



THE STATE OF ARIZONA
GAME AND FISH DEPARTMENT

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July 8, 2007

Harv Forsgren, Regional Forester
USDA Forest Service, Southwestern Region (R3)
333 Broadway Street
Albuquerque, NM 87102

Dear Mr. Forsgren:

Over the last several years, the Arizona Game and Fish Department (Department) has been actively engaged in local Forest Service (Forest) Land Management Plan (LMP) and Travel Management Plan (TMP) revision processes. The Department, by and through the Arizona Game and Fish Commission (Commission), has jurisdictional authority (Arizona Revised Statutes) for management of the state's wildlife resources, and safe watercraft and off-highway vehicle recreation, for the enjoyment, appreciation, and use by present and future generations. As such, the Department is committed to participating as a full partner with the Forest Service in the development and implementation of LMP's, TMP's and on the ground projects. In order to further our commitment to these resources, we felt it necessary to reiterate our concerns regarding those areas of planning that continue to remain uncertain, and/or are of vital importance to the Department.

The Department understands the challenge of creating a succinct LMP or TMP that must meet objectives to manage multiple resources and uses over 10-20 years. The complex nature of managing multiple resources in concert can create perceived or real conflicts between Desired Conditions or management direction for different uses, resources, or user groups. The Department is concerned that several resources and/or uses may inherently conflict, and the proactive and timely management of fish and wildlife could suffer as a consequence.

In addition, we are concerned that the complexity and detail needed to understand how, when, and where to be engaged statewide in planning has the potential to negatively impact public participation. We believe most constituents have and will find it difficult to thoroughly review and provide comments, within time frames allotted, and across planning areas. In light of these overarching concerns, we provide comment on both LMP and TMP processes specifically.

Land Management Planning

- On a statewide level, planning documents must be clear in their intent such that Forest personnel, as well as the general public, can interpret decisions or direction uniformly. Ensure clarifying language is included within plans of Forest terminology, policies, or direction to avoid misinterpretation in the future of how decisions or direction should be

implemented on the ground, or how proposed actions may or may not be consistent with overarching LMPs.

- Regardless of which planning rule moves forward, we request that the Forest commit to a species list or some other specified method to communicate and direct monitoring and funding priorities for wildlife and habitat parameters.
- In addition, we request that the Forest commit to the inclusion of Desired Conditions in LMPs that are specific enough to ensure that objectives can be realistically interpreted and tracked over time. Further, these conditions should be scientifically-based with standards and guidelines for timber, wildlife, and fish resources maintained and amended with the Department in full partnership with the Forest.
- While the Commission recognizes the USFS authority and responsibility to manage timber, grazing, and energy resources, the Commission does not support those activities in a manner or to a degree which imperils local wildlife populations.

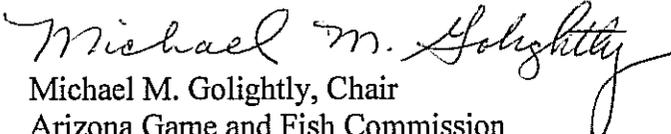
Travel Management Planning

Coordination between the Forests and the Department is vital to ensure that route networks are evaluated and discussed to address wildlife management objectives, and to ensure reasonable public access.

- The Commission requests the ability of legally permitted hunters the continued use of motorized vehicles for the timely and efficient retrieval of downed big game to aid the Department in achieving management objectives and wildlife population goals, to avoid the unlawful waste of game meat, and to facilitate our Challenged Hunter Access/Mobility Permit (CHAMP) Program.
- The Commission does not support broadly limiting dispersed recreational uses, such as camping, firewood collection, recreational shooting, etc., but rather prefers site specific and/or enforcement remedies where multiple uses conflict.

The Commission appreciates your attention to these matters. Based on these comments and concerns, the Commission requests your commitment to ensure the Department is engaged, locally and statewide, in planning processes to the fullest extent possible. If you have questions regarding this letter, please contact Josh Avey, Habitat Branch Chief, at 602-789-3605.

Sincerely,


Michael M. Golightly, Chair
Arizona Game and Fish Commission

cc: Duane L. Shroufe
National Forest Supervisors