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GAME AND FISH DEPARTMENT

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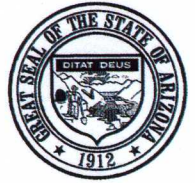
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April 27, 2010

Jeanine A. Derby
Forest Supervisor
Coronado National Forest
300 W. Congress
Tucson, Arizona 85701

Re: Comments on the Coronado National Forest Working Draft Land and Resource Management Plan.

Dear Ms. Derby:

Thank you for providing an opportunity for the Arizona Game and Fish Department (Department) to comment on the Coronado National Forest Working Draft Land and Resource Management Plan dated March 2010 (Plan). The Department recognizes the vital role that lands administered by the Coronado National Forest (Forest) currently play in providing wildlife habitat as well as opportunities for wildlife-related recreation in southeast Arizona. As Arizona's human population continues to grow throughout the life of the Plan, we anticipate that wildlife and the public will become increasingly dependent on Forest lands. It is therefore essential that the Plan not only address current wildlife habitat and recreational needs, but also provide for the high quality habitat and the maintenance of wildlife connectivity both within and between Forest lands in the sky islands. Wildlife habitat connectivity between Forest blocks in the sky islands region is a challenge unique to the Coronado within the National Forest system and therefore the Coronado's Forest Plan must address that unique challenge in ways that no other Forest may.

We offer the following general comments on the plan as a whole, and on the Draft Potential Wilderness Area Evaluation Reports. Specific comments are addressed in the attached table.

COORDINATION WITH THE DEPARTMENT

The Department has historically coordinated well with Forest staff on all aspects of forest planning. We have recently had a large turnover in staff in the Tucson office and as a result some long-standing staff relationships were lost as people have retired or moved on. The Department would like to express our desire to reinvigorate our efforts at close coordination with Forest staff to ensure that coordination is as efficient and effective as possible.

Our Memorandum of Understanding (MOU) with the Forest should provide guidance on any questions that arise regarding the Department's and the Forest's roles and responsibilities regarding communication and coordination. We understand that some staff have felt that the Federal Advisory Committee Act (FACA) precluded our participation on interdisciplinary teams (IDTs) and at project and planning meetings where we have traditionally been most effective at coordination with the Forest. At our joint annual coordination meeting held April 7th and 8th, 2010, the FACA issue was discussed and addressed to the Department's satisfaction.

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We understand that FACA will not preclude the Department from early coordination including participation on IDTs in the future. It is our understanding that the Forest will actively encourage the Department's close participation and coordination at the IDT level on future projects and plans and will include us early in the planning process for efforts in which the Forest expects us to have a keen interest.

GENERAL COMMENTS ON THE FOREST PLAN

Forest Plan Structure

The Department has reservations about the new structure of the Forest Plan. We understand that the Forest has moved away from a detailed plan with multiple detailed specific standards and guidelines to allow for the most flexibility and adaptability in implementation of the plan. Although this seems reasonable on one hand, the Department is concerned that it may also mean that the plan, as a collection of Desired Future Condition statements, provides a vision, but lacks a clear and navigable strategy for achieving that vision. Such a vision without a clearly defined course of action seems to provide for little accountability to the public. The Department would like to see some language in the plan explaining how the desired future conditions will be achieved through implementation planning tiered to the Forest Plan.

Public Land Access

One of the most serious issues facing public land users in southeastern Arizona is the lack of permanent legal public access to Forest lands. Obtaining or securing permanent legal access is one of the most important actions that agencies can take to ensure the recreational future of southeastern Arizona. Legal access issues are often complex, and are not easily solved, especially when dealing with differing opinions from multiple users.

While the Department recognizes a private landowner's right to control access onto and through their private property, we have a concern when a private landowner creates a situation where he has exclusive use and control of adjoining Forest lands. Some private landowners (including some grazing permittees and licensed outfitters/guides) are blocking public access by prohibiting the public from using roads on Forest lands while they themselves drive on roads on the Forest lands. Other private landowners allow their friends to cross their property to drive on Forest lands for recreation (e.g. hunting or camping), but prohibit the general public from the same access to those Forest roads. Some private landowners charge an access fee to any member of the public to cross their private land to access Forest trails, roads, and lands; and some of these owners actually charge different fees to different people. Some residential developers advertise exclusive access to Forest lands for those that purchase property adjacent to the Forest, leaving the general public unable to reach the public land without trespassing. By blocking and controlling access, private landowners are limiting the use of resources and thereby controlling the management of wildlife and other managed resources on Forest lands.

We believe that any roads on Forest lands should be open to all the public. There should be fairness and impartiality for access to Forest land, which belongs to all Americans, not just a privileged few.

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The Department suggests a strategy for resolving access issues and for ending the problem of exclusive use and control of Forest Resources:

1. The Department recommends the Forest gate, lock, and remove from public maps, all Forest access routes, roads, or trails that continue onto Forest land where public access is blocked or denied by the adjacent private landowner.
2. For Forest permittees, the Department recommends as a condition of the permit, that the permittee *must* allow public access to the Forest anywhere the permittee accesses the Forest.

Actions 1 and 2 will go a long way toward ending exclusive use and control of Forest lands and restore equal Forest access rights for all citizens. Adjacent landowners should have no more vehicle access to use public land than is available to the general public.

3. Identify an Acquisition Zone as part of the Land Use Zone system, outside of the Forest boundary. Within the Acquisition Zone, negotiate for rights-of-way, seek alternative public access from cooperative landowners, and use the Forest's condemnation authority to gain access rights. The Forest, as a land manager of these public lands, possesses condemnation authority to gain access rights. However, condemnation authority has not been used for decades by the Forest for acquiring access.

Road Management

Department staff previously compared the draft Land Use Zones to our previous recommendations on the Travel Management Plan (TMP). Because the Land Use Zone maps provided are of insufficient detail for us to see if our recommendations were incorporated, we are reiterating those recommendations here. We made note below of roads which we recommended in the TMP to be designated as Open, which are not shown on the Land Use Zone maps and which also fall within the Wild Backcountry Land Use Zone. We recommended that either: 1) these areas be identified as Roded Backcountry, or 2) that these roads be shown on the Land Use Zone Map so that that it is clear to the public that these will be open roads within Wild Backcountry. We believe that all of the following roads are needed by the public for adequate public access to public land.

Roads are listed by mountain range, Forest or Department assigned number, and then township, range, and section. Some of these roads were assigned base map Forest Service Road numbers in the TMP process; others we assigned a number for identification on the TMP maps. The Department is still referring to these roads by both numbering systems.

Whetstone Mountains:

#41 Existing Road in, T19S, R19E, Section 30 (FS4842)

Huachuca Mountains:

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#19 T21S, R18E, Sec. 26
#20 T21S, R18E, Sec. 25
#31 T21S, R16E, Secs. 26, 27, 35
#32 T21S, R17E, Secs. 17, 20
#33 T21S, R16E, Secs. 1, 2

Chiricahua Mountains:

Silver Peak Road: T17S, R30E Secs. 21 & 29
Sulphur Canyon Draw: T18S, R31E, Secs. 25 & 26
FS4276 Rock Creek Extension of Existing 259: T18S, R29E Secs. 2, 3, 10
Onion Saddle to Shaw Peak trailhead: T17S, R30E, Sec. 22

Peloncillo Mountains:

Access is currently limited by the landowner to Skeleton Canyon Roads FS702 and FS703. The Department and Forest are working to develop several access alternatives from New Mexico or across State Trust Land in Arizona. Forest lands in the north and western portions of the Peloncillo Mountains (within Arizona) that are outside of the current "Designated Roadless Area" should be identified in this draft Land Use Zone as Roded Backcountry rather than Wild Backcountry to allow road construction at a later date. These areas include: portions outside of the Roadless Area in T21S, R32E, Secs. 22, 26, 27, 29, 34, and 35, and T22S, R32E, Secs. 2, 3, 4, 5, 8, 9, 10, 11, 14, 15, 16, and 17.

Galiuro Mountains:

Squaw Creek Road (two forks) is currently open through a Department landowner access agreement. T8S, R18E, Secs. 7 and 8 and T8S, R19E, Secs. 12 and 13.

Need for Additional Wilderness

The Arizona Game and Fish Department appreciates the effort that the Forest has put forth to identify areas for Wilderness designation. Hunting was identified as a primary or secondary recreational activity in all proposed potential wilderness areas. The Department agrees that all of the identified potential wilderness expansion areas have wild, backcountry values and we would like to see those areas managed to maintain those values. We also understand that in some instances multiple use management on National Forest land can lead to overuse or an area leading to adverse impacts to wildlife and habitat. In some cases multiple-use becomes single-use, and wildlife habitat can be completely lost, severely degraded, significantly impacted, and/or severely fragmented. In instances where one use dominates all other uses, Wilderness designation may be preferred to that use despite the limitations it may impose on many other uses. Such is the case when an important wildlife habitat is converted to an open pit mine, new freeway, extensive solar development, oil or gas field, severely degraded rangeland, or other use which severely impacts wildlife habitat and eliminating wildlife-related uses. In those cases the Department sees Wilderness designation preferable to the severe degradation or loss of wildlife habitat.

However, the Department finds that a level of protection which maintains wildlife values, but allows flexibility in management is often a better strategy for the management of public lands. The Department, therefore, has some concerns with designation of additional wilderness areas. The Department has had numerous difficult episodes attempting to achieve our mission in designated wilderness areas. No matter how specific or general the designation language is crafted, wilderness often seems to slow or stop us from doing our work, or at least creates substantial additional compliance hurdles in accomplishing that work.

The kinds of activities that we believe could be complicated or obstructed by wilderness designation include:

- Creation of alternate access routes when existing designated access routes are closed across private land.
- Aquatic management, which might include physical removal of noxious weeds, application of chemicals for weed or fish removal, stocking of fish, construction and reconstruction and maintenance of habitat structures in aquatic habitats, general access improvements, etc.
- Wildlife surveys, sometimes by motorized vehicle, sometimes by plane and helicopter, sometimes including placement of remote monitoring stations (e.g. cameras or scent poles).
- Wildlife management, including introduction or removal of species, possibly including use of planes and helicopters, possibly including marking or collaring of animals and radio tracking of animals, use of motorized vehicles and equipment, development and maintenance of physical structures (e.g. bat gates or riparian exclosures).
- Wildlife water development and maintenance, sometimes including motorized vehicle use, plane or helicopter use, and use of motorized equipment.
- Stream renovation, including chemical removal of exotic fish and reintroduction of native fish, and possibly including development and maintenance of physical structures to help manage fish populations, monitoring of native fish populations.
- Habitat management, which could include removal of exotic plant species, timber or fuelwood removal,

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brush removal, prescribed fire, etc.

One would think that those activities could be allowed by specific wording in designation documents, but our experience has been that regardless of how specific or general the wording, our activities are hampered in areas that are designated as wilderness. It seems that different federal employees interpret wilderness designation in different ways, and new hurdles are often put in our path. Furthermore, we cannot predict what new activities might be needed in the future. Any specific wording to allow planned activities could exclude some needed activity that we could not have predicted.

Nevertheless, the Department recognizes the benefits that wilderness protection can have on wildlife habitat, particularly as it relates to development and infrastructure projects including new mining projects, new development of mining claims, transmission line and pipeline proposals, energy development proposals including wind, solar, gas, and oil extraction, construction of new highway and freeway routes, and other activities that may be harmful to wildlife. The Department concedes that Wilderness designation will provide a higher level of protection for the land and in some cases may be the only viable strategy for achieving that protection. The importance of this higher level of protection is undeniable given recent proposals for large new open pit mines, new corridors for large transmission lines, and the Interstate 10 bypass proposal.

Wilderness designation may provide an increased awareness of prohibitions for illegal off-road travel. It is unclear how much the designation will really impact off-road use, since off-road use is already currently illegal on the Forest. Increased education, signage, and enforcement of off-road use are needed regardless of Wilderness designation.

Rather than Wilderness designation, the Department would be much more supportive of another kind of special designation for areas recognized as having important ecosystem values. A greater level of protection which allows for beneficial management of wildlife, while protecting wildlife habitat from extensive development and infrastructure projects, would be the type of designation the Department could support without reservation. For instance we have been very supportive of the designation of National Conservation Areas such as those on BLM land in southeastern Arizona.

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

- Retention of existing public use roads that provide necessary public access to the area, including a reasonable road width to allow for parking and camping along the road.
- Creation of new public roads that access the areas when existing access is closed by private landowners.
- 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

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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 fuelwood removal, brush removal, prescribed fire, etc.

Please find attached a table of comments on specific components of the Plan and on each Draft Potential Wilderness Area. If you have any questions please feel free to contact me at 520-628-5376, or jwindes@azgfd.gov.

Sincerely,



John Windes
Habitat Program Manager

JDW:jw

cc: Laura Canaca, Project Evaluation Program Manager
Raul Vega, Regional Manager