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Forest Plan Revision
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RE: Scoping comments on the Tonto National Forest's Notice of Intent Management Direction of Its Existing 1985 Forest Plan as part of the Forest Plan Revision process

Please accept the following scoping comments from Arizona Sportsmen for Wildlife Conservation (AZSFWC) on the Tonto National Forest (TNF) Final Draft 'Needs for Change' and Notice of Intent for the Tonto Forest Plan Revision. Our comments will identify issues we have some concerns about with respect to the interests of sportsmen and women who participate in outdoor recreational activities, as well as our conservation, habitat, stream and riparian area concerns within the TNF's three million plus acre landscape.

AZSFWC is a 501c-3 organization dedicated to wildlife conservation, habitat work, youth recruitment and retention, as well as educating sportsmen and women on issues important to their passions. We have 32 member organizations and 6 affiliate members that reach across the spectrum of hunting, angling and outdoor recreation groups from all across Arizona.

The TNF identified a Purpose and Need, "Needs for Change" (NCF) and Proposed Actions outlining 54 components to consider in the Plan Revision. There were some additions too, such as 'Social and Economic Conditions', 'Recreation', 'Cultural and Historic Resources and Tribal Uses', 'Land Ownership, Status, Use, and Access' and 'Designated Areas'. While we are fine with those additions, we believe it is critical the TNF consider and evaluate within each of those topics "The Importance of Hunting and Hunting Heritage" per Executive Order (EO) 13443 which directs the Department of Agriculture 'to facilitate the expansion and

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enhancement of hunting opportunities and the management of game species and their habitat.'

Specifically, the TNF must:

- *Evaluate the effect of agency actions on trends in hunting participation and, where appropriate to address declining trends, implement actions that expand and enhance hunting opportunities for the public;*
- *Consider the economic and recreational values of hunting in agency actions, as appropriate;*
- *Manage wildlife and wildlife habitats on public lands in a manner that expands and enhances hunting opportunities, including through the use of hunting in wildlife management planning;*
- *Work collaboratively with State governments to manage and conserve game species and their habitats in a manner that respects private property rights and State management authority over wildlife resources;*
- *Establish short and long term goals, in cooperation with State and tribal governments, and consistent with agency missions, to foster healthy and productive populations of game species and appropriate opportunities for the public to hunt those species;*
- *Ensure that agency plans and actions consider programs and recommendations of comprehensive planning efforts such as State Wildlife Action Plans, the North American Waterfowl Management Plan, and other range-wide management plans for big game and upland game birds;*
- *Seek the advice of State and tribal fish and wildlife agencies and, as appropriate, consult with the Sporting Conservation Council and other organizations, with respect to the foregoing Federal activities.*

Conservation of wildlife resources upon all lands within Arizona, including within the TNF is the trust responsibility of the Arizona Game and Fish Department (AZGFD), and requires active management of wildlife and habitat resources to ensure that these resources are conserved for present and future generations.

The TNF not only has some of the most storied and productive cold water fisheries in Arizona, but it contains vital water sources for millions of people within the warm water lakes formed on the Verde and the Salt Rivers. Those bodies of water are home to some of the most important warm water recreational fisheries in the State!

The TNF is also home to critical and important wildlife habitat for Mule deer, Coues deer, Elk, Bear, Desert Bighorn Sheep, Rocky Mountain Bighorn Sheep, Javelina, Turkey and multiple species of quail and other small game. All of these species are not only important to sportsmen and women, but are enjoyed by thousands of citizens that hunt, fish, and simply enjoy viewing wildlife.

We would like to see these resources conserved, and we believe that the proposed forest restoration combined with thoughtful riparian rehabilitation can produce resilient, sustainable and highly functioning watersheds and landscapes that provide for healthy fish and wildlife populations.

Our suggested priorities for the NOI and improvements to the TNF follow. We believe these considerations will conserve, protect and promote viable healthy populations of both big and small game, as well as non-game species and help restore and protect coldwater fish species, enhance warm water fishing opportunities and preserve the hunting and angling components within the TNF Plan. We look forward to working with the TNF on both the revision and implementation of the Forest Plan.

Comments on Notice of Intent (NOI):

Our comments regarding the Notice of Intent follow by document order, offering support where we agree on the NOI statements and offering additional alternatives and/or recommendations where we feel the document is lacking.

1. Changes throughout the plan (1-4):

- *We support the statement that there is a need for using the best science available and where appropriate. Now more than ever there is supportive research that provides the necessary tools and management options to incorporate innovative science toward better and stronger forest ecosystem management.*
- *We believe there is a need to show the correlation between the Four Forest Restoration Initiative (4FRI)¹ and TNF and how they will integrate with each other. In particular the recent scoping for the Rim Country EIS includes portions of the TNF. The 4FRI is an important ongoing body of work that should benefit the TNF as it proceeds in its plan revision process. We recommend the TNF clarify the inter-relationship of these two related planning efforts.*
- *In addition, there is a need for the Arizona State Wildlife Action Plan strategies and Rim Country EIS to align.*

2. Monitoring (5):

- *Monitoring is one of the most valuable tools for stronger management of our forest resources; however, information obtained through monitoring must be used in a productive way and not be shelved. We support a strong monitoring and evaluation relationship in this plan.*
- *Conservation of wildlife resources upon all lands within Arizona, including within the TNF is the trust responsibility of the Arizona Game and Fish Department*

¹ Four Forest Restoration Initiative: collaborative, landscape-scale initiative designed to restore fire-adapted ecosystems in the Southwestern Region. <https://www.fs.usda.gov/main/4fri/home>.

(AZGFD), and requires active management of wildlife and habitat resources to ensure that these resources are conserved for present and future generations.

- Active management of wildlife and habitat resources would include but are not limited to water developments and catchments forage resources, fence modifications or removal, and impacts from other uses.

3. Collaborations and Partnerships (6-8):

- Partnerships come in a variety of packages. We support the NFC's statements and encourage the Forest to actively seek and partner with all entities. Many nonprofit organizations can provide economic and citizen science assistance in implementing program plans. We encourage the TNF to be aware of the variety of partnerships beyond the various government agencies.

4. Ecological Sustainability (9-14):

- Understanding the impacts of climate changes and its impact on conditions and trends on the Forest is a strong directive and we support the TNF for recognizing this management balance challenge. We support the need to strengthen overall the vegetative desired conditions, as it will help further strengthen, maintain, and promote better ecological conditions for riparian and aquatic systems.
- There is a need to manage the Forest and adjoining lands in a manner that maintains/enhances wildlife linkage, movement and migratory corridors for game species and other wildlife, including "at risk" species. NFC statement 13 identifies the need for landscape level restoration but does not relate that need to maintaining/enhancing wildlife linkage, movement, and migratory corridors. NFC statement 24 discusses habitat connectivity and species migration for "at risk" species but does not mention migratory game species such as elk and deer.
- We also believe consistency across Forest boundaries should be pursued when possible, for migration corridors, game retrieval, dispersed camping and access.

5. Landscape Scale Restoration (15-17):

- We support all of the NFC points identified in the document. Implementing more balanced grazing, assessment of OHV use, increasing vegetative cover, and implementing restoration projects are all methods for helping alleviate or diminish the increased impairment of the TNF's soils.
- We fully support adding components in the plan that emphasize landscape scale habitat restoration, benefiting big game, small game and non-game species.

6. Frequent Fire Ecosystems (18):

- *In the Southwest the role of fire in the health of our ecosystem cannot be overstated. We strongly support the focus on this identified need for change. The role that fire plays in our Ponderosa pine forests as well as the desert ecosystems is essential for healthy ecosystems. Currently the condition of the TNF watersheds places them in great jeopardy to wildfire intensities and size that has not occurred in the past. The risk to communities, ecologic health, clean water, air quality, tourism, rural economies and wildlife is high and growing. The TNF must address this in the new plan and find solutions that lower this risk. As mentioned earlier, we recommend the TNF clearly discuss the relationship of the 4FI-planned activities and how it will relate to the TNF plan revision.*

7. Desert Ecosystems (19):

- *Our desert ecosystems are fragile, and we believe it is critical for the plan to contain additional components that address not only the stressors to those environments, but also plans, guidelines and standards to address them. This runs the gamut from invasive species like buffle grass and extends to the adverse impact feral burros are having on the landscape. Control of some of those stressors and invasive species is fine, but consideration should also be given to not only reducing them, but eliminating them from the landscape.*
- *We fully support adding components in the plan that emphasize landscape scale desert habitat restoration, benefiting big game, small game and non-game species too.*

8. Riparian Ecosystems (21-22):

- *We support the TNF's recognition that riparian areas are threatened from a wide variety of impacts. Riparian areas are relatively rare on the TNF and should be an extremely high priority for protection and improved management. Maintaining and improving riparian vegetation conditions will improve conditions for a variety of species on the forest. We suggest the Forest include a NTC to reduce uses that threaten riparian stability. This will include stronger management direction to minimize inappropriate OHV use, lessen grazing impacts and other stressors. Finding partnerships that will support these challenging management issues should be an additional need. We recommend the plan include developing better relationships with partners who have a stake in improving riparian conditions.*

9. Watersheds and Water Resources (23-26):

- *We support all of the NTC items identified under this category. Understanding the economics associated with water resources on the Forest should be a consideration. Establishing partnerships with those users who impact the watersheds should be an addition to the list.*
- *There is a need to identify priority watershed and management activities for restoration of threatened/endangered native trout.*

- *We also believe that not only should stream channels and floodplains remain dynamic and resilient to disturbances, but that same mindset should extend to the lakes within the TNF.*

10. At-Risk Species (27):

- *In addition to supporting the NFC points under this topic, we recommend the TNF include native trout (Gila Trout) and associated habitat. Recognition of the efforts that are underway to restore and protect native trout habitat in the southwest should be included in the plan revision. Habitat degradation and water scarcity among other factors have impacted native trout species and their decline in Arizona. Understanding the impacts and effects of hybridization to native trout from other non-native trout (Rainbow) and predation on native trout from non-native trout will provide stronger plan components that conserve these species. We suggest strong collaboration with the agencies and organizations that are directed toward protecting these important species.*
- *We urge the TNF to assess and address the negative impacts invasive species like burros and horses are having on at risk species across the TNF landscape with special concerns in riparian areas.*
- *There is a need to develop standards and guidelines for these at risk species.*

11. Climate Change (28):

- *While we support the NTC component on climate change we recommend that the plan do more than “consider potential climate change impacts.” We recommend a more proactive approach the Forest take and identify projects and partnerships, coupled with science and management tools that would help water-stressed habitats in dealing with the effects of drier climates. In addition, should a wetter climate scenario occur on parts of the Forest, the plan should be flexible enough to address methods for managing such events.*

12. Social and Economic Conditions (29):

- *There are a great deal of components that utilize the TNF when it comes to contributing to the local economies and you specifically list several, but three additional activities should be specifically listed due to the magnitude of their economic impact, hunting, angling and recreational shooting !*
- *The TNF must include information from and impacts to state values and must identify the importance of Arizona’s rich heritage and historic traditions of hunting and angling; the yearly economic contributions from sportsmen and women including: approximately \$54 million for wildlife and habitat conservation, \$1.2 billion to the state’s economy, support for more than 18,000 jobs, and \$132 million in state and local taxes contained.*
- *Reference State of Arizona Proclamation on hunting and fishing signed by Governor Douglas A. Ducey on September 16, 2016.*

- *Hunting, angling and recreational shooting must be recognized as an appropriate and publicly valued activity under the USFS multiple-use mission and access is a key factor in all those pursuits.*

13. Ecosystem Services (30-31):

- *A stronger media program and outreach to the public in terms of education should be identified in the NTC components. While the public can love the land and water to death, they can also be its guardian if a strong messaging effort is developed. We recommend the TNF increase awareness of the many challenges it faces through a variety of outreach methods. Many of these uses are economic drivers (recreation, hunting and fishing, recreational shooting, grazing, mining, etc.) and collaborative programs with these users should be considered.*
- *Terrestrial and aquatic ecosystem management must be incorporated in the plan when it comes to managing resources commensurate with the multi-use facets involved in the plan.*
- *At the same time, wildlife and wildlife resources must be included as a primary component and characteristic in any form of outreach relative to wild and scenic rivers, recreation management areas including primitive or semi-primitive allocations, wilderness, recommended wilderness, etc.*

14. Timber, Forest and Rangeland Resources (32-35):

- *We recognize the long historical and cultural ties associated with grazing on the TNF, but are encouraged that the TNF recognizes there have been ecological impacts associated with some of those past grazing practices. We believe the TNF needs to make a concerted effort in working with permittee's to ensure that future grazing management on the TNF is improved and specifically responds to the needs in protecting streams, riparian areas and other important wildlife habitats.*
- *Implementing the best components of the Reading the Range program into the plan revision, based on the success it currently experiences, is a start. Building stronger relationships with permittee's and managing for the health of the ecosystem is paramount.*
- *In the process, we also believe it is critical to develop standards and guidelines for those rangelands in order to ensure sufficient cover and food remain for wildlife.*
- *Finally, when discussing grazing, wildlife should not be considered as a major human alteration that impacts riparian areas. Wildlife grazing has evolved as a natural component of those ecosystems.*

15. Recreation (36-39):

- *As one of the most visited national forests in the country, there is a strong need to increase partnerships with recreation users, expand outreach to nontraditional users, and educate the public as to the impacts from too much recreation use, on the land, water and wildlife.*

- *With respect to sensitive riparian zones, the plan revision needs to carefully look for opportunities to reduce the impact of overuse while at the same time providing high quality recreation experiences.*
- *With respect to the TNF's lakes, the TNF needs to demonstrate to the recreational public their "Tonto Pass" is being put to use for the benefit of the resource and the users. While the boat ramps are open most of the time, the ramadas, the cleaning stations and other facilities are usually closed.*
- *There is a need to work with the Salt River Project (SRP) on controlling lake levels to optimize the fish populations and the various spawning times.*
- *There is a need to manage the TNF to provide quality fish and wildlife habitat for species of economic and recreational importance, including both native and non-native sport fish, elk, deer, sheep, turkey, bear, quail and other small game.*
- *With respect to hunting, there is a need to provide direction on the use of motorized big game retrieval (MBGR) on the TNF that is consistent with all the national forests throughout Arizona. Inconsistent rules on MBGR in national forests and other public lands in Arizona create confusion among hunters and forest users, while at the same time complicating enforcement activities.*
- *The same situation exists with dispersed camping. The TNF should strive to seek consistency with the other national forests so recreational users receive a consistent and similar message on the dispersed camping rules.*
- *There is a need to maintain access across the TNF and utilize tools like the Sportsmen's Values Mapping program put together by the AZ Game & Fish Department and the Theodore Roosevelt Conservation Partnership. <http://azqfd.maps.arcgis.com/apps/MapSeries/index.html?appid=72ef284e22ab441b81c72472409c5d24&autoplay>*
- *The benefits of recreational shooting should be expounded upon and encouraged, not solely viewed as a source of conflict with other recreational users.*

16. Scenic Character and Mineral Resources (40-43):

- *We would agree with the Scenic character component as a consideration in your plan, but also believe that while you aspire to maintain scenery, you do so with wildlife and wildlife habitat at the forefront too.*
- *Wildlife and wildlife habitat also need to play a major role in consideration of any potential landscape changes or alterations, ie; transmission lines, wind, solar structures and any mineral extraction.*
- *In addition to recognizing the need to address desired conditions for transmission corridors and renewable energy generation on the Forest, the plan must also recognize the impacts and need to mitigate current and past mining activities. Surface and Subsurface resources are affected by Mineral development, which can have significant effects on watershed health and*

wildlife habitat conditions. The TNF plan should contain guidelines that address current and future mining potential.

17. Infrastructure (44):

- *We agree sustainable infrastructure is important for the TNF in the years ahead. Historical roads and access points need to be considered in any planning effort for the benefit of recreational users as well as administration and maintenance.*
- *Consideration should be given to a complete inventory of all roads (both system and non-system) and then in concert with recreational users, assess the road inventory to ensure that reasonable access and dispersed recreational opportunities are maintained.*
- *We also believe it is important to perform a complete inventory of existing water developments (dirt tanks, catchments, drinkers, water holes, etc) throughout the TNF, marking locations, conditions, and their respective impact on the wildlife in the area. This inventory could then be scrutinized for maintenance opportunities, refurbishment, replacement, or even elimination. What exists, what works and what is having a positive impact on wildlife in the TNF?*
- *We believe a similar opportunity exists for elimination of remains and hazardous remnants related to past grazing and mining activities. If the old fences, old corrals, loading chutes, etc are of no historical significance, they should be removed or the hazard eliminated.*

18. Land Ownership, Status, Use and Access (49-52):

- *We strongly believe flexibility in the plan components is important for efficient management of areas of special status. A prime example is the necessity for limited mechanized intrusion by the AZGFD in wilderness areas for wildlife management, such as surveys, assessments or captures.*
- *We also believe the TNF should consider acquisition of Right of Ways across private land where appropriate, to insure both public and administrative access.*

19. Designated Areas (53-54):

- *Wildlife and wildlife resources must be included as a primary component and characteristic of any special land use designation, including but not limited to: wild and scenic rivers, recreation management areas including primitive or semi-primitive allocations, wilderness, recommended wilderness, etc.*
- *We also recognize there are some boundary issues with current TNF wilderness areas that threaten access to long utilized travel corridors. We recommend that the Forest work with partners and Congress in this Revision process to fix those issues.*

- *For any identified, recommended, or proposed special land use designation, the TNF must disclose the social and economic impacts and the impacts to the AZGFD's trust responsibilities and statutory authorities of this conversion from multiple-use to special use. Specifically, the AZGFD's ability to manage wildlife and the economic impacts associated with loss of recreational opportunities.*
- *While we understand there needs to be a process by which to evaluate potential new wilderness areas, special management areas, and wild and scenic rivers as examples, we would caution you on the potential ramifications of any new special designations.*
- *Federal lands comprise 42% of Arizona's land mass, of which more than 43% have special land use designations, with significant restrictions relating to the public's ability to recreate and the AZGFD's ability to fulfill its trust responsibilities for wildlife management. Currently, 77% of Arizona lands harbor restrictions on public access and recreation through ownership (private, state, and tribal) or federal special land use designations, leaving only 23% free of restrictions and open for public use.*
- *Currently, 4.5 million acres in Arizona already have a wilderness designation. With an additional 5.8 million acres of special land use designations in the form of National Monuments, Parks, Wildlife Refuges, Conservation Areas, Areas of Critical Environmental Concern, Wild and Scenic Rivers, and Wilderness Characteristics Areas, the State has experienced a systematic loss of diverse recreational opportunities and an erosion of the AZGFD's ability to proactively manage wildlife.*
- *Special land designations on these roughly 10 million acres, have subjected the AZGFD to experience extensive and widespread project delays, elevated costs, man-hours and legal challenges, which has resulted in decreased efficiency in the conservation and management of Arizona's wildlife resources.*
- *Finally, we also recognize that some areas of Wilderness are receiving significant recreational use. If current wilderness areas on the TNF are experiencing overuse, it seems logical that the TNF consider management actions that protect what is currently available, prior to creating additional areas that might experience similar increased threats.*
- *At a minimum, a plan for addressing how the TNF will protect future designations should be developed with consideration of the impact that special designation will have on the ability of the AZGFD to proactively manage wildlife and wildlife habitat, and how it will impact recreational use.*

We are committed to conserving, restoring and protecting the unique fish, wildlife and habitat values of the TNF. We appreciate the opportunity to participate in the forest plan revision process and would like to work cooperatively with the TNF staff on the issues and concerns outlined above.

Thank you!

A handwritten signature in black ink, appearing to read "Jim Unmacht", with a long horizontal line extending to the right from the top of the signature.

Jim Unmacht
Executive Director

CC: Arizona Sportsmen for Wildlife Conservation Board
Arizona Game & Fish Department