



November 4, 2020

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Sent via email: comments-southwestern-apache-sitgreaves@usda.gov

RE: Black River Landscape Restoration Project Environmental Assessment

Arizona Sportsmen for Wildlife Conservation (AZSFWC) is a 501c-3 organization dedicated to wildlife conservation, habitat improvement, youth recruitment and retention, as well as educating sportsmen and women on issues important to their passions. AZSFWC has 43 member, affiliate and associate organizations representing in excess of 10,000 sportsmen and women who span the spectrum of hunting, angling, shooting and outdoor recreation groups and businesses across Arizona.

AZSFWC appreciates the opportunity to comment on the Environmental Assessment (EA) for the Black River Landscape Restoration Project (Project) located on the Apache-Sitgreaves National Forest (Forest). Areas within this planning area provide habitat for a diverse array of game and nongame wildlife species as well as native/sport fish that are of significant economic and recreational importance to local communities, our members, and Forest visitors from Arizona and other states.

The EA includes a new Alternative #3, which was developed in response to public input and now represents the preferred alternative. AZSFWC believes this alternative is best suited to address the Purpose and Need for this EA and accomplish important habitat restoration objectives. That said, our support for Alternative #3 is conditional on three important actions that must occur.

1. As noted in our comments on the Management Plan for the Heber Wild Horse Territory, the unchecked expansion of feral horses on the Forest poses an unacceptable and growing risk to fish, wildlife, and their habitats. The Black River EA planning area is occupied by feral horses, which are causing significant damage to soils, vegetation, and watershed conditions. The EA notes that this is occurring, stating (p. 82) that:

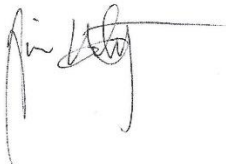
"The 2011 Wallow fire burned large sections of the boundary fence between the Fort Apache Indian Reservation and the ASNFs. Feral horses are common in the Centerfire Creek watershed. Their abundance is increasing, since they have no natural predators, and their distribution depends on the availability of adequate water and forage. Management responsibility lies with the State of Arizona. Effects of these animals are like those for elk or deer but are often more severe. Areas experiencing particularly severe effects from free-roaming horses (e.g. Wildcat Creek, Centerfire Creek, Boggy Creek)."

We take issue with the assertion that the impacts of feral horses are in any way comparable to those of native ungulates and management responsibility for these animals rests with the state of Arizona. Both statements are demonstrably inaccurate. AZSFWC understands that management of feral horses is not the focus of this EA, however, these animals must be removed from the Black River area before initiating expensive and time-consuming restoration efforts that would otherwise be compromised.

2. It appears that forest restoration treatments covered in the EA are intended to mirror those that will occur on surrounding areas included in the Rim Country EIS for the Four Forest Restoration Initiative (4FRI). We appreciate that alignment and note that the 4FRI stakeholders and Forest Service planning team have collaboratively developed additional changes to treatment design that are not included in the Black River EA. These additional changes should be included as much as possible in order to simplify implementation and ensure a consistent approach across the landscape.
3. Finally, we note that the EA places considerable focus on aquatic restoration actions that will benefit native fish, primarily Apache trout. AZSFWC supports those actions, but feels it important that they be done in a manner that recognizes and benefits existing populations of recreationally-important sport fish within the planning area, including brown trout, brook trout, and hybrid rainbow X Apache trout.

AZSFWC and 28 of our member organizations (list attached) support this important effort with the conditions as outlined above.

Thank you!



Jim Unmacht
Executive Director



AZSFWC Organizations Conditionally Supporting Black River Landscape Restoration Project EA

Anglers United
AZ Antelope Foundation
AZ Bass Federation Nation
AZ Big Game Super Raffle
AZ Chapter National Wild Turkey Federation
AZ Chapter of Safari Club International
AZ Council of Trout Unlimited
AZ Deer Association
AZ Desert Bighorn Sheep Society
AZ Elk Society
AZ Flycasters Club
AZ Houndsmen's Association
AZ Outdoor Adventures
AZ Outdoor Sports
AZ Predator Callers
Christian Hunters of America
Mohave Sportsman Club
Outdoor Experience 4 All
Southern AZ Chapter Quail Forever
Southwest Wildlife Foundation
SRT Outdoors
The BASS Federation
Theodore Roosevelt Conservation Partnership
Valley of the Sun Chapter Quail Forever
1.2.3.Go...
Sportsmen's Business Alliance
Ben Avery Clay Busters Governing Board
Conserve and Protect AZ