comment, we got carried away in the restrictive plan components. One that is inconsistent is special use guideline 8. This is inconsistent with law. Deserves attention. Let it go through the NEPA process before making a decision on this.

Amanda Reeve (FM): DC 01 "minimize adverse impact" is too vague. Who decides? Terminology is problematic.

Groundwater management and mining activities

RF Michiko Martin: Freeport McMoRan, help her understand what type of clarity around "groundwater dependent ecosystems" would be needed?

Amanda Reeve (FM): Not clear what it refers to. It is not in any applicable statutes or laws. Need to be consistent. Stick with applicable laws and statutes. Don't create new definitions.

RF Michiko Martin: If we could craft language that is within law, would they be okay?

Amanda Reeve (FM): Would need to see it.

RF Michiko Martin: Arizona Mining Co – clarify criteria around hydrologically connected ecosystems?

Michael Ford (AZMA): Concept they are looking for, "hydrologically connected", needs to be proven. Don't rely on it if they aren't.

RF Michiko Martin: Is there is something they would like to point us to for clarifying if something is hydrologically connected?

Dawn Meidinger: Refers to a Forest Service Region 3 guideline – concerned that it isn't correct. Surface water and groundwater... State law regarding water rights.

RF Michiko Martin: Sierra Club et al – the remedy asked for was a revision of riparian management zone guideline 1. How could we revise it to address the metrics they listed in their concern?

Don Steuter (SC): Skeptical that there are any new unknown sources. Leave them undeveloped if so. Protect springs at all costs.

RF Michiko Martin: What is a plan component that would further restrict development?

Don Steuter (SC): No development. If it needs to be developed, leave enough for wildlife. Concern about losing riparian areas in the future if we lose any more wildlife.

Interested persons? None

1330-1345: Summary of the Day - Michiko Martin, Neil Bosworth

- Reviewing Officer's and Responsible Official's reflections

RF Michiko Martin: thanks for joining and all the input. Please contact Ariel or Beth if we need to extend the discussion on groundwater.

FS Neil Bosworth: Great conversation.

Tonto Forest Plan Revision – Objection Resolution Meeting Notes

February 22, 2023 - Day 2

0800-0815: Welcome and Introductions - Michiko Martin, Regional Forester, Neil Bosworth, Forest Supervisor, Shawn Johnson, Facilitator

- Review meeting agenda and objectives
- Meeting roles and best practices
- Objection review process

Notes:

Shawn Johnson: Clarification of objection review process terminologies. Objectives of the meeting – clarify understanding of objection concerns, clarify processes. Explained who is on the call along with objectors and interested persons – planners from various levels of the Forest Service. Shared technological tips for the virtual meeting. Requested people honor time commitments, be concise, don't repeat objections, and focus on areas needing more clarification. Reviewed agenda and noted availability of handouts if anyone needs them provided. Introduction of Michiko Martin and Neil Bosworth.

Michiko Martin: Welcome and appreciation for the value of public participation. She has reviewed all the objections and identified areas where we would like additional clarification. Reviewed the objection process and clarified that we are discussing a subset of objections today. Clarification for expectations – she will not be making any decisions today. The objection response will group similar objection concerns.

Neil Bosworth: Welcome. Noted they started the revision process in 2014 and he's been a part of it since the beginning and appreciates the involvement from many people over that time. There are unique features on the Tonto and he is hoping the revised plan reflects that. Looks forward to today's conversation. This meeting will help shape the final decisions.

Shawn Johnson: Clarification on the process – Michiko will provide topic overview, then primary objectors speak, then interested persons.

0815-0845: Recreation - Access Fund, Arizona State Association of Four-Wheel Drive Clubs, Northern Arizona Climbing Coalition, Sierra Club et al., Interested Persons

- Plan components for rock climbing
- Management approaches for collaboration

Access Fund – grandfather in existing climbing and rappelling anchors and label them as authorized. Remove scenic integrity from Rec guideline 04.

RF Michiko Martin: Guideline 4 and remedy. Is listing all existing routes as authorized what they are asking for and any new routes would be considered new and unauthorized?

Curt Shannon: At the time routes were put in there was not rule saying they weren't "authorized". Their concern is with existing routes. To say they are all unauthorized now doesn't seem practical or right.

Cory Quackenbush: Agrees with what Curt said. Concerned that it would deem previous bolts unauthorized could be a safety issue since climbers who know about them may think they are authorized.

RF Michiko Martin: Concern is with vagueness around what is authorized or unauthorized? Consider all existing routes as authorized?

Curt Shannon: Yes. Existing routes could be grandfathered in. New routes would need to be authorized. Some type of management needs to be put into place going forward.

RF Michiko Martin: Would there be any existing routes that should be considered unauthorized?

Curt Shannon: Climbers should be able to go back to existing routes and replace bolts for safety. Today's bolts are more substantial and last longer. If there is a prohibition on replacing existing bolts, there is a chance climbers will clip into potentially unsafe bolts.

RF Michiko Martin: Any specific language recommended?

Curt Shannon: Has provided language to FS Neil Bosworth in the past. He can provide it again.

RF Michiko Martin: Second question is regarding scenic integrity. The request is to remove it from G04. What don't you like about using the term?

Curt Shannon: It's an undefined term and they are afraid it could be used overbroadly. I.e. if someone could see a bolt from a hiking trail, could it be considered as impacting scenic integrity and not be allowed? The term is overly vague.

RF Michiko Martin: She can see it as being different from cultural resources or wildlife.

Curt Shannon: If a hiker using the forest says they don't like seeing climbers from the trail, they are concerned it could impact options for climbing.

FS Neil Bosworth: There is a need to do NEPA on existing routes. Can do a better job of defining scenic integrity.

Interested persons? None

Cory Quackenbush (NACC): if we create a review process for authorizing new bolts, working with the climbing groups together would be good to have direct input and they can assist with the NACC.

Curt Shannon (AF): Access Fund would want to participate in that as well.

RF Michiko Martin: Are they aware of any forest creating that process already?

Curt Shannon (AF): Each forest has a slightly different policy. There has been rumor of a national policy being developed for over 30 years. Still have no national policy. There are things written, but they run the complete gamut from nothing allowed to bolt freely.

RF Michiko Martin: If their research finds one that works well, please share it.

Management approaches for collaboration

RF Michiko Martin:

Simone Griffin (ASAFWDC): It says work collaboratively with partners. Would like to see the forest provide more commitment and not just rely on the partners to provide all the resources. Need to recognize the economic input recreation activities brings to communities and provide more specific commitments.

RF Michiko Martin: Example language?

Simone Griffin (ASAFWDC): Add “the forest will provide half the needed resources”, not just rely on the partners to provide all the funding.

FS Neil Bosworth: Nothing to add.

Interested persons?

Lisa Markovchick, Wildearth Guardians – Part of Sierra Club et al. On the flip side, support right-sizing roads and encourage plan components to support minimizing the road system to something sustainable and maintainable.

Michiko, FS Neil Bosworth: Understands the point.

Simone Griffin (ASAFWDC): Clarification - Wants to ensure that if there was a trail maintenance project and a group could do it all and the Forest Service didn't have funding to contribute, they would still want the project to move forward.

0845-0945: Wilderness - Arizona Game and Fish, Freeport McMoRan, Sierra Club et al., Tonto Recreation Alliance, Interested Persons

- Wilderness recommendations
- Recommended wilderness restrictive plan components.

Wilderness Recommendations

RF Michiko Martin: She will organize objectors based on her questions. Tonto Rec Alliance and Arizona 4WD. Question about removing buffered routes? Which are the ones they are specifically concerned about?

Simone Griffin (ASAFWDC): All of them. Have observed that buffer areas keep getting bigger and roads get closed. Would like to see no recommended wilderness.

RF Michiko Martin: No middle ground? All recommended wilderness areas with buffered routes are of concern to them.

Simone Griffin (ASAFWDC): Yes.

RF Michiko Martin: Freeport McMoRan and Sierra Club et al. Sierra Club remedy asks for more information on why some areas aren't still under consideration?

Amanda Reeve (FM): Had initial concern about conflicts with MUSYA. Would like to know why areas were expanded – it's not clear. We state that we are going to manage as if they are wilderness, which isn't appropriate. Expanded acreage of recommended wilderness and mileage of Wild and Scenic Rivers.

RF Michiko Martin: First part of response, concern with number and size or is it the evaluation criteria? How could we improve it, so they understand?

Amanda Reeve (FM): There wasn't a proper place to comment since they weren't in the draft EIS. Concern about conflict with existing statute, MUSYA, mining laws, and even the wilderness act. It needs to be done properly. They didn't have a chance to comment. The plan says it constrains these places more than the plan, which isn't appropriate since they are just recommended wilderness, not congressionally mandated.

RF Michiko Martin: Asking of Sierra Club – clarify objection point.

Sandy Bahr (SC): The numbers were significantly reduced with no explanation of why. They support all of them and believe there should be more. The Forest Service isn't mandated to manage for all extractive uses. The Forest Service is supposed to manage for areas that are protected. Recognize that not everyone supports this. The Forest Service needs to have a justification for removing areas from considerations, especially in light of climate change. Be conservative about what you do to the forest, especially things you can't reverse.

RF Michiko Martin: Understands they don't like the decrease. Can you clarify what it would need to look like to help the organizations understand the decrease?

Sandy Bahr (SC): Explain why an area was dropped, why it didn't have the necessary characteristics, why it doesn't make sense to manage as a wilderness area.

RF Michiko Martin: In terms of the rationale, where would you want to see it? In the ROD? In the FEIS? In a separate place?

Sandy Bahr (SC): Both ROD and FEIS.

Chris Franks – Last topic, big concern. The wilderness act of 1964. Nothing shall prevent...including prospecting etc. Not opposed if it is in line with the law.

RF Michiko Martin: Question for Arizona Game and Fish, can you point to a specific recommended wilderness areas and what the wildlife mgmt. concern is?

Linda Pollack, AG&F Commission – Department understands the Forest Service has the authority to manage recommended wilderness, but the problem is when Forest Service personnel does a review of Department activities in those areas. The minimum decision guide is time consuming and expensive, i.e. use of a helicopter to manage bighorn sheep took months to complete. Loss for the state's wildlife and the Forest Service doesn't have the authority to require this in recommended wilderness areas. The Forest Service also doesn't have the authority or standard for requiring this in recommended wilderness. They suggest the department be left alone to conduct their work in recommended wilderness. They encountered this language in the Apache NF plan, requiring minimum decision guide in recommended wilderness. The Apache withdrew the language.

RF Michiko Martin: Example of minimum decision guide and example of helicopter was very helpful.

Luke Thompson AZGFD: Additional examples - water catchment, monitoring for wildlife that could require motorized retrieval, feral animals, retrieving deceased animals. Restrictions impact their ability to respond efficiently.

RF Michiko Martin: Are there any particular recommended wilderness areas that are problematic or is it to any of them.

Linda Pollack: Restrictions on all of them.

RF Michiko Martin: So not the actual recommended areas, but the restrictions placed on them?

FS Neil Bosworth: Aspects he is trying to understand. You can land a helicopter in a recommended wilderness area. Specific actions they need to take, if we alter the language to allow certain actions, he isn't hearing anything they can't already do, similar to outside of recommended wilderness. Not sure how to finesse the language.

Interested persons? None

Recommended wilderness restrictive plan components.

RF Michiko Martin: We partially started this topic previously. Start with Freeport- McMoRan. Don't agree with MA01 and S04. Remedy is to remove MA-01 and revise S-04. Is there a need for any mineral materials from recommended wilderness now or is it more philosophical?

Amanda Reeve (FM): It will conflict with existing acts, including wilderness act. Don't include managing recommended wilderness areas as established wilderness areas. Can change MA-01 to read that way. S-04 has a "shall not", which could conflict. Ask that it be clarified that it any material under the mining law are exempt. That would resolve the concern.

FS Neil Bosworth: If we clarify mineral materials would that help?

Amanda Reeve (FM): If we clarify any materials under the mining law, they would be okay.

RF Michiko Martin: Back to AZ G&F and AZ G&F Commission – remedy was to revise G4 and G1 and delete DC 5.

Linda Pollack (AG&F Commission): Noted screen text doesn't reflect the commission's recommendations for strike outs. Number one concern. See page 6 on May 2022 objection for exact proposed language. The FS doesn't have the authority to require minimum decision analysis reviews. Want that slide corrected for final plan.

RF Michiko Martin: Helpful to know "why" certain words are suggested. Guideline 1 – changed from motorized to motorized and mechanized uses. What is the important difference?

Linda Pollack (AG&F Commission): Trying to keep it as broad as possible. The Dept uses both motorized and mechanized tools.

RF Michiko Martin: Is it limited to conveyances?

Luke Thompson: Intent is to broaden it. Make sure it is broad enough, helicopter, water, etc.

RF Michiko Martin: Any other language changes you want to expand on?

Linda Pollack (AG&F Commission): Remove “if necessary”, which implies Forest Service review. Remove “unless specifically authorized”, which again implies authorization process for recommended wilderness.

FS Neil Bosworth: Conversation was very helpful to nail down how we are framing the words. Good relationship with department and communication.

RF Michiko Martin: Do any subject matter experts have questions? No.

Interested Persons?

Jim Vaaler, member of Sierra Club: Believes that the recommended wilderness areas should have interim guidelines and should have reviews like wilderness areas. Otherwise, why have a recommended wilderness area designation?

FS Neil Bosworth: Touchy subject. Only Congress can designate wilderness. Believes we should manage them, so they maintain their wilderness values in case congress does designate it a wilderness area.

Jim Vaaler (SC): Thinks the new plan missed a lot of areas that should have been included. Drastic. Don’t have enough. There are areas greater than 5000 acres that have wilderness values on them. The forest fell short in general.

RF Michiko Martin: Any more specific info or rationale he’d like to see in addition to what Sandy stated in regard to recommended wilderness?

Jim Vaaler (SC): Many areas dismissed with no information on how or why.

Don Steuter (SC): Mostly small contiguous areas were dropped, but had the Sierra Ancha area been added, it could have helped resolve the boundary issue along Cherry Creek. Why was that sensible proposal removed without explanation? A larger area on Indian Butte, 6,000 acres, no information provided on why it was dropped. Were there substantial reasons or was it political?

Sandy Bahr (SC): Additional info, the revised planning rule page 61 219.10 4 states that protection of congressionally designated...plus management of recommended... Believes this gives the Forest Service direction to manage as wilderness.

Amanda Reeve (FM): MYSYA is an applicable act, Wilderness Act, reiterates previous comments.

Linda Pollack (AG&F Commission): Had two other objections on this topic. Plan has 7 DCs for this. DC 5 – recommends that it be deleted. Has no basis. One other objection – Guideline 1 – “should not be authorized” ... Objection clarifies that this is a major federal action that imposes limitations. Doesn’t know if public was properly notified and it would require NEPA.

Jim Vaaler (SC): One concern. On the Tonto NF have dichotomous management needs – resource protection and motorized access. Needs to be balanced as motorized access is detrimental.

1000-1045: Wild and Scenic Rivers - Arizona Game and Fish, Sierra Club et al., Interested Persons

- Rationale for including or excluding eligible wild and scenic rivers
- Wild and scenic river plan components and alignment with other policy

Rationale for including or excluding eligible wild and scenic rivers

RF Michiko Martin: Invite Sierra Club et al.

Sandy Bahr (SC): Jim Vaaler will represent Sierra Club.

RF Michiko Martin: Are you able to identify specific aspects about the evaluation that need to be reevaluated that would help us understand?

Jim Vaaler (SC): There are a number of concerns that go back to a disagreement on using the area of comparison as a way to evaluate wild and scenic rivers. Believes it was used to declassify those identified in the 1993 study. Believes they should have been retained. The way to evaluate them in light of climate change, which is affecting the Tonto, needs to consider that desertification could be changing that. Should have evaluated them in that term: Can you help fight climate change by designating as many as possible?

RF Michiko Martin: Can you pick one or more segments and walk her through an example and how it fits the eligibility criteria?

Jim Vaaler (SC): Cherry Creek. Why was it declassified? No understanding of why. Used area of comparison. There are three tributaries to Cherry Creek – could have made one unit out of all 4 of them. Has riparian, waterfalls, cultural resources. This one was of particular concern.

RF Michiko Martin: Other criteria – climate change?

Jim Vaaler (SC): Proposing a lot of eligible wild and scenic rivers could help.

Sandy Bahr (SC): There are significant stresses on these stream sections. In light of pressures and impacts of climate change, the Tonto needs to do more to reduce stressors. They are being eaten up by cattle. There is plenty of direction to do so. If there are additional outstandingly remarkable resource values, the Tonto seemed to have taken a narrow view. Achieved a massive delisting.

RF Michiko Martin: Not sure how to use that as a metric for designating a WSR. How would we apply a climate change metric?

Sandy Bahr (SC): Evaluate what is happening to that river section that is at least partially associated with climate change. How is that affecting the values of that river?

Jim Vaaler (SC): Often wild and scenic rivers and recommended wilderness occur congruently. A big disappointment was Ash Creek. It was completely overlooked.

RF Michiko Martin: What were the outstanding resource values in Ash Creek that we missed?

Jim Vaaler (SC): RARE2. Why was it truncated. Backpacked up. Geology changed, included asbestos. Recognized why it was changed. We don't mine asbestos anymore. Beautiful waterfalls. Geology would be an outstandingly remarkable resource value.

RF Michiko Martin: Still not sure how certain segments could address climate change over others.

Sandy Bahr (SC): We know all rivers and streams on the Tonto are stressed by climate change. In light of that, riparian areas and wildlife are outstandingly remarkable values or can be. In certain instances,

establishing that their protection can help mitigate some of the impacts to wildlife in other places because they are all stressed.

RF Michiko Martin: Are you proposing that certain outstandingly remarkable values are impacted differently or at different rates because of climate change and we should take that into consideration?

Sandy Bahr (SC): That is close. It doesn't address how it can mitigate for impacts to nearby waters.

Subject matter experts? – Leigh Johnson: In this instance, regarding climate change, chapter 80 guides us in how we determine outstandingly remarkable values. These are resources that are there because of the river – it is difficult to connect that with climate change.

Interested persons?

Don Steuter: We don't consider healthy flowing streams as being a fire break as being an outstanding resource value. We do consider it a benefit. We don't consider a healthy flowing river that makes its way down to reservoir being an outstanding resource value, but it is a benefit. Land preservation and protection is national policy in light of climate change. The Forest Service should be following that.

Kestrel Kunz, American Whitewater: Coauthored objection letter with Sierra Club. Support their objections and comments. Also want to mention climate change and outstanding resource values. Climate change – add that climate change itself can be an ORV, climate adaptation or climate refugia. Some forests have used this. A number of species will go to higher elevations. That is dependent on the river corridor, depending on where it is. If it is high in the headwater, it is more likely to act as refugia. Don't just look at how climate change may impact other ORVs. Ellison Creek and the Salt River were proposed, and both have at least recreation ORV. The Salt River is close to Phoenix and is more accessible. Ellison Creek is the other end, very expert paddlers and waterfalls, which makes it unique.

Sandy Bahr (SC): Even if the Tonto couldn't consider climate change as an ORV, the segments that the Tonto left off have other ORVs that should qualify them as wild and scenic rivers. She believes they were removed inappropriately.

Wild and scenic river plan components and alignment with other policy

RF Michiko Martin: AZG&F Dept and Commission – add two new management approach components S02 and S 03 that allow fish barriers. Wants to understand the intent. Concern about the interpretation regarding construction/reconstruction of fish barriers.

Linda Pollack (AG&F Commission): Proposed language is lifted directly from FSM. Hopefully it shouldn't be controversial. The current standard "free flowing ... shall be maintained...". Experiencing push back from FS personnel on any barrier to free flowing. Congress allows that. Department needs that for both designated and eligible WSR for protecting native fish populations. No other issues.

Kestrel Kunz: Value native fish recovery and don't want to hinder that but have also seen fish barriers being constructed on wild free flowing rivers. Can be hazardous to boater depending on the design. Can change the distribution of sediment. There have been a few studies on the efficacy of the barriers as being less than 50%. Constructing concrete dams that may not work can be impactful. It is within the handbook, but want to emphasize that they should be analyzed on the free flow, ORVs, etc. Would like

to see language to allow for additional analysis on a site-specific basis. Complex topic. Would like to see a strong review process in place.

RF Michiko Martin: Any specific suggested language?

Kestrel Kunz: “water resource project” is very broad. Would like to see it listed as fish barriers. “May be permitted so long as the free flow of the river is maintained or limited impact to the free flow...” Could follow up with some redlined language.

RF Michiko Martin: Recognize answering the question on short notice was a big lift. Appreciates a follow-up.

Kestrel Kunz: add “protect or enhance all ORVs” with a fish restoration project, would help make sure recreation hazards aren’t created.

1045-1130: Wildlife - Arizona Sportsmen for Wildlife Conservation, Sierra Club et al., Interested Persons

- Habitat corridors and connectivity
- Mexican spotted owl (MSO) monitoring

Habitat corridors and connectivity

RF Michiko Martin: Sierra Club suggests a remedy to include site-specific plans to protect key wildlife corridors. What site specific components do you want to see in the plans?

Sandy Bahr (SC): Could be info about what wildlife is using specific areas and which are critically important for wildlife movement. Also, what type of habitat is available. With climate change stressors and development, wildlife moves and if there is suitable habitat in an area they may move to it if they aren’t blocked off. Critical role that rivers and streams, perennial and intermittent, play in connectivity.

RF Michiko Martin: You’re looking for recognition in the plan about the importance of water to connectivity? Sandy Bahr (SC): yes.

RF Michiko Martin: Provide usage info in the plan.

FS Neil Bosworth: In agreement with stream corridors being important to connectivity. Highways are a barrier to that. Not sure where in the plan they want it addressed.

Sandy Bahr (SC): Recognize the importance and also how does the plan help to look at retaining connectivity and perhaps restoring connectivity.

RF Michiko Martin: It would be odd to put usage info into a plan. So how could we put it, or put it in another venue?

FS Neil Bosworth: Some info is tracked by the State Game and Fish Department. Where or how would we display it? We don’t need to get into specific usage and numbers. It comes down to habitat. Make sure we have riparian areas that wildlife can move through and have connected habitat. As far as usage, need to think more about it.

Sandy Bahr (SC): Put in the plan that you would look at usage.

RF Michiko Martin: How can we document that we recognize that importance?

FS Neil Bosworth: Have enough information to go on for this.

RF Michiko Martin: AZ Sportsmen for Wildlife Conservation: add crossing or corridors: to G07; add action plans to management approaches. Have you seen examples of this in other areas.

Jim Unmacht (AZSWC): Carolyn Eppler will address.

Carolyn Eppler (AZSWC): In addition to the management approaches, a lot of work has been done with other entities in AZ that have been dealing with the connectivity issues. The highways is an issue as well as habitat. Especially altered landscapes with fires affecting habitat. There is emphasis on connectivity through other components instead of directly in the fish wildlife and plants components. Seems more appropriate to be in the fish wildlife and plants components. Included 8 additional suggestions for direction. Hope we are looking at all of them. The infrastructure in the plan is addressed in many components but not wildlife. Specific to wildlife habitat – the other recommendations made by the organization, nothing talking about water for wildlife.

RF Michiko Martin: While it appears that we appear to be addressing it in other sections, it is problematic to your organization that it isn't in the wildlife section?

Carolyn Eppler (AZSWC): Recreation talks about connection in relation to recreation, but not wildlife. In land ownership, talks about access of landowners, but not wildlife. The wildlife connectivity component is important to mention in those other areas, but it should also be listed in wildlife.

Interested persons?

Brian Nowicki (CBD): Follow up with one clarification on the point Sandy mostly addressed. Ideally, we would have a map-based identification of areas for corridors within the forest plan. Identify the constituent elements that need to be protected in each of those areas for the wildlife using it. The Tonto relies heavily on those stream corridors due to the terrain. Also have channeled funnels to get to higher ground. Identifying them now isn't possible to wrap into a plan revision this year but identifying it as a goal that the forest wants to provide those resources for future projects would be desirable. One example where it wouldn't be a project only basis. Give managers a larger resource.

RF Michiko Martin: Helpful. Suggesting that some inclusion of language that recognizes an end state of how we might steward the landscape with the recognition of the importance of corridors.

Brian Nowicki (CBD): Yes, and a commitment to creating a tool.

Jim Vaaler (SC): Connectivity and other things we've been talking about are related and interconnected and affect connectivity for wildlife. If it means more recommended wilderness and WSRs, maybe we will achieve more connectivity.

Carolyn Eppler (AZSWC): Hope that as you go back and look at the plan under each component that splitting out the needs of the wildlife and habitat and spreading it out under the other ones takes out the needs in the 8 recommended needs. Make sure they are addressed.

Mexican spotted owl (MSO) monitoring

RF Michiko Martin: Sierra Club et al – remedy to revise the plan per the 2012 recovery plan...

Brian Nowicki (CBD): When looking through the S and Ds, very few get pulled from the 2012 recovery plan. There is language that says we won't identify the S and Ds for species in the plan. Assumes impacts will be mitigated on how we are not developing the old growth and large tree components. Doesn't account for impacts outside of veg mgmt. that the forests could be managing for and mitigating – recreation, grazing, etc.

RF Michiko Martin: You don't like how we refer to recovery plans and guidance because it doesn't address other uses?

Brian Nowicki (CBD): The way he reads the forest plan now, we are identify vegetation treatments as the biggest impacts. Step back – the region has a larger process focusing on monitoring and recovery. Would like forests to have that more clear focus. We have the recovery plan and the lack of info on the Tonto in particular. The living map that shows MSO habitat since 1996. The tonto shows a 28% decrease in habitat. 40% of that is due to large fires. Not sure where/why the other 60% occurred. Monitoring only occurs at the regional level. An apparent decline in nesting pairs. Don't know what it means on the Tonto. Let's drill down and make it into the forest plan. Have pre-post and trend monitoring so we can know what is happening and why. It could be due to something other than veg treatment. Could be offroad use or grazing or something else.

RF Michiko Martin: Doesn't want to lose his first comment about the plan not accounting for proactive work we could be doing. Would like to invite him to draft specific language in the next day or two to see how we could incorporate it in a manner that would meet their concerns.

Brian Nowicki (CBD): Yes, but also realizes that if there was an easy way to do it, they probably would have included it in their objection.

Interested persons – None.

Summary of the Day

RF Michiko Martin: Reminder that Forest Supervisor Neil Bosworth is the responsible official. She will be taking all objections into consideration and will be responded to in a grouped manner. May also provide instructions to the FS. Expect this to be completed in April. Will email these to objectors and interested persons and post on the web page. FS will address any instructions and then will sign the ROD and Forest Plan.

FS Neil Bosworth: Reiterate, it is not just this conversation. This meeting occurred because there were clarifying questions. All objection points are being considered. If there weren't any questions on some points, it meant we didn't have any clarifying questions to drill into.

RF Michiko Martin: Sincere gratitude for participating in this meeting as well as years of participation.

Shawn Johnson: For those who were asked to provide follow-up, who should they provide it to?

FS Neil Bosworth: Send to Ariel Leonard. Ariel. leonard@usda.gov and a copy to kenna.belsky@usda.gov.

Appendix. Objection Resolution Meeting Attendance

February 21, 2023

Bahr, Sandy (Sierra Club et al.)

Bugbee, Chris (CBD)

Burgess, Jeff

Cassie

Eppler, Carolyn (Arizona Sportsmen for Wildlife Conservation)

Ford, Michael (Arizona Mining Association)

Franks, Chris (Freeport-McMoRan)

Grant, Vernelda

Griffin, Simone (Arizona State Association of 4 Wheel Drive Clubs)

King, Kasey

Koyiyumptewa, Stewart

Lutz, Stanley (Salt River Project)

Markovhick, Lisa (WildEarth Guardians)

Meidinger, Dawn (Pinto Valley Mining Corporation)

Nosie, Vanessa (San Carlos Apache Tribe)

Nowicki, Brian (CBD)

Potts, Lyndsay (Pinto Valley Mining Corporation)

Reeve, Amanda (Freeport-McMoRan)

Ritchie, Alexander

San Carlos AFMO

Steuter, Don (Sierra Club)

Thompson, Christine

Tuell, Cyndi (Western Watersheds Project)

Unmacht, Jim (Arizona Sportsmen for Wildlife Conservation)

Wesley, Victoria

Wright, Thomas

February 22, 2023

Colburn, Kevin

Eppler, Carolyn (Arizona Sportsmen for Wildlife Conservation)

Franks, Chris (Freeport-McMoRan)

Griffin, Simone (Arizona State Association of 4 Wheel Drive Clubs)

Koyiyumptewa, Stewart

Kunz, Kestrel (American Whitewater Association)

Lutz, Stanley (Salt River Project)

Markovchick, Lisa (WildEarth Guardians)

Nosie, Vanessa (San Carlos Apache Tribe)

Nowicki, Brian (CBD)

Pollack, Linda (Arizona Game and Fish Commission)

Quackenbush, Cory (Northern Arizona Climbers Coalition)

Reeve, Amanda (Freeport-McMoRan)

Shannon, Curt (Access Fund)

Sigl, Patrick (Salt River Project)

Smedley, Grant (Salt River Project)

Steuter, Don (Sierra Club)

Thompson, Luke (AZGFD)

Tuell, Cyndi (Western Watersheds Project)

Unmacht, Jim (Arizona Sportsmen for Wildlife Conservation)

Vaaler, Jim (Sierra Club)