

Chapter 2. Alternatives, Including the Proposed Action

Alternatives Considered in Detail

This chapter describes the proposed action and alternatives and provides a comparison of the environmental impacts of the alternatives in a summary table. In addition to a no action alternative, the Forest Service considered three action alternatives that would satisfy the purpose and need. These include: (1) the proposed action (to issue all permits for 88 recreation residences); (2) alternative 3 (to issue new permits for Turkey Flat residences only); and (3) alternative 4 (to issue new permits for Old Columbine only).

Alternative 1: No Action

No action is included as an alternative to the proposed action, in accordance with the requirements of CEQ regulations (40 CFR Part 1502.14(d)). It provides a baseline against which the impacts of the proposed action may be compared.

With no action, SUPs for both recreation residence tracts will expire on December 31, 2008. New 20-year term permits would not be issued. In accordance with FSM 2721.23(e)(2)(b), permit holders would be allowed 10 years of continued occupancy after notification that the permits will not be renewed. It is assumed that all recreation residence holders will use all 10 years for continued occupancy.

According to the terms and conditions of the 10-year permit, holders will have a reasonable timeframe after expiration to remove their structures and/or improvements and restore the site to natural conditions. Before removal of any structure or improvement, site-specific NEPA analysis would be completed. The process of removal may take up to 5 years. All structures and improvements are expected to be gone within 15 years after the decision not to issue new permits.

In general, improvements at the tracts include small residences, decks, patios, outbuildings, permanent grills, and other stationary improvements; pumps; overhead wiring; propane gas tanks; water tanks; and concrete foundations. Upon expiration of the 10-year term, permit holders would be required, among other things, to secure their wells with welded-on steel caps, pump and fill septic tanks and vault toilets with dirt, and fill pit toilets with dirt. Pipelines, underground wiring, sewage distribution boxes, and drain fields would be allowed to remain. Each site and associated use area would be contoured to the original landscape and planted with a native seed mix.

Roads into the Old Columbine and Turkey Flat tracts would be gated to prevent motorized access. Vegetation would be allowed to grow on the roadbeds. At present, no specific use for the decommissioned tracts is proposed. However, the area would continue to be open to visitors for dispersed recreational use.

Alternative 2: Proposed Action

The proposed action is to issue SUPs for 88 recreation residences on the Safford Ranger District upon their expiration on December 31, 2008. The new SUP term would be 20 years. Permit holders would be required to abide by all terms and conditions expressed in their respective SUPs and in accordance with an annual operation and maintenance (O&M) plan that is conveyed with each SUP. Prior to a new SUP being issued, each recreation residence would be inspected by the Forest Service to confirm that the permit holder is in compliance with the terms and conditions of the current permit (FSH 2709.11, Ch. 41.23a (3)).

Alternative 3: Issue Turkey Flat Permits Only

Implementation of alternative 3 would authorize new SUPs for 74 recreation residences at the Turkey Flat tract upon their expiration on December 31, 2008. Each new SUP term would extend 20 years, from January 1, 2009, through December 31, 2028. Permit holders would be required to abide by all terms and conditions expressed in their respective SUPs and in accordance with the annual O&M plan that is conveyed with the new SUP. Prior to new SUPs being issued, each recreation residence would be inspected by the Forest Service to confirm that the permit holder is in compliance with the terms and conditions of the current permit (FSH 2709.11, 41.23a (3)).

With this alternative, the permits for 14 recreation residences within the Old Columbine tract would expire on December 31, 2008, but new permits would not be issued. Instead, Old Columbine permit holders would be issued an SUP that authorizes 10 years of occupancy, after which all improvements would be removed from the forest at the expense of the permit holders (FSM 2721.23a (10)). Removal activities at Old Columbine would be the same as those described for alternative 1 (no action).

Alternative 4: Issue Old Columbine Permits Only

Implementation of alternative 4 would authorize new SUPs for 14 recreation residences at the Old Columbine tract upon their expiration on December 31, 2008. Each new SUP term would extend 20 years, from January 1, 2009, through December 31, 2028. Permit holders would be required to abide by all terms and conditions expressed in their respective SUPs and in accordance with an annual O&M plan conveyed with the new SUP. Prior to new permits being issued, each recreation residence would be inspected by special uses program staff to confirm that the permit holder is in compliance with the terms and conditions of the current permit (FSH 2709.11, 41.23a (3)).

With this alternative, the permits for 74 recreation residences within the Turkey Flat tract would expire on December 31, 2008, but new permits would not be issued. Instead, Turkey Flat permit holders would be issued an SUP that authorizes 10 years of occupancy, after which all improvements would be removed from the forest at the expense of the permit holders (FSM 2721.23a (10)). Removal activities at Turkey Flat would be the same as those described for alternative 1 (no action).

Alternatives Considered and Dismissed

Federal agencies are required by CEQ regulations to rigorously explore and objectively evaluate all reasonable alternatives and to briefly discuss the reasons for eliminating any alternatives that were not developed in detail (40 CFR 1502.14). The following alternatives were considered but dismissed from detailed consideration in this EIS.

In-Lieu Lots for Permit Holders

A forest may consider offering in-lieu lots, if available, to permit holders who have received notice that either their recreation residence permit is being revoked for specific and compelling reasons in the public interest or that a new permit will not be issued following expiration of their permit because their lot is needed for an alternative public use (FSH 2709.11, 41.23d).

There are no suitable in-lieu lots for recreation residences available on the district. Therefore, this is not a reasonably foreseeable alternative to the proposed action and was not considered further in this EIS.

New Recreation Residence Tract

The alternative of creating a new tract at a different location on the Safford Ranger District is also not reasonably foreseeable. Creation of a new tract would be contrary to Forest Service policy at FSM 2347.1 (6), which states, “Do not establish new recreation residence tracts for in-lieu lot purposes.”

No New Permits and Immediate Removal of Residences

The forest evaluated the feasibility of proposing an alternative wherein new SUPs would not be issued and immediate removal of residences would be required. Such an alternative would support the Western Apache preference that the TCP be restored to its natural state as quickly as possible. However, this alternative conflicts with Agency policy, which requires that at least 10 years of continued occupancy be authorized after leaseholder notification that the residence is to be removed (FSM 2721.23(e)). Therefore, it was dismissed from further consideration in this EIS.

Mitigation - Proposed Action

The entire Pinaleno mountain range is within the Western Apache TCP and sacred site, which has been determined as eligible for listing on the National Register of Historic Places. From the perspective of the Apache, the presence and occupation of the residences affects *Dzil Nchaa Si'an*. First, the presence of the residences has altered and continues to alter the mountain's natural fire-adapted ecosystem, because the Forest Service's response to wildland fire is suppression, which is necessary for the protection of private property. Second, certain recreational activities of residents do not reflect the degree of respect that is warranted by a sacred site. In Apache cosmology, disrespectful actions not only distract from the Apaches' experiences on the mountain, they can also bring harm to the world. If a decision is made to implement either the proposed action, alternative 3, or alternative 4, the continued existence of the recreation residences would be authorized by new permits, and these effects would continue.

The Forest Service has a trust responsibility toward American Indian tribes and is mandated by legislation and executive orders to consider the effects of projects on historic properties, to ensure American Indian access to sacred sites, and to protect the physical integrity of such sites wherever possible. Under the authority of the American Indian Religious Freedom Act, the Religious Freedom Restoration Act, and Executive Orders 13007 and 13175, the Forest Service consulted with the San Carlos Apache Tribe and White Mountain Apache Tribe to identify mitigation that would minimize the effects of the recreation residences on the Western Apache TCP. To this end, the Forest Service and the tribes developed the following stipulations that will be added to each recreation residence operating plan. If any of the action alternatives is selected, the operating plan that is issued with a new SUP will include the following items. These stipulations are consistent with other laws, regulations, and Forest Service goals of restoring the mountain's ecosystem:

1. Information about the importance of Mt. Graham (*Dzil Nchaa Si'an*) in Apache history and culture.
2. An explanation of the Forest Service's trust responsibility to the Apache.

3. Requirements regarding:
 - Color standards for all cabins, trim, roofs, and other structures to be approved by the Forest Service and designed to help the buildings blend in with the landscape;
 - Allowing public access to the sites;
 - Fire prevention measures;
 - Keeping domestic animals inside or on leashes not to exceed 6 feet in length; and
 - Minimizing conflicts with wildlife.
4. Prohibitions against:
 - Expansion of structures or room additions;
 - Planting of nonnative vegetation;
 - Diverting or holding natural water runoff;
 - Ground disturbance without case-by-case district ranger approval;
 - Attaching swings, yard lights, signs, wires, or other materials to trees;
 - Outdoor firepits and sports courts;
 - Outdoor storage of building materials, recreation vehicles, television antennas, sports equipment, picnic tables, lawn chairs, etc.;
 - Driving off road, or parking outside designated parking areas;
 - Construction of gates, fences, or walls;
 - Onsite trash burning or burial; and
 - Creating unreasonable or excessive noise. The Code of Federal Regulations (36 CFR 261.10i, 261.10j) sets noise guidelines for recreation sites, and national forests generally establish quiet hours at developed sites from 10:00 p.m. to 6:00 a.m.
5. A notice that in the event of a wildland fire, the Forest Service is not responsible for protecting cabins from fire. Forest Service firefighters will limit their activities to the protection of human life and control or maintenance of the fire in the immediate area.

Comparison of Alternatives

Based on the impact analyses reported in chapter 3, table 1 provides a tabular comparison of the potential impacts of each alternative to each resource area.

Table 1. Comparison of potential impacts of all alternatives evaluated in this environmental impact statement

Resource	Recreation Residence Tract	Alternative 1 – No Action	Alternative 2 – Proposed Action, Issue Permits for Both Tracts	Alternative 3 – Issue Turkey Flat Only	Alternative 4 – Issue Old Columbine Only
Wildlife Mexican spotted owl (MSO)	Old Columbine	Noise and human presence would sporadically disturb the owl during the removal of improvements. Thus, removal will not be allowed during MSO nesting season. As natural succession occurs, the loss of open areas on the tracts may result in a decrease in populations of small mammals, upon which the MSO preys. Eventual regrowth of trees (60 to 80 years afterward) may provide new habitat suitable for MSO nesting. Removal of residences would negate the need for future fire suppression, which, in turn, would encourage the return of the natural fire cycle. With this, less intense fires would be expected, and old growth nesting habitat conserved.	No change from existing conditions. Owls would continue to be disturbed occasionally by human presence and activity, but populations and habitat would not be significantly affected.	Effects would be the same as those identified for alternative 1.	Effects would be the same as those identified for alternative 2.
	Turkey Flat	Noise and human presence would sporadically disturb the owl during the removal of improvements. Thus, removal will not be allowed during MSO nesting season. As natural succession occurs, the loss of open areas on the tracts may result in a decrease in populations of small mammals, upon which the MSO preys. Eventual regrowth of trees (60 to 80 years afterward) may provide new habitat suitable for MSO nesting. Removal of residences would negate the need for future fire suppression, which, in turn, would encourage the return of the natural fire cycle. With this, less intense fires would be expected, and old growth nesting habitat conserved.	Retention of the openings created by the residences would benefit populations of small mammals, upon which the MSO preys. A determination of “may affect, not likely to adversely affect” was made with regard to the potential impacts to the MSO at both tracts. There would be “no effect” on designated critical habitat.	Effects would be the same as those identified for alternative 2.	Effects would be the same as those identified for alternative 1.
Wildlife Mt. Graham red squirrel (MGRS)	Old Columbine	Removal of an outhouse at Old Columbine could directly impact one midden and possibly result in MGRS death or injury. Thus, a	No change from existing conditions. Because of human presence at and near an	Effects would be the same as those identified for alternative 1.	Effects would be the same as those identified for alternative 2.

Resource	Recreation Residence Tract	Alternative 1 – No Action	Alternative 2 – Proposed Action, Issue Permits for Both Tracts	Alternative 3 – Issue Turkey Flat Only	Alternative 4 – Issue Old Columbine Only
		<p>determination that no action “may affect, is likely to adversely affect” the MGRS was made. Natural succession of trees on Old Columbine, but not Turkey Flat, may provide 25 acres of MGRS habitat over the long term. Increased tree density may reduce nutrients available for cone production. This, in turn, would negatively impact the squirrel’s food supply. The removal of residences at either tract would the need for future fire suppression, which, in turn, would encourage the return of the natural fire cycle. With this, less intense fires would be expected, and MGRS habitat at Old Columbine would be conserved.</p>	<p>active midden, a determination of “may affect, likely to adversely affect” was made for Old Columbine. A biological opinion issued by the FWS on August 18, 2008, assigned a “take” of two squirrels and reported that this take would not result in jeopardy to the species.</p> <p>The tract is not within designated critical habitat for the MGRS.</p>		
<p>Wildlife Mt. Graham red squirrel (MGRS)</p>	<p>Turkey Flat</p>	<p>Removal of an outhouse at Old Columbine could directly impact one midden and possibly result in MGRS death or injury. Thus, a determination that no action “may affect, is likely to adversely affect” the MGRS</p>	<p>No change from existing conditions. A determination of “may affect, not likely to adversely affect” was made with regard to potential impacts at Turkey Flat.</p>	<p>Effects would be the same as those identified for alternative 2.</p>	<p>Effects would be the same as those identified for alternative 1.</p>

Resource	Recreation Residence Tract	Alternative 1 – No Action	Alternative 2 – Proposed Action, Issue Permits for Both Tracts	Alternative 3 – Issue Turkey Flat Only	Alternative 4 – Issue Old Columbine Only
		<p>was made. Natural succession of trees on Old Columbine, but not Turkey Flat, may provide 25 acres of MGRS habitat over the long term. Increased tree density may reduce nutrients available for cone production. This, in turn, would negatively impact the squirrel’s food supply. The removal of residences at either tract would the need for future fire suppression, which, in turn, would encourage the return of the natural fire cycle. With this, less intense fires would be expected, and MGRS habitat at Old Columbine would be conserved.</p>			
Wildlife Apache trout	Old Columbine	Removal of improvements would increase erosion and runoff from the tracts in the short term. Impacts to water quality in the subwatershed would be insignificant.	No change from existing conditions. A determination of “may affect, not likely to adversely affect” was made with regard to the	Effects would be the same as those identified for alternative 1.	Effects would be the same as those identified for alternative 2.

Resource	Recreation Residence Tract	Alternative 1 – No Action	Alternative 2 – Proposed Action, Issue Permits for Both Tracts	Alternative 3 – Issue Turkey Flat Only	Alternative 4 – Issue Old Columbine Only
	Turkey Flat	This species does not occur at the Turkey Flat tract.	potential impacts to the Apache trout at Old Columbine.	Effects would be the same as those identified for alternative 2.	Effects would be the same as those identified for alternative 1.
Wildlife Forest Service Sensitive Species	Old Columbine	No trend toward Federal listing or loss of viability of any of the Forest Service sensitive species that occur at or near each tract.	No change from existing conditions. No trend toward Federal listing or loss of viability of any of the Forest Service sensitive species found at or near both tracts.	Effects would be the same as those identified for alternative 1.	Effects would be the same as those identified for alternative 2.
	Turkey Flat			Effects would be the same as those identified for alternative 2.	Effects would be the same as those identified for alternative 1.
Wildlife Management Indicator Species	Old Columbine	No significant changes in forestwide populations and habitat of forest management indicator species.	No change from existing conditions.	Effects would be the same as those identified for alternative 1.	Effects would be the same as those identified for alternative 2.
	Turkey Flat			Effects would be the same as those identified for alternative 2.	Effects would be the same as those identified for alternative 1.
Heritage Resources (Sites on or eligible for the National Register of Historic	Old Columbine	A determination of “no adverse effect” on historic properties was made, per 36 CFR 800.5 (b). Removal is the preferred alternative of the Western	Because residences were present prior to eligibility designation of the Traditional Cultural Property and their continued presence would not affect the qualities	Effects would be the same as those identified for alternative 1.	Effects would be the same as those identified for alternative 2.

Resource	Recreation Residence Tract	Alternative 1 – No Action	Alternative 2 – Proposed Action, Issue Permits for Both Tracts	Alternative 3 – Issue Turkey Flat Only	Alternative 4 – Issue Old Columbine Only
Places)	Turkey Flat	Apaches.	that make the mountain eligible for the National Register, a determination of “no adverse effect” on historic properties was made, per 36 CFR 800.5 (b).	Effects would be the same as those identified for alternative 2.	Effects would be the same as those identified for alternative 1.
Heritage Resources <i>(Dzil Nchaa Si’an, eligible Traditional Cultural Property)</i>	Old Columbine	Removal would enhance the sacredness of the mountain by fostering restoration of the natural fire regime and wildlife habitat, reducing visual intrusions, and reducing human occupation and potential disrespectful behavior.	No change from existing conditions, for example, restoration of wildlife habitat and natural fire regime would be inhibited, visual and noise intrusions would continue.	Effects would be the same as those identified for alternative 1.	Effects would be the same as those identified for alternative 2.
	Turkey Flat			Effects would be the same as those identified for alternative 2.	Effects would be the same as those identified for alternative 1.
Air Quality	Old Columbine	Short-term, sporadic, localized particulate matter (PM-10) emissions in fugitive dust from residence removal, burning debris, and vehicle traffic.	No change from existing conditions.	Effects would be the same as those identified for alternative 1.	Effects would be the same as those identified for alternative 2.
	Turkey Flat	Attainment of National Ambient Air Quality Standards would not be compromised.		Effects would be the same as those identified for alternative 2.	Effects would be the same as those identified for alternative 1.

Resource	Recreation Residence Tract	Alternative 1 – No Action	Alternative 2 – Proposed Action, Issue Permits for Both Tracts	Alternative 3 – Issue Turkey Flat Only	Alternative 4 – Issue Old Columbine Only
Soils	Old Columbine	Minimal short-term increase in erosion after improvements are removed. Use of best management practices would minimize impacts to insignificant levels.	No change from existing conditions. Natural soil bulk density and structure would remain slightly compacted and altered by foot and vehicle traffic within the 77 acres occupied by the tracts.	Effects would be the same as those identified for alternative 1.	Effects would be the same as those identified for alternative 2.
	Turkey Flat	Sites would eventually return to a more natural slope. No change in soil productivity.		Effects would be the same as those identified for alternative 2.	Effects would be the same as those identified for alternative 1.
Water and Riparian Resources	Old Columbine	Potential for increased erosion on 77 acres in the short term. Effects of sediment runoff in the subwatersheds would be discountable given the small acreage of the tracts relative to the size of the watersheds. Use of best management practices to minimize erosion would result in insignificant stream turbidity levels. As the tracts are replenished with vegetation, hydrologic function would improve. The riparian channel of Ash Creek would eventually naturalize.	No change from existing conditions.	Effects would be the same as those identified for alternative 1.	Effects would be the same as those identified for alternative 2.
	Turkey Flat			Effects would be the same as those identified for alternative 2.	Effects would be the same as those identified for alternative 1.

Resource	Recreation Residence Tract	Alternative 1 – No Action	Alternative 2 – Proposed Action, Issue Permits for Both Tracts	Alternative 3 – Issue Turkey Flat Only	Alternative 4 – Issue Old Columbine Only
Recreation	Old Columbine	Use of the tracts for developed recreation would discontinue after 10 years. Tracts would become dispersed-use sites. Minimal increase in use of other recreation sites on the district. Recreation Opportunity Spectrum setting for Old Columbine would change from Rural to Roaded Natural.	No change from existing conditions.	Effects would be the same as those identified for alternative 1.	Effects would be the same as those identified for alternative 2.
	Turkey Flat			Effects would be the same as those identified for alternative 2.	Effects would be the same as those identified for alternative 1.
Visual and Aesthetic Resources	Old Columbine	Short-term changes in visual quality during removal of improvements. Visual quality objective of Retention would not be affected.	No change from existing conditions	Effects would be the same as those identified for alternative 1.	Effects would be the same as those identified for alternative 2.
	Turkey Flat			Effects would be the same as those identified for alternative 2.	Effects would be the same as those identified for alternative 1.
Wild and Scenic Rivers	Old Columbine	No change from existing conditions.	No change from existing conditions.	No change from existing conditions.	No change from existing conditions.
	Turkey Flat				

Resource	Recreation Residence Tract	Alternative 1 – No Action	Alternative 2 – Proposed Action, Issue Permits for Both Tracts	Alternative 3 – Issue Turkey Flat Only	Alternative 4 – Issue Old Columbine Only
Social and Economic Resources	Old Columbine	Until improvements are removed after 10 years, the family culture and tradition of permit holders, the small positive effect on the economy of surrounding towns, and revenues to Forest Service and Graham County would continue. Removal of improvements would result in a cost to permit holders of about \$3,000. No disproportionate impacts to low income and minority populations.	No change from existing conditions. No disproportionate impacts to low income and minority populations.	Effects would be the same as those identified for alternative 1.	Effects would be the same as those identified for alternative 2.
	Turkey Flat			Effects would be the same as those identified for alternative 2.	Effects would be the same as those identified for alternative 1.
Fire Management	Old Columbine	After 10 years, Forest Service would realize cost savings because fuel thinning near structures and fire suppression would no longer be needed. As native vegetation repopulates the tracts, the fire cycle would gradually return to more natural fire-adapted conditions.	No change from existing conditions. Fire suppression and fuel thinning would continue to be necessary around tracts. Wildland fire use for resource enhancement would not be possible.	Effects would be the same as those identified for alternative 1.	Effects would be the same as those identified for alternative 2.
	Turkey Flat			Effects would be the same as those identified for alternative 2.	Effects would be the same as those identified for alternative 1.

Resource	Recreation Residence Tract	Alternative 1 – No Action	Alternative 2 – Proposed Action, Issue Permits for Both Tracts	Alternative 3 – Issue Turkey Flat Only	Alternative 4 – Issue Old Columbine Only
Cumulative Effects	Old Columbine	The removal of residences at both tracts would decrease the need for future fire suppression over 77 acres of the forest, which, in turn, would encourage the return of the natural fire cycle. Subsequent natural fires would be less intense, and wildlife habitat would be conserved, including MGRS habitat at Old Columbine. The mountain would be returned to a more natural condition, which would begin the reversal of numerous effects to the Western Apache TCP.	No change to existing cumulative effects in the area of effect of both tracts.	Effects would be the same as those identified for alternative 1.	Effects would be the same as those identified for alternative 2.
	Turkey Flat			Effects would be the same as those identified for alternative 2.	Effects would be the same as those identified for alternative 1.

