

### United States Department of Agriculture Forest Service March 2011



# **Environmental Assessment**

Fuenta de Agua (Bobtail Spring) Pipeline

Globe Ranger District, Tonto National Forest Gila County, Arizona

> T.2S., R.15E., Section 17 Gila and Salt River Meridian

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### **CHAPTER 1 – PURPOSE AND NEED**

### **Document Structure**

Forest Service has prepared this Environmental Assessment (EA) in compliance with National Environmental Policy Act (NEPA) and other relevant Federal and State laws and regulations. Supporting documentation, including more detailed analyses of project area resources, is on file in project planning record located at Globe Ranger District of Tonto National Forest in Globe, Arizona.

The document is organized into the following sections:

- Purpose and need information on project proposal, purpose and need for project, scoping.
- Description and comparison of alternatives, including the proposed action
- Environmental consequences environmental effects of implementing project
- Agencies and people consulted list of people and agencies consulted

### Purpose and Need for Action\_

Project's purpose and need is to provide perennial water in important white tail deer habitat, improve livestock water availability, and improve riparian vegetation. This action is proposed by USDA Forest Service in cooperation with Arizona Game and Fish Department and grazing permittee.

### **Background**

### **Existing Conditions**

Bobtail Spring. Spring is located on Pinal Mountains in a stream channel of an unnamed tributary to Pioneer Creek. Situated about two miles southeast of Pinal Peak at an elevation of about 5400 feet, it is part of Dripping Springs Wash of Middle Gila Watershed. Spring water is funneled into water line transporting water to points downstream. Project occurs on moderately steep-to-steep slopes with shallow-to-moderately deep soils of medium-to-coarse texture. Geology of area is dominated by granite, making upland soils highly susceptible to erosion. Surrounding upland vegetation is dominated by chaparral.

<u>Range capacity</u>. Bobcat Spring is located within an 8,400 acre pasture of an active grazing allotment. Allotment is permitted for 160 cattle which are grazed year-round in rest rotation pattern. Although pasture has several water sources, only two are functional. Bobcat Springs is one functional water source. Functional water sources are located near pasture boundary.

<u>Riparian condition</u>. National wetland inventory map delineates riparian vegetation at Bobcat Spring. Riparian area supports oak, young willow, sparse deergrass, emergent herbaceous plants, catclaw, manzanita, and sumac. Surface water was estimated to be approximately 50 linear feet in August 2009. Water from spring is unreliable for year-round use by riparian plants and animals. Chaparral may likely affect water availability.

<u>Wildlife</u>. Whitetail deer, mule deer, javalina, and many small game animals, such as cottontail rabbits, occur throughout project area. Wildlife use riparian area, but livestock do not generally access spring.

#### **Management Direction**

Tonto National Forest Land Management Plan (1985, as amended) identifies the following goals appropriate for this project. Page references refer to Forest Plan.

#### **Management Prescriptions - All Management Areas**

Wildlife and fish habitat elements will be recognized in all resource planning and management activities to assure coordination that provides for species diversity and greater wildlife and fish populations through improvement of habitat (Tonto National Forest Plan 20-1).

Emphasize a program of range administration which will bring range resource under proper management and improve range forage conditions (Tonto National Forest Plan 22).

Provide direction and support to all resource management activities to... enhance riparian ecosystems, by improved management (Tonto National Forest Plan 19).

Maintain a minimum of 30% effective ground cover for watershed protection and forage production, especially in primary wildlife forage producing areas. Where less than 30% exists, it will be the management goal to obtain a minimum of 30% effective ground cover (Tonto National Forest 40-1).

Forage use by grazing ungulates will be maintained at or above a condition which assures recovery and continued existence of threatened and endangered species (Tonto National Forest 42).

Re-establish riparian vegetation in severely degraded but potentially productive riparian areas (Tonto National Forest 41).

Optimize wildlife inputs in all management areas by coordination of other resource activities and direct habitat improvement projects (Tonto National Forest 41).

Provide wildlife access and escape ramps on all livestock and wildlife water developments (Tonto National Forest 42).

#### Management Prescriptions - Management Area 2F

Emphasis: Manage for a variety of renewable natural resources with primary emphasis on wildlife habitat improvement, water quality maintenance and livestock forage production. Manage for a variety of renewable natural resources with primary emphasis on wildlife habitat improvement, water quality maintenance and livestock forage production.

#### **Desired Conditions**

**Rangeland**: Management seeks to optimize production and utilization of forage allocated for livestock use consistent with maintaining the environment and providing multiple use for the range.

Soils and Vegetation: Manage chaparral type to emphasize production of whitetail deer.

**Riparian Areas:** Improve and manage riparian areas, included in management area, to benefit dependent resources.

*Watershed/Hydrology:* Watersheds will be managed so as to improve them to a satisfactory or better condition.

**Wildlife:** Provide for species diversity, maintain viable populations of existing species, improve habitat for selected species, and manage to increase population levels of threatened and endangered species. In riparian areas across the allotment, regeneration of vegetation to achieve multiple age classes and complex vegetative structure for fish and wildlife habitat is desired.

### **Proposed Action**

Pipeline from Bobcat spring will be tapped and another line will transport some water to a location about one-half mile side hill from tap. When possible, pipeline will be buried. A solar pump will be located at spring to pump water into a storage tank. Storage tank and troughs will be painted to blend with landscape. Fabrication of all parts of project will be metal to avoid any possible fire damage. Storage tank will be filled with water from spring, winter rains, and summer monsoons (depending on stream flow).

Two troughs will provide water year-round. Wildlife trough will be located to east of storage tank and will allow access by all types of wildlife at ground level. It will not be fenced off from livestock, but will be physically accessible only by wildlife. Any excess water will be returned to Bobtail Spring drainage to support riparian vegetation.

Livestock trough will have wildlife access and escape ramps, and bat friendly apparatus. It will be located near Forest Service Road 221. Each trough will provide year round water and excess will be returned to the spring to maintain riparian habitat.

#### **Decision Framework**

Globe District Ranger for Tonto National Forest will be responsible official. Responsible official will decide whether to adopt and implement Proposed Action, or an alternative to the Proposed Action (including changes to language and content of Tonto National Forest Plan), or whether further analysis is needed through preparation of an Environmental Impact Statement (EIS).

If deciding official determines that there are no significant impacts, decision will be documented in a Finding of No Significant Impact and Decision Notice.

#### **Public Involvement**

Proposal was listed in Schedule of Proposed Actions. Proposal was provided to public and other agencies for a thirty-day comment period during scoping, starting August 12, 2009.

Scoping document was sent to: 5 individuals, 14 private organizations, 21 representatives from local tribes, 9 state/county/town officials and 1 federal agency. From these scoping activities, 3 responses were received.

Forest Service is required to gather significant and non significant issues. Forest performed a content analysis on comments received to determine if any significant issues were presented. An issue is defined as a point of disagreement, debate, or dispute with a proposed action based on some anticipated undesirable effect caused by action. Some comments were about process, requests for clarification or additional information, or otherwise did not disagree with Proposed Action.

ues
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Significant issues are defined as those directly or indirectly caused by implementing Proposed Action. Non-significant issues are identified as those: 1) outside the scope of Proposed Action; 2) already decided by law, regulation, Forest Plan, or other higher level decision; 3) irrelevant to decision to be made; or 4) conjectural and not supported by scientific or factual evidence. Council for Environmental Quality (CEQ) NEPA regulations require this delineation in Sec. 1501.7, "...identify and eliminate from detailed study the issues which are not significant or which have been covered by prior environmental review (Sec. 1506.3)..."

During scoping process, no significant issues were identified.

# CHAPTER 2 - ALTERNATIVES, INCLUDING PROPOSED ACTION

This chapter describes and compares alternatives considered for Bobtail Fuenta de Agua project. This chapter presents alternatives in comparative form, in order to delineate differences between each alternative and provide a clear basis for choice among options. Mitigation, if employed, and monitoring measures incorporated into alternatives are also identified.

# Alternatives eliminated from further study\_

No additional alternatives were proposed or considered as scoping efforts did not result in identification of significant issues that could not be addressed through project design or mitigation measures.

### **Alternatives**

#### Alternative 1 - No Action

Under No Action alternative, current management plans will continue to guide management of project area. The Bobtail Fuenta de Agua project will not be implemented.

### **Alternative 2 - Proposed Action**

Pipeline from Bobcat spring will be tapped and another line will transport some water to a location about one-half mile side hill from tap. When possible, pipeline will be buried. A solar pump will be located at spring to pump water into a storage tank. Storage tank and troughs will be painted to blend with landscape. Fabrication of all parts of project will be metal to avoid any possible fire damage. Storage tank will be filled with water from spring, winter rains, and summer monsoons (depending on stream flow).

Two troughs will provide water year-round. Wildlife trough will be located to east of storage tank and will allow access by all types of wildlife at ground level. It will not be fenced off from livestock, but will be physically accessible only by wildlife. Any excess water will be returned to Bobtail Spring drainage to support riparian vegetation.

Livestock trough will have wildlife access and escape ramps, and bat friendly apparatus. It will be located near Forest Service Road 221. Each trough will provide year round water and excess will be returned to the spring to maintain riparian habitat.

### **Management Practices Common to All Alternatives**

Management practices include measures to reduce or avoid resource impacts that are incorporated into project design. These measures have been used on previous projects and are demonstrated to be effective at reducing environmental impacts. They are consistent with applicable Forest Plan standards and guidelines.

#### Soil, Water and Vegetation

Utilization of key upland herbaceous forage plant species will be managed to achieve goal of light-to-moderate grazing intensity. Objective is to protect plant vigor, provide herbaceous residue for soil protection, and to increase herbage producing ability of forage plants. A utilization guideline of 30-40% use of key species in key areas will be used to achieve this objective.

In riparian areas, allowable use for obligate riparian trees species will be to limit use to < 50% of terminal leaders (top 1/3 of plant) on palatable riparian tree species accessible to livestock (usually < 6 feet tall). Deergrass use will be limited to < 40% of plant species biomass. Emergent species (rushes, sedges, cat-tails, horse-tails) will be maintained at six-to-eight inches of stubble height during grazing period. Utilization will be measured seasonally when livestock are in pasture. Livestock will be moved from critical area or pasture when recommended guidelines are met. If riparian conditions continue to show degradation, fencing may be required and applied.

#### Wildlife

No range development construction or maintenance activities that involve use of mechanized equipment will occur within Mexican Spotted Owl Protected Activity Centers (PAC's) between February through August (breeding season). Mechanized equipment may be used in areas *at least* ½-mile distance from PAC's during breeding season.

#### Heritage Resources

Archaeological survey will be conducted prior to construction of any new range improvements and locations selected where impacts to heritage resource sites are avoided.

Existing range facilities (water troughs, corrals, etc.), where cattle regularly congregate, are periodically inspected to determine whether livestock are causing damage to heritage resource sites.

Salting locations are placed outside the boundaries of heritage resource sites.

### Management Objectives\_

Management objectives are measurable parameters that can be used to describe attainment of desired conditions. If trends are upward towards stated objective when monitored, then management may be considered effective in moving towards desired condition.

Management objectives for selecting appropriate action are:

- Maintain or improve conditions to at least 30% of effective ground cover for watershed protection;
- Establish and/or maintain multiple age classes and complex riparian species in Bobtail Spring; and
- Provide water source to improve wildlife habitat.

### **Monitoring**

Objective of monitoring is to determine whether Bobtail Spring Fuenta de Agua is properly implemented and actions are effective at achieving or moving toward goals and objectives.

Effectiveness monitoring includes measurements to track condition and trend of upland and riparian vegetation, soil, and watersheds. Monitoring will be done following procedures described in interagency technical reference and the Region 3 Rangeland Analysis and Training Guide.

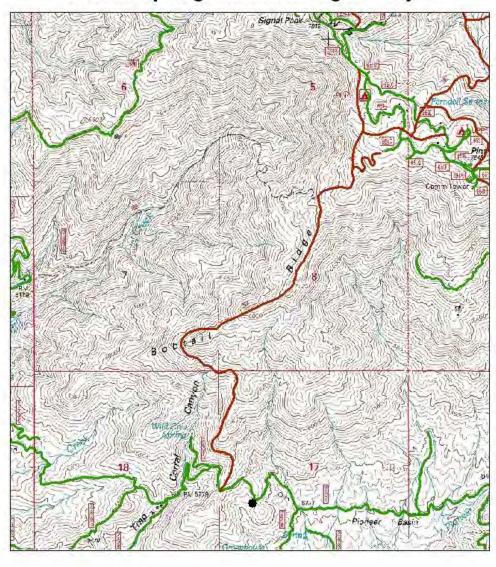
Implementation monitoring will occur at any time during grazing year and will include such things as inspection reports, forage utilization measurements, livestock counts, and facilities inspections. Utilization measurements are made following procedures found in Interagency Technical Reference (BLM et al 1996) and with consideration of "Principles of Obtaining and Interpreting Utilization Data on Southwest Rangelands".

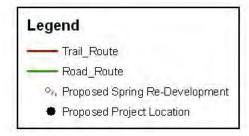
Trend monitoring will be done using photo points. One hundred percent surveys should be conducted at the spring, until vegetation density increases, using guidelines in McBride and Grove (2002).

Wildlife monitoring techniques may include trail cameras to identify type, kind, and amount of wildlife use.

Surveys will be conducted for Arizona hedgehog cactus in planned disturbance areas and in rocky areas around Bobtail Spring. If present, project will avoid disturbing area at or near hedgehog.

# **Bobtail Spring Fuenta de Agua Project**





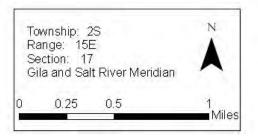


Figure 1. Bobtail Fuenta De Agua Project Area

### **Comparison of Alternatives**

This section provides a summary of effects of implementing each alternative. Information in table is focused on activities and effects where different levels of effects or outputs can be distinguished quantitatively or qualitatively among alternatives.

**Table 1 – Comparison of alternatives.** 

Element	Alternative 1 - No Action	Alternative 2 – Proposed Action
Range Capacity	Livestock and wildlife will continue to congregate in riparian area where limited water exists.	Livestock and wildlife will more likely disperse with water source located out of riparian area.
Riparian Condition	Condition of riparian areas and stream channel may continue to improve, but at a slower pace where congregate.	Condition of riparian areas, vegetative species diversity, structure, and function will continue to improve where livestock grazing has diminished.
Wildlife	Limited water in intermittent stream will require wildlife to search for additional water sources.	Year-round water supply for livestock and wildlife. Although water sources are adjacent and separate, wildlife will have access to livestock water source, but not vice versa.

# **CHAPTER 3 - ENVIRONMENTAL CONSEQUENCES**

This chapter summarizes the physical, biological, social and economic environments of affected project area and potential changes to those environments due to implementation of alternatives.

Rangeland	Management	

#### **Affected Environment**

Bobtail Spring is located within an active grazing allotment. Cattle graze a rest rotation pattern. The affected environment consists of one 8,400 acre grazing pasture. Although the pasture boasts several water sources, only a couple is functional. The functioning water sources are located near the pasture boundary. Current allotment permitted livestock numbers are 160 cattle yearlong.

#### **NO ACTION**

Directly, there will be no disturbance to soils or vegetation. Indirectly, livestock distribution may not evenly disperse across landscape, but rather congregate in riparian area.

#### PROPOSED ACTION

Directly, project construction will cause temporary minor disturbance to ground. Indirectly, improved livestock distribution will result in less grazing pressure on Bobtail spring riparian area.

#### **Cumulative Effects**

Allotment NEPA will be completed in 2015 which will address re-authorization of livestock grazing and desired conditions. This improved water source may increase livestock distribution, which in turn may improve future desired conditions. Pinaledera NEPA will be completed in near future and will address potential affect of prescribed fire. Proposed project is located within coverage of Pinaledera. Bobcat project infrastructure will be mostly fire resistant.

### Water and Riparian Vegetation

#### **Affected Environment**

National Wetland Inventory map delineates riparian vegetation at location of Bobtail Spring. Riparian area supports oaks, young willow, a few deergrass, emergent herbaceous plants, catclaw, manzanita and sumac. Surface water was estimated to be about 50 linear feet in August 2009. Forest Road 221 lies within 10 feet of spring. Wildlife use of area, but generally, livestock do not access this spring.

#### **NO ACTION**

Spring will continue to provide water intermittently. Cattle and wildlife will continue to be drawn to riparian area.

#### PROPOSED ACTION

Water will be available year-round. Removing water from spring may impact riparian vegetation and ability of spring to support more vegetation. Adverse impacts will occur if improved development causes spring to dry up. Moving troughs out of drainage may have a beneficial effect of drawing cattle and wildlife away from riparian area and riparian vegetation. If cattle and wildlife still access riparian area, then fencing may be necessary.

#### **Affected Environment**

For wildlife habitat improvement, affected environment includes Bobtail Spring, storage tank, water trough locations, and a generalized circle of 640 acres surrounding improvements. This approximates an area where wildlife habitat would benefit from year-round water. The project is within Arizona Game and Fish Department Management Unit 24A.

Big Game Species (white-tailed deer, mule deer, and javelin)

Project area habitat is important to big game, but no reliable year-round water is available.

#### Small Game Species, Upland Game Birds, and Fish

#### Small Game Species

Cottontail rabbits, Gambel quail and dove are primary species present. Habitat quality and quantity generally controls small game numbers in Arizona. Rainfall patterns play a significant role in population numbers for any given year. In project area, dense chaparral vegetation may be reducing habitat quality by reducing water availability and diminishing growing space and conditions for survival of forbs and grasses eaten by wildlife.

#### **Nongame Species**

Amphibians, reptiles, birds, and mammals associated with chaparral and riparian habitats form project's non-game species groups. Generally, non-game species populations are managed forest-wide and not at project level. They are managed as species groups or through habitat management in an ecosystem context.

#### Fish

No fish occur within project area.

#### Threatened, Endangered and Proposed (TEP) species

Three TEP species and/or their habitats occur in or near the project area. They are Mexican spotted owl, Gila chub, and Arizona hedgehog cactus. Existing condition for these species is disclosed herein. A biological Assessment and Evaluation will make a determination of affect for selected action

#### Mexican Spotted Owl

*Distribution* - Mexican spotted owls (MSO) occur in Arizona, New Mexico, southern Utah, and portions of Colorado and in Mexico (Ganey et al. 1988). Standardized surveys, according to an established protocol, began in late 1980's in Arizona. Results from these surveys led to establishment of management territories that were modified into Protected Activity Centers (PACs) in compliance with MSO Recovery Plan (USDI 1995). Surveys have continued intermittently throughout Tonto National Forest (District Files). Surveys for MSOs occurred intermittently between 1990 and 2009 near project area. These surveys have been associated with other projects such as prescribed burns and grazing allotments. Nearby Pinal Mountains have eight MSO PACs and several thousand acres of Protected/Restricted MSO habitats.

Recovery Plan - Range of Mexican spotted owl in southwestern United States is subdivided into six recovery units (RUs) as identified in Recovery Plan (USDI 1995 pages 36-49). Five additional recovery units occur in Mexico. Tonto National Forest is within portions of two recovery units, Upper Gila Mountain (UGM) and Basin and Range West (BRW). Project area occurs within BRW Recovery Unit.

Habitat - Critical habitat in Arizona consists of 3,983,042 acres. Project area is within critical habitat unit BR-W-6. Bobtail Spring and surrounding habitat is a matrix of thick chaparral vegetation with a few small springs. Mill Creek MSO PAC is approximately 1 mile north of project area, but southern ½ of PAC closest to Bobtail Spring is chaparral. Last known MSO nest is in

drainage in northern part of PAC roughly 1.75 miles from Bobtail Spring. Because project area is chaparral and does not have primary constituent elements related to forest structure, it is not MSO critical habitat

#### Gila Chub

*Distribution* - Populations of Gila Chub occurred historically in the Gila River, its tributaries, and other Arizona drainages. Until the 1980's, a population occurred in nearby Mineral Creek, a Gila tributary. Surveys in 2006 and 2009 did not detect chubs, but detected non-native fishes. Upper reaches of Mineral Creek are approximately 3 miles west of Bobtail Spring; however, project and Mineral Creek are in different watersheds.

*Habitat* - Approximately 2 miles of upper reaches of Mineral Creek on Globe District are designated critical habitat for Gila Chub. Upper Mineral Creek has been dry for many years, has a degraded channel, and flows only ephemerally in response to storm events. No Gila Chub critical, suitable, or occupied habitat occurs near Bobtail Spring.

#### Arizona Hedgehog Cactus

*Distribution* - Arizona hedgehog cactus (AHC) has limited distribution and is found only in Arizona within Gila and Pinal Counties. It occurs primarily on TNF lands, but probably also on other ownerships. Project area is about 4 miles from El Capitan AHC subpopulation and 7 miles from main AHC population surrounding Top of the World, Arizona.

*Habitat* - Arizona hedgehog cactus occurs primarily in rocky habitats such as bedrock, rock crevices, isolated rock outcrops, and rocky drainages. It also occurs rarely under dense chaparral vegetation.

#### **NO ACTION**

Limited water in intermittent stream will require wildlife to search for additional water sources.

#### PROPOSED ACTION

There will be a reliable year-round water supply for both livestock and wildlife. Livestock will more likely distribute themselves across landscape reducing concentrated disturbance in a relatively small area. Forage will undergo more even utilization across a wider area.

#### **Cumulative Effects**

Existing grazing management will continue, but will not be expected to contribute measurably to increases in cumulative effects on wildlife habitats.

### **Environmental Justice**

Environmental justice is fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to development, implementation, and enforcement of environmental laws, regulations, and policies. Toward attaining environmental justice for all communities and persons in United States, Executive Order 12898 (February 11, 1994) directed all Federal agencies to evaluate their Proposed Actions to determine potential for disproportionate adverse impacts to minority and low-income populations.

In memorandum to heads of departments and agencies that accompanied Executive Order 12898, the President specifically recognized importance of procedures under NEPA for identifying and addressing environmental justice concerns. This memorandum states that "each Federal agency shall analyze the environmental effects, including human health, economic and social effects, of Federal actions, including effects on minority communities and low-income communities, when such analysis is required by [NEPA]."

Implementation of any alternative evaluated in this EA will not result in adverse impacts to environmental resources and socioeconomic conditions. Therefore, disproportionate direct, indirect, or cumulative adverse impacts on low income or minority populations will not occur.

### **Cumulative Effects**

Cumulative effects are past, present, and reasonably foreseeable future actions that add to direct and indirect effects considered in this EA. These activities and occurrences have contributed incrementally to changes in ecological conditions in project area and may continue to influence conditions in project area over term of project. Foreseeable future actions are those for which a proposed action has been approved or those proposed for NEPA analysis in the future. Other possible future actions are considered too speculative to include in this analysis.

## Consequences Related to Significant Elements

In 1978 the Council on Environmental Quality (CEQ) promulgated regulations for implementing the National Environmental Policy Act (NEPA). Regulations (40 CFR 1500-1508) include a definition of "significantly" as used in NEPA. Elements of this definition are critical to reducing paperwork through finding of no significant impact when an action will not have significant impact on human environment and is therefore exempt from requirement to prepare an environmental impact statement.

Context and intensity of impacts. Context is defined as "The significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting (...) in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short- and long-term effects are relevant." Intensity is the "... the severity of impact..."

The context of this proposal is limited primarily to allotment and immediate vicinity. In that localized context, this proposal will not pose any significant short- or long-term effects. The relatively small scale of this proposal's effects on land and resources, particularly compared to

effects of other activities on allotment, limit proposal's effects to a minor level. No impacts from proposed action have been determined to be severe.

**Beneficial and adverse impacts.** There are both beneficial and adverse impacts from proposed action, but adverse impacts are insignificant.

Affects on public health or safety. No affects on public health or safety have been identified.

*May establish a precedent for future, similar actions.* There are no impacts that may establish a precedent.

**Related to other actions that are individually insignificant but cumulatively significant.** There are no impacts that may be individually insignificant but cumulatively significant.

Effects on historical/cultural resources. No effects were established from archeological clearance.

Effects on T & E species and their habitats. No effect on T&E species or their habitat.

*Compliance with Federal, State, local laws.* Proposed action and alternatives are in compliance with Federal, State, and local laws.

### **CHAPTER 4 - CONSULTATION AND COORDINATION**

Forest Service consulted with the following individuals, federal, state, and local agencies, tribes and non-Forest Service people during development of this environmental assessment:

#### **ID TEAM MEMBERS:**

Craig Woods, Wildlife Biologist

Annette Smits, Recreation Sub-Staff

Quentin Johnson, Fire Management Officer

Lynn Mason, Hydrologist

Janet Grove, Riparian Ecologist (retired)

Norm Ambos, Soil Scientist

A. Jamie Wages, Range Specialist

#### FEDERAL, STATE, AND LOCAL AGENCIES:

Arizona Game and Fish Department

U.S. Fish and Wildlife Department

City of Globe/Town of Miami/Town of Superior

Gila County Districts and Chamber of Commerce

Arizona Public Service

Arizona Department of Environmental Quality

Gila County Cooperative Extension

Arizona Department of Transportation

#### TRIBES:

Fort McDowell Yavapai Nation

Yavapai-Prescott Tribe

Yavapai-Apache Nation

San Carlos Apache Tribe

White Mountain Apache Tribe

Salt River Pima- Maricopa Indian Community

Hopi Tribe

Pueblo of Zuni Heritage and Historic Preservation

### Tonto Apache Tribe

### Gila Indian Community

### **OTHERS:**

Arizona State Mine Inspector

Mr. David McCasland

Silkie Perkins

Center for Biological Diversity

Archeological Consulting Services, Ltd.

Arizona Wildlife Federation

**Resolution Copper Company** 

Pacific Legal Foundation

Tom and Jane Hale

OMYA

Paul Stewart

Mr. Erik Ryberg (Western Watersheds)

Salt River Project

Don Zoble

The Sparks Law Firm