

# Appendix J – Arizona Game and Fish Department Comment Letter and Responses

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March 3, 2014

Jim Upchurch  
Forest Supervisor  
Coronado National Forest  
300 W. Congress  
Tucson, AZ 85701

Dear Jim:

The Arizona Game and Fish Department (Department) has reviewed the Draft Forest Land and Resource Management Plan (LRMP) and Environmental Impact Statement (EIS) and provides comments in two attached tables, one for the LRMP, and one for the EIS.

The Department appreciates the opportunity to comment on the draft LRMP and EIS and provides as thorough review as possible given overlapping Forest review priorities for this LRMP and the Rosemont Mine EIS. In general, the documents are well written and provide the reader with a clear understanding of the future of activities on the Forest. I did want to point out though that the Department would have appreciated the opportunity for greater involvement in the development and review of the LRMP, including participation on Interdisciplinary Teams and being afforded Cooperating Agency status as provided for in our Master Memorandum of Understanding (MOU) with the Forest Service. Further, the quality of the documents would have been improved with enhanced involvement from Department staff. The Department recommends facilitating better collaboration and removal of unnecessary obstacles such as prohibiting the Department from preliminary review of the plan outside of the confines of your offices. Federal laws including NEPA, Fish and Wildlife Coordination Act, Federal Advisory Committee Act, and our MOU clearly direct better Forest Planning coordination with the Department which has statutory authority and subject matter expertise. The Department's collaborative involvement and review provides the public and the Forest with a more comprehensive, defensible, and accurate analysis of impacts to natural resources including state trust resources.

I also wanted to raise an issue of concern with the overlapping nature but separate release of LRMP and Travel Management Plan (TMP) planning. This incongruous approach makes it very difficult for the Department and stakeholders to accomplish a proper review of both documents. In the attached comments table for the LRMP, the Department identifies a number of places where the LRMP appears to be inconsistent with the travel management planning as understood from our involvement with that process. However, without the TMP it is impossible to fully

analyze effects. For example, the small, imprecise maps showing Ecosystem Management Areas in the LRMP do not afford the amount of detail needed to understand where land use zones and proposed Wilderness may contradict or preclude TMP decisions. Even within the LRMP there are statements that, on one hand, imply that the TMP makes implementation level decisions on road designations and motorized travel prohibitions but, on the other hand put forth standards which seem to make those decisions prior to TMP availability. The Department strongly recommends the Forest TMP be included in the LRMP process for better consistency and public review.

The Department has multiple concerns with Wilderness, Recommended Wilderness, and Wild and Scenic designations where the Department's ability to effectively manage wildlife resources may be negatively and unnecessarily impacted. Further, access in southeastern Arizona is a serious concern to the Department and our stakeholders and additional restrictions to vehicular access is not warranted at this time. Also, any language regarding Forest Service permitting for the collection of animals must be clarified throughout the document to accurately reflect the Arizona Game and Fish Department authority regarding take of state trust species.

**The Department provides the following issues of general concern:**

- Locatable Mineral Withdrawals have been all but eliminated from further use by the Forest. The Department believes this is a short-sighted approach and eliminates an important management tool in protecting sensitive wildlife resources.

**Response:** Issue addressed in detailed comments

- Inconsistencies exist within the plan and between the EIS and LRMP which must be reconciled in the final documents. Both documents need to be reviewed for consistency of terminology and definitions (See specific comments attached). For example, a number of rare or endangered species are characterized as common in the LRMP. Also, the definition of Wild Backcountry in the EIS appears to be from a previous draft while the LRMP has been modified to be consistent with the Department's recommendations.

**Response:** Inconsistencies were corrected in both the Plan and EIS.

- The Department is concerned that the Forest has no guideline protecting or maintaining authorized routes connecting to existing roads on State Trust Land. This may lead to public access issues, and the Department offers to assist in obtaining legal access across State Land.

**Response:** Issue addressed in detailed comments

- The Forest should amend the plan and DEIS to allow motor vehicle use off the designated travel system limited to single trip use to retrieve legally taken big game species where such use does not negatively impact soils or vegetation.

**Response:** Issue addressed in detailed comments

- One of the key issues discussed at our recent Coordination Meeting was the need for consistency between forests to avoid confusion from legitimate land users. It would be helpful to add consistency on issues such as TMP and changing land status to wilderness.

The Department thanks the Forest for the opportunity to provide input on the LRMP and EIS. Please direct any questions regarding this letter to John Windes in our Tucson office at [jwindes@azgfd.gov](mailto:jwindes@azgfd.gov) or 520-388-4442.

Sincerely,

*/s/ Jim de Vos*

Jim de Vos  
Assistant Director-Wildlife Management

attachments



**Arizona Game and Fish Department Comment:**

Wild Backcountry on page 28.

"Suitable uses specified for the Wild Backcountry Land Use Zone are livestock grazing, harvesting of timber for restoration purposes, mountain biking, and collection of forest products and fuelwood. Off-highway vehicle (OHV) recreation, developed recreational facilities, and timber production are not suitable uses."

This conflicts with the LRMP page 95 which states: "this land use zone offers similar areas that are accessed by primitive roads or motorized trails and are used for a wide variety of activities, both recreational and other, including enjoyment of scenery, escape from the crowded areas, hunting, off-highway vehicle use, dispersed camping, hiking, horseback riding, mountain biking, mining, and cutting firewood."

**Arizona Game and Fish Department Recommendation:**

The Department cannot support the first excerpt from the EIS and insists that the LRMP be reconciled with the FEIS using the definition of acceptable uses from the LRMP to include motorized dispersed camping, hunting, OHV use, and cutting of firewood.

**Response:** The words "OHV recreation" have been removed from the EIS document.

*Suitable uses specified for the Wild Backcountry Land Use Zone are livestock grazing, harvesting of timber for restoration purposes, mountain biking, and collection of forest products and fuelwood. Developed recreational facilities, and timber production are not suitable uses.*

**Arizona Game and Fish Department Comment:**

Roaded Backcountry on page 28.

"This zone is not suitable for OHV trails". The FEIS conflicts with the LRMP, which states that the roaded backcountry is managed for a balance of dispersed motorized and nonmotorized uses. OHV trails do not conflict with this and may aid in managing this balance by separating users.

**Arizona Game and Fish Department Recommendation:**

The Department recommends reconciling the language in the FEIS with the LRMP to use the language from the LRMP.

**Response:** Removed the words "OHV Trails" from the EIS document to clear up confusion between EIS and Plan.

*Suitable uses specified for the Roaded Backcountry Land Use Zone include livestock grazing, motorized access on designated roads, motorized dispersed camping, mountain biking, recreation facilities, harvesting of timber in conjunction with restoration projects, and collection of forest products and fuelwood. This zone is not suitable for timber production*

**Arizona Game and Fish Department Comment:**

Elimination of Mineral Withdrawal from the Forest Plan – page 440 of Draft EIS.

The proposed action establishes desired conditions that support administration of mineral activities under current laws. Consistent with regulations and policy, environmentally sound

minerals development is emphasized. Compliance with law and regulation is also emphasized without reiterating specific requirements. The draft revised plan under the proposed action does not list areas recommended for mineral withdrawal, but rather sets desired conditions to protect resources that are very limited or unique and that are not already protected by law, regulation, and policy for specially designated areas (i.e., wilderness). This management approach contrasts with recommendations for withdrawal made in the 1986 plan, because this approach would protect resources by means other than withdrawal."

The Department finds this the most egregious failing of the EIS and LRMP. The above statement appears disingenuous and designed to mislead the public into believing that surface resources can be protected through means other than Locatable Mineral Withdrawal. The Department finds that the Forest has neglected to appropriately address protection of sensitive resources including important wildlife habitat by not describing the appropriate use of Locatable Mineral Withdrawals. The only instrument that effectively protects renewable resources from mineral entry is Locatable Mineral Withdrawal. This is the purpose of a withdrawal. Without withdrawal, sensitive resources are subject to the 1872 mining law and no amount of existing law, regulation, and especially policy, will protect those resources without mineral withdrawal.

The Arizona Game and Fish Commission's policy on multiple use (A2.18) states that "Multiple-use practices must not occur at the expense of the productivity of the land, nor the sustained yield of the renewable resources." While the Department recognizes multiple use as the desired management approach to public land management, inappropriately located mines "occur at the expense of the productivity of the land." Sensitive resources must be protected through judicious use of mineral withdrawal.

**Arizona Game and Fish Department Recommendation:**

The Forest should strike all references to phasing out mineral withdrawals and should identify appropriate resources needing protection via Locatable Mineral Withdrawal.

**Response:** The 1986 Plan had a list of mineral withdrawals but no action has been taken on those withdrawals. Mineral withdraw is still a tool we can use, however, the withdrawal process is cumbersome and time consuming. We have found that applications for mineral withdrawals are more successful when it can be demonstrated that all other means of protection have first been investigated. Therefore, our Desired Conditions are written so that a proposed mineral activity would be improbable in those areas.

**Arizona Game and Fish Department Comment:**

Wildlife - The Wildlife sections of the plan need further review and editing by the Forest. The Department has found numerous errors and inconsistencies requiring editing. For example:

In the first paragraph on page 5 the Chiricahua fox squirrel is listed as a rare species. On page 18 the fox squirrel is referred to as the Mexican fox squirrel, and at the bottom of page 33, it is listed as common in the Madrean Encinal Woodland habitat type. The Plan should select one common name for this species of fox squirrel and use that exclusively. Also, the species is not rare in the Chiricahua Mountains, but neither is it common in Madrean Encinal Woodlands on the Coronado National Forest. To be accurate, it is more commonly found in pine-oak associations solely within the Chiricahua Mountains on the Coronado National Forest.

The Mt. Graham red squirrel is also listed as a rare species in the first paragraph on page 5 of the Plan and later called a common species in spruce-fir on page 48 (second paragraph). The Mt.

Graham red squirrel is listed as endangered under the Endangered Species Act and cannot be considered common.

The twin-spotted rattlesnake is listed as a common species of spruce-fir habitats in the second paragraph on page 48 of the Plan. The twin-spotted rattlesnake is not a common species anywhere and is found primarily on talus slopes and should therefore be included in the Biophysical Features section starting on page 53, and not in the section noted above.

Under Riparian Areas on page 52, gray hawk, elegant trogon, eared quetzal, Mexican garter snake, Wet Canyon talussnail and Tarahumara frog are listed as common species. These are all in fact uncommon to extremely rare.

**Arizona Game and Fish Department Recommendation:**

The Forest should thoroughly review the wildlife sections of the plan in coordination with the Department. Amend the plan to use consistent naming conventions for all species. Amend the plan to replace rare species with common ones as examples where needed.

**Response:** The word common has been removed where noted in the document and species names have been corrected. We do not think it improper to list rare species that rely on certain habitat types instead of just common species. It underlies the importance of the habitat for species conservation. All references to the endemic Chiricahua squirrel have been corrected and the species vegetation community association has been redirected to the Madrean Pine-Oak woodland section. The species vegetation community association for the twin-spotted rattlesnake was expanded to include Mixed conifer, ponderosa pine-evergreen shrub and biophysical features (talus slopes).

**Arizona Game and Fish Department Comment:**

Goshawk Guidelines - Beginning on page 22 (Mid-Scale), and throughout the document, the Plan references forest conditions in goshawk nest areas, post-fledging family areas and foraging areas.

**Arizona Game and Fish Department Recommendation:**

These are all terms and management strategies identified in the Management Recommendations for the Northern Goshawk in the Southwestern United States (1992) and should be referenced as such.

**Response:** Reference added.

**Arizona Game and Fish Department Comment:**

Inconsistencies within Vegetation Descriptions - The environmental factors listed in the General Description sections for each vegetation community are inconsistent. For example, on page 36 the Madrean Pine-Oak Woodland General Description lists a fire frequency and a management indicator species (acorn woodpecker). These two elements were not identified in any of the previous Vegetation Community descriptions and an indicator species is not listed for any of the subsequent Vegetation Community General Descriptions except in the Mixed Conifer Forest and Natural/Constructed Water Sources.

**Response:** Thirty-three management indicator species (MIS) were identified in the 1986 plan. Only three MIS were carried forward to the revised plan. The revised plan reflects the appropriate MIS identified in the vegetation descriptions.

This change was based on the following factors:

- Implementation of 1986 plan direction for species management has not been fully successful because the management indicator species list itself was flawed in that it listed species as management indicators despite the fact that there was no habitat for them on the Coronado or the species no longer existed there (nonextant).
- The management indicator species list also included guilds of species. However, the grouping of certain species in the guilds was inaccurate in some cases, because many of those co-listed in a guild do not have the same habitat requirements.

**Arizona Game and Fish Department Comment:**

The Madrean Pine-Oak Woodland section does not list snag densities or tree basal area in the Desired Condition section.

**Response:** “Desired Conditions” state: “snags are well distributed.” Interpretation of this will occur at the project level based on site specific habitat needs.

**Arizona Game and Fish Department Comment:**

Though listed in all previous Vegetation Community Desired Conditions, from the Ponderosa Pine-Evergreen Shrub section on page 39 on through the Riparian Area section on page 52, the Plan does not list plant basal area, litter cover, or canopy covers. This is all valuable information relative to wildlife habitat and should be included in the Plan to assist in management and to maintain a consistent format.

**Arizona Game and Fish Department Recommendation:**

Amend plan to describe biotic communities and vegetation consistently with standard forestry metrics such as basal area, canopy cover, litter cover, etc.

**Response:** The vegetation “Desired Conditions” were developed at the Regional level and are based on many aspects. Where numerical ranges are not listed for basal area, canopy cover and litter, they can be established at the project level.

**Arizona Game and Fish Department Comment:**

In paragraph three on page 40 the effects of dwarf mistletoe on wildlife is difficult to gauge since it is based on the number of trees. Previous research has used a six class rating system to quantify dwarf mistletoe infection rates. Bennetts et al. (1996) found that bird species richness was positively correlated with dwarf mistletoe, which had a positive influence on wildlife habitat. They suggest that where management is not focused on timber production, control of dwarf mistletoe may not be justified, practical, or even desirable.

**Arizona Game and Fish Department Recommendation:**

Remove dwarf mistletoe abundance percentages from Desired Conditions.

**Response:** The paragraph referenced speaks to the “*composition, structure, and function of vegetation conditions are resilient to the frequency, extent, and severity of disturbances and climate variability*” in Ponderosa pine-evergreen shrub communities. While mistletoe has wildlife

benefit, we must balance this benefit with the risk of tree mortality it causes that can increase susceptibility to high intensity fire and reduced resilience.

**Arizona Game and Fish Department Comment:**

Montane Meadows - On page 51, within the Montane Meadows section, these meadows are described as vulnerable due to a changing climate since they will be susceptible to decreases in plant productivity from water limitations. On Mt. Graham many montane meadows are being used as campsites and the swift trail bisects several of them. From a wildlife habitat perspective, these meadows are important foraging areas for deer, turkey, black bear, etc. Based on their value to wildlife, fragmented nature, and the threats to their continued presence on the landscape, the Department requests additional Guidelines in this section.

**Arizona Game and Fish Department Recommendation:**

Add the following guidelines:

1. No new roads should be built in Montane Meadows and existing roads will be re-routed around them as opportunities to do so become available (this guideline is listed on page 73 under Motorized Transportation System.)

**Response:** Guideline two under Motorized Transportation System seems to cover this:

New road construction in meadows and wetlands should be avoided where physically or financially feasible. If these activities are unavoidable, they should be designed and implemented to minimize effects to waterflow, wetland recharge, and ecosystem function.

**Arizona Game and Fish Department Recommendation:**

2. No new developed campsites will be authorized in Montane Meadows.

**Response:** There is no Forest plan direction to add new developed recreation sites. Guideline 1 under “Montane Meadows” would apply to any future considerations:

“Management activities in meadows should not be allowed unless impacts to meadow soils and hydrologic function and native plant assemblages can be mitigated.”

**Arizona Game and Fish Department Comment:**

Animals and Rare Plants, Desired Conditions, Wildlife Linkages.

This section mentions wildlife linkages but doesn't reflect the challenges the Forest faces to improve, enhance, restore, and protect wildlife movement in the currently fragmented Ecosystem Management Areas (EMA) and along the forest boundary. Mines, powerlines, shrub-invaded grasslands, roads, trails, fences, disturbance, and development all fragment habitat and inhibit wildlife movement within the Forest.

Large projects can impact movement both within and between forest blocks requiring protection of movement corridors or enhancement of landscape permeability to allow for wildlife movement throughout the forest. Examples of activities that enhance landscape permeability are the retrofitting of fences; identifying and protecting important stopover habitat for migratory birds; identifying movement corridors between critical waters for amphibians and facilitating movement to maintain metapopulations; and controlling and mitigating movement of exotic invasives. In general, wildlife movement and connectivity is poorly addressed in the Plan.

**Arizona Game and Fish Department Recommendation:**

The Forest should address wildlife movement within EMA's as well as between EMA's and suggest approaches to maintain wildlife movement corridors, standards for permeability of fencing and infrastructure, both new and existing, and guidelines for evaluating and addressing permeability in all Forest activities and those activities under permit or lease. For example, new range fencing should meet AGFD standards for permeability, old range fencing should be required to be removed or replaced, and legacy fencing should be evaluated for permeability. New roads should require means to mitigate for permeability/fragmentary effects, and current roads and infrastructure should be evaluated for permeability/fragmentary issues and opportunities to ameliorate those issues. These approaches, standards, and guidelines should be reflected in the Forest Plan.

**Response:** The planning area is the forest itself; we lack jurisdictional authority to direct that movement corridors between EMAs be established; however we do have conditions for open space to work with willing landowners and jurisdictions between EMAs for wildlife connectivity. This is a goal we are working towards with partners. A guideline for range fences to allow for wildlife movement is shown in “Range Management” section under guideline three:

*“Construction or reconstruction of livestock fencing and replacement of nonpermeable fencing where wildlife movement is restricted should be consistent with the appropriate state wildlife agency standards<sup>1</sup> for safe passage of wildlife and/or species-specific fencing guidelines developed at the local or regional level.”*

The effects of individual roads to wildlife movements is evaluated at the project level.

Under Motorized Transportation System, Desired Conditions reads:

*“Unneeded roads, as identified through the transportation analysis planning process, are closed and rehabilitated to reduce human disturbance to wildlife and to reduce soil erosion.”*

Guideline 1 under “Vegetation Communities” section reads:

*“Project design should provide for wildlife movement between treated and untreated areas to increase available habitat.”*

Under “Land Ownership Adjustments and Boundary Management” section, Desired Conditions reads:

*“An interconnected network of undeveloped open space within and adjacent to the national forest provides opportunities for legal public access and corridors for wildlife movement and supports healthy ecosystems”.*

**Arizona Game and Fish Department Comment:**

Habitat Connectivity and Wildlife Linkages Generally - As we have seen with the Sunzia and Southline powerline projects, regional population growth in the United States is resulting in more

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<sup>1</sup> For Arizona Game and Fish Department, refer to the most recent Wildlife Water Development Standards section on standard wildlife fence; for New Mexico Game and Fish Department, use available habitat or species-specific guidelines.

impacts to open space, even on public lands. The plan recognizes this and highlights these negative impacts and identifies open space as a priority. The second to last paragraph on page 9 identifies the need to protect and provide wildlife corridors between sky islands. On page 19 the Desired Condition for the Climate Change Response section is connectivity of metapopulations throughout the landscape. Similarly, the Animals and Rare Plants section on page 62 states that wildlife species are susceptible to habitat loss and fragmentation.

**Arizona Game and Fish Department Recommendation:**

Areas outside the Forest Boundary which provide significant habitat connectivity should be identified by the Forest as areas in need of protection from development. For instance, the Forest participated in the Aravaipa Ecosystem Management Plan but has not identified the area between the Aravaipa Wilderness and the Galiuro EMA as an area threatened with development.

**Response:** The Forest Service participates in collaborative partnerships that look at landscape scale planning efforts to identify important corridors. Forest plan components do not apply to lands outside the forest boundary.

Refer to “Open Space Management Approach” under “Land Ownership Adjustments and Boundary Management”:

*“Working with willing landowners, communities, local governments, and partners to promote voluntary open space conservation. Participating in local planning efforts regarding development or use of non-Federal lands as an information provider to help promote appropriate open space, access and recreation opportunities as well as to reduce ecological impacts and wildfire risks for communities.”*

**Arizona Game and Fish Department Comment:**

Guidelines for protecting northern goshawks may overly restrict human presence outside of the nesting period.

**Arizona Game and Fish Department Recommendation:**

The Department recommends providing a citation for a need to restrict human disturbance after August 1 as fledged young are typically independent before the month of August.

**Response:** Citation used: Management Recommendations for the Northern Goshawk in the Southwestern United States (1992) ([https://www.fs.fed.us/rm/pubs\\_rm/rm\\_gtr217.pdf](https://www.fs.fed.us/rm/pubs_rm/rm_gtr217.pdf))

**Arizona Game and Fish Department Comment:**

Invasive Species - Within the Grassland Communities, Madrean Encinal Woodland, Wetlands, and Riparian Areas sections, there is no Guideline or even Management Approach listed for dealing with exotic species other than buffleggrass.

**Response:** Invasive species are defined in the plan as “alien species whose introduction does or is likely to cause economic or environmental harm or harm to human health” (Executive Order 13112). Although there is only an objective for buffelgrass there are a number of desired conditions and guidelines and management approaches that are focused on invasive species as a whole. There may be new species that become a problem during the life of the plan than what are the focus today.

Many plan components cover “invasive species.” Examples include:

Under Vegetation Communities, Desired Conditions:

*“Native plant communities dominate the landscape, while invasive species are nonexistent or in low abundance.”*

Under Constructed Waters, Desired Conditions:

*“If aquatic invasive species, such as American bullfrogs, northern crayfish, green sunfish, nonnative tiger salamanders, nonnative mollusks, and nonnative aquatic plants are present, their numbers are low and can be controlled”.*

The entire section “Invasive Species” covers “Desired Conditions, Objectives, Guidelines and Management Approaches.”

Under Pusch Ridge Wilderness:

Standard: *“All areas treated for exotic invasive grass populations shall be monitored and re-treated as often as necessary to prevent reestablishment of the target invasive species.”*

Management Approaches: *“Using the most effective combination of treatments available for invasive species containment and eradication to maximize effectiveness and minimize the amount of time required for management intervention.”*

Desired conditions for all vegetation communities reflect a native plant community not invasive. These plan components focus on controlling present and future invasive plants.

**Arizona Game and Fish Department Recommendation:**

Other invasive species such as Lehmann lovegrass, salt cedar, and sweet resin bush should be specifically targeted for treatments within the Invasive Species section, page 66.

**Response:** There are currently active control efforts for sweet resin bush; there has been little to no demonstrated success for control of Lehmann lovegrass.

**Arizona Game and Fish Department Comment:**

The Department supports the progressive standards and guidelines the Forest has outlined for public access to the Forest. The Department supports the Forest’s proactive measures to protect public access.

**Arizona Game and Fish Department Recommendation:**

The Department recommends maintaining the Standards and Guidelines for this section.

**Response:** Thank you for your comment.

**Arizona Game and Fish Department Comment:**

Standard 1: "Motor vehicle use is allowed on the designated system of roads and trails" and is "prohibited in all other locations, unless it is specifically authorized by law, permit, and/or orders issued by the Forest Service in conjunction with resource management and public safety actions."

Page 71 states "The motor vehicle use maps include designated roads, trails, and areas for each ecosystem management area. The designations include vehicle class, time of year of use, and any designations for motorized use associated with dispersed camping or game retrieval."

**Arizona Game and Fish Department Recommendation:**

The forest should strike (or modify) Standard 1 as it appears to contradict the previous statement (p71) which allows designations to be made via MVUM's and travel management plans.

The Forest should amend the plan and DEIS to allow motor vehicle use off the designated travel system limited to single trip use to retrieve legally taken mule and whitetail deer where such use does not negatively impact soils or vegetation.

**Response:** The words “game retrieval” were used only in reference to the information that can be shown on a MVUM map. To avoid confusion, the term has been removed from the page. As stated in the motor vehicle use maps (MVUM):

“motorized vehicle use off designated roads and trails for the purpose of game retrieval is not permitted on the Coronado National Forest.”

**Arizona Game and Fish Department Recommendation:**

The Forest has stated in Travel Management meetings with the Department that authorized roads without legal access across State Trust Land must be removed from the system. The Department recommends the Forest reverse this position and add a guideline to the plan stating "all authorized roads connecting to existing roads on Arizona State Trust Land (STL) over which the Forest has not legal easement or right of way across STL will be maintained as part of the designated road system as long as users may legally use the those roads with an Arizona State Land recreation permit."

**Response:** Providing public access is an identified need in our plan. At the national forest boundary, there are about 300 motorized access points; less than one-third of these provide permanent legal access. Most access points are located at an interface of National Forest System and non-Federal lands (State, county, private, and other ownerships). Our objective under the “Public Access” is to:

“Increase the number of permanent legal access routes to and within the Coronado National Forest by resolving the legal status deficiencies of 40 to 50 existing and proposed National Forest System roads and trails, using a variety of methods every 10 years.”

More specific guidance and direction is better addressed in the travel management environmental analysis.

**Arizona Game and Fish Department Comment:**

The Department supports the publication of motor vehicle use maps (MVUM) as one means of educating and informing the public of the designated road system. However, for all practical purposes open roads should be numbered and signed and closed or restricted roads should be physically closed or gated. The casual and occasional forest visitor cannot be expected to possess and understand MVUM's and the Department does not support MVUM's as the primary indicator that any given route is legal or illegal for travel.

**Arizona Game and Fish Department Recommendation:**

The Department recommends adding as a guideline that all roads open to the public be numbered and signed and that all closed roads be physically closed with native material or gated and signed closed. All roads maintained for administrative access only should be gated and signed for authorized use only.

**Response:** The Coronado adheres to national and regional guidance in relation to both publication of the MVUM and also signing related to Travel Management. While we understand the Department’s position on the matter we are obligated to adhere to the standards set forth by the USFS in this regard. Additionally, gating all roads not open to the general public for motor vehicle access would be prohibitively expensive and also require site-specific analysis and NEPA for such action to be implemented.

All National Forest System Roads are required to have a Route Marker displaying the road number at each road junction. This applies to both fully open-to-the-public roads as well as restricted-use roads (authorized use only). It is with the road numbers posted on the Route Markers that the public can determine whether the road is shown on the MVUM and therefore available for their use (unless seasonally closed—in which case that too is shown on the MVUM).

“Objective 3” under “Motorized Transportation System” supports your recommendation. “Decommission, close, and restore 3 to 10 miles of unneeded non-system roads annually throughout the plan period, except for roads identified for potential public access routes.”

**Arizona Game and Fish Department Comment:**

Standard 3.f. requires all new and replacement towers to be self-supporting due to the reasoning that self-supporting towers "minimize land area impacts."

**Arizona Game and Fish Department Recommendation:**

Move to guidelines and specify that the least impacting method should be used.

**Response:** The existing guidance for towers on the Forest was developed using internal collaboration with fire resource personnel and should be adequate to address safety concerns.

**Arizona Game and Fish Department Comment:**

Standard 3. requires new and replacement antennas and towers to be below the height for which FAA requires lights because of the interference with the fire lookout tower "and aesthetics." i. requires towers meet color requirements set forth in the Coronado's Guidelines for "Recreation Residences."

The Department questions why the guidelines meant for recreational residences is being used for very different structures and suggests that these guidelines are ill suited for this purpose and that perhaps towers and antennas should not be regulated under the same guidelines as recreational residences.

Commercial and scientific towers and antennas can be deadly hazards to Department aircraft which often fly closer to the ground than most aircraft as regulated by the FAA due to the needs of surveying wildlife and other wildlife management activities which occur regularly and frequently. Moreover, these antennas may be hazardous to USFS aircraft fighting fires.

**Arizona Game and Fish Department Recommendation:**

These standards should be deleted and/or changed. The Department requests that the safety of our personnel and USFS personnel be placed above that of aesthetics and that all towers and antennas be required to be visible from the air and be painted to contrast with the ground or background when viewed from above or at height or otherwise marked or lighted to ensure visibility by low

flying aircraft. The following language is taken from AGFD wind guidelines, and can be adapted for this section:

**APPENDIX C: Guidelines for Installation and Monitoring of Meteorological Towers and their Associated Infrastructure**

Met towers (whether temporary or permanent) and their associated infrastructure have the potential to cause avian and bat mortalities resulting from mid-flight strikes with the tower guy wires. Studies have shown guy-wired towers can cause four times more bird mortality than towers without guy wires (Young et al., 2003) ([http://www.west-inc.com/reports/fcr\\_final\\_mortality.pdf](http://www.west-inc.com/reports/fcr_final_mortality.pdf)). While bats can also strike guy wires, the occurrence is much less frequent. In addition, the visibility of met towers is important for the safety of aircraft pilots at low flight elevations. To reduce the potential for bat and bird collisions, and to provide guidance for keeping pilots and personnel safe, AGFD has developed these recommendations:

AGFD requests all *permanent* met towers be unguyed, free standing structures. If monopole are not practicable, then free standing lattice towers with perching deterrents may suffice. If possible, AGFD also requests temporary met towers be unguyed, monopole, free standing structures.

- When guy wires are present, AGFD recommends attaching Bird Flight Diversers (BFDs) at spaced intervals along the length of multiple wires. At a minimum, four Aircraft Warning Markers (spherical or cylindrical, 36 inches in diameter) should be placed 10 meters below the apex and BFDs be placed at 10 meter intervals along the length of each outer wire. Research shows the attachment of BFDs can reduce bird collisions by as much as 86-89 percent (Pope et al., 2006) ([http://www.chelanpud.org/documents/Burch\\_Final\\_Report\\_VI.pdf](http://www.chelanpud.org/documents/Burch_Final_Report_VI.pdf)). AWMs should be recognizable from a distance of at least 4,000 feet (1219m) in clear air and visible from all directions.

**Response:** Current standard specifies no guy-wires.

**Arizona Game and Fish Department Recommendation:**

- AGFD recommends all temporary towers are only on site for the minimum amount of time needed to monitor the wind resource. If towers are on site for more than 1 year, AGFD recommends carcass searches be implemented, especially during the bird migration period (see Chapter 5, Post-construction Monitoring and Reporting).
- If a temporary tower is going to become a permanent structure for the life of the project, AGFD recommends the tower(s) be included as part of the longer term (pre-construction and post-construction) monitoring program.
- AGFD recommends the applicant place acoustic monitoring stations on met towers in the proposed project area (Note: This will help collect bat activity information needed for pre-construction analysis). An acoustic monitoring station is defined as two acoustic detectors, one at "ground level" (approximately 1.5 meters above ground) and the other with an elevated microphone, ideally within the future rotor swept zone, but not less than 30 meters high. Reynolds (2006) and Lausen (2006) provide detailed guidelines for detector deployment and operation. Rainey et al. (2006) provides an in depth discussion of acoustic monitoring systems. Acoustic data collection objectives should strive to evaluate bat species composition and bat use of the project area nightly and across seasons to assess potential impacts.

- Work with AGFD to determine the number of acoustic monitoring stations needed to adequately cover the project area. The number of acoustic stations will depend on project footprint and habitat complexity.
- When siting met towers, avoid habitat features that congregate wildlife such as water resources, habitat edges, ridgelines, etc. At a minimum, AGFD recommend 100m setbacks from these features. This varies site to site dependent on the combination geographic features and wildlife resources.

**AGFD Personnel Safety**

- Low-level aerial flights can occur outside routine wildlife survey routes. GPS locations of all towers need to be provided to AGFD prior to construction to allow survey aircraft to avoid the towers. In addition, AGFD requests project proponents notify the Department when met towers are removed.
- When guy wires are present, AGFD recommends attaching Bird Flight Diverters (BFDs) at spaced intervals along the length of multiple wires. At a minimum, four Aircraft Warning Markers (spherical or cylindrical, 36 inches in diameter) should be placed 10 meters below the apex and BFDs be placed at 10 meter intervals along the length of each outer wire. AWMs should be recognizable from a distance of at least 4,000 feet (1,219 m) in clear air and visible from all directions.
- For all monopole towers, paint the top 30 feet of the tower in alternate orange and white paint. This does not apply to lattice towers or lit towers, both of which are more visible than monopoles.

**Response:** The existing guidance for towers on the Forest was developed using internal collaboration with fire resource personnel and should be adequate to address safety concerns. Some of the detailed recommendations provided by the Department may be more appropriate to consider on a project-level basis.

**Arizona Game and Fish Department Comment:**

Page 82, standard 14. "Limit nonpedestrian activities (e.g. bicycle and equestrian) authorized under special use permits to existing National Forest System trails and roads."

The Department questions the need for this standard. Would this limit hunting guides using pack animals and horses to trails and roads? The Department suggests that the variety of activities permitted under special use permits is great enough that this standard is unnecessarily restrictive and that such special use permits should evaluate uses on a case by case basis. The Department does not support limiting all "nonpedestrian" special use activities to trails and roads. This would also seem to limit the use of game carriers by licensed guides and outfitters to trails and roads.

**Arizona Game and Fish Department Recommendation:**

The Department recommends striking this standard and instead clarifying in guidelines or management approaches which activities should be limited to roads and trails and ensuring that licensed hunting guides and outfitters can utilize equines and game carriers off-trail.

**Response:** This standard has been removed.

**Arizona Game and Fish Department Comment:**

Grazing Guidelines on page 88.

**Arizona Game and Fish Department Recommendations:**

1. Add Santa Teresa and Pinaleño Mountain Ranges to areas restricted from domestic goat permits. Bighorn exist in the Santa Teresa Mountains, sufficiently close to the Santa Teresa's for goats to pose a threat.

**Response:** The following standard has been modified to add the Santa Teresa and Winchester EMAs:

“Grazing permits for domestic goats and/or sheep will not be issued in the Santa Teresa, Winchester, Galiuro and Santa Catalina EMAs to prevent the transfer of disease from domestic goats and sheep to wild populations of bighorn sheep.”

**Arizona Game and Fish Department Recommendation:**

4. Wildlife fencing standards should be consistent with the State's Guidelines for Wildlife Compatible Fencing, not meet AGFD wildlife water standards. The Guidelines are currently found at the following web location:  
[http://www.azgfd.gov/hgis/documents/110125\\_AGFD\\_fencing\\_guidelines.pdf](http://www.azgfd.gov/hgis/documents/110125_AGFD_fencing_guidelines.pdf)

**Response:** Based on conversations with Department personnel on April 26, 2017, the current recommendation from the Department is to use direction for Standard Wildlife Fencing found in the Wildlife Water Construction Standards found at the following web location:  
<https://www.azgfd.com/Portalimages/files/wildlife/watercatchments/wildlifewaterdevelopmentstandards2014.pdf>

**Arizona Game and Fish Department Comment:**

Locatable Mineral Withdrawals - This guideline seems intended to discourage locatable mineral withdrawals. The Department is concerned that this guideline will unnecessarily hinder wildlife habitat protection efforts.

**Arizona Game and Fish Department Recommendation:**

The Department recommends removal of the guideline.

**Response:** In response to your comment, we changed the wording of the guideline to make it clear that it is not our intent to discourage recommendations for mineral withdrawal. We have found that applications for mineral withdrawals are more successful when it can be demonstrated that all other means of protection have been investigated.

**Arizona Game and Fish Department Comment:**

Locatable Mineral Withdrawals - The Department finds that a major flaw in the DEIS is the lack of a description of what areas are withdrawn from Locatable Mineral Exploration and development, which areas are recommended for continued withdrawal, and which areas are recommended for or potentially recommended for revocation.

**Arizona Game and Fish Department Recommendation:**

The Forest should thoroughly describe existing and potential locatable mineral withdrawals and potential withdrawal revocations.

**Response:** The Forest will provide a list of existing and potential locatable mineral withdrawals to the department.

**Arizona Game and Fish Department Comment:**

The Department finds that the Forest has neglected to appropriately address protection of sensitive resources including important wildlife habitat, by describing the appropriate use of Locatable Mineral Withdrawals. The only thing that protects resources from mineral entry is Locatable Mineral Withdrawal. This is the purpose of a withdrawal. Without withdrawal, sensitive resources are subject to the 1872 mining law.

**Arizona Game and Fish Department Recommendation:**

The Forest should prescribe Locatable Mineral Withdrawal as an appropriate means of conserving and protecting unique and sensitive resources and should list all special designations which should be withdrawn from locatable mineral exploration and development. The Locatable Mineral Withdrawals section on page 93 should also include, within the first bullet statement, EMA corridors as examples of unique resource areas.

**Response:** Approval of a withdrawal is at the discretion of the U.S. Department of the Interior, and the Forest Service may only make recommendations for mineral withdrawals. We have found that applications for mineral withdrawals are more successful when it can be demonstrated that all other means of protection have been investigated. Furthermore, while withdrawal from mineral location (for location of a mining claim) prevents the location of new claims, it does not inactivate existing mining claims.

See Management Approaches under Locatable Mineral Withdrawals:

“Preserve a unique resource area where no reasonable alternative to a withdrawal will provide adequate protection and the area will not survive without undue damage or impacts caused by mineral development. Examples of unique resource areas are: research and experimental areas, botanical and zoological areas, cultural, historical, and archaeological areas, paleontological and geological areas, and other areas with special characteristics or unique values.”

**Arizona Game and Fish Department Comment:**

Locatable Mineral Withdrawals

- a. "Preserving a unique resource area where no reasonable alternative to a withdrawal will provide adequate protection and the area will not survive without undue damage or impacts caused by mineral development"

This language appears to overly restrict the use of Locatable Mineral Withdrawals to protect unique or sensitive resources.

**Arizona Game and Fish Department Recommendation:**

The Department recommends striking the first sentence in section "a" and replacing with language similar to "utilize locatable mineral withdrawals to preserve unique and sensitive resources where mineral development will cause undue damage or irreversible impacts to those sensitive resources."

**Response:** In response to your comment, we have found that applications for mineral withdrawals are more successful when it can be demonstrated that all other means of protection have been investigated.

**Arizona Game and Fish Department Recommendation:**

The Department further recommends revising the second sentence to read "Examples of unique and sensitive resources are research and experimental areas, botanical and zoological areas, cultural, historical, and archaeological areas, paleontological and geological areas, and crucial wildlife habitat areas."

**Response:** Changes made to plan under "Locatable Mineral Withdrawals", "Management Approaches": "Examples of unique resource areas are: research and experimental areas, botanical and zoological areas, cultural, historical, and archaeological areas, paleontological and geological areas, and other areas with special characteristics or unique values."

**Arizona Game and Fish Department Comment:**

Wildlife in Wilderness - Within the Wildlife in Wilderness section on page 104, the Standards and Guideline all refer to wildlife decisions that are not under federal authority. Any wildlife introductions or reintroductions are decisions of the Department's and not subject to the US Forest Service or a Land and Resource Management Plan. As stated in the Wilderness Act of 1964, "Nothing in this Act shall be construed as affecting the jurisdiction or responsibilities of the several States with respect to wildlife and fish in the national forests (16 U.S.C. 1133)."

**Arizona Game and Fish Department Recommendation:**

These Standards and the Guideline must be removed. Similarly, on page 129 under the Chiricahua EMA, Standard 2.a. states that a special use permit is required for any animal collection. Once again, this is the purview of the Department and not the Forest, whether through the issuance of a hunting permit-tag or a scientific collecting permit. This Standard must be changed.

**Response:** See responses below.

**Arizona Game and Fish Department Comment:**

Standard 1 "Nonnative species shall not be introduced into any wilderness area"

Standard 2 "Reintroductions shall only occur when a species is determined to be indigenous to the area and when it was extirpated by human-induced events."

These two standards are unnecessary and may create problems with differing definitions of "native" and "indigenous." The Department, which has management authority over wildlife, manages for some nonnative species on the Coronado Forest. This standard unnecessarily puts the Forest and the Department at odds over management authority of state trust responsibility species on federal lands. Moreover, some species may not be considered "native" or "indigenous" because they are not genetically pure strains or because said species cannot be definitively shown to occur in the habitat where reintroductions occur. For instance, in the Pinaleños, five species of

trout are currently managed by the Department. Two of these are "native" to Arizona, but one of these species may be a different race than historically occurred in the Pinaleños, and one or all may be considered "nonnative". The Department recognizes that often the indigenous species is the most obvious choice for reintroduction but sometimes there are reasons why this is impossible or ill-advised. In some cases, native species may have been extirpated but similar species may fill an important ecosystem niche. This is especially true when taxonomic classifications are continually changing. Ramsey Canyon leopard frogs are now considered the same species as Chiricahua leopard frogs and this species is currently in flux and likely will continue to be. Other species this could cause issues with are pronghorn antelope, dusky grouse, Gila trout, Apache trout, and many others.

Making a standard that reintroductions *shall only occur when* a species is determined to be extirpated by human-induced events is biologically ignorant and practically infeasible. Such a standard is designed without regard to the reality of the limits to scientific knowledge. All extirpations are likely to be the result of complex interactions from a number of factors. Quantification of the importance of any one of those factors, including anthropogenic influence, in the extirpation of a species would be extremely difficult if not impossible given the state of our knowledge.

**Arizona Game and Fish Department Recommendation:**

Strike Standard 1 and Standard 2 from Wildlife in Wilderness.

**Response:** Our standards were modified as follows (including footnote):

1. Non-indigenous<sup>2</sup> species shall not be introduced into any wilderness area.
2. Reintroductions shall only occur when a species is determined to be indigenous to the area.

The following “management approach” was also added to section:

- Cooperating with State game management agencies as outlined in policies and guidelines for fish and wildlife management in wilderness.

**Arizona Game and Fish Department Comment:**

Wildlife in Wilderness Guideline:

**Arizona Game and Fish Department Recommendation:**

Language within this guideline should mirror the Policies and Guidelines for Fish and Wildlife Management in National Forest and Bureau of Land Management Wilderness (FS, BLM, and AFWA-June 2006).

**Response:** The guideline was modified as follows:

“Non-indigenous species should not be introduced into areas adjacent to wilderness areas when it is likely that individuals of that species will spread to wilderness areas during ordinary life processes.”

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<sup>2</sup> Determination of whether a species is indigenous will be made in consultation and coordination with State game management agencies.

The following “management approach” was also added to section:

- Cooperating with State game management agencies as outlined in policies and guidelines for fish and wildlife management in wilderness.

**Arizona Game and Fish Department Comment:**

Land Ownership and Boundary Adjustment in Wilderness

**Arizona Game and Fish Department Recommendation:**

Standards - Add Standard: "Locatable Mineral exploration and extraction will be disallowed through withdrawal."

**Response:** Wilderness areas are withdrawal from mineral entry except where valid mineral entry rights existed prior to wilderness designation.

**Arizona Game and Fish Department Comment and Recommendation:**

On page 114, add this management approach: "Ensuring enforcement of restrictions on dogs in the bighorn sheep special management area within the Pusch Ridge Wilderness Area."

**Response:** Management approach added. “Supporting enforcement of restrictions on dogs, domestic sheep, and domestic goats in the Bighorn Sheep Special Management Area within the wilderness area.”

**Arizona Game and Fish Department Comment:**

Recommended Wilderness and Wilderness Study Areas - The Arizona Game and Fish Department has experienced restrictions resulting from Special Land Designations (specifically wilderness) including project delays, increased costs, increased man-hours, etc. This ultimately leads to decreased efficiency in protecting and managing Arizona's wildlife resources.

Language within the plan should recognize that, as habitats become more restricted and fragmented, proactively managing fish and wildlife is necessary and justifiable in these areas to maintain and enhance populations and biological diversity.

The Department supports a level of protection which maintains wildlife values, yet allows flexibility in management as a preferred strategy for the management of public lands. The Department, therefore, does not support designation of additional Wilderness areas.

Some activities that the Department would want allowed in any special designation for areas identified as having Wilderness values include:

- Hunting as regulated by the Department throughout the designated area, without special limitations
- Wildlife surveys, including motorized vehicle and equipment use when appropriate such as the use of planes and helicopters, helicopter landings in remote areas, and chainsaw use to clear deadfall from trails needed for management purposes.
- Wildlife management, including: introduction of native species; removal of undesirable species; use of planes and helicopters; helicopter landings in remote areas; use of motorized vehicles and equipment; capture, marking, collaring and radio-tracking of animals; development and maintenance of physical structures (e.g. bat gates or riparian exclosures)

- Wildlife water development and maintenance, including temporary motorized vehicle use, plane or helicopter use, and use of motorized equipment for specific projects.
- Stream renovation, including chemical removal of exotic fish and reintroduction of native fish, use of motorized vehicles and equipment, development and maintenance of physical structures to manage fish populations.
- Habitat management, including removal of exotic plants, timber or fuel wood removal, brush removal, prescribed fire, etc.

This section should refer to the Memorandum of Understanding between the USFS Southwest Regional Office and the Department, and to its attached *'Policies and Guidelines for Fish and Wildlife Management in National Forest and Bureau of Land Management Wilderness'* (June 2006).

**Arizona Game and Fish Department Recommendation:**

The Department recommends that an alternative be developed which uses alternate means than Wilderness to protect large areas of the Forest from the threat of single use development and that this alternative make judicious use of those means. The Department further recommends that the Forest thoroughly analyze the hindrance Wilderness might impose on managing for climate change.

**Response:** Alternatives were considered with varying amounts of wilderness recommendations. The hindrance of Wilderness designation on managing climate change is thoroughly analyzed through a range of alternatives with varying amounts of recommended wilderness.

The Plan does not suggest wilderness management that is not consistent with the cited MOU.

**Arizona Game and Fish Department Comment:**

Comments on Specific Wilderness Areas -

The Plan recommends two additions to the Wilderness system; The Ku Chish Wilderness Area (WA) at the north end of the 152 Chiricahua Mountains, and the Mt. Graham WA. Mt. Graham has been a Wilderness Study Area for 30 years and therefore managed as a defacto WA. The map for this WA in the Plan is difficult to decipher. Based on participation with the Forest on travel management planning (TMP), the Mt. Graham Wilderness Study Area has roads "cherry-stemmed" into the interior of the Study Area at Carter Canyon, Nuttall Canyon and Frye Mesa. The Department recommends these remain open, as well as extending the length of the road in Carter Canyon an additional 1.09 miles (converted to non-motorized use in the TMP process). Regarding the Ku Chish; there is one road decommissioned by TMP within the WA (4223), but the Department's understanding is that the road is out of service. Another road in Emigrant Canyon (255) needs to remain open and not be impacted by WA designation. Again, it is difficult to see how the proposed map interacts with these roads. An additional Management Approach added on page 129, stating that the Forest will collaborate with state and federal wildlife agencies to restore fish and wildlife populations, would enhance our efforts at Gould's turkey, native fish, and Chiricahua leopard frog reintroductions in these areas

**Response:** Safford RD travel management process is ongoing and would be the proper place to put forth these specific recommendations for roads.

**Arizona Game and Fish Department Recommendation:**

The Forest should amend the EIS to show the cherry stemmed areas on the map, which should include the additional 1.09 miles in Carter Canyon. The Road in Emigrant Canyon needs to remain open and the EIS should show this.

**Response:** The proper place to put forth these specific recommendations for roads is in the travel management process at the district level.

**Arizona Game and Fish Department Recommendation:**

The Forest should add an additional Management Approach on page 129 stating that the Forest will collaborate with state and federal wildlife agencies to restore fish and wildlife populations.

**Response:** The word “restore” was added to the following management approach under “Animals and Rare Plants” as a Forest-wide approach:

“Cooperating and collaborating with State and Federal wildlife management agencies and other partners to monitor and restore wildlife, fish, and rare plant species occurring on National Forest System lands.”

**Arizona Game and Fish Department Comment:**

Desired Conditions in Wilderness and WSA's -

The Department is concerned that thriving wildlife and fish populations are not mentioned in the Desired Conditions section. The Department has experienced issues with other plans when wildlife and fish are not mentioned in the Wilderness section as this has been interpreted that those are not a high priority.

**Arizona Game and Fish Department Recommendation:**

Add the following to Desired Conditions:

1. Wildlife and Fish populations are healthy, robust, and thriving and do not show a trend toward decline or loss of diversity.
2. Wildlife populations are critically important components of naturalness (and, therefore, of wilderness character) in Arizona's wildernesses.

**Response:** Modified language in “Desired Conditions” as follows:

“Wilderness contributes to preserving the natural processes and habitats that sustain native species. Wildlife and fish populations in wilderness areas are thriving. Wilderness habitats are an important component of naturalness and are particularly valuable to threatened and endangered species, where the factors that threaten their existence are greatly minimized.”

**Arizona Game and Fish Department Comment:**

Wilderness Standards under Recommended Wilderness

**Arizona Game and Fish Department Recommendation:**

Add Standard 2. "Locatable Mineral exploration and extraction will be disallowed through withdrawal."

**Response:** We do not have the authority to do this. Mineral withdrawals will be prioritized and applied for through our regular process. Existing claims in the proposed wilderness areas would be subject to valid existing rights. Also, the Forest Service does not have the final authority to ensure the withdrawal, therefore, the FS can only recommend withdrawal.

**Arizona Game and Fish Department Recommendation:**

Add Standard 3. "Ecological integrity, including maintenance and enhancement of native fish and wildlife values will be prioritized over aesthetic values."

**Response:** We don't think it's appropriate to prioritize any value over another.

**Arizona Game and Fish Department Comment:**

Wilderness and WSA Guidelines -

Again, Wildlife and Fish are missing from the Guidelines as high priority Wilderness values.

**Arizona Game and Fish Department Recommendation:**

Add Guideline: "Wilderness Study Areas, recommended Wilderness, and Designated Wilderness Areas will be managed to maintain and enhance wildlife and fish populations at optimal levels as a high priority Wilderness value."

**Response:** We recognize that wildlife is an important component and have modified the plan to reflect that status.

**Arizona Game and Fish Department Comment:**

Wild and Scenic River Desired Conditions -

Wild and Scenic rivers are extremely important native fish and aquatic wildlife habitat. Native fish and wildlife management must be recognized in the Forest Plan as a high priority resource need in any Wild and Scenic desired conditions to avoid situations where other resource needs and human aesthetics trump survival of imperiled fish and wildlife.

The Department fully supports the following: "Aquatic habitat is maintained in a condition with low substrate embeddedness, abundant aquatic food supply, and stable streambanks." However we recommend adding further clarification.

**Arizona Game and Fish Department Recommendation:**

Add the following to Desired Conditions:

"Where desired, native fish and wildlife populations are thriving without threat of competition from non-native competitors.

**Response:** Our current desired conditions adequately covers these points as well under the "Invasive Species" section.

**Arizona Game and Fish Department Recommendation:**

Aquatic habitat and desired fish assemblages are maintained using methods that may include fish surveys, non-native fish removal utilizing nets or battery or gas powered electrofishing equipment, construction and maintenance of fish barriers, and chemical renovations.”

**Response:** Thank you for your comment. We already support these activities as identified in the management approach under “Animals and Rare Plants” as a Forest-wide approach:

“Cooperating and collaborating with State and Federal wildlife management agencies and other partners to monitor and restore wildlife, fish, and rare plant species occurring on National Forest System lands.”

**Arizona Game and Fish Department Comment:**

Wild and Scenic River Guidelines -

The Department is concerned that Wild and Scenic River designation may inhibit our ability to manage for native fish in the most effective and efficient manner.

**Arizona Game and Fish Department Recommendation:**

Add Guideline: "For all Wild and Scenic River designations, full consideration will be given to the potential impacts on the ability of the Forest and the Arizona Game and Fish Department to efficiently and effectively manage fish and wildlife resources to maintain and enhance fish and wildlife values associated with the rivers. Specific management actions to maintain and enhance fisheries values may include such activities as fish surveys, non-native fish removal utilizing nets or battery or gas powered electrofishing equipment, construction and maintenance of fish barriers, and chemical renovations."

**Response:** Thank you for your comment, we fully intend to work with Arizona Game and Fish Department as identified in the management approach under “Animals and Rare Plants” as a Forest-wide approach:

“Cooperating and collaborating with State and Federal wildlife management agencies and other partners to monitor and restore wildlife, fish, and rare plant species occurring on National Forest System lands.”

**Arizona Game and Fish Department Comment:**

Wild and Scenic Rivers Standards

**Arizona Game and Fish Department Recommendation:**

Add Standard 2. "Locatable Mineral exploration and extraction will be disallowed through withdrawal."

**Response:** In most locatable minerals operations, the Forest Service does not have the legal discretion to deny a proposal to explore for and remove the minerals. The approval of a withdrawal is at the discretion of the U.S. Department of the Interior, and the Forest Service may only make recommendations to them for mineral withdrawals.

**Arizona Game and Fish Department Recommendation:** Add Standard 3. "Ecological integrity, including maintenance and enhancement of native fish and wildlife values will be prioritized over aesthetic values."

**Response:** Desired condition states, “These rivers exist in a free-flowing condition with a range of flows that provide optimum conditions for native fish and wildlife and scenic quality.”

Wild and scenic river designation by Congress identifies “outstandingly remarkable values” for each individual river when designated.

**Arizona Game and Fish Department Comment:**

"Salable Minerals extraction will not be allowed."

**Arizona Game and Fish Department Recommendation:**

Certainly these areas warrant protection from mining exploration and mining for locatable minerals. The Department recommends the Forest amend the plan to withdraw all specially designated areas from mineral exploration and extraction.

Add Standard 2. "Locatable Mineral exploration and extraction will be disallowed through withdrawal."

**Response:** In most locatable minerals operations, the Forest Service does not have the legal discretion to deny a proposal to explore for and remove the minerals. That approval of a withdrawal is at the discretion of the U.S. Department of the Interior, and the Forest Service may only make recommendations for mineral withdrawals.

**Arizona Game and Fish Department Comment:**

The proposed designation of the Cave Creek Canyon Birds of Prey Zoological-Botanical Area and the extension of the Pole Bridge Research Natural Area (RNA) should not affect Department operations.

**Arizona Game and Fish Department Recommendation:**

The Department supports these designations.

**Response:** Thank you for your comment.

**Arizona Game and Fish Department Comment:**

Chiricahua EMA, Standard 2.a. states that a special use permit is required for any animal collection. This appears to usurp state authority contrary to State and Federal Law, the Department's MOU with the Forest, and contrary to the Wilderness Act as stated above. The Arizona Game and Fish Commission asserts sole authority to issue permits for collection and take for all state trust responsibility species, i.e. all wildlife species not expressly under the authority of the federal government.

**Arizona Game and Fish Department Recommendation:**

Strike "animal" from Standard 2.a.

**Response:** The Standard that is referenced applies only to the South Fork of Cave Creek Zoological Botanical Area (786 acres) and not to the Chiricahua EMA as a whole. Zoological Botanical Areas are areas that the Forest Service has designated to ensure protection of specific biological and zoological communities. They are designated for a special feature such as a rare plant or animal. As such, requiring a special use permit allows the Forest Service to track any plant or animal collections that may have a bearing on the special features of the area. This does not eliminate the requirement to obtain State permission for animal collections in these small research natural areas.

**Arizona Game and Fish Department Comment:**

Tumacacori EMA Standard 1.a. "A special use permit is required for any plant or animal collection"

This appears to usurp state authority contrary to State and Federal Law, the Department's MOU with the Forest, and contrary to the Wilderness Act as stated above. The Arizona Game and Fish Commission asserts sole authority to issue permits for collection and take for all state trust responsibility species, i.e. all wildlife species not expressly under the authority of the federal government.

Moreover, the purpose of this special designation area is not for the purpose of greater management of state responsibility wildlife species.

**Arizona Game and Fish Department Recommendation:**

Strike "animal" from Standard 1 .A.

**Response:** The Standard that is referenced applies only to the Wild Chile Botanical Area (2,836 acres) and not to the Tumacacori EMA as a whole. Botanical Areas are areas that the Forest Service has designated to ensure protection of specific biological communities. They are designated for a special feature such as a rare plant or animal. As such, requiring a special use permit allows the Forest Service to track any plant or animal collections that may have a bearing on the special features of the area. This does not eliminate the requirement to obtain State permission for animal collections in these small research natural areas.

**Arizona Game and Fish Department Comment:**

Goudy Canyon RNA

Arizona Game and Fish Department Recommendation:

Standard 1. a. on page 155 regarding the Goudy Canyon RNA should indicate that prescribed fire to enhance wildlife habitat would be allowed. Bulleted statements 1, 6, and 7 under Management Approaches on page 156 are redundant.

**Response:** Text currently says:

1. Within the Goudy Canyon Research Natural Area:
  - a. Wildlife habitat improvement, water yield improvement, and related improvement projects are prohibited.

In the establishment documentation it specifically states the prohibition of wildlife habitat improvement but does not prohibit prescribed fire for other purposes.

- b. Vegetation manipulation, including timber sale and harvest of forest products, will not be allowed except for approved research purposes.

Management approaches – the two redundant Management approaches were removed.

**Arizona Game and Fish Department Comment:**

Climate Conditions and Trends Consistency-Range Management -

In Chapter 5, Suitability, the second paragraph under Grazing Capability and Suitability on page 167 states that current climate conditions and trends are not outside of historical norms. This is completely contradictory to the beginning of Chapter 2 and Appendix A, which identifies climate change as a major concern within the plan and identifies a potential decrease in forage and water for livestock (pg. 18). It then goes on to state that forage productivity is not currently mapped at a fine scale and not used in range capability determinations.

**Response:** The suitability/capability analysis is based on current conditions that are determined to be within historical ranges. Long-term climate effects are difficult to quantify.

**Arizona Game and Fish Department Recommendation:**

The Department recommends revising Chapter 5 and adding mapping of forage productivity to aid in management as a Desired Condition within the Range Management section on page 88.

**Response:** This level of detail is more appropriately covered under site-specific analysis for individual allotments during review of allotment management. The Forest is in the process of mapping productivity based on soil units but the analysis is not complete.

**Arizona Game and Fish Department Comment:**

Natural Water Sources -

In the Monitoring section on page 179, under Natural Water Sources, the Monitoring Question posed is how many springs have been developed for species recovery? This seems contrary to the Natural Water Sources Objectives on page 57 that identify reconstructing only developed springs, and the Guideline on page 58 to protect natural springs and seeps.

**Arizona Game and Fish Department Recommendation:**

This Monitoring Question should be restated as, "How many stream restoration/development projects and spring reconstructions have been completed for the recovery of species of conservation concern?"

**Response:** Current wording: "How many stream or spring restoration projects have been completed for the benefit of species of conservation concern?" Removed "how many springs have been developed for species recovery."

**Arizona Game and Fish Department Comment:**

The second paragraph on page 204 lists the Aspen fire of 2003 as the largest on record in the Coronado National Forest. That is no longer accurate as the Horseshoe 2 fire was nearly three times that size.

**Arizona Game and Fish Department Recommendation:**

The plan should be reviewed for errors, consistency, and accuracy by multiple disciplines before finalization.

**Response:** Replaced text: "In June 2003, for example, the 84,750-acre, human-caused Aspen Fire on the Coronado National Forest (one of the largest on record) occurred during one of the warmest years on record with one of the latest monsoons.