



WHITE MOUNTAIN APACHE TRIBE OFFICE OF THE ATTORNEY GENERAL

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Sent via email to: invasivespecies@ios.doi.gov

November 26, 2019

U.S. Department of the Interior
Office of Policy Analysis – Mailstop 3530
ATTN: Invasive Species Comments
1849 C Street NW
Washington, DC 20240

RE: DOI Invasive Species Strategic Plan Comments of the White Mountain Apache Tribe

To Whom It May Concern:

Please accept the following comments of the White Mountain Apache Tribe in response to the Oct. 7, 2019 Department of Interior (DOI) letter seeking input on the formulation of a DOI Invasive Species Plan. The Tribe's Reservation spans more than 1.6 million acres in east-central Arizona and is home to a wide variety of plants and animals. The Reservation includes extensive surface water sources and varies in elevation from Upper Sonoran Desert to Sub-Alpine ecosystems. As a result, it encompasses the single broadest range of plants and animals in the region.

The Tribe's land and species management programs coordinate with the US Fish and Wildlife Service, the US Forest Service and other agencies as pertinent to the need and activity at issue; the Bureau of Indian Affairs acts, in its Trustee capacity, to facilitate and perform forest management for the Tribe. The Tribe's forest stands are integral to the regional ecosystem and anchor the area watershed that is critical to future Apache generations; these waters are also utilized heavily by downstream, off-Reservation interests that only continue to grow in Arizona.

The extent and variation in speciation and topography across the Reservation make Tribal land management especially challenging and drought, wildfire and economic fluctuations only escalate the task. Climate change is also a factor, driving native animal species further north into areas they have not previously occupied or where they have at least been only uncommon and generally unsuccessful. The added appearance of non-native, invasive species represents a new element of land management for which there is no historic or obvious practical solution. As such, invasive success represents a new, potentially devastating threat to the Tribe's longevity. The Tribe relies heavily on outdoor recreation as a stand-alone economic sector and also as a feed to its overall economy, with Reservation visitors patronizing its casino and other area services.

Examples of invasive species noted on the Fort Apache Indian Reservation (FAIR) posing significant potential to do harm include:

- Crayfish (threat to listed and other native fish and destructive to aquatic habitat, impacts water quality and contributes to bank erosion)
- Green Sunfish (competition to native fish resources)
- Fathead Minnows (competition to native fish resources)
- Tamarisk (out-compete and take essential water from native species and habitats, alter soil chemistry)
- Elm trees (out-compete and take essential water from native species and habitats)
- Thistles and noxious weeds (out-compete and take essential water from native species and habitats, some poisonous to livestock/wildlife)
- New Zealand mud snails (clogs water dispersal, compete with native species for resources)
- Whirling disease (impacts native and recreational fisheries)
- White Pine blister rust (impacts forest health)

In addition, DOI should assume that any invasive presence on either the Apache-Sitgreaves or Tonto forest units is currently impacting or has the substantial potential to ultimately impact the FAIR. A link to lists from both of those USFS divisions is noted below for that reference.

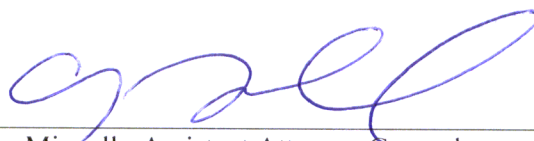
<https://www.fs.usda.gov/detail/r3/forest-grasslandhealth/invasivespecies/?cid=fseprd483071>

The Tribe considers invasive control a federal trust responsibility. Hopefully, then, DOI will treat this submission as support for agency programming to address this rapidly expanding concern on the FAIR. It is also hoped that climate change will be fully recognized as a part of the cumulative effects on the land and native species. Warming and weather changes have added to the problem impacting forest health (i.e. bark beetles, loopers, spruce bud worm, spruce aphid) and to the catastrophic fire danger. Incidents occur more often and are of longer duration. Vectors for disease are also moving into areas where they were either absent or infrequent, due to warming (i.e. fleas, ticks, mosquitoes, Africanized bees, etc.) and should be addressed as potential issues. The problem of feral animals, which can be damaging to the land and a hazard to humans, should also be addressed as a priority; feral pigs are not on the Reservation at present, but could be a potential future hazard if migrations are allowed to continue.

There were four areas of concern discussed in the listening session: 1) Funding, 2) Identification and Training, 3) Prevention, and 4) Research. All are necessary for any Plan development and would be of interest to the Tribe for further consultation. Research would be important as a DOI trust responsibility. Uses of "natural means" of addressing invasive issues would be preferable to the Tribe rather than over-used and understudied chemical treatment responses. The Tribe has worked diligently to restore and foster resilience for native species and habitats on its lands and would appreciate restoration being included as part of the Plan. Assistance from DOI in training and appropriate funding on new technological advances such as e-DNA for invasive species detection, especially for use in our waterways, would help tribes be pro-active in addressing the problem of invasive species. Other considerations of importance would be the inclusion of TEK-Traditional Ecological Knowledge and Cultural Significance into the Plan. Initial consultation with and contributions from tribes are essential for the development of this Plan, since they are the historical stewards of the lands.

The Tribe greatly appreciates the opportunity to submit these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'gall', is written above a horizontal line.

Amy Mignella-Assistant Attorney General
White Mountain Apache Tribe