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Forest Service
Southwestern Region



**Gray Wolf Land Exchange
Project Proposal and Alternatives**

Prescott National Forest



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Gray Wolf Land Exchange Project Proposal and Alternatives

Chapter 1.0

This document consists of an overview of the proposed Gray Wolf Land Exchange and alternatives to it, as well as a preliminary comparison of effects of implementing the proposal and alternatives. The purpose of this document is to allow the public an opportunity to review the proposal, alternatives and effects summary and to then provide comments as they see fit on this proposal, as per 36 CFR 215.

1.1 Introduction

In the late 1980s and early 1990s, the Verde Valley Landfill was nearing capacity and Yavapai County (County) was investigating several alternatives for solid waste disposal. In 1990, Waste Management of Arizona (WMA) presented a proposal to the County to develop the Gray Wolf Landfill on a 160-acre privately-owned inholding within the Prescott National Forest (PNF). This land parcel is located approximately 0.2 miles south of State Route 169, between Interstate 17 and State Route 69, in Dewey, Arizona (Figure 1). In October 1990, after public hearings, WMA gained approval for the landfill from the County Planning and Zoning Commission and Board of Supervisors and committed to providing sufficient landfill capacity for the solid waste disposal needs of all of Yavapai County for a 20-year period beginning in 1993.

WMA then began a lengthy permitting process with the Arizona Department of Environmental Quality (ADEQ) and the U.S. Environmental Protection Agency (EPA), the agencies that have oversight responsibilities for municipal landfill operations. This process involved completion of a Municipal Solid Waste Landfill Facility Plan and a 30-day public comment period. In order to access the 160-acre inholding, WMA obtained a special use permit from the PNF for an approximately 0.2-mile road easement across Forest Service land from State Route 169 to the landfill site. This road provides the only access to the Gray Wolf Landfill.

The proposed land exchange includes the land north of WMA's inholding that is crossed by the access road. The proposed exchange also includes surrounding lands to the east and south of WMA's property (Figure 1). Approval of the land exchange would negate the need for WMA's existing special use permit and could allow for the expansion of the landfill. The Gray Wolf Landfill is the only municipal landfill in the County and it is anticipated to reach capacity in 2009 if it is not expanded.

In late 2001, the PNF Forest Supervisor signed an Agreement to Initiate authorizing both the PNF and WMA to evaluate the potential impacts of the proposed Gray Wolf Land Exchange on the human environment in compliance with the National Environmental Policy Act (NEPA). Should the PNF authorize the land exchange, the expansion of the Gray Wolf Landfill would require permitting and approvals by the EPA and ADEQ. Regardless, of land ownership, these agencies would continue to maintain oversight of the operation for the life of the landfill and after closure. This oversight would include the requirement that WMA satisfy all environmental compliance elements outlined in ADEQ's Municipal Solid Waste Landfill Facility Plan (MSWLF) checklist.

Completing the proposed land exchange is a discretionary action; therefore, this proposal does not establish precedence for future land exchanges between the federal government and private interests. The proposed exchange is being considered under the authority of the following legislation:

- General Exchange Act of March 20, 1922 (Stat. 465, as amended, 16 USC 485, 486);
- Federal Land Policy and Management Act (FLMPA); and
- 43 U.S.C.A. 1701 and Federal Land Exchange Facilitation Act (FLEFA), 43 U.S.C.A. 1701.

The project record for this analysis includes all reports, other documents, and significant letters related to the proposal. This project record is incorporated by reference in its entirety into this analysis document. A copy of the record is available at:

Prescott National Forest Supervisors Office
ATTN: Wes Girard
344 South Cortez
Prescott, Arizona, 86303
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1.2 Purpose and Need

According to the PNF (Forest Plan pp. 56-57), lands considered for exchange must meet one or more of the following criteria:

1. To meet the needs of expanding communities;
2. To more efficiently manage isolated tracts or scattered parcels;
3. To consolidate public lands;
4. To improve management, benefit a specific resource, or increase management efficiency;
5. To meet overriding public needs.

The purpose of the proposed land exchange is as follows:

- To facilitate the consolidation of federal land ownership and reduce inholdings within land administered by the Forest Service;
- To enable the Forest Service to dispose of publicly administered lands to WMA for the purpose of expanding the existing Gray Wolf Landfill;
- To eliminate the need for the Forest Service to continue to administer a special use permit for the existing access road to the Gray Wolf Landfill;
- To acquire lands that include valuable wildlife habitat and riparian attributes and that maintain scenic integrity (as in the case of the Nutrioso Parcel); and,
- The exchange would improve management, benefit specific resources, or increase management efficiency.

The federal lands are being considered for exchange by the Forest Service because they are adjacent to the existing Gray Wolf Landfill. Expansion of a single, existing landfill may represent better regional planning and reduce overall environmental impacts than the development of a new landfill in the region. The proposed land exchange is needed to eliminate the administration of a Special Use Permit for the access to the inholding and to facilitate the expansion of the existing Gray Wolf Landfill, which will reach capacity in approximately five years (2009). By acquiring the federal lands, WMA could expand the existing landfill, thereby eliminating the need to site, permit, and develop another municipal solid waste landfill in the County. The exchange would eliminate the existing need for a special use permit from PNF for the access road and expansion of the landfill would occur on land owned by WMA, thereby eliminating the need for any future special use permits. WMA could then continue to operate the Gray Wolf Landfill, the County's only municipal solid waste facility, for an additional 12 to 15 years. Under the land exchange, oversight for municipal landfill facilities and operations would remain under ADEQ and EPA jurisdiction.

The proposed land exchange affects approximately 0.75 mile in the middle of the historic General Crook Trail. Rerouting the General Crook Trail would mitigate the loss of this section of trail. This mitigation would satisfy the need to maintain connectivity of the existing trail and allow continued access to public lands.

1.3 Proposed Action

WMA has proposed the Gray Wolf land exchange to acquire approximately 255 acres of National Forest land (federal lands) on the PNF in Yavapai County, Arizona. In exchange, the PNF, Apache-Sitgreaves National Forest (ASNF), Kaibab National Forest (KNF), and Coronado National Forest (CNF) would receive title to seven parcels of private land (non-federal lands), totaling approximately 872 acres. These parcels are located within the boundaries of four National Forests in Arizona: PNF, ASNF, KNF, and CNF located in Yavapai, Apache, Coconino, and Santa Cruz counties, respectively. The land exchange

would be based on trading federal lands for non-federal lands of equal appraised value. If necessary, unequal land values up to 25 percent of the total value of the federal land would be offset by cash payment by either party per the Federal Land Policy and Management Act (FLPMA). The non-federal third party is First American Title of Arizona, Inc., acting as a trustee under Trust No. 8210K. All legal title work would be completed prior to finalizing the proposed exchange.

The locations of the federal lands and non-federal lands are described in Table 1 and depicted in Figures land 2 (see Appendix A for location maps of each parcel).

Table 1- Summary of the Federal and Non-Federal Lands Locations

Table 1. Summary of the Federal and Non-Federal Lands Locations

Parcel	Acres	Ownership	Location
Gray Wolf, Prescott NF, 255 Verde Valley RD		Federal	Approximately seven miles east of Dewey south of State Highway 169. Gila and Salt River Meridian (G&SRM), Yavapai Co., AZ, T13N, R3E, Sec. 8 (portions of Lots 10, 11, and 12 south of SH 169; and Lot 13) and Sec. 17 (Lots 2, 4, and 5)
Total Acreage Of Federal Land Selected For Disposal: 254.78			
Buck Tank, Kaibab NF, 40 Williams RD		Private	Approximately eight miles northeast of Ash Fork. G&SRM, Coconino Co., AZ, Sec. 22, T23N, R1W,
Ash & Cedar, Coronado NF, Sierra Vista RD	30	Private	Approximately nine miles southeast of Patagonia. G&SRM, Santa Cruz Co., AZ, Sec. 22, T23S, R16E, unsurveyed, That portion of Mineral Survey No. 2193 described as the Ash and Cedar Patented Mining Claims.
Nutriosio, Apache-Sitgreaves NF, Alpine RD	14	Private	Approximately four miles north of Nutriosio. G&SRM, Apache Co., AZ, T7N, R30E, Sec. 9
Turkey Creek, Prescott NF, Bradshaw RD	42	Private	Approximately one mile north of Cleator. G&SRM, Yavapai Co., AZ, Sec.14 and Sec. 23, T11N, R1E,
Buster Tract, Prescott NF, Bradshaw RD	62	Private	Approximately three miles northwest of Crown King. G&SRM, Yavapai Co., AZ, - That portion of Mineral Survey No. 1430 described as the Buster, Mary Jane, and Pictou patented Mining Claims.
Yearin, Prescott NF, Chino Valley RD	560	Private	Approximately nine miles north of Paulden and one mile west of State Route 89. G&SRM, Yavapai Co., AZ, Sec.13, T19N, R2W,
Capital Coal, Prescott NF, Chino Valley RD	124	Private	Approximately five miles north of Paulden and three miles west of State Route 89. G&SRM, Yavapai Co., AZ, Sec. 3, T18N, R2W,
Total Acreage Of Non-Federal Land Offered For Federal Acquisition: 872			

The PNF proposes to relocate a section of the General Crook Trail and route it around the southern boundary of the landfill. The proposed reroute would include the construction of a new trail (Figure 3). This trail would be approximately four feet wide and approximately two miles long. Although no trees would be removed, vegetation such as grasses and forbs would be cleared along the trail. An interpretive sign would be constructed near the west end of the rerouted section of trail to explain the historic

significance of the General Crook Trail.

1.4 Decision to be Made

By agreement of all Forests involved, the PNF has been designated as the lead agency for this exchange proposal. The Forest Supervisor will decide whether to retain the federal lands under Forest Service jurisdiction or to authorize the land exchange as proposed, with modifications, or not at all. The Forest Supervisor will also decide if an Environmental Impact Statement (EIS) is needed.

The decision process for the land exchange considers, among other things, whether the non-federal lands:

- Provide vital threatened and endangered species habitat or other vital wildlife habitat;
- Contain wetlands and riparian areas;
- Contain unique natural or cultural values;
- Demonstrate characteristics that allow improvement of public land management, meet specific administrative needs, or benefit other National Forest programs;
- Provide needed access, protection from fire or trespass, or prevention of damage to forest land resources;
- Consolidate public land ownership; or
- Meet research needs (USFS 1986).

The Forest Supervisor will also decide if the proposed Gray Wolf land exchange is consistent with the FLPMA and the PNF Forest Plan (USFS 1986) in that disposal of the federal lands for expansion of the landfill would meet both the needs of expanding communities and overriding public needs (for solid waste disposal).

1.5 Public Involvement

1.5.1 Scoping Comment Solicitation and Public Involvement

A scoping letter was mailed on January 18, 2002, to 251 agencies, organizations, and interested individuals. The letter described the proposed action and solicited public comments regarding the proposed land exchange. In addition to this letter, a legal notice requesting comments on the project was published in the *Prescott Daily Courier*, *Arizona Daily Star*, *Arizona Daily Sun*, and the *White Mountain Independent* on February 15, 2002. The PNF has also listed the proposed land exchange in its Schedule of Proposed Actions (SOPA), which is published quarterly, since June of 2002.

1.5.2 Comments Received, Issues, and Evaluation Measures

Ten comment letters were received in response to scoping, and each comment was analyzed to determine if it constituted an issue. An “issue” is defined as “a point of discussion, debate, or dispute with a

proposed action based on some anticipated effect” (USDA 1993). The identified issues were then evaluated for their significance. An issue was considered “non-significant” if it met any of the criteria listed below.

- The issue is outside the scope of the proposed action;
- The issue is already decided by law, regulation, Forest Plan, or other higher-level decision;
- The issue is irrelevant to the decision to be made; or
- The issue is conjectural and not supported by scientific (or factual) evidence.

An issue not meeting these criteria was considered significant.

Twenty-six issue statements were initially identified by the ID Team. Seven of the 26 issue statements were considered significant based on the above criteria and are displayed in Table 2. Included in the table are the issues identified, issue statement, and units of measure.

Table 2 - Significant and Units of Measure

Issue	Issue Statement	Units of Measure
Groundwater Hydrology and Quality	The expanded landfill would go deeper into the water table and would cause ground water pollution.	ADEQ, EPA, and ADWR regulations regarding landfill design and construction.
Surface Water Contamination	Water pollution would result from transporting garbage.	ADEQ, EPA, and ADWR regulations regarding transport of solid waste by commercial entities.
Non-Point Source Pollution	Air and water pollution from roadway runoff would be generated by landfill material being transported.	ADEQ, EPA, and ADWR regulations regarding transport of solid waste by commercial entities.
Erosion	Parts of Racetrack Wash downstream of the landfill have steep sides, which indicates down cutting. Continued erosion would take place as a result of the land exchange	Forest Specialists will assess compliance with ADEQ, EPA, and ADWR regulations regarding erosion control and stormwater management.
Visual Quality/ Scenic Integrity	The proposed action would alter the viewshed of the federal lands by allowing for the expansion of the landfill.	Qualitative evaluation of the federal lands’ visual quality and whether the foreseeable uses are consistent with established visual quality objectives of surrounding forest lands; ADEQ, EPA, and ADWR regulations regarding transport of solid waste by commercial entities.
Heritage Resources	Garbage trucks scatter litter on the landscape and litter is blown from the landfill onto adjacent lands. The proposed action would result in impacts to two unnamed archaeological sites, approximately 0.75 mile of the General Crook Trail, and possibly Smith	Qualitative evaluation of the number and eligibility of sites impacted on federal lands. Potential for sites on non-federal lands. Mitigation for eligible archaeological sites

1.5.3 Issues Considered but Eliminated from Further Analysis

Nineteen of the 26 issue statements were found to be non-significant according to the above criteria and were eliminated from further analysis in this EA. Six comments were received regarding the NEPA process and the preparation of the EA. These comments will be addressed in the EA. The remaining issue statements are displayed in Table 3.

Table 3 - Issues Found to be Non significant

Table 3. Issues Found to be Non-Significant

Issue	Issue Statement	Issue Evaluation
Grazing	The EA should include the status of grazing permits on each property, existing and potential.	This information will be included in the EA and is not considered an issue.
Socioeconomic Resources	The EA should include the savings attributable to each forest by elimination of the inholdings.	This information will be included in the EA and is not considered an issue.
	The EA should include a general statement regarding the benefit to Yavapai County for extending the operation of the existing landfill, so that the expense of creating a new landfill can be deferred.	A statement to this effect will be included in the EA.
	Federal, state, county and local authorities should mandate, or encourage by incentive, recycling to reduce material and extend landfill life.	Mandating recycling is outside of the authority of the Forest Service.
	County needs to mandate WMA to recycle more items (i.e., Styrofoam, plastics, etc.).	Mandating recycling is outside of the authority of the Forest Service.
Land Use	The EA must describe any remaining holdings or conflicting uses that could affect FS management of parcels it would acquire.	This information will be included in the EA.
	Expanding the landfill would require WMA to amend their existing approved use permit. This would require the approval via a public hearing process.	This statement is correct and is not considered an issue (outside the scope of this project).
	Establish in the EA how the FS plans to manage the parcels, and that mgmt. plans are consistent with purpose for which each is being acquired. (e.g., if a riparian area is acquired for enhancement, don't use for grazing).	Non-federal lands acquired through the exchange would be managed according to the applicable Forest Plan(s).
	Expanding the landfill onto the proposed FS land is a good idea. It is an open area and would be used instead of being developed.	Thank you for your comment; this is not an issue.
	Would the landfill expansion plan for estimated growth in population of Tri-city area?	WMA has contracted with Yavapai County to meet all solid waste needs until 2013. The proposed expansion would allow WMA to meet that obligation.

Table 3. Issues Found to be Non-Significant

Issue	Issue Statement	Issue Evaluation
Non-Point Source Pollution	The EA should include information on any violations for which WMA has been cited, a full discussion of any contamination that has occurred on land surrounding the existing landfill.	This information will be included in the EA.
Wildlife	Proper management of acquired parcels could improve habitat conditions for wildlife.	The non-federal parcels would be managed according to the applicable Forest Plan(s).

Chapter 2.0 Alternatives

2.1 Development of Alternatives

Land exchanges typically have limited alternatives because the exchange proponent desires specific Federal lands administered by PNF and the Forest may use its discretion to not process any proposed exchange which it finds undesirable or not in the public interest. Because no private land is adjacent to the existing landfill, an alternative in which WMA would directly purchase adjacent private land to expand the Gray Wolf Landfill is not available. Thus, this assessment analyzes two reasonable alternatives, the No Action Alternative, as required under NEPA, and the Proposed Action alternative.

2.2 Alternatives Considered in Detail

2.2.1 No Action

Under this alternative, the proposed land exchange would not occur. The federal lands would remain part of the PNF and would be subject to multiple-use management for sustained yield of goods and services. The non-federal lands would remain private inholdings within the four National Forests and subject to the rights, privileges, and obligations of private land ownership. At present, WMA has no anticipated plans for the future use of the non-federal parcels, although they could sell one or more of the parcels. Any development plans for the non-federal lands under this alternative are considered too speculative to analyze in this EA. Under this alternative, the special use permit previously issued to WMA for the access road would remain in effect until December 31, 2015. WMA would not be able to expand horizontally at their present location.

2.2.2 Proposed Action (Gray Wolf Land Exchange)

Under this alternative, WMA would exchange 871.73 acres of privately owned lands for 254.78 acres of National Forest land. Non-federal lands consist of seven private inholdings controlled by WMA within the PNF, ASNF, KNF, and CNF boundaries. All mineral and water rights associated with the non-federal lands would be conveyed with the title upon finalization of the exchange. The federal lands consist of land that abuts the existing Gray Wolf Landfill and SR 169. Mineral and water rights associated with the federal lands would be retained by the PNF.

None of the Forest Plans for the PNF, ASNF, KNF, and CNF specifically provides for the acquisition of these non-federal lands; therefore, the Forest Service has not developed any specific management prescriptions for the seven inholdings. Under this alternative, the inholdings would be managed in a manner consistent with the Forest Land surrounding them. Table 4 lists the non-federal lands and references the applicable Forest Plan management direction under which it would be managed.

Under this alternative, WMA would fence the perimeter of the Gray Wolf parcel to prevent unauthorized access. By fencing the property, a portion of an historic trail, the General Crook Trail^a, would no longer be accessible to the public. Therefore, WMA has committed to reimburse PNF for all costs associated with the relocation the trail around the southern edge of the Gray Wolf parcel (see Figure 3 in Chapter 1). The PNF would be responsible for the construction approximately two miles of new trail that would be routed to the south of the Gray Wolf parcel. Construction would consist of clearing debris and small rocks, installing drainage control features (i.e. “water bars”), and installing signage.

Table 4 - National Forest Plans Associated with the Non-Federal Parcels

Table 4. National Forest Plans Associated with the Non-Federal Parcels

Buck Tank	Kaibab National Forest Plan (1988) pages 37-41
Ash & Cedar	Coronado National Forest Plan (1986, as amended in 1988 and 1992) pages 27-46
Nutrioso	Apache-Sitgreaves National Forest Plan (1987) pages 40-44
Turkey Creek	Prescott National Forest Plan (1986, as amended in 1994 and 1996) pages 24-61
Buster Mine	Prescott National Forest Plan (<i>ibid.</i>)
Yearin	Prescott National Forest Plan (<i>ibid.</i>)
Capital Coal	Prescott National Forest Plan (<i>ibid.</i>)

2.3 Alternatives Eliminated From Detailed Study

The exchange process itself limits the range of alternatives. For an alternative to be considered, it must meet the Purpose and Need while not violating any minimum environmental standards. A balanced (i.e., of equal value) exchange package is determined through a series of proposals and counter proposals until both parties mutually accept a mix of parcels. In determining an acceptable package of lands, one of the seven original parcels, the Verde Valley parcel, was withdrawn from the proposal and replaced with the Ash and Cedar parcel. The Verde Valley parcel was withdrawn because much of its boundary is adjacent to residential areas and its acquisition would likely create management problems typical of National Forest system lands bordering urban areas (e.g., cutting of boundary fences, illegal dumping of refuse, unauthorized off-road vehicle use, etc.). Therefore, at the request of the PNF, WMA substituted the Ash and Cedar parcel for the Verde Valley parcel as part of their non-Federal lands package.

An alternative considered but eliminated from further study was the Forest Service retention of ownership of the Federal lands and issuance of a special use permit for the expansion of the landfill onto the PNF. This alternative was eliminated because the proposed use of the Gray Wolf parcel would violate federal

^a Recent research indicates that the General Crook Trail, as depicted on USGS maps, may be incorrect (SWCA 2001). The trail present on the Gray Wolf parcel is most likely a slightly older trail known as the Stoneman Trail.

regulations regarding lands under the administration of the Forest Service. 36 CFR 251.54 (e) (iv) states that a special use permit must not create “an exclusive use or perpetual right or use”. The proposed expansion of the existing landfill would create perpetual use of the area because the landfill is considered permanent. Furthermore, the proposed expansion would result in the disposal of solid waste on lands administered by the Forest Service, which is prohibited under 36 CFR 251.54 (e) (ix).

By acquiring the Gray Wolf parcel, WMA, as the landowner, would become the sole responsible party for any potential environmental liabilities in the future. The Federal government (EPA) and the State of Arizona (ADEQ and ADWR) would retain regulatory oversight under current Federal and state regulations (Resource Conservation and Recovery Act and 40 CFR 258). These regulations are beyond any that would be required under a special use permit from the Forest Service.

2.4 Comparison of Alternatives

The alternatives are compared in Table 5 with respect to their response to the issues, Forest Plan direction, the project’s purpose and need, and preliminary key environmental effects.

Table 5 - Comparison of Alternative

Table 5. Comparison of Alternatives		
Response to Public Issues	No Action	Proposed Action
Groundwater Hydrology and Quality	<u>Non-Federal Lands</u> No impacts to groundwater are expected on the non-federal lands. However, the Forest Service would not have the authority to regulate impacts to groundwater within any of the inholdings.	<u>Non-Federal Lands</u> Consolidation of the non-federal lands would allow for the Forest Service to monitor and regulate groundwater resources according to the appropriate Forest Plan.
	<u>Federal Lands</u> No impacts to groundwater are expected to occur as a result of this alternative. However, WMA would continue to operate the Gray Wolf Landfill and monitor groundwater surrounding the landfill per ADEQ, EPA, and ADWR regulations.	<u>Federal Lands</u> No impacts to groundwater are expected to occur as a result of this alternative. However, WMA would expand the Gray Wolf Landfill and monitor groundwater surrounding the landfill per ADEQ, EPA, and ADWR regulations.

Table 5. Comparison of Alternatives, continued.

Response to Public Issues	No Action	Proposed Action
Surface Water Contamination	<p><u>Non-Federal Lands</u></p> <p>No impacts to surface water are expected on the non-federal lands. However, the Forest Service would not have the authority to regulate impacts to surface water within any of the inholdings.</p>	<p><u>Non-Federal Lands</u></p> <p>Consolidation of the non-federal lands would allow for the Forest Service to monitor and regulate surface water resources according to the appropriate Forest Plan.</p>
	<p><u>Federal Lands</u></p> <p>No impacts to surface water are expected to occur as a result of this alternative. However, WMA would continue to operate the Gray Wolf Landfill per ADEQ “Best Management Practices”.</p>	<p><u>Federal Lands</u></p> <p>No impacts to surface water are expected to occur as a result of this alternative. However, WMA would be required to comply with ADEQ, EPA, and ADWR regulations.</p>
Non-Point Source Pollution	<p><u>Non-Federal Lands</u></p> <p>No adverse impacts to surface water quality are anticipated on the non-federal parcels.</p>	<p><u>Non-Federal Lands</u></p> <p>No adverse impacts to surface water quality are anticipated on the non-federal parcels.</p>
	<p><u>Federal Lands</u></p> <p>There would be no change in the status of existing land uses that have potential to affect surface water quality, thus surface water quality is not anticipated to change.</p>	<p><u>Federal Lands</u></p> <p>The proposed land exchange would not impact surface water quality on the federal parcel. Although the land exchange would facilitate the potential landfill expansion, WMA would still have to demonstrate compliance with all applicable federal, state, and local environmental regulations before expansion of the existing facility would be permitted.</p>
Erosion	<p><u>Non-Federal Lands</u></p> <p>Erosion conditions would likely remain the same on the non-federal parcels.</p>	<p><u>Non-Federal Lands</u></p> <p>Erosion conditions would remain the same on the non-federal parcels. No additional grazing would be permitted and the Forest Service would administer the lands according to the appropriate Forest Plan.</p>
	<p><u>Federal Lands</u></p> <p>Continued downcutting and erosion of Racetrack Wash south of the Gray Wolf Landfill would continue as a result of the continued operation of the landfill.</p>	<p><u>Federal Lands</u></p> <p>No engineering for the expansion of the Gray Wolf Landfill has been completed at the time of the publication of this document. However, WMA would be required to submit any future plans to ADEQ for review. WMA would address downcutting in Racetrack Wash at this time.</p>

Table 5. Comparison of Alternatives, continued.

Response to Public Issues	No Action	Proposed Action
Visual Quality/Scenic Integrity	<u>Non-Federal Lands</u>	<u>Non-Federal Lands</u>
	Potential development of the non-federal lands under this alternative could result in the net loss of areas meeting the existing Forest Service high level of SI. This would include the potential modification of scenic quality of approximately two miles of scenic roads along U.S. 180/191, the Coronado Trail National Forest Scenic Byway, and three miles of Forest Service 259.	The Forest Service would acquire seven inholdings. This would result in the Forest Service’s ability to maintain the existing moderate to high levels of scenic integrity within areas of the National Forest that were formerly private inholdings.
	<u>Federal Lands</u>	<u>Federal Lands</u>
	The Forest Service would retain the Gray Wolf parcel and no increase in the visual impact on views from S.R. 169 would be expected.	WMA would expand to the east and south of the existing landfill. This would continue to alter the form, line, color and textures common to the surrounding characteristic landscape. Although this change would visible in the immediate vicinity, it would not dominate the viewshed of the PNF along S.R. 169.
Heritage Resources	<u>Non-Federal Lands</u>	<u>Non-Federal Lands</u>
	No heritage resources associated with the non-Federal lands would come into federal management and protection. Any sites on non-Federal lands would remain under private ownership; protection under National Historic Preservation Act only if the disturbance activity is a federal action.	Any heritage resources on non-Federal lands would gain direct federal protection under the National Historic Preservation Act. This would allow for protection of additional Heritage Resources currently outside of Forest Management. Upon acquisition, the non-federal lands would be managed in accordance with the current applicable Forest Plans and become subject to federal protection of the National Historic Preservation Act (NHPA).

Table 5. Comparison of Alternatives, continued.

Response to Public Issues	No Action	Proposed Action
	<p><u>Federal Lands</u></p> <p>No landfill expansion would occur; therefore, there would be no adverse impacts to heritage resources.</p>	<p><u>Federal Lands</u></p> <p>The proposed land exchange would result in the loss of one archaeological site (the other site was eliminated through testing). The PNF would require this site be excavated and all data and artifacts properly archived with a public museum.</p> <p>Approximately 0.75 mile of the General Crook Trail would be removed from Federal management. This segment would be rerouted onto adjacent federal land and would require the construction of approximately 2 miles of new trail.</p>
Forest Plan Direction	<p><u>Non-Federal Lands</u></p> <p>The Forest Plans would not apply to the non-federal land.</p>	<p><u>Non-Federal Lands</u></p> <p>The objectives (i.e. consolidation of lands) of the respective Forest Plans would be met.</p>
	<p><u>Federal Lands</u></p> <p>The Forest Service objective of eliminating the need for a Special Use permit for the access road would not be met.</p>	<p><u>Federal Lands</u></p> <p>The Forest Service would consolidate land and eliminate the need for a Special Use permit for the access road.</p>
Purpose and Need		
Facilitate the consolidation of federal land ownership	This alternative would not facilitate the consolidation of federal land ownership.	The Forest Service would acquire seven inholdings within the state of Arizona.
Enable the Forest Service to dispose of publicly administered lands to WMA for the purpose of expanding the Gray Wolf Landfill	The Forest Service would not dispose of publicly administered lands; therefore, the Gray Wolf Landfill would not be expanded onto adjacent land.	The Forest Service would dispose of publicly administered lands and WMA would be able to expand the Gray Wolf Landfill.
Eliminate the need for the Forest Service to continue to administer a special use permit for the existing access road	The Forest Service would need to reauthorize a special use permit for the existing access road to WMA's property.	The Forest Service would no longer administer the land with the access road; therefore, there would be no need to administer a special use permit.
Acquire lands that include valuable wildlife habitat and riparian attributes and that maintain scenic integrity	The Forest Service would not acquire land that would include wildlife and riparian attributes and that maintain scenic integrity.	The Forest Service would acquire a net of approximately 617 acres of lands that would include wildlife habitat, riparian attributes, and that maintain scenic integrity.

Table 5. Comparison of Alternatives, continued.

Response to Public Issues	No Action	Proposed Action
Improve management, benefit specific resources, or increase management efficiency	The Forest Service would not improve management of land or resources, benefit specific resources, or increase management efficiency.	The Forest Service would improve management through the consolidation of lands, benefit specific resources such as wildlife and scenic views, and increase management efficiency by eliminating the need for a special use permit.
Other Preliminary Key Environmental Effects		
<i>Vegetation and Wildlife</i>	<u>Non-Federal Lands</u> Potential modification of 872 acres of wildlife habitat on private land. No direct impact on wildlife habitat would occur on land administered by the Forest Service.	<u>Non-Federal Lands</u> Acquisition of 872 acres of wildlife habitat by the Forest Service to be managed in accordance with applicable Forest Plans. This would allow the Forest Service to address issues of habitat fragmentation as appropriate for each ranger district.
	<u>Federal Lands</u> Retention of approximately 255 acres of wildlife habitat by the Forest Service. The Forest Service would continue to maintain responsibility for managing the land for wildlife values as consistent with the PNF Plan.	<u>Federal Lands</u> Approximately 255 acres of wildlife habitat would be fenced and use by wildlife reduced or lost. This would not result in a substantial reduction in biological resources on the PNF.
<i>Special Status Species</i>	<u>Non-Federal Lands</u> No federal acquisition of potential habitat for the five federally listed threatened and endangered species. Potential habitat for 39 Forest Service Sensitive species would not be acquired.	<u>Non-Federal Lands</u> Federal acquisition of potential habitat for the five federally listed threatened and endangered species. Potential habitat for 39 Forest Service Sensitive species would be acquired.
	<u>Federal Lands</u> No impact to federally-listed threatened and endangered species. PNF would retain 255 acres of “low quality” habitat for mule deer and pronghorn. No Forest Sensitive Species would be impacted.	<u>Federal Lands</u> No federally-listed threatened and endangered species or critical habitat would be impacted. 255 acres of “low quality” habitat for mule deer and pronghorn would be impacted. Individuals of one Forest Sensitive species, Arizona toad, may be impacted. However, impacts would not result in a trend toward listing or loss of population viability.

Table 5. Comparison of Alternatives, continued.

Response to Public Issues	No Action	Proposed Action
<i>Livestock Management</i>	<u>Non-Federal Lands</u> Continued private grazing of 872 acres.	<u>Non-Federal Lands</u> Federal acquisition of up to 872 acres of potential rangeland of currently unassessed carrying capacity. Consolidation of the non-Federal Lands would allow for improved livestock management.
	<u>Federal Lands</u> 255 acres of federal land remains within the Cienega allotment.	<u>Federal Lands</u> Reduction of 255 acres of grazing within the Cienega allotment but no corresponding net reduction in AUM's.
<i>Riparian and Wetland Habitat</i>	<u>Non-Federal Lands</u> Potential impacts to approximately 38 acres of riparian and wetland habitat from private development. No direct impact to land administered by the Forest Service.	<u>Non-Federal Lands</u> 38 acres of riparian and wetland habitat would be acquired by the Forest Service and be subject to Forest Management Plan directives. This would result in Federal oversight on any future actions that may affect these areas.
	<u>Federal Lands</u> No impacts to floodplain and wetland habitat.	<u>Federal Lands</u> Loss of 11 floodplain acres.

3.0 References Cited

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