



January 22, 2019

Annette Fredette  
Forest Planner  
Coconino National Forest  
1824 S. Thompson Street  
Flagstaff, AZ 86001

RE: Coconino National Forest Monitoring Transition to Focal Species

Dear Ms. Fredette:

Arizona Sportsmen for Wildlife Conservation (AZSFWC) appreciates the opportunity to comment on your Forest Monitoring Transition to Focal Species.

Conservation of wildlife resources upon all lands within Arizona, including those within the Coconino National Forest (CNF) with the exception of tribal lands, are the public trust responsibility of the Arizona Game and Fish Department (AZGFD) through authority of the Arizona Game & Fish Commission under Title 17 of the Arizona Revised Statutes. That responsibility requires active management of wildlife to ensure those resources are conserved for present and future generations.

The CNF proposal defines “focal species” as follows:

Focal species are defined by the 2012 Rule as “A small subset of species whose status permits inference to the integrity of the larger ecological system to which it belongs and provides meaningful information regarding the effectiveness of the plan in maintaining or restoring the ecological conditions to maintain the diversity of plant and animal communities in the plan area. Focal species would be commonly selected on the basis of their functional role in ecosystems” (36CFR §219.19).

AZSFWC would suggest pronghorn fit these criteria quite well!

Your proposed revised plan leaves the Mexican spotted owl listed as a focal species and adds four species of birds, but eliminates pronghorn from the plan.

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The proposal also states:

Pronghorn were not carried forward as focal species for grasslands since they are difficult to effectively monitor, and they are managed as a game species by the Arizona Game and Fish Department. As such, detectable population changes in response to forest management activities would be more difficult to discern.

AZSFWC would respectively disagree with that conclusion.

AZGFD actively manages pronghorn across Arizona including on the CNF. They also identify pronghorn as a Species of Greatest Conservation Need (SGCN) due to habitat loss that has occurred over the years. That concern alone is the reason AZGFD, in concert with the Arizona Antelope Foundation (AAF) along with other NGO's have spent both thousands of dollars and thousands of volunteer hours working on grassland restoration on the CNF, Anderson Mesa is a prime example.

AZSFWC questions where in 36CFR §219.19 does it preclude a focal species based upon how it is managed? It states:

“a species of conservation concern is a species, other than federally recognized threatened, endangered, proposed, or candidate species, that is known to occur in the plan area and for which the regional forester has determined that the best available scientific information indicates substantial concern about the species' capability to persist over the long-term in the plan area.”

This definition tracks with the AZGFD identification of pronghorn as a SGCN.

AZSFWC agrees with the AZGFD contention that pronghorn are **not** difficult to effectively monitor. In fact AZGFD annually performs aerial surveys within the forest for pronghorn and shares that information each year. AZGFD also has GPS collar information on 60 pronghorn south of I-40 that can be used by the CNF in making informed land management decisions. AZGFD has also undertaken numerous long term telemetry studies north of I-40 in the past as well, which could provide data that might be useful in monitoring population fluctuations relative to forest management.

Since pronghorn are managed as a game species, AZSFWC would suggest that should make them even more favorable as a focal species due to that attention alone!

Pronghorn are currently being used by the CNF as a management indicator species for grasslands, and if they would remain as such, would provide diversity in the list focal species currently proposed.

Finally, one last concern relates to the AZGFD efforts in working with multiple landowners in restoring grasslands called the Northern Arizona Grassland

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Initiative. Some of the areas slated for future habitat enhancement border both the CNF and the Kaibab NF, so for consistency across the landscape, common metrics would be important.

AZSFWC would urge the CNF to keep pronghorn as a focal species for the CNF grassland ecosystems. We also know the AZGFD has been a long term partner with the CNF on habitat matters across the forest and we would encourage that partnership to continue.

Thank you.

Yours in Conservation,

A handwritten signature in black ink, appearing to read 'Jim Unmacht', with a long horizontal flourish extending to the right.

Jim Unmacht  
Executive Director

Arizona Sportsmen for Wildlife Conservation (AZSFWC) is a 501c-3 non-profit organization dedicated to wildlife conservation, habitat work, youth recruitment and retention, as well as educating sportsmen and women on issues important to their passions. AZSFWC consists of 43 member, affiliate, and associate groups that reach across the spectrum of hunting, angling, shooting, outdoor recreation and businesses from all across Arizona. Our member groups represent in excess of 10,000 sportsmen and women from Arizona.

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