



Interested Person Request

I would like to participate as an interested person in the objection resolution discussions for one or more of the identified objection issues for the Tonto National Forest Plan Land Management Plan Revision.

Name: Kestrel Kunz, Southern Rockies Associate Stewardship Director; Hattie Johnson, Southern Rockies Stewardship Director; Kevin Colburn, National Stewardship Director

Affiliation: American Whitewater

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Name of lead interested person (if more than one): Kestrel Kunz

I am interested in participating in any resolution discussions with the following objector(s) and on the following objection issues:

1. AZ Game and Fish Commission, Leland "Bill" Brake: Eligible Wild and Scenic Rivers and Management of Eligible and Designated Wild and Scenic Rivers
 - a. American Whitewater opposes the AZ Game and Fish Commission's objection. The basis of the objection is that management of eligible Wild and Scenic Rivers may conflict with management of native fish species. However, that is beyond the scope of Wild and Scenic eligibility criteria, which are free-flow character and presence of at least one Outstandingly Remarkable Value. American Whitewater and our members are deeply connected to these rivers and our coalition comments on the DEIS demonstrate that numerous rivers in the Forest meet the criteria for eligibility determinations.
2. AZ Game and Fish, Clayton Crowder: Eligible Wild and Scenic Rivers and Management of Eligible and Designated Wild and Scenic Rivers
 - a. American Whitewater opposes the AZ Game and Fish Department's objection. The basis of the objection is that management of eligible Wild and Scenic Rivers may conflict with management of native fish species. However, that is beyond the scope of Wild and Scenic eligibility criteria, which are free-flow character and presence of at least one Outstandingly Remarkable Value. American Whitewater and our members are deeply connected to these rivers and our coalition comments on the DEIS demonstrate that numerous rivers in the Forest meet the criteria for eligibility determinations.



3. Freeport-McMoRan Inc., Francis McAllister: Eligible Wild and Scenic Rivers and Management of Eligible and Designated Wild and Scenic Rivers
 - a. American Whitewater generally opposes Freeport-McMoRan's objections that relate to Wild and Scenic Rivers. Freeport-McMoRan has broadly objected to protective designations throughout the Forest, including new eligible Wild and Scenic Rivers, on the basis that the overlay of protections restrict multi-use activities. This argument is beyond the scope of an eligibility study and American Whitewater and our coalition partners have identified rivers on the Forest that specifically meet the eligibility criteria as determined by the Wild and Scenic Rivers Act and the USFS Handbook. In addition, the objector raises issues on specific plan components for eligible and designated rivers. American Whitewater generally does not support the objections and is interested in discussing these plan components further with the objector and the USFS.
4. Sierra Club - Grand Canyon Chapter, Sandy Bahr: Eligible Wild and Scenic Rivers and Management of Eligible and Designated Wild and Scenic Rivers
 - a. American Whitewater and the Sierra Club are both members of the coalition that submitted substantive comments on the Draft Forest Plan. American Whitewater supports the objections that the Sierra Club raises on eligible Wild and Scenic Rivers that were included in our coalition comments, but not included in the Final Forest Plan. American Whitewater contributed substantive evidence demonstrating that these additional rivers qualify for eligibility determinations and we have a vested interest in any objection resolution discussions regarding these determinations.
5. Salt River Project, Stanley Lutz: Eligible Wild and Scenic Rivers and Management of Eligible and Designated Wild and Scenic Rivers
 - a. The Salt River Project Objection letter states that it opposes the criteria used to identify proposed Wild and Scenic River designations. We assume that this is in reference to eligible Wild and Scenic Rivers, for which there are only two criteria (free flow character and Outstandingly Remarkable Values) as determined by the Wild and Scenic Rivers Act. American Whitewater has in depth experience working on Wild and Scenic eligibility studies and has a vested interest in any objection discussions that address the eligibility determination process or eligibility determinations for specific rivers on the Forest. The Salt River Project has additional concerns that Wild and Scenic Rivers will prevent access to their existing water infrastructure. We believe this concern can be resolved by discussing and clarifying protections for existing rights.

American Whitewater's past participation in the planning process:

American Whitewater contributed substantive comments on the Draft Environmental Impact Statement (DEIS) as part of the Tonto Citizens Coalition Comments (Doc Name: TontoCoalitionVersion03122020) submitted on March 12, 2020. We then actively participated in



a virtual meeting between coalition members and Tonto Forest Plan Revision staff on July 22, 2020 to review our comments. In addition, over 40 American Whitewater members and constituents submitted comments on the DEIS in support of Eligible Wild and Scenic Rivers.

American Whitewater is a national 501(c)(3) non-profit organization with a mission “to conserve and restore our nation’s whitewater resources and enhance opportunities to enjoy them safely”. With 6,000 individual and 100 affiliate club members, American Whitewater represents the interests of over 80,000 river enthusiasts. As conservation-minded whitewater recreationists, we place a high value on protecting naturally functioning river ecosystems, including their fish and wildlife, geomorphic processes, and potential to provide clean and safe drinking water. Our membership and the general public highly value our nation’s river systems and associated riparian zones, and we have a direct interest in maintaining healthy rivers for everyone to enjoy. There are numerous creeks and rivers within the Tonto National Forest boundary that attract our members from across the region and the country, and we support management actions that protect and preserve healthy riparian systems and provide unique recreational opportunities.

American Whitewater played a key role in the original designation of the 1968 Wild and Scenic Rivers Act and since then American Whitewater and our members have been advocating for the preservation and implementation of the Act, including ensuring that qualifying rivers are determined Eligible and that management of designated Wild and Scenic Rivers is in accordance with the Wild and Scenic Rivers Act.

We have been invested in the Tonto National Forest Plan Revision process and respectfully request to be included as an Interested Person in the above objection issues.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. K.', with a small flourish at the end.

Kestrel Kunz

Southern Rockies Associate Stewardship Director

American Whitewater

kestrel@americanwhitewater.org