

**Public Comments on the Arizona Game and Fish Department's
Draft Wildlife Management Program Strategic Plan, *Wildlife 2006***

[Comment Received from December 15, 2000 through January 19, 2001]

February 20, 2001

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Note: Page numbers in the "Comments," Responses, and "Decisions" below refer to the December 15, 2000 Public Review Draft of *Wildlife 2006*.

General Comments (no specific page reference)

Comment (Cochise County Planning Department): Thank you for the opportunity to comment on this Strategic Plan that will guide your Department's actions over the next 6 years. It is a very thorough and well thought-out document. The Cochise County Planning Department supports the Game and Fish's goal of partnerships with "all levels of government." Although in its preliminary stages, this has already been demonstrated in Cochise County with the Game and Fish's recovery efforts for the back-tailed prairie dog in the eastern part of our County. **Response:** Thanks. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (E. Woodin): Thank you for having provided the opportunity to comment on this important document, which will guide the Department and the Commission in its public trust responsibilities over the next five years. With that in mind, I would like to commend you on the hard work you put into the document as you reviewed it in its several drafts and made additions of your own ideas as well as those of the many publics which have commented along the way. Many of those additions are commendable. I liked the new language on p.6 on the integration "of wildlife programs into management of ecosystems and broader landscapes." The history and statistics of hunting in Arizona section on pp. 19-22 was interesting and informative and will serve many of your constituents as a useful reference tool. **Response:** Thanks. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (Animal Defense League of Arizona; Arizona Desert Bighorn Sheep Society; R. Thomas): Your deadline for public comment is January 19, and the Commission will take final action on this Strategic Plan on January 19. How will the comments submitted on January 19 be given any consideration? The decision should be delayed until the February meeting to allow time for comment to be assembled for submission to the Commission. **Response:** Development of this Strategic Plan has taken place over the past ten months. Public meetings have enabled us to discuss the issues with the public and with the Commission many times. A special public work session with the Commission in November provided a daylong hearing on the major issues. The draft on which comment was due January 19 had, in short, presented changes from the previous draft in a relatively few areas, with a few of the changes being made in the same fashion but in several places. The document was prepared with strike-through and underscore markings so the public and the Commission could easily see what changes had been made. That being said, clearly it was more difficult to handle comment that individuals and organizations waited until the last day to submit. However, after lengthy discussion, the Commission determined that our

collective instant analysis and response on January 19 was sufficient for final approval to occur. **Decision:** The Strategic Plan will not be revised as a result of this Comment, and the Plan was approved (subject to directed changes resulting from other Comments) on January 19.

Comment (H. Dillon): I find the Plan a good generalization, but I want to see specifics on implementation, such as funding \$ now and future. Number of new agents and authority of volunteers. Who or how will contact with the Legislature be maintained, e.g. Lobbyist? Advocate? Etc. What will a signed agreement with landowners look like? Will any attempt be made to use findings of nonresidents (winter visitors) and migratory species? **Response:** The Strategic Plan is not designed to provide implementation specifics such as those identified in this Comment. Those are addressed in annual budget processes, and annual operational plans. Our contact with the Legislature is at several levels: our Commission, Director, and our Legislative Liaison are the primary contacts. Other employees come into contact with Legislators at public meetings and in a variety of other forums. "Signed agreements" with landowners, such as stewardship agreements, are constructed to address circumstance-specific objectives, etc. **Decision:** The Strategic Plan will not be revised as a result of this Comment. The "implementation specifics" requested are not appropriate to the Strategic Plan. Copies of operational plans, budget papers, and various kinds of agreements (including stewardship agreements) that provide such specificity, can be obtained from the Department office responsible for the area of concern (i.e. Game Branch for Game Management, Fisheries Branch for Sportfish Management, and Nongame Branch for Nongame and Endangered Wildlife Management).

Comment (R. Thomas): Additional items that should be added to the *Wildlife 2000* [2006] Strategic Plan relates to a more accurate reflection of the accountability of funds received and spent by the Department. There should be full disclosure to the Commission and to the public. [These should include:] the total cost associated with each program or activity...all employee pay, benefits, overhead, personnel costs, supplies, vehicle, fuel, maintenance, and insurance...volunteer time, equipment...a complete reporting of funding by AGFD to all other government agencies, organizations, and individuals...an inventory of all lands owned by the AGFD including cost of purchase, amount of taxes no longer paid to the counties, and other economic, social and cultural impacts.... **Response:** Much of the information you identified is included in a variety of documents that the Department routinely makes available to the public. Our Annual Report provides an overall financial statement for the agency, in a format much like that used by most corporations. Our annual and biennial budget packets that the Commission reviews and approves to set our budget requests to the Governor and the Legislature provide even greater detail. You can request copies of these documents from our Director's Office, and they may be inspected at our central office. Please note that per policy and law, a fee may be charged for photocopying. For further response on any of the other information that you requested be included in the Strategic Plan, please contact our Director's Office. As has been explained previously, we believe that level of detail is inappropriate to include in our Strategic Plan. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (Grand Canyon Wildlands Council): This appears to be a progressive document, one that if followed may provide further guidance for management of the state's carnivores, migratory birds, and non-game biota. We appreciate the effort your Department has put into making this a credible document, and we certainly understand the difficulty of the undertaking. **Response:** Thank you. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (Grand Canyon Wildlands Council): We find two aspects of this report quite troubling, and the revised version does little or nothing to alleviate our concerns. (1) First, many of the species portrayed in your harvest effort graphs appear to be declining. This effect could result from stable populations facing increasing numbers of hunters, but it could also result from long-term population declines. Because your Department apparently has limited data on population sizes for most species (excepting ungulates), there is no way to understand these temporal trends. Neither is there a clear commitment in the report on the part the AGFD to develop a strategy to deal with these enormous data gaps. Therefore, we respectfully request that the next five years be spent collecting, analyzing, and publishing such data in peer-reviewed journals. For the reasons cited below, we recommend that you contract this work to independent and university-based researchers and research teams. (2) Second, the value of scientific peer-review cannot be overstated when evaluating trends in sensitive wildlife species for the public trust. In addition to public commentary, we strongly recommend that AGFD engage an independent panel of wildlife researchers to scientifically review this document, existing data, the way wildlife data are collected and archived, and the Department's future plans for wildlife monitoring and management. Such an effort would greatly alleviate our concerns that the state's wildlife are being well managed, and would greatly improve the credibility of the Department as a whole. Recommendations of such a panel should be followed carefully, and subsequent work to fill in data gaps and conduct monitoring or research should be competitively bid to qualified researchers. These efforts would substantially improve the credibility of your Department in the eyes of the public. **Response:** (1) We agree that we do not have as much data available as we would like, and that better information is needed to more effectively manage wildlife. However, we cannot take five years off and gather, analyze, and publish in peer-reviewed journals all the data we need, let alone all the data you recommend that we collect. We have neither the funding to collect the data, nor the time to devote ourselves to such activities. Wildlife conservation as a state agency is a year-round full-time activity. The Strategic Plan as written (see Challenges 2 and 3) directs us to gather more and better information, and use it more efficiently and effectively. We will do both, within the constraints of funding, and other essential activities. (2) We agree about the value of peer-review. Many of our publications are published in peer-reviewed journals, and in the proceedings of workshops, conferences, and symposia that are subject to peer review or outside editing. Many are not. Regardless, neither funding nor time constraints will allow us to empanel a group of external "experts" to analyze this Strategic Plan and the published and unpublished information on which it is based. With regard to contracting data collection, we routinely use Requests for Proposals and granting processes (e.g. Heritage Grants) to enable other entities to gather information and provide relevant recommendations to us. Frankly, the results of even the most carefully-monitored contracts are uneven. Some so-

called “experts” produce studies as good or sometimes even better than those completed by our own professional staff. Many others do not. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (R. Thomas): AGFD must inform the public of any and all agendas/meetings that impact or take place in impacted parts of the state. This should include paid ads in the local newspapers of all scheduled meetings of the AGFD and any other proposed actions that impact the local areas. The protection of human health, life, and private property must be afforded the highest priority in the course of any work performed by the Arizona Game and Fish Department. Accurate science vs. best available science should be the basis for all decisions made by the AGFD and no actions should be taken without the accurate scientific information. **Response:** We comply fully with Arizona’s public meeting law with regard to noticing the public about meetings. Allegations to the contrary should be addressed to our Director. Although we occasionally do pay for ads in newspapers to notice the public, we do not do so routinely because we do not have sufficient funding for such, because most newspapers publish the information as a community service, and because we use other less-costly mechanisms for outreach. The Department’s highest priorities are set by A.R.S. Revised Statutes (e.g. Title 17) and Commission direction. The Strategic Plan identifies those priorities, which include wildlife conservation, protection of human health and safety (as it may be relevant to wildlife issues), respect for property rights, and good scientific methods. When decisions must be made, they are made on the basis of the best information available. When they need not be made, we prefer to wait for better information. Our actions in this regard are no different than those of any responsible agency, organization, or individual. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (K. Hill): I am disappointed to see that this report has been captured by landowners, developers, and hunters....[It includes] pro-hunting blather....I object to the word “harvest” referring to killing deer, elk, and other animals. Animals are not turnips to be harvested....I’m not impressed by Enlibra. Animals and the land cannot be all things to all people. A stand has to be made either For or Against animals, instead of placating everybody. Now that I see the bias of this report, I suggest the title be changed to “Strategic Plan for Killing Arizona’s Animals....” Please remove me from the mailing list. **Response:** The Plan is an effort to balance the full range of our legal responsibilities for wildlife conservation, including both consumptive and non-consumptive uses. Acknowledging that we must consider disparate opinions and values does not mean we will try to be all things to all people. It merely reflects our legal and ethical responsibility as a public agency. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (Arizona Desert Bighorn Sheep Society): Although the written response to some anti-hunter comment appeared to recognize that Sportsmen are the primary customer of the AGFD I didn’t see it written as clearly in the final draft of the Plan. [Ex-Commissioner Berlat] did an admirable job of presenting this concern at the Tucson meeting but it does not appear to have been adequately addressed in the final draft. **Response:** With regard to wildlife, the

Department has primary customers in three areas, and many if not most of the actual individuals value two or more of these areas: game management, sportfish management, and nongame and endangered wildlife management. *Wildlife 2006* represents a balance of our responsibilities in all three areas. Which values are preeminent is determined on a case-by-case basis, with an eye always toward balancing the decisions on a statewide basis to meet overall public needs. Many other Comments and Responses in this document and in the preceding Public Comment Analysis for *Wildlife 2006* also address these issues. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (J. Williamson): The approach of *Wildlife 2006* to conservation is not sufficient to protect Arizona's wildlife and associated habitat. The Commission and Department have a responsibility to protect the public's interest in wildlife held in trust for our community (this State) in perpetuity....*Wildlife 2006* is limited in its focus, with priority given to the availability of wildlife as a consumable commodity available for hunting and fishing. The report is negligent in not focusing on the Department's role as a principal in conservation of wildlife resources....To that end, it might be appropriate for the Department to specify outcomes that achieve landscape complexes that assure proper functioning eco-processes, which in turn contribute to self-perpetuating ecologies rich in diverse wildlife. Those outcomes could be pursued by and through performance specifications, which are informed by conservation biology and enabled by aggressive public education programs that help create a public that constructively interacts with and within proper functioning landscapes. There is abundant evidence that managing to enhance fragments or parts of a complex will lead to mutating that complex and often unintended loss of other components. Subsidizing certain species inevitably harms others and in the end system functioning. There is not evident in *Wildlife 2006* a predator strategy that recognizes their value in balancing ecological functioning. There is a preference given to the recreational interests of people today even at the probable expense of future recreationists. There is little to no consideration for exclusion of short-term use in deference to long-term healthy functioning....Please encourage objectives to interact with all wildlife as you have approached your nongame strategy and focus on conservation and ecological functioning. **Response:** We believe the Strategic Plan appropriately balances consumptive and nonconsumptive values, provides biologically appropriate guidance for predator management, and establishes our commitment to look at and work toward managing at the landscape level. We do not believe the Plan will allow, let alone force, us to degrade long-term benefits for recreationists in favor of short-term gains. We appreciate your comments regarding the nongame strategies and believe the Game and Sportfish Subprograms provide the same guidance, just in different format and style. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (M. Seidman; Sky Island Alliance): It is clear from this document *Wildlife 2006* that the state sees its wildlife department as a service industry, a business like any other, its business being the production of wildlife for people. This is an outmoded mission. We are in the throes of a global extinction crisis and the Department continues to measure its success by hunter satisfaction. Satisfying hunters and anglers invariably results in actions that harm ecosystems. It promotes an obsession with access into wildlife habitat despite overwhelming evidence that

roads impact wildlife; and it nurtures a bias against predators, who prey on animals that many human hunters, in their arrogance, believe belong to them. It's time to reorganize the state wildlife agency, to put it in touch with contemporary conservation concerns and a new constituency that values the protection of biodiversity more and the hunting of big game less. The Department needs to change from being a service industry to a conservation organization, called something like the Arizona Department of Wildlife Conservation. **Response:** We believe the Strategic Plan appropriately reflects the Department's mission, which is indeed to provide a public service. We do not believe that satisfying anyone necessarily (invariably and inevitably) results in actions that harm ecosystems. We agree there are major conservation issues to address and resolve in the near term, if in the long term future generations are to enjoy the natural treasures that we have to enjoy, vicariously or actively, today. We look forward to focused discussion with you that better enables us to collaboratively address such issues. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (Animal Defense League of Arizona): In general, we oppose the wildlife management direction delineated in Revised Wildlife 2006 because of the blatant focus on consumptive use of wildlife and the management of game animals while the needs and interests of non-consumptive wildlife users and nongame wildlife are largely ignored. There are provisions throughout the document to which we do not object. However, the tenor and tone of the document which is clearly intended to favor consumptive wildlife users and which promotes an anti-predator bias is unacceptable and inappropriate....We encourage the Commission and Department to revisit their statutory mandate and their trust responsibility to the public and base future wildlife management decisions on those standards. Given the severe deficiencies in Revised Wildlife 2006, we strongly urge the Commission to reject this document and to begin preparation of a new version of Wildlife 2006 which will provide analysis and management proposals consistent with the interests of all Arizonans and which will provide a greater level of scope. [The remainder of this 8-page letter raises issues addressed elsewhere in the Public Comments Analysis and thus is not included herein. These other issues include: preference for ecosystem management; preference for landscape-scale planning, with emphasis on movement corridors and refugia; desire for more specific information throughout the document; far more detailed discussion of the Commission's and Department's public trust mandate and efforts to meet that mandate; commitment to partnerships; multiple-use concept vs. "wildlife first;" encouragement of increased participation by youths, females, and other under-represented groups in hunting, fishing, and shooting sports; Department model for estimating deer, elk, and pronghorn populations; various specifics of game species accounts; need for more emphasis of nongame work; and alternative funding.] **Response:** See immediately preceding Comment and Response. We do not agree with your perceptions of an imbalance, or the tone and tenor of the document. We reviewed our statutory mandate and trust responsibility throughout the strategic planning process, and believe the final Strategic Plan is fully reflective of both. We regret that you opted not to submit comment on the previous drafts of the Strategic Plan, but we do not believe the planning process has been deficient or that it should be started anew. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (Sierra Club - Grand Canyon Chapter): We fail to understand why “property owners and lessees” are given more prominence in this document than other groups among the public. This is inappropriate and should be deleted. This is not a livestock management document. **Response:** They are mentioned so frequently because they have rights associated with their ownership or leasing of public lands that individual members or groups of the public do not have. We also note there are many other kinds of property owners and lessees than just those associated with the livestock industry. Our intent was to efficiently capture the full range of such interests, and property owners and lessees seemed to do that. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (H. Biller): First and foremost this type of administrative undertaking is in my judgment an exercise in the creation of vast amounts of paperwork that create additional administrative positions (as well as imagined importance) for the temple at Greenway Road and does little or nothing for either the consumptive or nonconsumptive user and most importantly of all the wildlife it so piously attempts to address. **Response:** We disagree. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (J. Colvin): There is a very obvious omission [in this Strategic Plan] of the concept of “burro management.” This federally imposed fiasco needs legislative revision. G&F can only influence this sore subject in their/your ‘habitat management’ planning efforts. All attempts that can be made by G&F or anyone else should receive immediate attention. BLM recognizes the problem of over population so they use the feeble adoption program. The adoption program could be broadened along with other effective methods to reduce the wild horse and burro populations on all land. **Response:** We believe the burro issue is adequately addressed in the Strategic Plan by Challenge 2 (p. 9), Strategies D and E; Challenge 3 (p. 10), Strategies C, H, and J; and Challenge 4 (p. 11), Strategies A, D, and F; and Challenge 5 (p. 13), Strategy A. We are working with BLM to develop funding so we can more effectively address the burro issue. We made substantial progress last year in resolving some previously contentious aspects of the issue and our two agencies are now in much better alignment on all counts. In early January 2001, BLM informed us that they are already beginning to see increased budget support within their agency as a result of our more effective partnership. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (Arizona Audubon Council): An equal or greater level of resources should be devoted to nongame as to game programs. If our nongame wildlife and their habitats are sufficiently protected, game animals will prosper as well. **Response:** We interpret this to mean fiscal and staff resources. Allocation of such resources is part of the budget and operational planning processes. We believe the Strategic Plan provides the strategic guidance necessary for the Commission to make the appropriate allocations within those processes. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (Arizona Audubon Council; R. Eidsmoe; Maricopa Audubon Society; J. Miano; B. Powell; R. Rodgers): We support endangered species reintroduction programs. Restoring

Arizona's biodiversity should be a top priority of the Commission and the Department. **Response:** We agree that reintroductions are necessary to restoring Arizona's biological diversity, and we believe the Strategic Plan establishes our commitment to restoring that diversity. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (S. Rutkowski): The Plan appears satisfactory as written. Being a general plan, it could be subverted if those in charge stray from the spirit expressed herein. **Response:** Thanks. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (G. Coudriet): The Plan is excellent. Good luck in implementing it. **Response:** Thanks. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (N. Terebey, Jr.): The report is huge but I want you to know that I will read it if you pay me to do it. As a biologist, I have the professional qualifications to make this offer. I am in the literature in a paper where I discovered that scales will regenerate in the snakes even though they do not grow back a tail, unlike some lizards. I wanted you to know what I have done. My fees will be reasonable in service to Arizona. **Response:** We realize the Plan is lengthy, and appreciate your offer to review it for a fee. However, we respectfully decline your offer, and will rely on our staff and comment from other members of the public to guide us through to closure. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (R. and J. Prosser): We feel that the document fails to address the connection between wildlife populations and their habitat capabilities, as well as wildlife populations and their influences on each other. We believe the document could be expanded to include [documentation of several things relevant to elk management, and] clarification of what constitutes "high quality habitat." We do commend the Commission for eliminating the Spring turkey hunt and for reducing deer tags in our units, 5A and 5B. **Response:** The Strategic Plan is not designed or intended to address the connection between wildlife populations and their habitat capabilities and their influences on each other. It does however in many places direct the Department to address those issues through its management actions, including operational planning. Our Elk Management Plans (available from Game Branch and our Regional Offices) will provide some of the information you want, including a definition of "high quality habitat." As for the hunts you referenced, each year the Commission adjusts big game hunts to reflect current information on wildlife populations and hunter success. Where populations are not sufficient to sustain harvest, they are closed. When populations cycle up again, they are restored. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (The Diablo Trust): The revised Wildlife 2006 Plan does not seem to address all the previously submitted questions concerning wildlife carrying capacity, methods of determining and inventorying habitat quality, and information as to the locations of different quality habitats. Nor does the document identify what types of ongoing land/habitat monitoring may be occurring in Arizona, and who is doing what monitoring. **Response:** See immediately preceding Comment and Response. The information you note is intentionally lacking. We do not believe it belongs in

an agency-wide Strategic Plan, but you will find much of it in our operational Plans. The Strategic Plan does, however, as noted above, include direction to the Department to address most of the topics you mentioned. It does not direct the Department to document what types of land/habitat monitoring may be occurring in Arizona and who is doing it. However, we do that on a case-specific basis while determining what monitoring program is appropriate to that situation, whether ultimately we do the monitoring or someone else does. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (The Diablo Trust): We believe the Strategic Plan could be used as an opportunity to reach out to landowners, encouraging collaboration on preserving open spaces, for the benefit of wildlife. **Response:** We believe the Plan does just that, under the Habitat Challenge (p. 11) and the Recreation Challenge (p. 16), as well as elsewhere. It does so in the context of wildlife values, however, because that is our legally-mandated mission. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (B. Holaday; Sierra Club - Grand Canyon Chapter; D. Steuter): Out of 80 [actually 82] pages in the *Wildlife 2006* document, only 10 [actually 14] are devoted to nongame. And no mention of the endangered Mexican wolf. Why is this? **Response:** Please remember that the 11-page Challenges section of the Strategic Plan also applies to each of the three Subprograms covered 539.25 ing Nongame. Moreover, the length of each Subprogram's

equal and timely access to the information. Strategic Plans should be archived there for future comparisons. **Response:** We fully agree that website development is crucial to increasing public participation in planning efforts. The relevant documents for this Strategic Planning effort have been and are available via the Department's website. Our ability to load all Department documents is constrained by staff and fiscal resources. We are developing the website as quickly as those resources allow. We thought the Strategic Plan provided sufficient direction to the Department to develop and allocate additional resources to support this effort, but perhaps an explicit Strategy should be added under Challenge 9 (p. 17). **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (J. Gunn): Future public meetings need to be better publicized by following up with individuals in the media and providing sufficient notice to the various conservation and sporting organizations. If you want public input you have to make it easier to get the word out. **Response:** The Department advertised this 10-month planning effort through: newsletters to a mailing list with 6000 entries, and news bulletins and press releases to the mass media at each stage of the effort, with updates before and after the five Commission meetings at which the Plan was discussed. Every known conservation and sporting organization in Arizona is on the mailing list. Most are on it two or more times, through entries for various officers of the organizations. Every known media source in Arizona, including radio, television, and newspapers, received this information. The Planning Team and our Public Information Officers were interviewed countless times by the media. The only technique we did not use was to purchase ad space in the media to provide public notice on planning events. We believe the outreach effort was appropriate, and we believe the Strategic Plan provides appropriate direction for maintaining and improving this effort (see p. 17, Challenge 9). **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (J. Gunn): The plan should recognize the importance of wildlife waters and other specific habitat improvements. This is one of the few viable options by which the Department can actually improve habitat for many species of wildlife. If this activity is not mentioned in the plan, its omission will likely be used for opposing the activity in the future. The Commission should enact a policy that states; A primary wildlife habitat goal, due to habitat fragmentation and degradation, is for each non-urban township in Arizona to have a minimum of one perennial wildlife water source. I want to take this opportunity to alert you to the fact that the development and re-development of wildlife waters has been greatly reduced since I left the AGFD 1.5 years ago. This trend should be reversed. **Response:** We do not agree that our commitment to sustaining and improving water development efforts has diminished in the past 1.5 years. Two years ago we developed 5 new waters; last year we developed 4; this year we will develop 5 more. Two years ago we re-developed 7 waters; last year we did 10; this year we will do at least 10 and as many as 15. Our development and repair of wildlife waters is conducted in accordance with priorities reflecting available funding, problems caused by drought, and the number of waters proposed for development or repair. In recent years, the number proposed by our Regions has dropped off slightly, but proposals from other areas of the Department's statewide program and from external cooperators has more than compensated for that. With regard to the Strategic

Plan, we consider water developments to be a component of wildlife habitat. We believe the Plan provides appropriate guidance on improving all components of wildlife habitat, including water developments (see p. 10, Challenge 3; Strategies A, C, and H; see p. 11, and Challenge 4, Strategies A, B, D, E, F, G, and I). **Decision:** The Strategic Plan will not be revised as a result of this Comment, except to re-insert development of new and maintenance of existing waters in the appropriate Species-Specific Strategy for bighorn sheep (p. 36).

Comment (City of Sierra Vista): Thank you for taking the time to respond to our questions and comments regarding the Round Two draft of *Wildlife 2006*. As always, we appreciate the considerable time and effort that went into reviewing the numerous comments you received both from us and others, especially considering the many other demands on the Department's time and resources. While many of your comments were helpful in clarifying the Department's goals under the plan, several of the goals and strategies remain unclear. Many of our comments asked for the definitions of terms and phrases used. Our intent in asking was not to seek legal definitions or terminology, but to ask for clarification in layman's terms of the processes, criteria, and other methods alluded to in this document. The Department's responses directing us to the English dictionary to look up the meanings of terms used in the plan were not helpful. The definitions in the dictionary fail to include the criteria which the Department will use in determining, for instance, what it means when it says it will "ensure that the biological information on which wildlife conservation and recreation decisions are based is accurate, current, and readily available." We asked how the Department defines "accurate, current, and readily available," because, for instance, one scientist's definition of accurate data may differ from another scientist's. Likewise, one person's definition of data that is "readily available" may require that the information be available on the internet, while another person may require that it be available at the Department's Phoenix office during business hours. In response to our question, the Department stated: "The words are used in the standard English context, and the meanings are set forth in any standard dictionary." Perhaps our initial question was too vague. The dictionary meaning does not sufficiently address our concern. Who determines which scientific standards are acceptable in determining whether data is accurate? Does "readily available" mean that person can request to view the data? Can persons request that data be sent to them? **Response:** Scientific standards are determined by methods appropriate to the situation under consideration. There is no "one size fits all" approach. The applicable published and unpublished literature is reviewed, knowledgeable individuals are consulted, analyses are conducted, and conclusions are drawn. From the analysis, pertinent standards and guidelines are set forth. They are tested (reviewed, critiqued, etc.) by internal and invited and uninvited external scrutiny. As new and better information is developed, and new insights are gained (especially through experience), the standards and guidelines are reconsidered and, as necessary and appropriate, revised. All of this takes place within the constraints of available expertise, funding, and the time available before an answer must be provided. "Readily available" means the information is easily retrieved from databases, files, etc. by the staff who must analyze it and develop position papers, recommendations, and the myriad of other "findings" and documents that are necessary to operate a state wildlife agency in these often contentious, litigious times. "Readily available" is not generally used in *Wildlife 2006* in reference to the public. Data held by

the Department are available to the public within the standards and guidelines set forth by the Arizona Public Records law. Much of our information (typically based on analyzed data sets) is published in technical reports, popular articles, books, etc. that are “readily available” to the public. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (City of Sierra Vista): We are unclear on the Department’s intent in seeking public comment and providing responses. We stated: “The Draft Wildlife 2006 Strategic Plan contains many goals and strategies that are vague and unclear without either further clarification or substantial knowledge of the Arizona Game and Fish Department’s (AGF) inner workings and current methods of managing Arizona’s wildlife populations. Most of the comments contained herein focus on that lack of clarity and definition, and also request explanation of the role the public will play in realizing the various goals that the Department proposes to set for itself.” In response, the Department stated: “Wildlife 2006 is written at a strategic level, with coverage of broad, programmatic challenges, issues, strategies, objectives, etc. The writing style is intended to facilitate public understanding by lay people, and not to provide precise legal terms that might be more familiar to attorneys (such as the commenter). **The Department also agrees that to fully comprehend the Strategic Plan, in terms of how it is implemented, one should also be conversant with our annual operation plans and our annual budget documents.**” (Emphasis added). Those who lack knowledge, then, of the Department’s operations and budget, cannot fully understand the manner in which this plan will be implemented and executed. Unfortunately, knowledge of the strategies and objectives of the plan mean little without further knowledge of the manner in which the plan will be implemented and carried out. **Response:** Our intent in seeking public comment on the plan was to better determine what the public thought about our draft strategies for conducting business over the next six years. We hoped to use the comment received to better understand how to meet public needs, and to modify the document accordingly. We provide responses so the commenter can, if he or she so chooses, follow-up with us and try to get a “better” answer. As with any document, a reader’s ability to understand what is included is constrained by his or her personal knowledge of the subject matter. Readers who are less familiar with the document, the issues discussed, and the Department will obviously have greater difficulty understanding the document. However, it is not practical (or physically possible) to include all relevant background information in every document. However, copies of relevant documents (e.g. operational plans and budget papers) are available on request to the Director’s Office, subject to guidelines set forth in the Arizona Public Records Law and Commission-approved policy. A much better understanding of the issues that seem to concern you could be gained by routinely attending our Commission’s scheduled meetings, and reviewing the materials provided to the attending public. Most agendas cover a dozen or more, often far more, items, and one entire meeting each year (typically in June) covers the Department budget. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Department Mission Statement (p. 1)

Comment (Arizona Audubon Council; R. Eidsmoe; Maricopa Audubon Society; J. Miano; R. Rodgers; Sierra Club - Grand Canyon Chapter; Sonoran Audubon Society): We

strongly support the current Department Mission Statement. No changes are necessary. It is both broad and reasonable, and matches the Commission and Department's task of managing Arizona's diverse wildlife as a public trust. **Response:** The Department appreciates and agrees with this Comment. The Mission Statement included in *Wildlife 2006* is developed by the Department's Management Team (middle and upper managers) through another process, and cannot be changed in the Strategic Plan. **Decision:** The Strategic Plan will not be revised as it sufficiently addresses this issue.

Comment (Arizona Heritage Alliance; A. MacFarlane; E. Woodin): A major concern which we share with many other individuals and organizations is that of possible changes to the Department's mission statement. We remember all too well from the Workshop in Tucson that several commissioners wanted to insert "where appropriate and economically feasible." Now we see it only in the mission statement for the nongame section. (Why not the game management section?) It goes without saying that if a project is not economically feasible after exhausting all manner of ways to make it so, then it won't be carried out. It is, therefore, not necessary to state it. The "where appropriate" part is what I find most objectionable as it is so vague and open to interpretation. Who will decide if a project is appropriate? Doesn't that require much public input first? All in all it seems like language best left out of the Department's fine, strong mission statement as well as out of the nongame section. **Response:** See preceding Comment. **Decision:** The Department Mission Statement will remain as published in the draft. However, Mission Statements for the three Subprograms will all be revised to include the phrase, "when appropriate and economically feasible" in the appropriate place.

A Commitment to Partnerships (pp. 2-4)

Comment (J. Fraser): I was shocked to learn that you have amended the *Wildlife 2006* Plan to include a commitment to Partnerships and an adoption of Enlibra. This was not in your first draft which went out for public review and is now foisting on the public two concepts that are anathema to wildlife management in the public interest. Emphasis on partnerships backed up by adoption of Enlibra is a prescription for selling off the wildlife resources of this state...Fish and wildlife are public trust resources. They do not belong to the State; they belong to the collective citizenry. The State is trustee for the trust on behalf of the beneficiaries, the public. By adopting "Enlibra" you are ignoring this trust status of wildlife and your role as trustee on behalf of the beneficiaries – the public. **Response:** We do not agree that a commitment to partnerships necessarily has the effects you reference. Actions speak louder than words, and powerful words can inspire meaningful actions. We suggest that you judge us on what we do rather than on what another state might or might not have done. **Decision:** The Strategic Plan will be revised to delete any reference to Enlibra.

Comment (A. MacFarlane): (pp. 2-4) I am sure the Department's staff is committed to partnerships. I am not sure the Commission is committed to this. I see no attempt by the Commission to reach out to groups that do not hunt or fish and that are primarily interested in nongame and endangered species. This is not to suggest that hunters and anglers do not care

about these species, only that some groups focus more on them. **Response:** The Commission is indeed committed to partnerships with all wildlife interests. We hope that you will work with us to help us build stronger relationships with the groups you mention. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (D. Steuter): I must take exception to much of the language in the Introduction to the final draft of *Wildlife 2006*. As a public lands grazing activist I am familiar with the controversy and debate over ranching in our southwestern deserts and therefore familiar with the language and terminology used in the context of that debate. Many of the concepts and words used in the Introduction of the document are rancher buzz words used by facilitators and others to promote cattle grazing on our public lands. "Win-win, partnership, collaborative process, enlibra," are the lexicon of those trying to make economic use of these lands, not necessarily those most concerned about wildlife. I have no problem with mentioning these concepts and the importance of working with ranchers, but to devote the entire Introduction to one interest group as you seem to have done is totally inappropriate. Ranchers should not determine the agenda of the Game and Fish Department. Stick to the basics. Be honest with people concerning threats to wildlife from population increase, sprawl, and poorly managed grazing. I appreciate the comments on the loss of riparian areas and their effect on wildlife and hope these comments remain in the document. Expand more on wildlife as a public trust and how the Department can continue to take a proactive role in preserving this resource. Why not talk about the role you take in commenting on Environmental Impact Statements, Environmental Assessments, Allotment Management Plans, etc. so the reader knows more what the Department does? **Response:** We believe the partnerships text is appropriate to the Strategic Plan. Our commitment to the resource is primary. We believe the partnerships text is crucial to affirming our commitment to work with any and all partners who would help protect that resource. We have not "sold out" to any special interest group. With regard to adding text regarding wildlife as a public trust, and how the Department can take a more proactive role in preserving this resource, we have perhaps too assiduously tried to shorten the document to lighten the load on our readers. **Decision:** Delete the Enlibra portion of the partnerships section, but do not add any text in the Introduction as suggested by this Comment. The document is sufficiently long now, and the suggested information is concisely included elsewhere in the Plan and is available in other documents.

Comment (R. and J. Prosser): We feel that the third draft is an improvement upon the prior document. We appreciate the concept of "Enlibra," as well as some of the incorporated language, specifically the references to "multiple use" and collaboration. **Response:** Thanks. The collaboration, partnership, and multiple-use text was inserted to re-affirm our current practices as well as our commitment to future practices. During Commission discussion on January 19, consensus indicated the word "Enlibra" caused broad-scale consternation and confusion due to widely disparate opinions as to exactly what it stands for, and what might be obligated as a result of invoking it. Since the commitment to collaborations and partnerships was what we wished to emphasize, and not the term "Enlibra" itself, the Commission chose to delete the passages directly related to Enlibra and retain the partnership text. **Decision:** The Strategic Plan will be revised to delete the Enlibra passages and retain the partnership text.

Comment (The Diablo Trust): We are impressed with the re-written introduction of this document. We are happy to see the term “Enlibra” used to describe the Department’s future partnerships with the many interests affected by wildlife management policy. We believe good partnerships will best solve the major wildlife issues facing the West today. **Response:** See immediately preceding Comment and Response. **Decision:** The Strategic Plan will be revised to delete the Enlibra passages and retain the partnership text.

Comment (Arizona Heritage Alliance; A. MacFarlane; E. Woodin): Why, even though it was not mentioned at all at the Workshop in November, has Enlibra been invoked as the guiding principle for your work as commissioners of wildlife? This is new to wildlife management in Arizona and, from what we know of Enlibra, it is not really compatible with such concepts as the Department’s responsibility for “aggressive protection and management programs.” Enlibra seems designed to seek the solution which is best for healthy economies first, while allowing wildlife values to exist “where appropriate and economically feasible.” In short, if you wish to take the big step of adopting Enlibra as the guiding philosophy for the work of the Commission and Department, would it not be more correctly taken up in an open Commission meeting as its own agenda item? Otherwise, how can the public for whom you are holding the state’s wildlife in trust, know what Enlibra is and what the reality of its implementation in the context of wildlife management might be? **Response:** See immediately preceding Comment, Response, and Decision. **Decision:** The Strategic Plan will be revised to delete the Enlibra passages and retain the partnership text.

Comment (Arizona Heritage Alliance): It is not appropriate for the Department to rely on stakeholder process and landowner and lessee partnerships to make science-based wildlife management decisions. **Response:** We are simply saying that involving such interests can lead to better decisions. Our commitment to partnerships in no way undermines our commitment to making science-based decisions where science is the appropriate framework for decision. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

A Glossary (p. 5)

Comment: None received.

A Focus on Wildlife (pp. 5-6)

Comment (Sierra Club - Grand Canyon Chapter; E. Woodin): (p. 6) We support the addition of the paragraph that promotes integrating wildlife into management of ecosystems and broader landscapes. That is essential for success and the long-term survival of many species. **Response:** We appreciate your Comment. The text was inserted as a response to previous public comment. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (A. MacFarlane): (p. 6) The discussion of managing ecosystems is exemplary, but needs backup from the Commission to implement and that seems to be seriously lacking. **Response:** We do not agree that Commission support is lacking. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (Sonoran Audubon Society): The primary focus of any future Strategic Plan should be the protection and sustainability of the state's wildlife and habitat. **Response:** We agree. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Challenges and Strategies (pp. 7-17)

Challenge 1. Public Service, Planning and Funding (pp. 7-8)

Comment (Grand Canyon Wildlands Council): (pp. 7-8) We appreciate the opportunity to review this document, and we would appreciate annual updates on your efforts to guarantee the continued healthy existence of this state's wildlife populations. **Response:** Thanks. As is noted in Challenge 1, Strategy N (p. 8), we will be evaluating performance under this Strategic Plan every two years. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (T. Bergman): (p. 8) Wildlife watching and nature photography should have a special license or day permits, or have a hunting license. **Response:** Challenge 1, Strategy M directs the Department to pursue new sources of funding. We and the other state wildlife agencies have been working on new sources of alternative funding for at least 20 years. The concept of various "non-user" fees has been explored at length, nationally. The best opportunity we have had to generate appreciable revenues was the Conservation and Reinvestment Act that Congress effectively gutted late last year, despite overwhelming public support. We will be exploring this issue in depth this year, and your suggestions will be considered. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Challenge 2. Wildlife Information (p. 9)

Comment (Sierra Club – Grand Canyon Chapter): We oppose the change that includes "used to fully implement the multiple use concept of managing public land, and available to use in stewardship of private lands." The Game and Fish Commission and Department have no such multiple use mandate. If a use conflicts with the long-term survival of a species then the Department should ask that it be limited or curtailed – that is your responsibility. **Response:** Our wildlife mandate is set forth in A.R.S. Title 17, and implemented through Commission policies, rules, etc. The Commission has a long-standing policy on multiple use, which does not compromise our commitment to wildlife. We do not interpret or apply multiple use as meaning "all activities on all lands," but "the appropriate activities on the appropriate lands." The determination of what is appropriate and where, is based on all the pertinent information, laws and values, and land ownership or management responsibility. We routinely ask or require that

certain practices be prohibited or curtailed when they would compromise wildlife values.
Decision: The Strategic Plan will not be revised as a result of this Comment.

Challenge 3. Wildlife Management (p. 10)

Comment: None received.

Challenge 4. Wildlife Habitat (p. 11-12)

Comment (E. Woodin): (Strategy E) The last line does not read effectively. Surely you don't mean that the Department should compensate private individuals for depredation by wildlife? If so, I hope you will reconsider that quantum leap away from past Commission and Department policy. It opens a huge Pandora's Box of ills that are without end. The state is not in most cases responsible financially for damage by wildlife, nor should it be except from the standpoint of educating and assisting constituents about wildlife needs and behavior and how best to live with them. **Response:** The sentence in question refers to external agencies that compensate the State for lost wildlife (habitat) values, such as has occurred with various construction projects in wetland or riparian habitats (e.g. riprapping and channelization along the Colorado River). **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (White Mountain Apache Tribe): (Strategy L) Tribal members pay the same excise taxes that support PR-DJ-Wallop-Breaux funding that goes to the states but have never received any of the funding benefits. Initiating cost-share funding for projects that benefit habitat conservation across borders (federal, tribal, and state lands) would benefit all wildlife and the varied users. **Response:** We understand your Comment and will ask the Commission for guidance. **Decision:** The Strategic Plan will not be revised as a result of this Comment. We note the Department has provided Heritage grant funds to tribal authorities for a variety of projects that benefit wildlife. Additional cooperative projects are possible through Memorandums of Agreement with individual tribes, as provided for elsewhere in the Strategic Plan.

Comment (Coalition of Arizona-New Mexico Counties): While the Coalition shares the Department's concern for riparian areas, we feel that there has been too much focus on the riparian area proper with lack of concern for the connection to healthy upland watersheds. The failure to make this connection has led to misplaced blame for riparian degradation and sparse fiscal resources being expended in riparian restoration when they would have better been spent in watershed restoration. Upland restoration would not only benefit riparian areas but would immensely benefit Arizona's game and fish populations. These benefits would be derived from increased habitat diversity along with protection from catastrophic wildfire. The Coalition suggests adding the following subsection (Strategy): M. Advocate for, and where possible participate in upland watershed restoration to improve water delivery to and water quality for riparian habitat. **Response:** We agree. **Decision:** The Strategic Plan will be revised to address this issue.

Challenge 5. Partnerships (p. 13)

Comment (Sierra Club - Grand Canyon Chapter): We suggest that you insert the words “where possible” prior to “Collaboratively address wildlife-related issues...” **Response:** We find it surprising that someone who has objected so strenuously to our using that kind of phrase elsewhere in the document asks us to use it in this instance. Regardless, we do not agree with the suggested change. We believe it is always possible to use collaboration techniques to address issues. Partners may drop out along the path toward resolution if they become dissatisfied (or in many cases if they become satisfied) by the progress or lack thereof, but we think it is always good to be receptive to further constructive engagement or re-engagement (i.e. collaboration). **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (Cochise County Planning Department): (Strategy B) You may want to consider revising this Strategy to include rural lands and rural waters as well as cooperative agreements with county governments. This Strategy may facilitate some counties’ open space planning and implementation where we share common objectives. **Response:** Thanks for the suggestion. We agree. **Decision:** The Strategic Plan will be revised as suggested in this Comment.

Comment (White Mountain Apache Tribe): (Strategy C) Shouldn’t this be extended to Arizona tribes as well? **Response:** We understand your Comment and will ask the Commission for guidance. **Decision:** The Strategic Plan will be modified to address this Comment.

Challenge 6. Laws and Legal Considerations (p. 14)

Comment: None received.

Challenge 7. Law Enforcement (p. 15)

Comment: None received.

Challenge 8. Wildlife Recreation (p. 16)

Comment (Arizona Audubon Council; R. Eidsmoe; Maricopa Audubon Society; J. Miano; B. Powell; R. Rodgers; Sierra Club - Grand Canyon Chapter; Sonoran Audubon Society): We believe there is too much emphasis on providing recreational opportunities for game and nongame, instead of focusing on the protection and sustainability of the wildlife populations and their habitat. **Response:** Recreational opportunity is to a large extent a by-product of healthy, stable wildlife populations. The Department strives to achieve a sustainable balance between wildlife conservation and wildlife-based recreation, and Challenges 3, 4, 5, and 8 outline our strategies to address wildlife-based recreation needs. These strategies allow the Department to address increased recreational pressure and its impacts on wildlife resources, as implied by our Mission Statement. We do not believe the scale is tipped in favor of recreation. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (T. Wooten): We like your dedication to recreation and hunting opportunities, but believe that the first responsibility is the maintenance and development of wildlife habitat. This should be a higher priority than utilization. **Response:** Please see the Response immediately above. We agree recreational use must not exceed habitat capability, and recreational use must be considered in the context of all other demands on wildlife habitat. We believe, however, the Strategic Plan as written is consistent with those priorities. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Challenge 9. Public Information and Education (p. 17)

Comment: None received.

Game Management Subprogram (pp. 18-60)

Comment (R. Dunkirk): (no specific page reference) As most folks are aware, the population fluctuations in Arizona's deer populations have suffered drastically in the past due to ill-timed moisture (rain/snow), or the lack thereof. Would it be possible for the Department to institute some formula wherein, for example, if rain/snow levels did not reach a certain level for a period of time (2 or 3 years as an example) the hunting of deer would be suspended until the population regained the desired population level deemed necessary? Maybe this would help in increased recreational opportunities (viewing/hunting), and would also help in a speedier recovery of the resource after adverse weather conditions. Just a suggestion. Thank you very much for an excellent job that the Department is doing. **Response:** Thanks for your comment and support, but we do not believe it would be advisable to try to manage hunting in this manner. Arizona is sufficiently large and varied in weather, topography, and habitat capability that such an approach would be impractical statewide, as well as being biologically inappropriate. Our current approach of establishing maximum and minimum population levels (targets) for game species management ensures to the extent possible that populations will not drop below viable, sustainable levels. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (J. Gunn): (no specific page reference) We object to the recurrent language in the big game sections, "while avoiding adverse impacts to wildlife habitat and/or other species." Is there a documented case other than the North Kaibab (where there were [and still are] great numbers of livestock on the winter range) in recent history, where Arizona ungulates became so dense as to impact their habitat? Even in the 3-Bar enclosure with 25-35 deer/sq. mi., the deer did not negatively impact their floral resources. This language is absent from the sections dealing with small game and nongame. This additional wording could be used as an instrument to stop big game efforts because of some obscure and/or unfounded endangered or threatened species concern. **Response:** We believe that in some instances elk have had a detrimental impact on wildlife habitat and/or other species. Accordingly, we have strived to reduce herd size as needed. We also believe that deer have similar capacity, as was documented on the Kaibab. Although we agree that such instances are truly "exceptional," we believe the phrase to which you have taken

exception provides sufficient assurance that we will manage herds to prevent such problems. **Decision:** The Strategic Plan will be revised as a result of this Comment, by deleting from all species accounts the entire passage relating to impacts. The Department's internal project review process (Environmental Assessment Checklist, etc.) is sufficiently rigorous to determine whether such impacts might occur, and to identify appropriate avoidance or mitigation measures.

Comment (Arizona Desert Bighorn Sheep Society): It was not apparent to me that the final draft makes a clearer effort towards identifying the total recreational benefit of our big game program. It is not just hunter days but more importantly total recreational days associated with any given hunt (i.e. scouting, packing, assistance, etc.). I believe that the Department really needs to better present and quantify the total recreational benefit so as to justify these programs to Arizona's changing population dynamics and their view towards hunting. **Response:** Yes, you made the same point at the November Commission work session on *Wildlife 2006*. The Department agreed with you then, and the Commission decision then was to revise the Plan by adding a Strategy directing the Department to develop the desired information, since it does not exist right now. The Plan was revised as the Commission directed (see p. 16, Strategy A). Game Branch and our Responsive Management Coordinator are already discussing how to gather the information, and what it will cost to do so. **Decision:** The Strategic Plan will not be revised further as a result of this Comment.

Comment (J. Gunn): (no specific page reference) The Commission should direct the Department to substantially expand the concept of quality firearms hunts. Harvest in these hunts should be limited to mature animals. **Response:** The Department currently addresses quality hunt management through the Alternative Mule Deer Management Plan, and the Elk Operational Plans, which are developed with Commission and public input. Pronghorn and bighorn sheep are managed in a conservative manner with quality hunting as a direct consideration. Expanding hunting opportunity designed to target mature animals would result in reduced total hunt opportunity because harvest of the older animals must be more conservative. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (Arizona Antelope Foundation; Arizona Bighorn Sheep Society; Arizona Wildlife Federation; The Diablo Trust): We are concerned about a number of things that the Commission and Department say are not appropriate to the Strategic Plan's game management section, because they are operational issues. Where are the operational plans that include the details that we desire, or when will such plans be developed, and by whom? **Response:** We are committed to working with our partners to produce any operational plans that are lacking for big game species, small game species, and other species as appropriate and economically feasible to do so. Copies of any existing operation game management documents can be obtained from our Game Branch. Your comment on them, and your participation in revising them and in developing other operational plans is welcome. **Decision:** The Strategic Plan will not be revised as a result of this Comment. However, the Commission and Department will meet with these organizations to discuss operational planning issues, and to involve these customers in revising existing or developing new operational plans to address these issues.

Comment (T. Hulen): The plan suggests that the Department continue on the path it is currently traveling with regards to Arizona's wildlife. I find this sad and maddening when I consider that deer, pronghorn, turkey, and Mearns' quail populations are at their lowest levels in recent memory. This comes at a time when the Arizona Game and Fish Department has the most money and employees at its service than any other time in the Department's history. This is occurring when there are the fewest number of hunters in the field. Does the Department consider this a good plan? If so, I believe it is time for a major overhaul of the Department. **Response:** We do consider it a good plan, as do many of the people who provided comment. As for current levels of funding, in terms of inflation we have lost ground since 20 years ago. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (T. Hulen): I believe it is unnecessary to continually blame the "drought" for this problem [declining wildlife populations]. Wildlife populations were plummeting before the last or current drought commenced. Another convenient scapegoat employed by many Department employees and fellow sportspersons is that predators are taking too many game animals. The real issue is habitat loss or degradation. Arizona's population is growing at an unprecedented pace and we are allowing land use practices that prevent wildlife populations to flourish... I want to repeat what I learned in a college wildlife biology course: habitat, habitat, and more habitat. If the Department makes it its primary goal to save and protect habitat it will be successful in meeting its mission. **Response:** We agree that habitat is the key problem and potentially the key solution. Our efforts are focused to a very large extent on habitat protection and restoration. Nevertheless, predation, disease, and other factors also affect wildlife populations and must be given due attention. Drought and in some locations severe winters are also problems, but there is much less that humans can do about those, with regard to wildlife management. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (The Diablo Trust): (p. 21) We are wondering about the sentence "The percentage of hunters who felt that the density of roads in their hunt area was too high increased slightly from 1994 to 2000." We would like to know what this percentage is. **Response:** The passage (pp. 18-22) in which the sentence you questioned occurs is based on the results of the Department's 2000 Hunter Survey. We opted to include only the most important specific percentages so the reader would not be overwhelmed by numbers. Your Comment has been passed on to Game Branch staff, and they will contact you directly regarding your specific question and availability of the overall Hunter Survey results. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (Sierra Club - Grand Canyon Chapter): (p. 30) We are pleased to see the target population of pronghorn increased, but wonder why this change was made. We also want to know why the objective of maintaining one black bear per square mile of high quality bear habitat was eliminated. There is no explanation of this. We would like to see explanation of these kinds of changes, so both the Commission and the public can be better informed regarding the reasons for the changes and therefore comment more appropriately. **Response:** Both changes

were made as a result of public comment on the previous draft of the Strategic Plan, and both changes were explained in the previous Public Comment Analysis, which you were given at the November Commission Meeting and which is available as a download from the Department's website. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (Arizona Antelope Foundation): (pp. 30-31) We strongly recommend deleting the proposed allocation of 2.5% of the available general and muzzleloader antelope permits to juniors-only. While we back the Department's efforts to recruit youths into the hunting community, we feel this is best done by the allocation of javelina, turkey, deer (antlerless, preferably) and cow elk tags to juniors. An antelope hunt in Arizona is a trophy hunt, and our youth will be more effectively encouraged to enter the hunting community by building their way up to the taking of an animal of the pronghorn's trophy quality....Allocating antelope tags to juniors will only further reduce the drawing odds for adults and discourage them from remaining in the state's community of hunters. Since the vast majority of youths recruited into the hunting community come from families that already hunt, we should be very careful about implementing any program that might discourage adults from maintaining their interest in hunting. **Response:** The 2.5% allocation is consistent with Commission direction to provide opportunities for more youths to participate in hunting. We also note that if your hypothesis were true (i.e. that most youths who hunt come from families that hunt), providing a special youth allocation would increase the likelihood that a family with a youth could enjoy a hunting experience. An adult who is not drawn could hunt with a youth who is drawn. In some ways, that could be an even more memorable experience for the adult than if he or she were personally drawn. We also believe it is important to provide youths with trophy and non-trophy hunting opportunities, and that these opportunities should be apportioned across all game species that can sustain harvest, including the pronghorn. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (Arizona Antelope Foundation): (pp. 30-31) We recommend offsetting recent pronghorn habitat losses through an aggressive grassland management and acquisition program. Heritage monies should be spent to acquire habitat, especially on the state's rapidly declining grasslands....Specifically, we would like to see two additions to the pronghorn section of the plan (p. 31): add the following objective "Acquire, through either ownership or conservation easements, no less than 50,000 acres of high or medium quality pronghorn habitat;" add the following Species-Specific Strategy "Allocate no less than 25% of yearly Heritage Fund expenditures to the acquisition of grassland habitats, with the grasslands' value as pronghorn habitat serving as an important factor in evaluating its suitability for acquisition." **Response:** We agree that pronghorn habitat should be protected, and must be protected, if we are even to maintain, let alone enhance, Arizona's statewide population. We also believe the Strategic Plan provides explicit direction toward that end, and both Pittman-Robertson and special-tag funds provide financial resources for pursuing such objectives. However, State law precludes spending Heritage habitat acquisition funds on species that are not endangered or threatened, or candidates for such status. Thus, of the pronghorn subspecies in Arizona, only the Sonoran would qualify and that species exists almost entirely on federally-owned or managed lands. **Decision:** The

Strategic Plan will not be revised as a result of this Comment. The Department shall work with the Commenter to refine and appropriately address the issue operationally.

Comment (Arizona Antelope Foundation): (pp. 30-31) We recommend that the following two changes be made to the pronghorn objectives: change objective 1.3.1 to read “Increase the statewide population to 15,000 post-hunt adult pronghorn;” and add an additional objective that reads “Improve habitat to achieve a statewide gain of at least 10% in high quality habitat and a gain of at least 10% in medium quality habitat.” **Response:** We agree, although we note that achieving even the current objectives (which are lower) is doubtful, because of increasing urban encroachment and fragmentation of pronghorn habitat through development of roads, utility corridors, “40-acre parcels,” and property-line fencing. **Decision:** The Strategic Plan will not be revised as a result of this Comment. The Department shall work with the Commenter to refine and appropriately address the issue operationally.

Comment (A. MacFarlane): (pp. 30-31) With regard to antelope, if there is a lack of suitable habitat, why raise the objectives and bring in more antelope? **Response:** The objective could be raised on the assumption that other objectives targeting habitat improvements will be achieved. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (Arizona Antelope Foundation): (pp. 30-31) We recommend adding (to pronghorn) a Species-Specific Strategy stating “Establish transplanted pronghorn herds of no fewer than 100 animals per herd in a minimum of five areas of suitable habitat that are currently unoccupied.” **Response:** We agree that establishing pronghorn populations in suitable but unoccupied habitat is appropriate, although the target number and size of those populations should be developed following analysis of site-specific distribution and habitat data. **Decision:** The Strategic Plan will not be revised as a result of this Comment. The Department shall work with the Commenter to refine and appropriately address the issue operationally.

Comment (Arizona Antelope Foundation): (pp. 30-31) We recommend adding an additional sentence to pronghorn Species-Specific Strategy 1.3.3 to make it read “Establish self-sustaining populations at all new transplant sites. Evaluate predator populations at proposed release sites and, prior to the release, reduce their numbers as needed to ensure survival of at least 50% of transplanted pronghorns during the 12 months following their release.” **Response:** We agree that predator populations should be evaluated as part of any reintroduction effort. However, many factors contribute to low survival rates following translocations. The specifics of this suggestion more appropriately belong in an Environmental Assessment document for each specific transplant. From a practical standpoint, the level of pre-release predator control that would result in 50% survival of pronghorn over the 12-months following translocation would be conjectural. **Decision:** The Strategic Plan will not be revised as a result of this Comment. The Department shall work with the Commenter to refine and appropriately address the issue operationally.

Comment (Arizona Antelope Foundation): (pp. 30-31) We recommend adding (to pronghorn) a Species-Specific Strategy stating “Establish a self-sustaining Sonoran pronghorn herd at a

location north of Interstate 8 or east of Arizona Highway 85.” **Response:** We agree, and the Sonoran Pronghorn Recovery Team is developing appropriate recommendations. However, specific sites have not yet been identified using biological habitat suitability data. **Decision:** The Strategic Plan will not be revised as a result of this Comment. The Department shall work with the Commenter to refine and appropriately address the issue operationally.

Comment (J. Gunn): (pp. 30-31) The plan should identify as an objective to evaluate the reintroduction of pronghorn antelope to selected portions of the Sonoran and Mojave deserts of western Arizona, north of the Gila River. **Response:** We agree, although we must ensure that efforts for Sonoran pronghorn (see immediately preceding Comment) and for other pronghorn subspecies do not conflict with each other. **Decision:** The Strategic Plan will not be revised as a result of this Comment. The Department shall work with the Commenter to refine and appropriately address the issue operationally.

Comment (The International Sonoran Antelope Foundation): (pp. 30-31) The U.S. Fish and Wildlife Service (Interior Department) has done a less than average job in protecting and growing the endangered herds of Sonoran antelope found in the south, southwest corner of Arizona. In fact, their numbers are almost half of what they were in 1980. During the 80s, we raised \$13,000 to help them in this recovery effort but because of their superior intellect they decided to give it to Mexico for the same purpose. This was through the “Camp Fire Club of America.” AZG&F have proven themselves with their remarkable recovery of the desert bighorn. Without starting a war, you should try to take over this effort. **Response:** We appreciate your confidence in us. We are working diligently with the Sonoran Pronghorn Working Group and other entities to increase the effectiveness of Sonoran pronghorn conservation efforts on both sides of the border. We believe sufficient progress is being made to continue that partnership approach. If the rate of progress becomes unacceptable, we will take the appropriate remedial action. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (J. Gunn): (pp. 30-31) Arizona currently has the potential to produce limited, but high quality pronghorn hunting. A rifle antelope tag has become as hard to obtain as most bighorn tags. Pronghorn permits should be set more conservatively so that yearling bucks have a life expectancy of 7-9 years. I note with regret, that prior to the livestock industry, pronghorn antelope were abundant and widespread throughout Arizona. **Response:** We disagree that permits should be adjusted as suggested. Doing so would further reduce the number of permits (i.e. hunting opportunities), and we believe the current balance of trophy to non-trophy opportunities is more beneficial to Arizona hunters overall. Also, we note that this Comment suggests the livestock industry caused historical pronghorn declines in Arizona. Most authorities agree that the near demise of the species through most of the West was a result of many factors, including changing climate, severe drought, and unregulated market hunting. Severe overgrazing at the turn of the 19th Century occurred against that backdrop, and cannot be isolated as the primary cause of big game population declines. The factors constraining growth of current populations and preventing restoration to pre-settlement historical levels are similarly complex. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (The Diablo Trust): We believe the Strategic Plan fails to address [three issues specific to elk management]. **Response:** The issues you raised are or will be addressed through our Elk Management Plans. You are involved in developing the plan for your area, and we look forward to your continued participation. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (R. Maynard; White Mountain Apache Tribe): (pp. 33). Re: Strategy 9: A potential mechanism for reducing vehicle-elk collisions is described in literature from Vancouver Island [and the State of Washington]. Transmitter collars are placed on elk to trigger a warning flash along the highways. **Response:** Thanks for providing the information. It will be given to our Game Branch for them to consider while pursuing Strategy 9. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (White Mountain Apache Tribe): (reference to pp. 34, 35, 46, 50, 51, 53, 54, etc.) Who sets hunt numbers and from what data if population estimates are not available? **Response:** For the species in question (turkey, javelina, quail, blue grouse, doves, band-tailed pigeon, waterfowl, etc.), when population estimates are not available, hunt numbers are based on hunter questionnaires, prior history, informed opinion, federal guidelines, and/or any other relevant, available data. **Decision:** The Strategic Plan will not be revised as a result of this Comment. The Department (Game Branch) will provide the appropriate response to the Commenter directly.

Comment (Arizona Desert Bighorn Sheep Society; J. Gunn): (p. 36) The plan should separately identify and establish respective goals for the two distinct subspecies of bighorn sheep: Desert and Rocky Mountain. Lumping them together does not seem appropriate for their habitat needs and management issues are distinct. I urge the Commission to establish a goal to reintroduce Rocky Mtn. bighorns to the great canyons of the Mogollon Rim and Coconino Plateau. **Response:** Although their habitats differ, desert and rocky mountain bighorn sheep are managed in very similar ways. Both are managed in a conservative, quality hunt fashion. Differences in their management are noted in the hunt management guidelines. Areas for establishing additional Rocky Mountain bighorn sheep should be evaluated prior to establishing goals for additional populations. **Decision:** The Strategic Plan will be revised to include a Strategy for evaluation of additional sites for establishment of Rocky Mountain Bighorn sheep.

Comment (Arizona Desert Bighorn Sheep Society): (p. 36) Strategy 5 should re-state the Department's commitment to developing and maintaining water catchments. This language was deleted. It was present in Wildlife 2000. **Response:** The language was deleted because water catchments were considered just one type of habitat enhancement and we did not identify the many other kinds of enhancements. Throughout the entire document, the Planning Team made a conscious effort to reduce unnecessary specificity so the document would be shorter and more readable. The Team also considered the overt mention of water catchments a "red flag" that unnecessarily drew attention to what the Department considers an important conservation

activity. The Plan as it was re-written provided fully for continuation of our water development program. **Response:** The Strategic Plan will be revised to reinsert the appropriate text.

Comment (Arizona Audubon Council): (p. 39) With regard to mountain lions, we prefer the goals to provide hunting and other recreational activities in a manner and in locations that are consistent with the Endangered Species Act and the protection of endangered species. **Response:** We are not sure that we fully understand this Comment. It seems to imply that the mountain lion goals are in some way inconsistent with the Endangered Species Act and the protection of endangered species. We do not believe they are. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (M. Stromberg): (pp. 48-49) The proper name of the Mearns' quail is "Montezuma quail" (Checklist of North American Birds 1998. Amer. Ornithologists' Union, 7th ed., p. 128). This is the name used in virtually all field guides to birds now in print. This is not a simple academic argument; if you want the average hunter to be able to look up a picture of the bird they intend to hunt, they will not find "Mearns' quail" in a field guide. It is long overdue that AGF start using the name the rest of the world uses for this bird. **Response:** This issue is also relevant to how the buffalo is treated in the Strategic Plan. In both cases, for legal reasons, the Plan uses the common name that is set forth in statute. We do not believe the effort required, and the risk involved, in changing the statute is worth the time and cost. Moreover, we do not believe that Mearns' quail hunters are so naïve that they would be unable to find their target species in a field guide, regardless of whether the field guide provides the historical as well as the current name. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (M. Stromberg; E. Woodin): (pp. 48-49) Since at least 1900, a variety of game biologists and ecologists have pointed out that maintaining cover for this bird (Mearns' quail) is critical. Grazing that removes more than about 45% of the annual production of grass will eliminate the populations of this bird. I see that you had this and another good strategy in the draft but that it was deleted. It should be explicitly included. Again, it is time that AGF recognize what has been known by the rest of the world for a very long time. Specifically, please include, under Species-Specific Strategies, part N-1, "Coordinate with the Coronado National Forest to ensure that Mearns' quail population potential is achieved through enforcement of standards and guidelines that direct managers in high quality Mearns' quail habitat to (a) leave 15 acres of uncut tree stands interspersed with openings less than 150 feet wide, and (b) prevent forage use by livestock from exceeding 45 percent by weight of annual production." **Response:** We disagree. The referenced guidelines were recommended for deletion because they are currently under review, based on studies conducted in the past few years. Thus, the Strategic Plan currently provides direction to the Department, in cooperation with public and private partners, to develop guidelines for Mearns' quail management. If you wish to be part of that effort, please contact our Game Branch or our Tucson Regional Office. **Decision:** The Strategic Plan will be revised to affirm that Mearns quail should be managed on the Coronado National Forest under current Department standards guidelines, until new standards and guidelines have been developed from the Department's recently-completed research.

Comment (Sierra Club - Grand Canyon Chapter; Western Game Bird Alliance): (pp. 48-49) Why is the Department no longer proposing to coordinate with the Coronado National Forest regarding the Mearns' quail? Is that because Commissioner Chilton has an ongoing conflict with the Coronado National Forest regarding her allotment and the overgrazing that affects this species? Why, too, is the Department removing the section that says it should prevent forage use by livestock from exceeding 45% by weight of annual production? **Response:** The coordination text was modified to include all affected and interested parties without specifying just one (i.e. the Coronado). This was done to simplify and shorten the document, not because of any personal matters of Commissioner Chilton. The "45%" text was modified because the Strategic Plan should not set specific numbers like that. It should only reference standards and guidelines that are published in other documents. Thus, when the guidelines change, the Strategic Plan need not be re-written. In any event, pursuant to discussion on January 19, the Commission directed that the Mearns' quail strategies be re-written again, as is discussed elsewhere in this document. **Decision:** The Strategic Plan will be revised to restore coordination with the Coronado National Forest as necessary to implement current Department guidelines, and to develop new guidelines based on Department research.

Comment (J. Gunn): (pp. 48-49) As the range of this magnificent game bird (Mearns' quail) has been greatly contracted due to range degradation, I recommend the plan identify the need to re-establish this species in the central Arizona Madrean communities. I am very disappointed the final draft plan has stricken all existing language regarding forage utilization and tree harvest. **Response:** We agree with regard to working toward recovery of the small pockets of Mearns' quail that occur in central Arizona's Madrean habitats. **Decision:** The Strategic Plan will be revised to address the need to evaluate habitat potential for possible transplant of Mearns' quail in central Arizona Madrean habitats.

Comment (H. Biller): (p. 50) Enhance habitat, berry production is but a portion of both adult and juvenile grouse diet. The literature cites a multitude of herbaceous undercovers utilized at various times of the year. Again these concepts have been promulgated since the 1970s, but no action taken. Identify realistic goals, formulate a program, implement same, quantify results, and create accountability if not seen through. **Response:** We believe the timber cuts identified in Species-Specific Strategy 2 would promote growth of herbaceous cover as you recommend. **Decision:** The Strategic Plan will not be revised as a result of this Comment, other than to clarify that herbaceous growth would also be stimulated through Strategy 2.

Comment (E. Woodin): (p. 52, line 1.4.3) The [deleted] language on p. 52, line 1.4.3 seemed adequate for describing dove hunt objectives. Why the new, aggressive language about increasing harvest objectives when the populations recover? **Response:** As you noted, our premise is that populations can and will be restored to higher levels. If that occurred, increasing harvest objectives would simply be consistent with our mission to provide hunter recreation days commensurate with resource capabilities. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (H. Biller): (p. 53) This (band-tailed pigeon) is the least known...game bird in the State. We need to return to square one and gather the most basic and fundamental information, that we once possessed but have simply ignored in the last twenty years....Habitat areas must be identified, major migration areas, major migration stopovers, population trends, annual mast production, and harvest information must all be compiled if the Department is to make informed recommendations on future hunting of this bird....The use of salt blocks at major migration areas, stopovers, and nesting areas should be utilized and maintained. **Response:** We understand your Comment and will ask the Commission for guidance on the priority of such efforts. **Decision:** The Strategic Plan will not be revised to address this Comment, and no additional priority should be given to band-tailed pigeon management.

Comment (H. Biller): (pp. 54-55) Continue acquisition and development of new waterfowl areas. Identify those historical waterfowl areas that have either silted in, fell into a state of disrepair, or had dams breached. Pay particular heed to Little Colorado River and those within the confines of SRP watershed. Using existing habitat at Willcox Playa WMA and Whitewater Draw WMA commence establishing white goose wintering populations. Identify over-utilized (hunting) and key loafing and roosting areas for waterfowl and create innovative management solutions i.e. alternating days, three-days a week hunting, etc. Work with Fisheries to ensure that projects such as Carnero and Wiltbank Reservoirs do not preclude the participation of waterfowlers [i.e. end trout season on these and similar waters on September 30]. Utilize large amount of State land adjacent to Cibola NWR as an adjunct to that facility. **Response:** We believe that most of these suggestions could be pursued, if appropriate, under the Strategic Plan as written (see p. 55, Species-Specific Strategies 6 and 8). We will ask the Commission for guidance on covering them all. **Decision:** The Strategic Plan will not be revised to further address this Comment. The Department shall ensure that these issues are addressed operationally.

Comment (J. Gunn): (p. 58) Non-native game birds. I am pleased to see the draft language was changed to consider management for these species. I recommend the Commission direct the Department to issue an RFP (Request for Proposals) for an outside contractor to evaluate and assess the several opportunities that exist; as an example to evaluate the feasibility of establishing scaled quail on State Trust Lands in central and northern Arizona Grasslands. **Response:** This is an operational issue, not a Strategic Plan issue. Moreover, if the recommended project were undertaken, Game Branch, Research Branch, and the appropriate Region(s) would be expected to determine whether it could best be accomplished internally, through cooperating agencies, or through an RFP for private consultants. The Department has just begun a scaled quail research project. We encourage you to contact our Research Branch, as public input is currently being solicited for design of this study. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (Arizona Heritage Alliance): (p. 58) We object to using additional resources on introduction of nonnative species as is indicated in the gamebird section. We are opposed to

language which opens the door for introducing more nonnative bird species. Don't we have enough problems with nonnative species? Besides, we don't have the resources right now to adequately manage the species we already have. **Response:** We understand your comment, but disagree. Whether we have the funds for such work will be determined if such efforts are proposed. Potential impacts on wildlife already occurring here would also be assessed at that time. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (A. MacFarlane; E. Woodin): (p. 58) We were truly sorry to see the addition of "may" introduce new species of non-native birds for hunting when, in the beginning of your document, you had said that you would not introduce non-natives. How can the introduction of new non-native species of anything not put stress on habitats which are already inhabited by native species? Haven't we learned that lesson many times over, e.g. crayfish, striped bass, and bullfrogs to name a few? **Response:** See immediately preceding Comment and Response. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (H. Biller): (p. 58) Stop with the myopic attitude toward non-introduction. The management or should I say mismanagement within the Small Game Division has fostered this concept since the departure of Small Game Chief David Brown. More than suitable habitat exists in this State for the introduction of ruffed grouse, mountain quail, and the Rio Grande turkey. A joint venture should be undertaken with both the Navajo Nation and the Kaibab Paiute Reservation looking into the introduction...of sage grouse. I would maintain that none of these non-natives would compete nor endanger native Flora or Fauna. It would also greatly increase the opportunity for non-consumptive and consumptive users alike and add to an ecological niche not currently being utilized or at the very best being severely under utilized. **Response:** The Strategic Plan as written enables the Department to implement ecologically acceptable introductions of non-native game birds (see p. 58, Goal). **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (H. Biller): (p. 58) Increase information gathering sources. The chukar should have been included on the ill thought out Migratory Bird Stamp. No harvest data has been available to the Department since ceasing the Small Game Questionnaire in 1995. Small Game has no information on population dynamics, harvest information, and very limited knowledge on its range (both have expanded). **Response:** We understand your Comment and will ask the Commission for guidance. **Decision:** The Strategic Plan will not be revised to address this Comment.

Comment (H. Biller): (p. 58) The Department's Status Summary Reports/Goals and Objectives, the forerunners of *Wildlife 2000* and *Wildlife 2006*, offered suggestions for habitat enhancement and increased populations, but these like *Wildlife 2000* only received lip service. **Response:** Much of the land on which non-native game birds occur in Arizona is federally owned or managed. Current federal laws, policies, and Executive Orders greatly constrain the ability to manage for such species. The Strategic Plan as written enables the Department to implement ecologically appropriate management for non-native birds, but many other factors will determine

whether such management occurs. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (B. Holaday): (p. 60) While I do not hunt or fish, I do not oppose these sports. However, I do heartily object to the continuing effort to ravage populations of furbearers and predators. On p. 60 of your plan, you encourage an annual harvest of 50,000 coyotes, which exceeds the 45,000 figure reported for 1999. To me, slaughter of 50,000 coyotes is beyond my comprehension. The public should be appalled by such an outright slaughter. **Response:** We believe that harvest at the target level will have no statewide impact on coyote populations. The coyote is one of the most prolific and adaptable wild animals in the Southwest. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Sportfish Management Subprogram (pp. 61 through 68)

Comment (Old Pueblo Trout Unlimited): (no specific page reference) Please add a Strategy directing the Department to identify streamside incubators (e.g. Whitlock-Vibert boxes) and any other on-site mechanisms, equipment, or technology as supplements to hatcheries in working toward recovery of Arizona's native salmonids (Apache and Gila trout) and management of any other species for which they can be used effectively. **Response:** Thanks for the innovative suggestion. We agree. **Decision:** The Strategic Plan will be revised as suggested by this Comment.

Comment (T. Bergman): (no specific page reference) How about a new Angler Survey for 2002. **Response:** The survey is conducted every other year, and will be conducted again in 2002. **Decision.** The Strategic Plan will not be revised as a result of this Comment.

Comment (White Mountain Apache Tribe): (no specific page reference) You may want to address crayfish, and other non-native threats such as bullfrogs, softshell turtles, etc. and impacts on native flora and fauna. Stronger regulations against any further non-native introductions may be necessary. Research should be stressed for the removal of these invasive non-natives where impacts are greatest. **Response:** We understand your Comment and will ask the Commission to provide guidance. **Decision:** The Strategic Plan will not be revised to address this Comment. The Department will address this issue through the scheduled revision of the Live Wildlife Rules, which will afford the public opportunities for involvement and the Commission opportunities for approval.

Comment (T. Hulen): Arizona's fisheries are also in dismal shape. We have significantly degraded most of our aquatic habitat. Streams should be evaluated and certain streams with significant wildlife potential should be rehabilitated. This would include streams where the exotic aquatic animals are removed and replaced with native species. What an amazing opportunity if it were possible to fish for both Apache and Gila trout in Arizona's streams. You can go anywhere and fish for rainbow trout or small mouth bass, but not the Apache and Gila trout. Many streams such as the lower Salt River will have to remain stocked with exotic game

fish, but why not have streams with native fish only. **Response:** We do not agree that Arizona's fisheries are in dismal shape, but we do agree it is essential to balance sportfishing opportunities against native fish conservation needs. The Strategic Plan addresses this in several places, in both the Sportfish Management and the Nongame and Endangered Wildlife text. Several streams have been or will be converted to Apache or Gila trout conservation (and eventually will be open to angling), and other streams will also be converted to "native fishes management emphasis" as we continue working toward watershed-based fisheries management. Others, as you noted, will remain dedicated to maintaining and enhancing sportfishing opportunities. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (Arizona Heritage Alliance; Sierra Club - Grand Canyon Chapter): (p. 68) We oppose the new sportfish Strategy which states, "Enhance some water currently managed for non-native trout to develop additional blue ribbon fishing opportunities for rainbow and potentially for brown trout (where they currently exist)." There are almost no streams in Arizona without nonnative fishes and very few with a large number of native species, so this goal seems to be in direct conflict with working to reestablish stable populations of native fishes. **Response:** The disputed Strategy is not in conflict with native fish conservation efforts. They reflect our movement toward watershed based fisheries management. Some streams, reaches, or entire watersheds are being converted to native fish conservation. Others are being converted to sportfish management. The disputed strategy simply says that in some of the waters currently occupied by rainbow and/or brown trout that will be retained as sportfish emphasis waters, we will convert the management from quantity objectives (which generally means smaller but more fish) to quality objectives (which generally means fewer but larger fish). The Strategy was inserted to specifically address loss of some sportfishing opportunities associated with recovery efforts for Apache trout. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Nongame and Endangered Wildlife Management Subprogram (pp. 69-82)

Comment (Arizona Audubon Council; Bobbie Holaday; T&E Inc.): (no specific page reference) We support more emphasis on nongame species management. The bulk of wildlife species and numbers are nongame species, and deserve a priority as high if not higher than game species. Supporting nongame species should be in the interest of all Arizona citizens. **Response:** Within the Department's budget process, funds are allocated not by which species are most numerous but in relation to need and to some extent in proportion to how the funds are generated and how many customers are served. Although the Heritage Fund and the Nongame Checkoff both provide essential funds to this agency, the majority of our funding is derived from licenses sold to hunters and anglers and from taxes on goods bought by them or for them to use. We believe that our allocation process is fair to all three wildlife Subprograms, although clearly many needs are not being fully met, due to lack of funding. Thus, the Strategic Plan, in strategies outlined in Challenge 1 (p. 8), in particular Strategy M, and Objective 9 (pp. 78) and Goal 9 (p. 77) in the Nongame Subprogram, provides opportunities for us to seek alternative funding sources for our programs. We do in fact incorporate various alternative funding mechanisms,

such as the Nongame Wildlife Income Tax Checkoff, the Wildlife Passport program, and the lottery-based Heritage Fund. We also coordinate with other state wildlife agencies to seek alternative funding sources on the federal level, such as the Conservation and Reinvestment Act that is again under consideration by Congress. **Decision:** The Strategic Plan sufficiently addresses this issue (e.g. see Nongame Goal #10), and does not need to be revised as a result of this Comment.

Comment (Arizona Audubon Council; Maricopa Audubon Society; Sonoran Audubon Society): (no specific page reference) Let's have a fully-funded, adequately staffed and robust nongame program, equal to that of the game program, especially considering that nongame species comprise the bulk of Arizona's wildlife. **Response:** Please see the Response to the immediately preceding Comment. **Decision:** The Strategic Plan sufficiently addresses this issue, and does not need to be revised as a result of this Comment.

Comment (Old Pueblo Trout Unlimited): (no specific page reference) Please add a Strategy directing the Department to identify streamside incubators (e.g. Whitlock-Vibert boxes) and any other on-site mechanisms, equipment, or technology as supplements to hatcheries in working toward recovery of Arizona's native salmonids (Apache and Gila trout) and management of any other species for which they can be used effectively. **Response:** Thanks for the innovative suggestion. We agree. **Decision:** The Strategic Plan will be revised as suggested by this Comment.

Comment (Arizona Audubon Council; R. Eidsmoe; Maricopa Audubon Society; J. Miano; B. Powell; R. Rodgers; Sierra Club - Grand Canyon Chapter; Sonoran Audubon Society): (no specific page reference) We strongly support the endangered species reintroduction program. These programs provide opportunities for increased local input and consideration of local issues as well as education to Arizona's wildlife heritage. **Response:** We appreciate and agree with this Comment. Goals 2 and 6 (p. 77), and Conservation Strategy 12 (p. 80) both demonstrate our commitment to restoring extirpated populations. **Decision:** The draft Strategic Plan sufficiently addresses this issue, and does not need to be revised as a result of this Comment.

Comment (T. Hulen): (no specific page reference) The California condor program should be abandoned. The evidence is conclusive that there were no condors in Arizona during the historic period. Their heyday was the Pleistocene epoch. They lasted as long as they did in California because of marine mammal availability on California's beaches and the early Californian cattle business that harvested cattle for leather, not meat. If animals like the condor are so important to reestablish why not bring the grizzly bear back. We have authentic documentation on the disappearance of this animal. **Response:** Decisions about which species to reintroduce are made on a case-by case basis, although the public as a whole supports such actions at overwhelming levels (typically more than 75% of the public surveyed favors them). The Department's decision to reintroduce condors was made through open public process, and was widely supported. The project continues to enjoy overwhelming public support, despite the difficulties we have encountered. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (Coalition of Arizona-New Mexico Counties): (p. 69) The section on riparian habitats should be amended to reflect a shift of emphasis to include upland watersheds.
Response: We agree. **Decision:** The Strategic Plan will be revised to address this Comment.

Comment (J. Gunn): (p. 69) On p. 69, the draft makes a rare reference to habitat. I disagree with the emphasis on riparian habitats. While important, indeed critical, I urge the Commission to be aware that these areas and their attendant obligatory species are typically abundant in the more mesic regions east and south of Arizona. The habitats that are truly precious and contain unique flora and fauna are our plains and uplands. These are the habitats most chronically degraded and the most difficult habitats to recover. I urge the Commission to direct the Department to strive for a balance and direct additional attention to these areas. **Response:** We agree that riparian habitats are more abundant in more mesic regions outside this State, but that makes them all the more precious where they do occur, or could occur again, in Arizona. Moreover, although we cooperate with other states and countries on conservation issues of mutual concern, our primary responsibility is to manage wildlife, and ensure appropriate management of wildlife habitats, within the State of Arizona. We further believe the Department's efforts in this regard are balanced, and that such balance is under constant review and revision, but not through the Strategic Planning process. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (J. Gunn): (p. 71) The discussion of consumptive collection of reptiles and amphibians is conspicuously absent from the plan, reflecting the general bias of the Department against this activity. This group of hunters, comprised of many non-residents too, should not continue to be ignored. The Plan should recognize their contribution to the recreation economy and delineate strategies (educational outreach / special permits etc.) that will increase their satisfaction with their outdoor experiences. These hunters are far more numerous than are some of our more mainstream game species (Grouse, Bighorn, Bear, etc.). As these species of wildlife are far more abundant than most of our game species, there exists a great potential to expand this sector. **Response:** The Strategic Plan does not include extensive text detailing any particular segment of the consumptively oriented customer base for nongame species. We could easily add additional passages to rectify that shortcoming, under the Supply and Demand sections and under Recreation Strategies. However, the Plan does provide the Department with guidance that we would heed to ensure that both consumptive and nonconsumptive interests are sufficiently addressed (see p. 77, Goal 3 and Objective 3; also see p. 80, Conservation Strategy 8.a). These comments notwithstanding, the Department does not ignore consumptively oriented nongame interests, resident or not. Each year we solicit comment from all sectors of the public to determine whether our existing rules and Commission Orders provide recreational opportunities appropriate to meeting public demand, within legal and resource constraints. **Decision:** The Strategic Plan will be revised to address this Comment.

Comment (Coalition of Arizona-New Mexico Counties): (p. 75) The paragraph on “other species” should be amended to include the need to protect and restore upland watersheds.
Response: We agree. **Decision:** The Strategic Plan will be revised to address this Comment.

Mission Statement (p. 77)

Comment: None received.

Goals (p. 77)

Comment: None received.

Objectives (pp. 77-78)

Objective 1 (p. 77)

Comment (Arizona Audubon Council; Maricopa Audubon Society; R. Eidsmoe; J. Miano; B. Powell; R. Rodgers; Sierra Club - Grand Canyon Chapter; Sonoran Audubon Society): Your goal of maintaining projects on merely 25 of the 113 species on the “species of special concern” list is woefully inadequate. This is the time to try to prevent those species from becoming officially endangered. **Response:** The goal is an estimate based on wildlife resource needs and financial and staff resources to carry out such work. We will choose the particular species at any given time based on their conservation status, distribution, probability of success, project feasibility, availability of funding, and staff expertise. We will continue to monitor and evaluate the status all 113 species, and act accordingly. At any given time, we may work with fewer or more than 25 species. The number is offered as a goal, not as a minimum or a cap. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Comment (T&E Inc.): Wildlife 2006 Draft Management Plan starts from an excellent premise that we endorse wholeheartedly. The Department Mission is well stated. Our big concern, however, and the major deficiency in the draft plan is the small number of “species of concern” projects the plan sets as a goal. The goal should be all species of concern, but if the intent here is to reflect a number more likely to be maintained, then we submit that you are grossly neglecting one of the most important parts of the Game and Fish Department’s responsibility. We do not want to see these species decline to the point that they must be listed as endangered. In like vein we strongly support reintroduction of native species that have been extirpated from the state. **Response:** Thanks for the kind words. With regard to the numbers of species with which we will work, please see the Response to the preceding Comment. Also, we agree with your comment regarding proactive conservation to preclude endangerment, and with using reintroduction as a tool to promote recovery. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Objective 2 (p. 77)

Comment (Sierra Club - Grand Canyon Chapter; Sonoran Audubon Society): While the objective of maintaining at least five re-establishment programs for endangered species may be an appropriate number, it is imperative that these programs receive adequate funding or they are destined to failure. **Response:** We agree that such efforts are doomed to failure if funding is inadequate. Unfortunately, declining Heritage revenues and cutbacks in the wildlife budgets of our federal partners have caused us to cut back several of these efforts in recent years, and absent new funding additional cutbacks can be expected. This is at least part of the reason why the Commission has determined that all three Subprograms must, with regard to enhancement, restoration, or re-establishment of species, consider economic feasibility. It does little if any good to start a project that cannot be finished. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Objective 3 (p. 77)

Comment: None received.

Objective 4 (p. 78)

Comment: None received.

Objective 5 (p. 78)

Comment: None received.

Objective 6 (p. 78)

Comment: None received.

Objective 8 (p. 78)

Comment: None received.

Objective 9 (p. 78)

Comment (Coalition of Arizona-New Mexico Counties): The Coalition is on record opposing the Conservation and Reinvestment Act (CARA). There is limited private land in Arizona. Any further reduction in the private land base will have an adverse impact on the limited tax base in the rural areas of the state. The Coalition requests striking the following subsection: "_1.6_ 9. Work to see full enactment of the Conservation and Reinvestment Act, as proposed to Congress in the year 2000." **Response:** Federal payment of "in lieu" taxes has often been used to effectively offset any projected loss of tax revenues associated with land acquisition. The CARA

legislation addressed this issue specifically, with dedicated funds to ensure that local governments did not suffer from lost tax revenues associated with land acquisition under CARA.

Decision: The Strategic Plan will not be revised as a result of this Comment.

Comment (White Mountain Apache Tribe): We also support enactment of the Conservation and Reinvestment Act (CARA) and have worked for the past 2 years with a variety of southwestern and other tribes to get CARA passed. **Response:** Continued efforts such as yours will be crucial to ensuring that the new Congress and the Bush Administration help us make this effort successful. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Objective 10 (p. 78)

Comment (Coalition of Arizona-New Mexico Counties): The Coalition concurs with the following and will coordinate efforts with the Department to achieve this change in the ESA: _N_ 10. Propose and advocate (a) ten-fold increases for, and block granting to, state wildlife agencies for funds provided under Section 6 of the Endangered Species Act, (b) Congressionally-directed "line item" funds to the states to address specific "species at risk" partnership projects as proposed by the Western Association of Fish and Wildlife Agencies, and (c) reauthorization revisions to the Endangered Species Act to ensure that at the time of listing a species, sufficient funds are allocated to the states to carry out their Section 6 responsibilities for such species. **Response:** We look forward to the collaboration. **Decision:** The Strategic Plan will not be revised as a result of this Comment.

Strategies and Approaches (pp. 78-81)

Conservation Strategy 1 (p. 78)

Comment: None received.

Conservation Strategy 2 (p. 79)

Comment: None received.

Conservation Strategy 3 (p. 79)

Comment (White Mountain Apache Tribe): Training should include information on cultural and traditional significance and use of certain plants and animals to Tribes. **Response:** We understand your Comment and will ask the Commission for guidance. **Decision:** The Strategic Plan will not be revised to address this Comment. The range of tribal values with regard to cultural and traditional significance is too wide for the Department to provide such information cost-effectively and without offending another tribe with a disparate viewpoint.

Conservation Strategy 4 (p. 79)

Comment: None received.

Conservation Strategy 5 (p. 79)

Comment: None received.

Conservation Strategy 6 (p. 79)

Comment: None received.

Conservation Strategy 7 (p. 80)

Comment: None received.

Conservation Strategy 8 (p. 80)

Comment: None received.

Conservation Strategy 9 (p. 80)

Comment: None received.

Conservation Strategy 10 (p. 80)

Comment: None received.

Conservation Strategy 11 (p. 80)

Comment: None received.

Conservation Strategy 12 (p. 80)

Comment: None received.

Conservation Strategy 13: (p. 81)

Comment: None received.

Recreation Strategy 1 (p. 81)

Comment: None received.

Recreation Strategy 2 (p. 81)

Comment: None received.

Recreation Strategy 3 (p. 81)

Comment (White Mountain Apache Tribe): Interpretive signs should also provide information on traditional and cultural importance and uses of plants/animals to Arizona Tribes. **Response:** We understand your Comment and will ask the Commission for guidance. **Decision:** The Strategic Plan will not be revised to address this Comment. The range of tribal values with regard to cultural and traditional importance is too wide for the Department to provide such information cost-effectively and without offending another tribe with a disparate viewpoint.

Recreation Strategy 4 (p. 81)

Comment: None received.

Information and Education Strategy 1 (p. 81)

Comment: None received.

Information and Education Strategy 2 (p. 81)

Comment: None received.

Information and Education Strategy 3 (p. 82)

Comment: None received.