

Summary of SACPA's concerns regarding the Arizona Game and Fish Department's Sport Fish Stocking Environmental Assessment

SACPA has submitted formal comments on the Arizona Game and Fish Department's Environmental Assessment (EA) for their Proposal for stocking of non-native sport fish in Arizona waterways.

The EA is important to SACPA members because of the native fish restoration program that is planned along with it for mitigating negative impacts to endangered species from the sport fish program.

The AZGFD's native fish mitigation and "restoration" program involves using the fish toxins rotenone and antimycin A to kill all oxygen-consuming wildlife in springs and/or stock tanks and then re-stocking with native and/or endangered species. This is not mentioned anywhere in the EA, nor is a plan laid out within the EA specifying which streams and stock tanks will be poisoned and when. Public comment is not invited on the poisoning of waters.

SACPA's primary concern is that more than 210 studies have linked rotenone to Parkinson's disease in humans.

[A February 2011 study released by the National Institutes of Health](#) has shown that persons who apply rotenone are 2.5 times more likely to develop Parkinson's disease than the average person. Using rotenone in rural waters and high streams can potentially lead to endangering the health of people who live in those areas or downstream.

Another concern is that no Environmental Impact Statement (EIS) has been published for the fish restoration plan as required under NEPA. In fact, the Environmental Assessment (EA) never mentions the planned rotenone poisonings. The fish "restoration" program is vaguely mentioned in Appendix P, but nowhere can a plan be found specifying which streams and cattle tanks will be poisoned or when.

A third concern is that when rotenone is used in this manner it kills non-target species. [Peer-reviewed studies have shown that a significant percentage of bug species affected by the poison disappear altogether and never recover.](#)

A fourth concern is that the poisoning process usually is repeated numerous times as invasive non-desired species tend to recover naturally or are sometimes illegally restocked.

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A fifth concern is human error such as has occasionally happened in other fishery management agencies with significant accidental overdoses and miles of non-target waters downstream being poisoned.

Detailed information on the dangers of the rotenone fish killing program can be found on the Tucson Citizen's ["View from Baja Arizona" blog by Hugh Holub](#), who happens to be representing the Town of Patagonia in resisting the poisoning of waters just four miles upstream of the town's well fields.