



January 13, 2021

Ms. Sandra Watts
Acting Regional Forester
333 Broadway Blvd SE
Albuquerque NM, 87102

Electronically submitted to: objections-southwestern-regional-office@usda.gov

RE: Final Environmental Impact Statement for Fossil Creek Wild and Scenic River Comprehensive River Management Plan on Coconino National Forest and Tonto National Forest.

Dear Ms. Watts:

The Arizona Game and Fish Department (Department) appreciates the opportunity to work closely with the Coconino National Forest and the Tonto National Forest (Forest, collectively) as a cooperating agency and interdisciplinary team (ID Team) member during development of the final environmental impact statement (FEIS) for Fossil Creek Wild and Scenic River Comprehensive River Management Plan (CRMP) on the Forest.

Under Title 17 of the Arizona Revised Statutes, the Department, by and through the Arizona Game and Fish Commission (Commission), has jurisdictional authority and public trust responsibilities for the management of state fish and wildlife resources. In addition, the Department manages threatened and endangered species through Section 6 authorities and the Department's 10(a)1(A) permit. It is the mission of the Department to conserve Arizona's diverse fish and wildlife resources and manage for safe, compatible outdoor recreation opportunities for current and future generations. For your consideration, the Department provides the following comments based on the agency's statutory authorities, public trust responsibilities, and special expertise related to wildlife resources and recreation.

Cooperating Agency Status and Member of the Verde Front's Fossil Creek Working Group

As a Cooperating Agency and member of the Fossil Creek working group, the Department would like to commend the Forest for its transparent public process through utilization of the Verde Front regional collaborative. Many meetings, co-convened by the Department and the Forest, have been held since 2015. Over the years, numerous non-governmental organizations, tribes, municipalities, and interested parties with disparate interests and views on what constitutes appropriate management of the Fossil Creek Wild and Scenic River Corridor have met and actively participated in the planning process. Over time, this process developed enough trust among the parties to enable the Forest to structure the necessary compromise of all stakeholders identified concerns to meet the requirements of the Wild and Scenic River Act. It is

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the Department's desire that the Forest will continue to utilize a collaborative and transparent process in future planning, decision making, and implementation processes.

Hunting and Angling Access

Interim management of Fossil Creek over recent years has provided adequate access to this important location by hunters and anglers. This was accomplished through seasonal separation of permitted recreational use and fishing seasons, along with providing hunter access with gate codes where gated closures were necessary. Roads such as FR9D have remained open as negotiated during the travel management discussions. The Department requests that the Forest continue to use the travel management planning process for any future changes that may affect access, particularly for hunters and anglers. In addition, any changes in seasonal permitted access should be mitigated to ensure access for anglers to this important blue ribbon native-fish fishery. Support from fly fishing groups was critical in early conversations of decommissioning the Irving power plant and returning Fossil Creek to natural flows. They were partners in the 2004 renovation. The Department recognizes that the CRMP will continue to provide access and parking to this important resource during the designated fishing season (from the first Saturday in October through April 30).

Monitoring Metrics and Thresholds

The focus of the CRMP is conservation of outstandingly remarkable values (ORVs). It is proposed that this be accomplished through an adaptive management process wherein careful monitoring of key indices, many of which are biological, would result in expedient mitigation of adverse impacts. Most of the identified negative impacts are attributed to recreational use and mitigation measures involve recreation management. While the Department recognizes the importance of careful monitoring of biological indices to better understand the ecological health of these important riparian systems, the Department questions the utility of some of these biological indices to efficiently monitor the impacts of recreation on ORVs. Most fish and wildlife species vary in distribution, density, and relative recruitment independent of impacts from recreational use. Some species require data sets measured in decades to understand causal relationships in population trends. Most notably, aquatic invertebrate data are highly variable between seasons, years, and location and may provide little to no benefit with regards to discerning potential impacts from recreational use in a timely manner. These data are also extremely expensive to collect and analyze. The Forest recognizes the potential limited use of aquatic invertebrate data under the Monitoring and Adaptive Management Plan Implementation chapter 6 (Page 131) where it states that Index of Biological Integrity (IBI) scores "are not thought to be usable in most of Fossil Creek due to travertine effects on macroinvertebrates." The Department requests that the monitoring plan and EIS be crafted so that they allow for the legal flexibility of adjusting monitoring metrics in the future. This flexibility allows the Forest to most effectively and efficiently use biological data to meet management objectives and to ascertain whether temporal or spatial changes in the biological indexes are a result of recreational use. Furthermore, the Department requests that the Forest work closely with species leads from the Department for the development of the monitoring plan and EIS.

Funding for Monitoring and Implementation of the CRMP

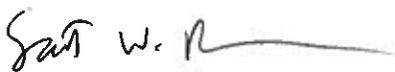
Monitoring is critical to the implementation of the CRMP. Chapter 5 (Page 118) states that changes in recreational use and infrastructure that enable increases in recreational use will be implemented depending on monitoring results. This Chapter also states “If assessment of monitoring data indicates adverse impacts attributable to management actions or visitor use may be occurring, adaptive management actions that are anticipated to lessen these impacts will be implemented”. However, funding for monitoring is not identified in the plan nor has sufficient long-term funding been identified in recent stakeholder meetings. While the Department recognizes that funding sources are difficult to identify in plans such as this, it’s important the Forest recognize that long-term funding is necessary and that volunteer labor alone will not be sufficient for monitoring. Specifically, much of the biological data collection necessary to meet the language of the plan will need to be collected by trained specialists.

Adaptive Management Decision Making Process

Public input is critical throughout the implementation of adaptive management actions in order to maintain trust. Chapter 5 (Page 115) states, “This monitoring and adaptive management plan has been developed collaboratively. Stakeholder and public participation throughout the planning process have helped define river values, determine desired conditions, and identify management concerns. Engagement with subject matter experts in other agencies and organizations, especially through the Verde Front’s Fossil Creek Working Group, has helped inform monitoring indicators and thresholds and the overall structure and implementation strategy of this plan. This collaborative process should continue with the implementation of this plan.” The Department believes that the word “should” be replaced with “will” to ensure that public input and trust is considered when moving forward with implementation of the adaptive management process. The Department also requests that the Forest add language in Chapter 5 describing the framework in which stakeholders will continue to collaboratively engage with the Forest during the implementation of this plan. This language needs to include how, when, and where stakeholders will continue to play an active role in the adaptive management of Fossil Creek.

Thank you for the opportunity to provide input on the FEIS for the Fossil Creek Wild and Scenic River Comprehensive River Management Plan. For further coordination, please contact Scott Rogers at srogers@azgfd.gov or 928-214-1245.

Sincerely,



Scott Poppenberger
Regional Supervisor, Flagstaff

Cc: Clay Crowder, Assistant Director, Wildlife Management
Ginger Ritter, Action Habitat, Evaluation, and Lands Branch Chief, AGFD
Shaula Hedwall, USFWS

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