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Public Comments Processing
Attn: FWS-R2-ES-2011-053
Division of Policy and Directives Management
US Fish and Wildlife Service
4401 N. Fairfax Drive
MS 2042-PDM
Arlington, VA 22203

The Gila County Board of Supervisors would like to offer comments on the "Designation of Revised Critical Habitat for Southwestern Willow Flycatcher; Proposed Rule, (FWS-R2-ES-2011-053)" published in the August 15, 2011 Federal Register. Our comments relate to the areas within and adjacent to Gila County that are addressed in this proposed rule.

Gila County is a rural county, comprised largely of federally managed land, a considerable area of Native American Reservation lands, and a mere 4% of the land in Gila County privately owned. Our local economies depend both on resource based industries and recreation opportunities provided to our visitors and our residents. With a 12% unemployment rate county-wide and 21% of our residents living at or below 200% of the federal poverty level, we are keenly aware of the detrimental effect that is caused by restricting business and recreational opportunities.

We do not feel that the impact on local economies has been adequately examined. The small communities of Tonto Basin and Roosevelt in particular, have small locally owned businesses that employ local residents, serve the local area, and depend heavily upon recreation visitors to Roosevelt Lake and the surrounding area as their sole source of income. The larger communities of Globe, Payson, and San Carlos also realize economic benefit from campers, hikers, fishermen and hunters who travel through those communities (and buy supplies, food, gas and lodging) to access the more remote locations. Designating large amounts of traditional recreation areas as critical habitat will and has had a considerable negative impact on local economies. Since we are a rural, less affluent county, the relative impact is much greater than on more populated counties.

We strongly support the proposed exclusions of the Roosevelt Lakebed and the San Carlos Lakebed. We would like for you to provide more detailed maps that allow the opportunity to more clearly see what specific areas within those two recreation areas are being proposed for exclusion. From the maps included in the proposal, it is impossible to determine exactly how many, if any, of the existing campgrounds, both developed as well as lake shorelines are being considered for

exclusion, or if they are considered part of the critical habitat designation. Nor could we find in the text of the proposed rule, these types of sites and their proposed designation were identified or explained.

We would like to strongly suggest that the historical and developed recreation sites located along the banks of these two lakes be added to the exclusion area if they are not already contained in the proposed exclusions.

With regard to the established and proposed stream segments along the Verde River, Tonto Creek, Salt River, Pinal Creek and the Gila River both above and below Coolidge Dam, at the very least we request that you additionally exclude from critical habitat designation, all recognized stream crossings that currently exist for vehicles as well as the known game and livestock trails within these designated stream segments. This would allow for ample critical habitat, while minimizing the adverse impacts on local recreationists, local livestock producers, local federal land managers, and our already struggling local economy.

Given that the population of the Southwestern Willow Flycatcher in Gila County is a stable population with abundant breeding sites occurring over a relatively broad geographic range, as evidenced by statements contained within the proposed rule as well as statements contained within the literature cited, it is unclear to us why the areas in Gila County are included in the proposed critical habitat designation.

The Gila County Board of Supervisors believe that once again, this proposed rule is evidence of species management by litigation, rather than a more holistic, evidence based management objective grounded in the health, functionality and productivity of the ecosystem as a whole.

The Gila County Board of Supervisors thanks you for the opportunity to comment and requests to be kept informed and included in the process as this analysis continues and as the US Fish and Wildlife Service evaluates, reviews and reaches a decision regarding this proposed rule.

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