



CHAPTER 6
RESPONSE TO COMMENTS ON THE
DRAFT RMP/DRAFT EIS

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CHAPTER 6

RESPONSE TO COMMENTS ON THE DRMP/DEIS

6.1 INTRODUCTION

After publishing the DRMP/DEIS, the BLM had a 90-day public comment period to receive comments on the DRMP/DEIS. The BLM received written comments by mail, email, and submitted at the public meetings. Comments covered a wide spectrum of thoughts, opinions, ideas, and concerns. BLM recognizes that commenters invested considerable time and effort to submit comments on the DRMP/DEIS, and developed a comment analysis methodology to ensure that all comments were considered as directed by NEPA regulations.

According to NEPA, BLM is required to identify and formally respond to all substantive public comments. BLM developed a systematic process for responding to comments to ensure all substantive comments were tracked and considered. Upon receipt, each comment letter was assigned an identification number and logged into CommentWorks, a Web-based database that allowed the BLM to organize, categorize, and respond to comments. Substantive comments from each letter were coded to appropriate categories based on content of the comment, retaining the link to the commenter. The categories generally follow the sections presented in the DRMP/DEIS, though some relate to the planning process or editorial concerns.

Comments similar to each other were grouped under a topic heading, and BLM drafted a statement summarizing the ideas contained in the comments. The responses were crafted to respond to the comments; a response indicates whether or not the commenters' points resulted in a change in the document. As a result of public comments, changes were made to the DRMP/DEIS and reflect consideration given to public comments. A summary of major changes between the DRMP/DEIS and the Proposed RMP/Final EIS can be found in **Section 1.7**, Changes between the DRMP/DEIS and the PRMP/FEIS in **Chapter I**, Purpose and Need for the RMP.

Although each comment letter was diligently considered, the comment analysis process involved determining whether a comment was substantive or nonsubstantive in nature. In performing this analysis, BLM relied on the CEQ's regulations to determine what constituted a substantive comment.

A substantive comment does one or more of the following:

- Questions, with a reasonable basis, the accuracy of the information and/or analysis in the EIS;
- Questions, with a reasonable basis, the adequacy of the information and/or analysis in the EIS;
- Presents reasonable alternatives other than those presented in the Draft EIS that meet the purpose and need of the proposed action and addresses significant issues;
- Questions, with a reasonable basis, the merits of an alternative or alternatives;

- Causes changes in or revisions to the proposed action; and
- Questions, with a reasonable basis, the adequacy of the planning process itself.

Additionally, BLM's NEPA handbook identifies the following types of substantive comments:

- Comments on the Adequacy of the Analysis: Comments that express a professional disagreement with the conclusions of the analysis or assert that the analysis is inadequate are substantive in nature but may or may not lead to changes in the Proposed RMP/Final EIS. Interpretations of analyses should be based on professional expertise. Where there is disagreement within a professional discipline, a careful review of the various interpretations is warranted. In some cases, public comments may necessitate a reevaluation of analytical conclusions. If, after reevaluation, the manager responsible for preparing the EIS (authorized office [AO]) does not think that a change is warranted, the response should provide the rationale for that conclusion.
- Comments That Identify New Impacts, Alternatives, or Mitigation Measures: Public comments on a draft EIS that identify impacts, alternatives, or mitigation measures that were not addressed in the draft are substantive. This type of comment requires the AO to determine whether it warrants further consideration. If it does, the AO must determine whether the new impacts, new alternatives, or new mitigation measures should be analyzed in the Final EIS, a supplement to the Draft EIS, or a completely revised and recirculated Draft EIS.
- Disagreements with Significance Determinations: Comments that directly or indirectly question, with a reasonable basis, determinations regarding the significance or severity of impacts are substantive. A reevaluation of these determinations may be warranted and may lead to changes in the Final EIS. If, after reevaluation, the AO does not think that a change is warranted, the response should provide the rationale for that conclusion.

Comments that failed to meet the above description were considered nonsubstantive. Many comments received throughout the process expressed personal opinions or preferences, had little relevance to the adequacy or accuracy of the DRMP/DEIS, or represented commentary regarding resource management without any real connection to the document being reviewed. These comments did not provide specific information to assist the planning team in making a change to the Preferred Alternative, did not suggest other alternatives, and did not take issue with methods used in the DRMP/DEIS, and are not addressed further in this document. Examples of some of these comments include the following:

- The best of the alternatives is Alternative D (or A, B, or C);
- BLM has yet to show land stewardship at or above the level currently demonstrated by the private sector;
- Your plan does not reflect balanced land management;
- Stop giving away land to the mineral companies;

- More land should be protected as wilderness;
- I want the EIS to reflect the following for this area: no grazing, no logging, no drilling, no mining, and no OHVs;
- You need to protect all ACECs/Wild and Scenic Rivers/areas with wilderness characteristics;
- Do not add any more road closures to what is now in existence;
- People need access and the roads provide revenue for local communities; and
- More areas should be made available for multiple uses (drilling, OHVs, ROWs, etc.) without severe restrictions.

Opinions, feelings, and preferences for one element or one alternative over another, and comments of a personal and/or philosophical nature were all read, analyzed, and considered, but because such comments are not substantive in nature, BLM did not respond to them. It is also important to note that while all comments were reviewed and considered, comments were not counted as “votes.” The NEPA public comment period is neither considered an election nor does it result in a representative sampling of the population. Therefore, public comments are not appropriate to be used as a democratic decision-making tool or as a scientific sampling mechanism.

Comments citing editorial changes to the document were reviewed and incorporated. The Proposed RMP/Final EIS has been extensively technically edited and revised to fix typos, missing references, definitions, and acronyms, and other clarifications as needed.

6.1.1 HOW THE CHAPTER IS ORGANIZED

The chapter is divided up into three main sections. **Section 6.1**, Introduction, provides an overview of the comment response process. **Section 6.2**, Issue Topics and Responses, contains comments, summary statements, and responses for all topics except livestock grazing management. The section is divided into sub-topic headings that include excerpts from individual comment letters, a summary statement (as necessary), and the BLM’s response to the summary statement. **Section 6.3**, Responses for Specific Comments, contains comments and responses pertaining to the specific livestock grazing management and travel management implementation decisions considered in the SDNM. Due to the detail and uniqueness of these and their specificity to implementation level decisions, these comments are presented in more detail and responded to individually.

6.2 ISSUE TOPICS AND RESPONSES

6.2.1 EXTENSION REQUEST

Comment Number: I00105-2

Commenter: Doug Martin

Comment Excerpt Text:

I fielded many of the questions and explained the plan as best as I could. There were many people who are not very computer literate and I offered to walk them through the comment process. Walking these people through

the process is taking longer than I hoped and many of their comments may not be submitted in time. With this being such an important issue with long lasting effects on the public, we need more time. I hope you are receiving many comments. That would show greater public involvement.

I'd like to see an extension to this comment period. Maybe just an extra 30 days. This will give me time to help these folks learn to use the website and make their comment.

Comment Number: LSFO-SDNM-DRMP--1-18612-2

Commenter: Douglas Martin

Comment Excerpt Text:

I'd like to see an extension to this comment period is approved. Maybe just an extra 30 days. This will give me time to help these folks learn to use the website and make their comment. I do realize there is a time line but since the goal is to obtain public comments I think this is the right thing to do. If it were only a few people I wouldn't say anything, but there was forty-fifty people at the last meeting.

Summary

Commenters requested a 30-day extension to the public review period for the DRMP/DEIS due to difficulties with accessing and using the Web site to review the document and make comments.

Response

The BLM may grant an extension to the public comment period when it is determined to be warranted due to a high volume of requests or a high level of controversy. In this case, the BLM determined that the schedule mandated by the court settlement did not allow for any extensions.

6.2.2 EPLANNING

Comment Number: 100039-1

Commenter: John Norris

Comment Excerpt Text:

The inability to comment on the proposed plan because of the byzantine steps involved is counter-productive. It is one of the least user friendly sites I have ever visited and discourages comments from other than IT experts.

Comment Number: 100040-1

Commenter: Richard Ditch

Comment Excerpt Text:

There hasn't been a version of Microsoft Internet Explorer for Mac computers for many years now so why do you require the use of IE7 to comment on plans? I was planning on commenting on "Lower Sonoran and Sonoran Desert National Monument Draft Resource Management Plan and Environmental Impact Statement (DRMP/EIS)" at this link: <https://www.blm.gov/epl-frontoffice/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=11856&dctmId=0b0003e8800a9942>

PLEASE do not assume that everyone uses a Windows PC and has IE7 - many of us prefer and use better computers and software.

Comment Number: I00049-I

Commenter: Brent Moody

Comment Excerpt Text:

I have tried repeatedly to use your website to provide my comments on the restrictions you have proposed with respect to the use of firearms in the area covered by your proposed plan. The procedure for providing comments is convoluted and virtually impossible for the average citizen to use.

Comment Number: I00054-I

Commenter: Carol Millette

Comment Excerpt Text:

Please note I was not able to submit online as I use Firefox.

Comment Number: I00074-I

Commenter: Tom Britt

Comment Excerpt Text:

Therefore I expect you will consider these comments even if received after the 11/25/2011 deadline noted in your media release since access to this document has not been adequate.

Comment Number: I00105-I

Commenter: Doug Martin

Comment Excerpt Text:

During the course of these meetings I met many concerned people and was able to show them my copy of the draft LSRMP. This site is a bit confusing at times and I'm receiving many emails from people having trouble posting their comments.

Comment Number: LSFO-SDNM-DRMP-I-17313-I

Organization: RSD Racing

Commenter: Douglas Martin

Comment Excerpt Text:

Your public input process is a joke. If I hadn't stumbled onto this form by accident I wouldn't be making this comment at all. I will be at the meetings as well, but my point is you are using an electronic, web based media to contact off road enthusiasts, but avoiding the off road websites.

Comment Number: LSFO-SDNM-DRMP-I-17563-I

Commenter: J Garner

Comment Excerpt Text:

I'm finding it extremely difficult and time-consuming to access pertinent information to comment on this website. In particular it is impossible to scroll through the document page by page. Clicking on the next or previous page buttons does nothing. Because most people view documents even online by scrolling through pages until they find what they're interested in it makes it nearly impossible to find what you're looking for so you can post an appropriate comment, suggestion, or criticism. If I didn't have the printed copy of this document with me as I do, it would be close to impossible to find the section, paragraph or sentence that I would like to comment on. Because most people in this day and age will access this information online, it's extremely important to be able to navigate

this site in an efficient manner. Due to the limited time available to submit comments on this report I hope these concerns are addressed in a timely fashion. If not, it might prove necessary to extend the time available for public comment.

Summary

Several commenters noted problems using the BLM's ePlanning software during the public commenting process for the DRMP/DEIS.

Response

In order to make documents more easily accessible to the public, along with streamlining preparation and organization of land use planning documents, BLM has developed the Web-based ePlanning system (http://www.blm.gov/wo/st/en/prog/planning/planning_overview/eplanning2.html).

The Lower Sonoran-SDNM project is one of the first in BLM to use the latest version of ePlanning for viewing and commenting on documents, though the Draft RMP was made available for review via other media (such as PDF on the BLM Web site, CD, and paper copies) and comment via other methods (such as email, comment cards at public meetings, postal mail, and fax).

All comments submitted regarding difficulties using the ePlanning application will be considered in the maintenance of the software application and in future upgrades.

6.2.3 PLANNING ISSUES

Comment Number: 100110-3

Commenter: Tyler Kokjohn

Comment Excerpt Text:

2.12.2 (page 216) Adaptive Management

The draft plan describes what is meant by adaptive management and recommends, but does not mandate, a commitment to employ adaptive management principles. In Appendix H (page 1223) a similar lukewarm promise is made regarding best management practices. That means a comprehensive and strategically focused control system for the plan is lacking. This is a serious oversight because it asks the public to endorse a plan that provides virtually no insight into its projected function. More information needs to be provided and, most important, forethought and planning needs to go into the mechanisms to implement, monitor and when necessary, modify the RMP as necessary to ensure the conservation of BLM resources for public use now and in the future. A plan without a management structure that allows cumulative impacts to be recognized, provides a broad-scale capacity to assess conditions and track management activities to confirm their success or reveal failure, will be crippled before it is approved. This oversight puts the RMP into immediate jeopardy of devolving to an uncoordinated hodgepodge of quasi-independent sub-plans.

Comment Number: I00137-1

Organization: Fennemore Craig P.C.

Commenter: Dawn Meidinger

Comment Excerpt Text:

The core of resource management planning is the identification of concerns, needs, and issues regarding resource use and development and receipt of input from interested parties. See 43 C.F.R. § 1610.4-1. According to the DRMP, over 6,000 comments were received from the scoping effort conducted in 2003. The BLM then distilled those comments into six major issues (i.e., Travel Management, Wilderness Characteristics, Wildlife, Livestock Grazing, Renewable Energy Development and Recreation) in an effort to summarize general public concerns. DRMP at 7-11. In the 2002 NOI, BLM stated that the identified issues would be placed into one of three categories: 1) issues to be resolved in the plan; 2) issues resolved through policy or administrative action; or 3) issues beyond the scope of the plan. See 67 Fed. Reg. 72968 (Dec. 9, 2002). Thereafter, the BLM stated it would provide rationale in the plan for the placement of the issues into categories and then identify other management questions and concerns to be addressed in the plan. Id. Agency follow through on this commitment in the NOA is absent in the DRMP/EIS. Id.

Summary

Commenters requested general planning and process related information in the RMP/EIS including 1) a commitment to employ adaptive management principles and 2) rationale for placement of scoping issues into categories and identification of other management questions and concerns addressed in the RMP/EIS.

Response

The regulations in 43 CFR 1610.4-9 require that land use plans establish intervals and standards for monitoring and evaluations, based on the sensitivity of the resource decisions involved. Land use plan monitoring is the process of (1) tracking the implementation of land use planning decisions (implementation monitoring), and (2) collecting data/information necessary to evaluate the effectiveness of land use planning decisions (effectiveness monitoring). Throughout implementation, the BLM monitors the management actions and documents BLM's progress toward full implementation of the land use plan and the achievement of desired outcomes. It is BLM policy to encourage field offices to involve tribes, state and local governments, and the public if they express an interest in participating in this process (BLM Land Use Planning Handbook, p. 33).

The monitoring process should collect information in the most cost-effective manner and may involve sampling or remote sensing. Monitoring could be so costly as to be prohibitive if it is not carefully and reasonably designed. Therefore, it is not necessary or desirable to monitor every management action or direction. Unnecessary detail and unacceptable costs can be avoided by focusing on key monitoring questions and proper sampling methods. The level and intensity of monitoring would vary, depending on the sensitivity of the resource or area and the scope of the proposed management activity.

BLM's planning handbook defines adaptive management as "...a system of management practices based on clearly identified outcomes, monitoring to determine if management actions are meeting outcomes, and, if not, facilitating management changes that would best ensure that outcomes are met or to re-evaluate the outcomes" (BLM Land Use Planning Handbook, p. 36). The BLM planning guidance noted above sets the stage for adaptive management by:

- Planning for desired future conditions via goals and objectives,
- Identifying management actions and allocations that would help meet the desired future conditions, and
- Directing field offices to conduct implementation plans, effectiveness and implementation monitoring, evaluations every five years, and noting whether maintenance, amendment, or revision is needed to address changes and/or progress.

The cyclical nature of the planning process captures the intent of adaptive management. Through the RMP Goals and Objectives, the RMP provides the framework that would be used for developing the resource or use triggers and thresholds that would guide adaptive management. Further thought is required to design monitoring plans that are considered implementation of the RMP.

The scoping comments were categorized into the three categories as described in the DRMP/DEIS. The scoping comments categorized as issues to be addressed in the RMP were then further divided into applicable resource groupings. The methods used are described in Section 3.3 of the scoping report, which may be found on the BLM Web site (http://www.blm.gov/pgdata/etc/medialib/blm/az/pdfs/planning/son_des.Par.48097.File.dat/Scoping_Report.pdf). The PRMP/FEIS was clarified to better explain how the scoping process resulted in the plan addressing the issues, as well as how new issues raised during the draft public comment period were incorporated into the Final EIS. See **Section 1.3.2**, Public Scoping, and **Section 1.7**, Changes between the DRMP/DEIS and the PRMP/FEIS, for details.

6.2.4 NEPA

6.2.4.1 Alternatives

Comment Number: 100126-3

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

The DRMP/DEIS does not currently contain an alternative that would designate the minimum road network necessary for protection of the Monument objects. BLM should include this alternative and choose it as the preferred in the Proposed RMP to be consistent with current policy guidance for the National Landscape Conservation System.

Comment Number: 100126-52

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

BLM has policy direction for units of the National Landscape Conservation System that requires designation of roads only when required for public health and safety, are necessary for the exercise of valid existing rights, minimize impacts to fragile resources, or further the purposes for which an area was designated. This is, in short, the “minimum road network” necessary for protection of the values for which the unit was designated. BLM should both analyze a minimum road network alternative and choose it as the best option consistent with BLM policy and for the protection of Monument objects.

Comment Number: I00136-30

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

BLM has made the same fatal flaw for the LSFO that it made for the SDNM: it failed to analyze a reasonable range of alternatives, including an alternative that would shift the LSFO allotments to ephemeral use.

Comment Number: I00136-60

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

Unfortunately, the BLM failed to analyze an alternative that would end livestock grazing immediately, and instead considered only terminating grazing upon the expiration of current permits under Alternative B. DRMP/DEIS at I48. The plan does not disclose when those permits expire. Id. at I293-I295. The plan does not disclose that BLM already renewed the permits without NEPA under the Rescissions Rider to the 001 Appropriations Act of 2004 (P.L. 108-108). The permitted grazing on the SDNM allotments (Beloat, Conley, Hazen, and Lower Vekol) is slated to continue until 2015 under this authority. Because the permits contain language suggesting that the permits may be cancelled, suspended or modified at the completion of processing them in compliance with applicable laws and policies, there is no reason that the BLM did not consider an alternative that would have established immediate removal of livestock grazing.

Comment Number: I00137-6

Organization: Fennemore Craig P.C.

Commenter: Dawn Meidinger

Comment Excerpt Text:

In addition, the DRMP/EIS misses the mark in terms of identifying and adequately discussing alternatives eliminated from detailed study. The DRMP/EIS identified four separate implementation strategies including: 1) the prohibition of carrying of weapons; 2) allowing unrestricted driving in washes; 3) disposing of federal land bordering the Gila River Indian Reservation and the Estrella Mountains; and 4) converting all grazing allotments to strictly ephemeral use only and states that those four “alternatives” were dismissed from further study for various identified reasons. DRMP at 40-41. None of the identified individual implementation strategies rise to the level of land use management alternatives for the entire planning area. Even if all four were considered together, the requirement to identify and dismiss other reasonable alternatives has not been met. This failure violates the BLM’s planning regulations (43 C.F.R. § 1610.4-5) as well as applicable NEPA regulations. See 40 C.F.R. § 1502.14 (a) and (c) (mandate to rigorously explore and evaluate all reasonable alternatives including those not within the jurisdiction of the lead agency).

Comment Number: I00148-4

Commenter: Jon M Shumaker

Comment Excerpt Text:

There is no discussion of how the plan will be implemented—how personnel needs will be addressed or even what they are, how costs will be met or even what those are, nothing about funding expectations, nothing about consequences in the event no funding is forthcoming, etc. There is nothing about expanding resource staff.

Summary

Commenters recommended several alternatives be included and analyzed including 1) an alternative that designates the minimum road network necessary for protection of the SDNM objects, 2) an alternative that analyzes selling/patenting lands under R&PP actions in the SDNM to manage recreational shooting, 3) an alternative that would shift the LSFO allotments to ephemeral use, and 4) an alternative that would completely end livestock grazing. Commenters noted several deficiencies in the alternatives including a lack of suitable recreational shooting sites in Alternative B and failure to identify and adequately discuss alternatives eliminated from detailed study.

Response

The DRMP/DEIS considered a range of alternatives designed to meet the BLM's legal duties and purpose and need for action. The purpose and need section in the DRMP/DEIS clearly states that the purpose of the agency action includes compliance with all applicable laws, including the Sonoran Desert National Monument Proclamation (see **Section 1.1**, Purpose and Need). All transportation network designs suggested in the alternatives were determined to protect the objects of the Monument. The route network suggested in Alternative D contains the fewest routes and would result in the largest area without motorized access (see **Table 2-35**, Off-Highway Vehicle Area Designations by Alternative). For example, selling or patenting SDNM parcels under authority of the Recreation and Public Purposes Act would not be consistent with the Proclamation.

The BLM's range of alternatives in the DRMP/DEIS represented a full spectrum of options. Alternatives analyzed include a No Action Alternative, three action alternatives, and the preferred alternative. The No Action Alternative is a continuation of current management as written. Alternative B represented a use-oriented perspective. Alternative C proposes a mix of natural processes and "hands-on" techniques for resource stabilization and restoration, thus reducing the need for intensive use management to avoid or mitigate any adverse effects. Alternative D represented a mostly conservation-oriented approach. Alternative E (the Proposed RMP) provides a balanced approach between uses and conservation. Specific to grazing program actions, the BLM included a no-grazing alternative and considered but eliminated from detailed analysis an alternative that proposed ephemeral use (see **Section 2.4**, Summary of Alternatives, Alternative D, and **Section 2.5**, Alternatives Considered but not Further Analyzed, Livestock Grazing, respectively).

The BLM acknowledges many variations of alternatives could be included in the RMP analysis process. However, the BLM is not required to analyze in detail each variation, including those variations determined not to meet the RMP's purpose and need or those determined to be unreasonable given BLM mandates, policies, and programs (CEQ 40 Questions, question number 29b). CEQ regulations require BLM to analyze a reasonable range of alternatives.

Chapter 2, Alternatives, in the Final EIS was modified to include information for how the BLM determined the Proposed RMP in the Final EIS (**Section 2.2**, Selection of the Proposed RMP) and expanded the explanation for alternatives eliminated from consideration (**Section 2.5**, Alternatives Considered but not Further Analyzed).

6.2.4.2 Data Adequacy

Comment Number: 100121-19

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

In order to comply with the National Environmental Policy Act, the DEIS must fully disclose all relevant research and management information, such as annual data on bighorn surveys, annual and seasonal visitor numbers, numbers and categories of special use permits, citations and infractions, work projects, water hauls, budgets, staffing, etc.

Comment Number: 100161-1

Organization: Pacific Biodiversity Institute

Commenter: Peter Morrison

Comment Excerpt Text:

I am also disappointed that the BLM has failed to provide accurate and thorough information to the public in the DRMP/DEIS and associated maps and data. The BLM does not reference in the DRMP/DEIS most of the research reports that PBI conducted on the SDNM for TNC and the BLM. This research was conducted for the specific purpose of understanding ecological conditions and processes on the Monument in relation to management decisions. Only one of the six reports that PBI wrote for TNC and the BLM is referenced in the (DRMP/DEIS). Five of our studies are not mentioned in the DRMP/DEIS despite the fact that they were produced at over 4 years ago and I personally presented the information to BLM staff that were responsible for management of the SDNM and development of the DRMP/DEIS. PBI developed high quality information and maps on vegetation communities and their ecological condition, explicitly to aid BLM in developing their management plans and the DRMP/DEIS. Instead of using this high quality information, BLM used data that are coarser scale and much less accurate than the data that PBI's provided to BLM. For example, the BLM used vegetation community maps that have no resemblance to the detailed and accurate vegetation maps that PBI produced and delivered to the BLM, which much more accurately characterize the Monument's ecosystems. The agency's reliance on low quality and low resolution information to make management decisions is inexplicable. I am personally and professionally disappointed at BLM's choice to ignore this scientifically -robust information

Comment Number: 100161-10

Organization: Pacific Biodiversity Institute

Commenter: Peter Morrison

Comment Excerpt Text:

When the BLM does not provide adequate data, or zero content data or data that is in direct conflict with maps in the DRMP/DEIS it makes it very difficult for the public to conduct a detailed review of the DRMP/DEIS. I suggest that the BLM rectify this situation, revise its analysis and issue a supplemental DRMP/DEIS which rectifies all the issues that I have discussed above.

Comment Number: 100161-9

Organization: Pacific Biodiversity Institute

Commenter: Peter Morrison

Comment Excerpt Text:

On a final note, the BLM should be advised that some of the GIS data files included as supporting information on the DRMP/DEIS website page are devoid of any data or other information. Some of this data has zero content. This includes data from PBI's studies. The GIS data that BLM provided to the public through the website is also woefully incomplete.

Summary

Commenters expressed their general opinion that the DRMP/DEIS did not include sufficient or appropriate data to support management and analysis, including reference to Pacific Biodiversity Institute reports and requests to disclose all relevant management information and supporting data.

Response

The CEQ regulations require an environmental impact statement to “succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration. The description shall be no longer than is necessary to understand the effects of the alternatives. Data and analyses in a statement shall be commensurate with the importance of the impact, with less important material summarized, consolidated, or simply referenced. Agencies shall avoid useless bulk in statements and shall concentrate effort and attention on important issues” (40 CFR 1502.15).

The requisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed action(s). The baseline data provided in **Chapter 3**, Affected Environment have been revised and updated to include information provided by commenters and additional relevant data. This updated information along with the various appendices in the Lower Sonoran-SDNM RMP/EIS supports, at the general land use planning-level of analysis, the environmental impact analysis resulting from management actions presented in **Chapter 2**, Alternatives, of the RMP/EIS. For example, in the LHE (**Appendix F**, Arizona Land Health Evaluation for the Sonoran Desert National Monument), the BLM explained how they applied the baseline data collected as part of the Pacific Biodiversity Institute (PBI) studies (see Land Health Standard B, Desired Resource Conditions). The PBI study was “designed to be used as baseline information to help assess changes and trends in the condition of the natural communities. Analysis of the applicable vegetative community data for 48 study sites (interchangeably referred to as plots) is included in this evaluation... Depending on the location and position on the landscape, PBI study sites were analyzed to address vegetation attributes specific to wildlife habitat (bighorn sheep) values. In some instances, these sites were located in areas that receive no livestock use or negligible livestock use. Data were also collected by PBI in the Barry M. Goldwater Range (BGR) and the southern portion of Area A (See **Map F-4**, SDNM Grazing Allotments & Monitoring Sites). Historical records indicate that livestock use in this area has been recently absent or relatively light.”

While the PBI data added to the BLM's baseline information, one year of PBI data, in itself, is not enough to support sound conclusions. BLM chose to use NRCS Ecological Site descriptions to assist BLM in defining ecological conditions. Classification, mapping, and spatial scale concepts often become confusing

when comparing different classification, mapping, and hierarchical relationships. Ecological site classification is based on the fundamental idea that differences in associations of plant species and their resilience are governed by subtle differences in local climate, geomorphology, and soils (Bestelmeyer et al. 2009).

PBI's study was of limited use because it did not address the intensity, frequency, timing, class of livestock, season of use, ecological sites, precipitation patterns, and other variables the BLM needs to address the effects of current livestock grazing practices on the objects of the Monument. However, BLM did use some of PBI's plot data to address vegetation attributes when defining Ecological Site and Key Area DPC objectives.

The impacts of historical grazing are not in doubt. What is questionable and not elucidated by the PBI study is whether or not current livestock grazing is compatible with SDNM object protection. Only by a site-specific assessment and monitoring can BLM determine the effects of current livestock grazing practices on the objects of the Monument.

NRCS ecological site descriptions assist the BLM in defining, quantifying, and documenting the relationships among climate, landscape elements (for example landform, aspect, slope, and elevation), soils, and plant species or groups of plant species.

As specific actions come under consideration, the BLM would conduct subsequent NEPA analyses that include site-specific project and implementation-level actions, which may include but are not limited to timber harvest, fuels treatment, restoration, or other ground-disturbing activities.

6.2.5 THE SONORAN DESERT NATIONAL MONUMENT

Comment Number: I00121-3

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

BLM has not demonstrated how each of the SDNM's objects will be protected in the DRMP/DEIS. This analysis and demonstration must be completed prior to finalizing the RMP.

Comment Number: I00126-1

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

This IM clearly affirms that not all uses must be accommodated within Monuments; BLM's priority is fulfilling the purposes of the Monument and protecting the Monument Objects. BLM has not yet shown how each of the objects are being protected by the plan. This analysis must be performed before the RMP is complete.

Recommendations: We applaud BLM for including a list of Monument objects in the Draft RMP. BLM must now specifically describe how each of the objects are being protected and prioritized over other uses in the RMP.

Comment Number: I00136-96

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

The BLM claims that future study design recommendations by peer reviewers will be considered in any monitoring plan for the SDNM. DRMP/DEIS at I054. We note that BLM has, in the past, collected monitoring data sporadically, and most of the data sets used in the LHE and DRMP/DEIS are incomplete or reflect such widely-spaced monitoring episodes as to be useless. See McPherson 2009. The resources of the LSFO and SDNM are too precious to neglect and the DRMP/DEIS should have included the monitoring plan; without this, the anticipated impacts of the preferred alternative cannot be verified and management cannot be adjusted accordingly.

Summary

Commenters noted adequacy issues in the DRMP/DEIS related to management of the SDNM and provided recommendations to analyze and demonstrate how each of the SDNM's objects would be protected. Commenters also requested that the RMP/EIS include a monitoring plan for the SDNM.

Response

The Proclamation's management mandates create an exception to the BLM's general management mandate as set forth in FLPMA (See BLM Instruction Memorandum, No. 2009-115). The Proclamation mandates the protection of the historic, cultural, natural, and scientific objects within the Monument as the highest priority. The BLM's range of alternatives are designed to provide a framework that protects the Monument objects while managing the Monument in accordance with the provisions of the Proclamation and other authorities such as FLPMA, the National Historic Preservation Act, Endangered Species Act, and the Minerals Leasing Act, where applicable.

The BLM developed the management goals, objectives, and actions under each action alternative with the purpose of protecting Monument objects (see **Section 1.1** for the purpose and need of the SDNM RMP). The PRMP represents an effort to identify an optimum course of action to protect the Monument objects while allowing for compatible public uses as described in the Proclamation (see **Appendix A**, Sonoran Desert National Monument Presidential Proclamation). For instance, Cultural Resources, Goal 2 states that the BLM would "Reduce threats, reduce or prevent damage, and resolve potential conflicts from naturally occurring or unauthorized human-caused damage or deterioration" and management action CH-2.1.4 states, "Sites and Monument Objects damaged by vandalism, excessive visitation, vehicle traffic, or other causes, would be restored by using signing, fencing, gating, trail re-routing or other measures." (See **Table 2-6**, Management Actions and Allowable Uses for Cultural Resources). Further, Vegetation, Goal 1 for the SDNM states: "The natural diversity and abundance of native vegetation occurs as expected for landform and ecological site, and within the SDNM would protect the vegetative objects of the Monument" and Objective 1.1 states the BLM would "Maintain or restore vegetative communities to achieve desired future conditions (DFCs)," including the noted vegetation communities in the SDNM such as palo verde/mixed cacti ecosystem (See **Table 2-9**, Management Actions and Allowable Uses for Vegetation Resources). In short, the DRMP/DEIS range of action alternatives are intended to meet the stated intent of the Proclamation.

As required by 40 CFR 1502.16, the DRMP/DEIS provides a discussion of the environmental impacts of the alternatives. The analysis was expanded to show how actions could protect the Monument's objects, describe any adverse environmental effects that cannot be avoided should the alternatives be implemented, show the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and describe any irreversible or irretrievable commitments of resources that would be involved in the action should it be implemented. For example, in **Section 4.5**, Impacts on Cultural and Heritage Resources, the Alternative C analysis for the SDNM expands on the nature of impacts that results in protections to cultural resources from the proposed designation of the Sonoran Desert Historic Trails SCRMA. The revised analysis in the PRMP/FEIS presents the decision maker with detailed information to aid in determining whether to proceed with the PRMP or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives (see 40 CFR 1502.1).

The BLM recognizes that monitoring the implementation and effectiveness of RMP decisions is an important step in the planning process (see 43 CFR 1610.4-9 and BLM Land Use Planning Handbook, Section V. Monitoring, Evaluation, and Adaptive Management, p. 32). Monitoring programs were considered under the Administrative Actions section of the RMP/EIS and are noted under the Grazing Administration, Air Quality, and Cultural Resources programs. Specific monitoring programs would be developed after the BLM Authorized Officer signs the Record of Decision, at which point the BLM begins implementing the RMP decisions.

6.2.6 PLANNING PROCESS

Comment Number: I00120-8

Commenter: Bill Broyles

Comment Excerpt Text:

I worry that the plan doesn't look far enough into the future. Considering our state's and the West's growing population, I expected to see more talk about groundwater, viewsheds, usage, resources monitoring and thresholds, special regulation triggers, buffer areas on BLM lands, and recovery plans, as well as staffing goals, budget needs, and performance objectives.

Comment Number: I00137-3

Organization: Fennemore Craig P.C.

Commenter: Dawn Meidinger

Comment Excerpt Text:

Due to the passage of time between the 2002 NOI, the conduct of scoping in 2003, and subsequent publication of the NOA in late 2011, BLM should have conducted additional scoping. The additional scoping should have included a summary of prior scoping comments, notice to the public that the agency still intended to complete the DRMP/EIS and the opportunity to provide further input. Public sentiment about the utilization of public lands has certainly changed over the past decade particularly in light of the "great recession." Job creation, support of industry, and domestic security resulting from minimizing dependence on foreign resources are important issues facing the public today and those key public policy issues were not as apparent in 2003. The above referenced defects in the planning and scoping process are fundamental flaws and can only be addressed through the conduct of additional scoping, public coordination and consultation.

Comment Number: I00137-4

Organization: Fennemore Craig P.C.

Commenter: Dawn Meidinger

Comment Excerpt Text:

In keeping with the requirement to coordinate and consult with other federal and state agencies, it should be noted that the content of what typically makes up an entire chapter on “Consultation and Coordination” in draft and final RMPs is absent from the document. This chapter must be included to ensure compliance with the NEPA and BLM land use planning policy. See 40 C.F.R. § 1502.25 and BLM Land Use Planning Handbook H-1601-1 (Appendix F). Without the inclusion of a chapter on Consultation and Coordination in the DRMP, it is not possible to determine if the agency has properly undertaken consultation with the United States Fish and Wildlife Service (“USFWS”) (16 USC § 1536 (a)(2) and the Advisory Council on Historic Preservation pursuant to §106 of the National Historic Preservation Act (“NHPA”).

Comment Number: I00147-1

Organization: Arizona Public Service Company

Commenter: Michael Neal

Comment Excerpt Text:

There is no evidence in this four-volume document of any consultation or coordination with existing ROW/easement holders including APS for either the Lower Sonoran area or the Sonoran Desert National Monument. Appropriate departments to speak with at APS would include Transmission and Distribution Maintenance, Forestry and Special Programs, Natural Resources, Land Services, and Siting.

Comment Number: I00148-2

Commenter: Jon M Shumaker

Comment Excerpt Text:

There appears to be no list of individuals and organizations that were consulted with in the course of preparing this document.

Comment Number: I00148-8

Commenter: Jon M Shumaker

Comment Excerpt Text:

It is completely inappropriate and unacceptable to wrap management plans for the Lower Sonoran and for Sonoran Desert National Monument into a single document. The final result is a disorganized jumbled mess that is confusing and virtually incomprehensible for the general public—and this from someone who reads complex, boring documents for a living. This document obfuscates what exactly is being proposed where. It is at times difficult if not impossible to understand what parts of this refer to the Monument vs. the Lower Sonoran management area vs. the planning area. The SDNM component must be pulled out and presented clearly in a separate, stand-alone document so that there is no confusion, and no ambiguity regarding what is being proposed and how those proposals will be implemented. As a sometime land manager, I reviewed this document with an eye to how I would use it as a land manager, and it is in my opinion completely worthless as a planning and/or management tool, especially with regard to SDNM. BLM must go back to the drawing board on this, separate the two documents, and do it right this time.

Comment Number: 100166-2

Commenter: Steve Saway

Comment Excerpt Text:

The Yuma Field Office Record of Decision and Resource Management Plan was recently approved in January 2010. Lands in the Lower Sonoran Field Office have many of the same characteristics as lands in the Yuma Field Office. Recommend the Yuma RMP be considered in preparation of the final Lower Sonoran RMP/EIS. The Yuma Plan also reflects involvement by the Arizona BLM Resource Advisory Council (RAC), while the Draft Lower Sonoran plan does not. From a public perspective, it is good to have consistent policies and a seamless transition for lands that lie in adjacent field offices.

Comment Number: 100117-2

Commenter: Douglas Thomas

Comment Excerpt Text:

Citizens are at a distinct dis-advantage in this comment process. BLM has had at least 10 years to analyze and formulate the 1379 page SDNM Draft RMP before publishing it in August 2011. Citizens, however, have 90 days to analyze and formulate their comments regarding same, without the advantage of the considerable resources available to BLM in this process.

Summary

Commenters identified several process-related items associated with NEPA compliance and other applicable BLM policy and regulations, including (1) the plan does not look far enough out in terms of groundwater, viewsheds, usage, resources monitoring and thresholds, special regulation triggers, buffer areas on BLM lands, and recovery plans, as well as staffing goals, budget needs, and performance objectives, (2) requests for a monitoring plan, (3) inclusion of a “Consultation and Coordination” Chapter, (4) conducting additional scoping due to the amount of time since the NOI, (5) comments indicating BLM failed to consult with ROW and easement holders during the process, and (6) general recommendations to consider the Yuma RMP/EIS during this process.

Commenters also (7) suggested the plan should completely separate the Lower Sonoran and SDNM Decision Areas, (8) stated that BLM should have done better coordination with the Yuma Field Office, and (9) stated that 90 days was insufficient to comment on a document that took BLM 10 years to write.

Response

1) The RMP is intended to have a life of approximately 20 years, but changing conditions may require amendments to keep the plans current. BLM does not have the authority to manage groundwater, as that is a function of the Arizona Department of Water Resources. Management of viewsheds and land use are included in the RMP and form the essence of the alternatives. BLM is not allowed to manage buffer areas, recovery plans are implementation actions not addressed in an RMP, and staffing and budget are administrative actions, not RMP-level land use planning decisions. If the “performance objectives” refer to land use objectives, many objectives are defined in **Chapter 2** and establish the targets against which success is measured.

2) The BLM recognizes that monitoring the implementation and effectiveness of RMP decisions is an important step in the planning process (see 43 CFR 1610.4-9 and BLM Land Use Planning Handbook,

Section V. Monitoring, Evaluation, and Adaptive Management, p. 32). Monitoring programs were considered under the Administrative Actions section of the RMP/EIS and are noted under the Grazing Administration, Air Quality, and Cultural Resources programs. Specific monitoring programs would be developed after the BLM Authorized Officer signs the Record of Decision, at which time the BLM begins implementing the RMP decisions.

3, 5 & 6) The BLM has included a Consultation and Coordination chapter (**Chapter 5**) in the Final EIS that documents how and with whom BLM conducted required consultation (e.g., Section 7 consultation with the USFWS and tribal consultation), coordination with adjacent BLM field offices, affected permit holders, the Resource Advisory Council and cooperating agencies, complete listing of comments received on the DRMP/DEIS and responses to the comments, and an expanded list of document preparers and reviewers.

4) The public comment period on the DRMP/DEIS was another opportunity for the public to provide comments and raise issues. Additionally, the scope and purpose and need for the Lower Sonoran–SDNM RMP/EIS have not changed since publication of the Notice of Intent in 2002; therefore, a new scoping period is not needed.

7) The decision to include plans for both decision areas into one EIS is because, although they are managed differently, they are within the same geographic area and are not completely independent. The idea of including them in one EIS is intended to capture impacts that relate to both areas in one document, allowing the public to clearly see the management proposed for both areas and see how management for the Monument differs from other BLM land. Some uses that are allowed and managed for on BLM lands within the Lower Sonoran Decision Area may not be appropriate within the SDNM Decision Area, due to the focus on protection of Monument objects. By including both plans together, the public can see those differences.

8) BLM has coordinated with the Yuma Field Office and has attempted to develop consistent management approaches where the management objectives are similar. The Resource Advisory Council has been involved in the Lower Sonoran-SDNM RMP as well, receiving many briefings and providing comments.

9) Due to a settlement agreement, BLM has very little time to complete the RMP process. CEQ Regulations require a minimum of 45 days for public comment on an EIS, and BLM regulations require a 90-day public comment period on RMP/EIS documents.

6.2.7 BORDER ISSUES

Comment Number: I00043-2

Commenter: John N. Ellis

Comment Excerpt Text:

Can we please get an in depth analysis by the BLM of the damage caused and the unsafe conditions created in the Sonoran Desert Nation Monument by the “illegal’s” using the area for illegal activity?

Comment Number: I00051-2

Organization: Town of Gila Bend

Commenter: Colby Turner

Comment Excerpt Text:

The designations also fail to address the true nature of the problem, Illegal Drug and Immigrant Traffic Damage which leads to further damage by Government Enforcement Agencies (Border Patrol, Pinal County, Maricopa County) as they monitor the area and pursue suspects.

Comment Number: I00058-1

Commenter: Tom Matheson

Comment Excerpt Text:

Secondly the report does not seem to seriously address the issue of environmental degradation caused by illegal immigration. This damage is widespread and will not be stopped by regulations imposed on law-abiding citizens. To ignore serious mention of this problem in the report seriously damages its legitimacy and therefore its worth and value. This seemingly intentional omission is unacceptable and will diminish support for your efforts.

Comment Number: I00104-2

Commenter: Tom Taylor

Comment Excerpt Text:

I. I hope you can boost patrols of the landscape, not only for illegal uses by citizens, but also the negative impact of illegal human migrations.

Comment Number: I00109-4

Commenter: Joaquin Vega

Comment Excerpt Text:

Furthermore, in recent years we have seen an increase in undocumented aliens and Customs and Border Patrol activities throughout all of the current parks and monuments in the Southwest. BLM's desire to implement preferred alternatives to governing and maintaining the land would merely go unnoticed with DHS and CBP's overruling authority on the land. Currently, all these lands are subjected to daily degradation with disregard to rules and regulations. I've seen it with my own eyes, and so have many residents. They violate many standards already, such as creating new roads, destroying flora in the process, and even cutting fence, allowing horse and burro onto roadways causing safety concerns. All of these things should not go unnoticed, when it is vital towards the BLM's initiative of preservation.

Comment Number: I00111-1

Organization: National Park Service

Commenter: Lee Baiza

Comment Excerpt Text:

Border impacts affect access to areas, cause diverse and abundant damage to resources and infrastructure and greatly limit management effectiveness. This is particularly true of the Ajo Block. The Draft EIS does not substantively discuss border issues and their influence on management. The NPS views this draft EIS review as an opportunity to incorporate today's border challenges into the management process and we hope through this process to continue cooperating with BLM to develop comprehensive strategies regarding a collective response to

these issues. These discussions are important not only to reduce adverse impacts on resources, but are critical in the continued efforts to save Sonoran pronghorn from extinction.

Comment Number: I00117-1

Commenter: Douglas Thomas

Comment Excerpt Text:

In this citizen's view, if....

“...The purpose of the Lower Sonoran and SDNM Draft RMP/Environmental Impact Statement (EIS) is to provide guidance for managing the use of public lands and provide a framework for future land management actions within the Planning Area...”

...then failure on BLM's part to thoroughly analyze and take into consideration (as part of their planning process) the ramifications of the SDNM lands being in the middle of an Illegal Alien and Drug smuggling corridor is highly suspect.

Comment Number: I00117-3

Commenter: Douglas Thomas

Comment Excerpt Text:

Unfortunately, BLM has chosen not to include a comprehensive analysis of the data they compiled as part of their planning process for the SDNM and Lower Sonoran decision areas. Without such a comprehensive analysis, BLM will be proceeding with a decision making process and formulating new regulations without considering how the reality of Illegal Alien and Drug Smuggling will ultimately determine the wisdom and/or effectiveness of these new regulations.

Comment Number: I00117-5

Commenter: Douglas Thomas

Comment Excerpt Text:

Land managers on Federal lands adjacent to the Lower Sonoran and SDNM Decision Areas have taken proactive steps to identify, quantify and analyze the effects of WDS on the lands they manage and in their decision processes. The Lower Sonoran and SDNM decision areas are direct recipients of much of the smuggling traffic through these adjacent lands.

All federal land managers rightfully acknowledge that border issues are beyond their explicit scope. however, land managers should not use this an excuse for not explicitly recognizing, analyzing and quantifying the problem of Illegal Alien and Drug Smuggling and how it will ultimately impact the effectiveness of their land management decisions.

Comment Number: I00117-6

Commenter: Douglas Thomas

Comment Excerpt Text:

There are 1264 instances of “Travel” to be found in the SDNM DRMP/EIS. The rules and regulations formulated as a result of BLM's decision process will determine what access the public will have to the decision areas in the future.

According to the document, “The plan alternatives progressively explore increasing restrictions to motorized recreation and access, which would result in a progressively limited, motorized route network and reduced access.” If BLM had conducted, included, and considered an analysis of the effects IA/DS has on the decision areas, the route evaluation process and corresponding route “decision tree” might look entirely different.

To what end would it be to “progressively explore increasing restrictions” (in any of the plan alternatives) on the existing motorized network of existing routes when smugglers adhere to their own “route plan”?

Comment Number: 100117-8

Commenter: Douglas Thomas

Comment Excerpt Text:

The SDNM may be unique in that much of the existing road network are primitive roads that occur mostly in washes near the Sand Tank Mountains and few upland primitive roads exist. Smugglers make extensive use of this travel network in washes throughout the SDNM. Nature has generally paved the most direct routes north through the SDNM to Interstate 8 and the smugglers take advantage of this fact:

Comment Number: 100117-9

Commenter: Douglas Thomas

Comment Excerpt Text:

Once inside the “Area A” boundary on BLM land, smugglers use one of the 8026 route alternatives to arrive at Johnson’s Well. The smuggling route then proceeds on the Sand Tank Wash Road (Route 8008) to Papago Indian Chief Mine, south of Javelina Mountain. This area is listed in the DRMP/EIS as one of the “ Site-Specific Sample Areas “ that is “representative of remote, pristine and lightly used areas of SDNM that are difficult to access without aid of high clearance or specialized vehicles. “

From Papago Indian Chief Mine the smugglers have their choice of two routes north, but once they have delivered their loads to Interstate 8, they traverse a complete loop back to Kaka, through the SDNM and/or the BMGR. One route north traverses east of the Sand Tank Mountains on Big Horn Road (Route 8011), NW to the 8020 road, takes the wash that parallels the 8020 road west to the Goetz Well road (Route 8012), and takes the 8012 road north to Bender Wash (Route 8018). The Bender Wash and all branches west of the Getz well area are listed in the DRMP/EIS as one of the “Site-Specific Sample Areas” that is “representative of remote areas of SDNM where vehicle routes exist in sand washes and use prior to the Monument proclamation is well known. This area is outside the area A permit area. “

As stated before, the Bender Wash route puts smugglers to within 1/2 mile of Interstate 8 and access to 7 miles of Interstate mile markers to use as drop-off/load-up points. The other possible route north from Papago Indian Chief Mine is through the Sand Tank Wash, through the middle of the Sand Tank Mountains (Route 8013) This area is also listed in the DRMP/EIS as one of the “Site-Specific Sample Areas” that is ...

“... representative of remote areas of the SDNM where the only available vehicle routes are in sand washes. This area is considered to be some of the best desert wash habitat in SDNM. Wash travel inside Area A was prohibited by previous Air Force land use plan. Designating these routes as primitive roads is being considered”. Continuing in the description “... this area is representative of large mountainous areas with few routes and good habitat and primitive recreation opportunity. The area is fairly pristine.”

Route 8013 winds through the middle of the Sand Tank Mountains in the Sand Tank Wash, connects with Route 8017, traverses west to Route 8014 and north to the Bender Wash (Route 8018) and/or the gate at MM124, with the previously mentioned access to Interstate 8.

The route back to Kaka on the Tohono O’odham Reservation completes the “smuggling circuit”. Retracing either one of two routes mentioned above has been documented as a return route, however, recently smugglers have been remiss to retrace any part of these routes for fear of detection. Currently the “return route home” entails following the Bender Wash (Route 8018) or the wash aligned with Route 8019 to the west outside the SDNM boundary to the “Nine Mile Wash” road, and south to Route 8008, across the BMGR “Hot Zone” and back to the Indian Reservation and Kaka.

Comment Number: I00149-3

Organization: Desert Protectors

Commenter: Fred Goodsell

Comment Excerpt Text:

A glaring omission in the plan is consideration of on-going and future border activities. Those activities affect everything that goes on at all levels and stages of the use of the land.

Comment Number: LSFO-SDNM-DRMP--I-1851 I-1

Commenter: Grady Rhodes

Comment Excerpt Text:

According to reports from law enforcements, the SDNM is in the middle of a drug and human smuggling corridor starting in Mexico. I have been in this area and I have seen the large warning signs to U.S. citizens to beware of the dangers from smugglers. I will not stand for U.S. officials limiting the access and freedoms of law abiding U.S. citizens on public lands so that illegal immigrants and drug smugglers from Mexico have an easier time entering the U.S. If “urbanites” are “freaked out” at the sound of target shooting, how will they feel when they become the human targets of murdering drug smugglers? Stop this foolishness and choose “Alternative A - do nothing”. This is the best option to make the best of a very bad situation caused by unwillingness of the U.S. Government to protect its border with Mexico.

Comment Number: LSFO-SDNM-DRMP--I-18661-I

Commenter: Gina Kirkpatrick

Commenter: Kevin Kirkpatrick

Comment Excerpt Text:

Now I want to get to the point of closing the area and making it Wilderness. If that happens, you have now opened the area up to be a perfect destination for drug running. Since it will not be heavily patrolled and the fly zone will be at a higher altitude, how would you stop this from happening. To some of us, this is in our back door and we have concerns about this happening. Also, if this happens, the desert will get more destroyed by the drug runners than the general public using the land for multi purposes.

Comment Number: LSFO-SDNM-DRMP--I-18661-I

Commenter: Gina Kirkpatrick

Commenter: Kevin Kirkpatrick

Comment Excerpt Text:

Now I want to get to the point of closing the area and making it Wilderness. If that happens, you have now opened the area up to be a perfect destination for drug running. Since it will not be heavily patrolled and the fly zone will be at a higher altitude, how would you stop this from happening. To some of us, this is in our back door and we have concerns about this happening. Also, if this happens, the desert will get more destroyed by the drug runners than the general public using the land for multi purposes.

Summary

Commenters expressed several concerns regarding the effects of border issues in the planning area, including impacts on BLM management, environment degradation, and threats to public health and safety and requested the BLM address these issues in the RMP.

Commenters also suggested the BLM take a proactive approach, requesting increased monitoring of the border and coordination with adjacent land managers to develop comprehensive strategies in response to these issues.

Several commenters provided detailed information regarding smuggling activities and the use of roads/washes taking place in the Ajo Block, the Tohono O’odham, and the SDNM.

Commenters were also concerned that if areas were to become wilderness, law enforcement would be restricted from these areas, diminishing their effectiveness.

Response

The BLM considers law enforcement actions to be administrative and outside the scope of an RMP. Law enforcement officers have the authority to conduct their duties or work collaboratively with other law enforcement agencies. This is a standard operating procedure. Joint law enforcement cooperation is described in **Chapter 5**, Consultation and Coordination, **Section 5.3.5**, Federal and Military Coordination.

However, as drug and human trafficking issues are known to occur in the planning area, these border issues were considered in the cumulative impacts section of the FEIS (see **Section 4.25.2.1**, Both Decision Areas, Cumulative Impacts on Special Designations, Wilderness Areas; **Section 4.25.3.2**, Lower Sonoran, Cumulative Impacts on Livestock Grazing;). Additionally, the BLM added a new section under **Section 4.25.2.1** titled “Cumulative Impacts of Illegal Border Activities” to specifically address the environmental and public safety impacts resulting from illegal and law enforcement activities in the border region.

It is BLM’s policy to allow emergency and/or law enforcement access into wilderness areas under administrative access provisions. See **Section 2.7.1**, Management Common to All Alternatives, Wilderness.

6.2.8 ADMINISTRATIVE ACTIONS

Comment Number: I00052-3

Organization: National Rifle Association

Commenter: Susan Recce

Comment Excerpt Text:

Under the Federal Lands Hunting, Fishing, and Shooting Sports Roundtable MOU, the parties pledged to work together to increase access and opportunities for hunting, fishing, and recreational shooting and to resolve issues associated with these activities. The non-governmental organizations have responded in every instance when a federal land manager has requested assistance in getting sites cleaned up, in reaching out to the local shooting community, and in seeking volunteers to assist the land manager in encouraging safe and responsible shooting by the public. There is no record that a manager of the SDNM ever contacted the BLM's MOU partners and asked for assistance.

Comment Number: I00052-6

Organization: National Rifle Association

Commenter: Susan Recce

Comment Excerpt Text:

In addition the BLM should call upon its MOU partners to assist in identifying suitable sites and implementing the Respected Access is Open Access outreach campaign to shooters, as well as all recreationists, on BLM lands.

Comment Number: I00052-9

Organization: National Rifle Association

Commenter: Susan Recce

Comment Excerpt Text:

The MOU lists resources that are available for responding to issues and opportunities associated with looting and shooting. But MOU partners took a step further by funding research in advance of developing an education outreach campaign in partnership with Tread Lightly! The campaign was launched as the Respected Access is Open Access campaign. Today it is being used by recreational interests beyond hunting and shooting. Materials created by Tread Lightly! are available free of charge for downloading for placement in kiosks, visitor centers and other public places. In fact, the BLM has a link to Tread Lightly! on a page devoted to target shooting on BLM Arizona lands. The non-governmental organizations have stepped up to the commitments they pledged by signing the MOU, but they have not seen a similar level of commitment from the BLM. If it were otherwise, the BLM would have reached out to its national partners to address recreational shooting in the SDNM.

Comment Number: I00068-1

Commenter: Melvin Lee Garrett

Comment Excerpt Text:

The issue of environmental damage (primarily trash left by irresponsible shooters) is a real problem, but not an insurmountable one. One possible way to improve matters considerably is the posting of properly and carefully worded signage. You must entice the shooters into a feeling of co-ownership of the land (and, from a very large-scale perspective, that may not be too far from the truth.) People generally do not trash and destroy what belongs to them. (Please note that the signage at the Table Mesa Recreational Area, while an honest attempt, is far too business-like and is not particularly effective.)

Comment Number: 100110-6

Commenter: Tyler Kokjohn

Comment Excerpt Text:

c. Integrate plans to standardize data collection, create computerized databases that preserve raw data and all metadata, and allow for public input and review of the data or results into the plan objectives. This draft does not even recognize that we are in the computer age and the public has vast resources of social networks available to them. Managers should seek to exploit this potential for fast updates and citizen participation by establishing a web-based system for public information inputs to management or the data system. This could be as simple as establishing a Facebook page.

Comment Number: 100110-8

Commenter: Tyler Kokjohn

Comment Excerpt Text:

suggest the following:

Agency permitted activities - (agency approved collecting, scientific studies, wildlife census efforts, archaeological investigations, etc.) – request/require that a condition of agency approval to conduct these activities is the stipulation that a report will be given to BLM when work concludes or, if very long-term in scope, activity reports will be presented to the agency on a periodic basis. This information can then become part of the information inventory for land managers. Request that the agency manager receives copies of any publications that result from the permitted activities. To give an example, regarding paleontological resources you might request to know what was found (and taken), the location, and other information of interest (discovery of nearby vertebrate fossils of value, evidence of other excavation efforts, vandalism, etc.).

Special interest group activities - enlist help from organizations known to be active in the area to conduct inventories, assess conditions, or report conditions and problems. This could be groups such as the Arizona Archaeological Society, Off-road user groups, rockhounds and recreational prospectors, Sierra Club, Arizona Wilderness Coalition, etc.

Employ BLM volunteers whenever possible – solicit reports from agency-trained citizen volunteers (trail monitors, site stewards, etc.) working in the area.

Basically, adopt the stance that (1) any activity undertaken on BLM lands is an opportunity to gather management information (2) the BLM will need to be creative in management efforts as both agency personnel and funds will almost certainly be limited for the foreseeable future.

Comment Number: 100113-3

Organization: Archery Trade Association et al.

Commenter:

Comment Excerpt Text:

We are also very concerned that the BLM failed to consult with any of the 40 national hunting, fishing, sport shooting and wildlife conservation organizations who signed a memorandum of understanding (MOU) with the BLM in 2006. Under the MOU, the parties pledged to work together to increase access and opportunities for hunting, fishing, and recreational shooting and to resolve issues associated with these activities. There is no record that a manager of the SDNM ever contacted the BLM's MOU partners and asked for assistance.

Comment Number: I00120-13

Commenter: Bill Broyles

Comment Excerpt Text:

7. Build an office, maintenance yard, and a visitor center adjacent to the Monument, such as in Gila Bend, Casa Grande, Mobile, or maybe Buckeye, or even within the Monument, perhaps along Highway 238. BLM needs a much greater presence both in the Monument and the neighboring communities.

Comment Number: I00120-18

Commenter: Bill Broyles

Comment Excerpt Text:

13. Develop and present a multi-media interpretive program for Monument resources, such as Bighorn Station, ranching history, padres and explorers, Native Americans... the list is long. The NPS interpretive model is appropriate for BLM, too, and again take a look at Escalante-Grand Staircase NM with its successful programs. Your anniversary celebration for the Monument and for the Arizona Wilderness Act was splendid. Again, you need a visitor center, even if it is housed with the Gila Bend Museum or a municipal building in Casa Grande or a mobile trailer.

Comment Number: I00123-4

Organization: Friends of the Sonoran Desert National Monument

Commenter: Thomas Hulen

Comment Excerpt Text:

The Draft RMP does not discuss how the Bureau of Land Management intends to educate the public about the rich cultural and heritage of the area comprising the Sonoran Desert National Monument.

Comment Number: I00132-6

Organization: Tread Lightly! Inc.

Commenter: Lori McCullogh

Comment Excerpt Text:

More important than the past though is the future, through a public/private partnership with Tread Lightly! and the Federal Lands Hunting & Shooting Sports Roundtable have worked to develop better ethics education materials for use by local land managers. Through the Respected Access is Open Access campaign, quality materials are available for free that speak exactly to the issues that are prompting the closure of SDNM. A current overview about the Respected Access campaign is also attached, but more information about the campaign as well as the materials available for your use can be found at www.respectedaccess.org.

If we don't have exactly the right messages or look for the SDNM, I commit to customizing our materials, and in short order, to be more valuable to the Sonoran office. Before closing the entire SDNM off to recreational shooting, I implore BLM to give Tread Lightly! and its partners within the hunting and shooting sports community the opportunity to work with land managers in the Sonoran field office to try and improve behavior through an increased emphasis on ethics education and promoting responsible behaviors to see if the situation can be improved on the ground.

Comment Number: I00151-15

Organization: Arizona Off Highway Vehicle Coalition

Commenter: Jeff Gursh

Comment Excerpt Text:

Implementation and budget section of the TMP:

Please plan to use 501 c3 organizations to accomplish the tasks of completing the deferred maintenance necessary to make the designated routes land health standard compliant. There is a statewide assistance agreement in place already allowing such assistance. Plan to apply for OHV sticker funds to accomplish this work.

Comment Number: I00166-16

Commenter: Steve Saway

Comment Excerpt Text:

Also, I think BLM should consider a partnership with the Arizona Game and Fish Department whereby the Gila River RMZ could also offer a wildlife viewing destination at the Painted Rock State Wildlife Area (which currently has no public access).

Comment Number: LSFO-SDNM-DRMP--I-18361-2

Organization: Offroading and off road racing

Commenter: Douglas Martin

Comment Excerpt Text:

Secondly. "local partners sought to monitor". Is this a mandatory condition? What if nobody wants to be out in that area? Is the area then closed to competitive events?

Comment Number: LSFO-SDNM-DRMP--I-18361-7

Organization: Offroading and off road racing

Commenter: Douglas Martin

Comment Excerpt Text:

Also, will this are being designated as the only "open" area near town, will water be piped out there for dust control? This forty acre lot only has one mile and half course on it. Will it be allowed to be developed into more of a complex with more trails, tracks, and facilities?

Summary

Several commenters requested actions that are not land use planning-level decisions, including agency and stakeholder outreach (not associated with the RMP process), education, site-specific activities, and other administrative actions. Commenters requested actions related to (1) BLM coordination under the Federal Lands Hunting, Fishing, and Shooting Sports Roundtable Memorandum of Understanding to discuss recreational shooting issues in the SDNM, (2) outreach, education, and other programs, including using the "Tread Lightly" and "Respected Access is Open Access" campaigns to help manage recreational shooting in the SDNM, (3) utilizing computer technology for public input (e.g., Facebook), (4) requiring a condition of approval for a report to the BLM after completion of agency-permitted activities, (5) building a visitor center/office and developing an interpretive program for the SDNM, (6) establishment of partnerships to manage and monitor recreational activities, (7) using 501(c)(3) organizations to perform maintenance in support of land health standards for designated routes, (8)

asking if local partners are a mandatory condition for the Open Area, and (9) asking if there would be water piped to the open area, or opportunities for expansion of the trail network.

Response

During the planning and analysis process for shooting in the SDNM, the BLM contacted local shooting sports interest groups. See **Chapter 5, Consultation and Coordination** for further details.

As noted in the Draft EIS in **Section 2.2.3, Administrative Actions**, these types of activities are day-to-day activities conducted by BLM, which are often required by FLPMA but do not require NEPA analysis or written decision by a responsible official to be accomplished. Examples of administrative actions include, but are not limited to: mapping, surveying, inventorying, monitoring, partnering, developing education materials, adjusting staffing, patrolling, and scientific research and studies. Selection of organizations, partners, or contractors to work on federal projects is based on qualifications rather than profit or non-profit status. This topic is beyond the scope of this land use planning initiative.

It is BLM policy to work with neighboring communities to provide visitor services. Additionally, should a visitor center for the SDNM be proposed in the future, the BLM would undertake the required NEPA documentation specific to the project, and involve the public through scoping and commenting.

While it is not mandatory for local partners to monitor open areas, having a local partner to assist with management and monitoring would be a condition for allocating this open area. BLM has very little local presence and wants to assure users have a pleasant experience and that the local environment is cared for. The specifics of management, such as water piping, trail networks, parking locations, etc. are implementation-level decisions outside the scope of this RMP. Those would be decided in a site-specific planning effort.

6.2.9 CUMULATIVE ISSUES

Comment Number: I00137-18

Organization: Fennemore Craig P.C.

Commenter: Dawn Meidinger

Comment Excerpt Text:

Similarly, the cumulative effects analysis is nothing more than a statement of the obvious, proclaiming that “more utility development would be shifted to non-federal lands, as large portions of public lands within the planning area would be off limits to surface disturbing activities.” DRMP/EIS at 895. Put simply, the economic consequences of land use administration that leaves large portions of federal lands “off limits” to surface disturbance must be fully evaluated. At a minimum, the effects on rural low-income population areas whose future growth and prosperity depends on commerce and industry must be considered. Currently, the extent of the socio-economic analysis in the cumulative effects section of the DRMP/EIS is a mere mention that growth-inducing effects are not expected to occur from the less than 50,000 acres of public land that will be offered for disposal. DRMP/EIS at 903. Again, this analysis is inadequate and fails to meet NEPA requirements and BLM’s stated planning criteria. See 40C.F.R. § 1502.16(a) and (b) (BLM will produce an EIS in compliance with NEPA standards).

Comment Number: I00137-21

Organization: Fennemore Craig P.C.

Commenter: Dawn Meidinger

Comment Excerpt Text:

The cumulative effects analysis in the DRMP/EIS regarding the impacts on mineral development consists of a single paragraph that speaks volumes about the insufficiency:

“Minerals development is dependent on resource demand and is not constrained by local and management decisions. If mineral deposits are removed from availability by planning decisions, the resource will simply be developed at another location, be it located (on non-BLM lands) regional, national or international. Since particular environmental impacts are location specific, the eventual cumulative impacts of necessary minerals development could be more or less than if the resources within the decision area were developed. The impact of developing low unit value minerals (sand & gravel, crushed rock, etc.) from outside the market area could be significant since the primary expense for these commodities is usually transportation.” DRMP/EIS at 883.

The sentiment appears to be that if mineral development is precluded in this BLM planning area, it will simply go elsewhere. The key fact missing from this result driven analysis is that minerals occurrence is not universal and if mineral resource development is foreclosed in areas where minerals are naturally occurring, the development cannot simply be replicated in another location.

Summary

Commenters questioned the adequacy of the socioeconomic and minerals cumulative effects analyses, indicating the analyses were not in compliance with NEPA and BLM planning criteria.

Response

The cumulative impacts analysis has been updated to incorporate new and updated data on past, present, and reasonably foreseeable future actions. Additional socioeconomic and mineral cumulative effects analysis is provided.

6.2.10 AIR RESOURCES

6.2.10.1 Emissions and Conformity

Comment Number: I00126-45

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

The Draft RMP does not adequately analyze the impacts to air quality that will result from the area and route designations, and activities planned and permitted in this document. Because the planning area has levels of ozone that are near the point of exceeding NAAQS, or that are exceeding NAAQS, BLM must disclose that it is prevented by FLPMA and the Clean Air Act from approving any activities that would further exacerbate or exceed these levels. The failures described above are contrary to both FLPMA and the Clean Air Act, which require that BLM observe air quality standards, and NEPA, which requires that BLM disclose the impacts of the activities it is analyzing. BLM must prepare a comprehensive emissions inventory, which includes fugitive dust emissions, and

then model these figures in near-field, far-field, and cumulative analyses. Without doing so, BLM cannot know what impact these activities will have and whether it is complying with federal and state air quality standards. BLM may not authorize any activities which will contribute ozone precursors (NOX and VOCs) or PM2.5 to ambient concentrations in the planning area (e.g. it may not permit any vehicular travel on designated routes) if these emissions will lead to exceedance of federal or state air quality standards.

Comment Number: I00140-10

Organization: US Environmental Protection Agency

Commenter: Kathleen Goforth

Comment Excerpt Text:

The EPA recommends that the BLM include in the PEIS a detailed qualitative (and if possible, quantitative) comparison of particulate matter emissions for each alternative.

Comment Number: I00140-2

Organization: US Environmental Protection Agency

Commenter: Kathleen Goforth

Comment Excerpt Text:

The DEIS states that the largest source of particulate matter emissions within the Decision Areas is related to “surface-disturbing activities including construction, mining, and OHV (recreation-related) travel.” The DEIS, however, does not provide enough information to compare projected emissions for each alternative. This is important, because as stated in the DEIS, “air quality regulations boundaries for PM2.5 and PM10 will expand to encompass the majority of the Decision Area, in parallel with population growth.” It is not clear in the DEIS how, or if, the preferred alternative will conform to the State Implementation Plans (SIP) for the nonattainment areas located in both Planning Areas.

Comment Number: I00140-3

Organization: US Environmental Protection Agency

Commenter: Kathleen Goforth

Comment Excerpt Text:

We also ask for more information on the preferred alternative’s potential air quality impacts, and whether it will conform to the SIPs for the nonattainment areas within the Lower Sonoran and Sonoran Desert National Monument Planning Areas

Summary

Commenters recommended an accounting and assessment of emissions associated with management in the RMP/EIS to ensure the alternatives conform to State Implementation Plans for nonattainment areas.

Response

As indicated by commenters, under Section 176(c)(1) of the Clean Air Act (CAA), the BLM is responsible for demonstrating that its actions do not interfere with state and local plans to bring an area into attainment with the national ambient air quality standards (NAAQS); as discussed in **Section 3.2.1** and shown on **Map 3-1** of the DRMP/DEIS, portions of the decision areas are within nonattainment areas for one or more of the NAAQS. To meet the implementing regulations for the CAA General

Conformity rule found at 40 CFR 51 Subpart W and 40 CFR 93 Subpart B, a CAA general conformity analysis was conducted to determine whether the actions proposed in the RMP are subject to and meet the requirements of the General Conformity Rule and whether those actions conform to the applicable state implementation plans. The preliminary findings from the analysis have been included in **Section 4.2** of the PRMP/FEIS. In addition, the impacts on air quality from travel management have been updated for each alternative in the FEIS.

6.2.10.2 Grazing LHE

Comment Number: 100136-85

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

The DRMP/DEIS is largely silent about the impacts of livestock grazing on air quality. The BLM only admits that the construction of range developments and the movement of livestock could create dust emissions, but fails to analyze or disclose the impacts of vegetation removal on soil surface erodibility. DRMP/DEIS at 388, 400. This is significant, especially since the BLM is proposing to reauthorize both perennial and ephemeral use on the Monument, ensuring that vegetation cover is removed, soils are trampled, and soil crusts are destroyed by cattle. The LHE and key area data are insufficient indicators of the potential for dust creation since they are not representative of the areas with the most concentrated impacts (such as water developments).

Summary

Commenters recommended additional analysis of impacts of livestock grazing related to air resources due to the proposed changes in the LHE.

Response

Section 4.2 of the DRMP/DEIS identifies potential impacts from livestock grazing on air quality, including negligible short-term, localized dust emissions from livestock movement and from surface disturbance related to rangeland improvements. Impacts from all action alternatives except for Alternative D were determined to be similar in magnitude to baseline conditions. Additional information has been added to **Section 4.2** of the PRMP/FEIS to describe potential indirect dust impacts that could result from removal of vegetative cover and destruction of soil crusts by livestock.

Best management practices (BMPs) and standard operating procedures (SOPs) for soil resources and livestock grazing described in **Appendix H**, Best Management Practices and Standard Operating Procedures, and guidelines for grazing administration described in **Appendix L**, Guidelines for Grazing Administration, would be followed to minimize erosion impacts from livestock grazing.

6.2.10.3 Impacts

Comment Number: 100120-9

Organization:

Commenter: Bill Broyles

Comment Excerpt Text:

3. Protect regional air quality by ending grazing, off-roading, ATVs, abandoning unneeded trails and roads, ending driving in washes in the Monument, and limiting other activities that disturb soil crust or raise dust. Both Maricopa and Pinal counties face federal issues with air quality. Concerning a haboob that rolled through the Phoenix area earlier this year, one newspaper reported, “Pinal County’s degraded bowl is the likely contributor. Name your poison: vast acreages of tilled land, grazed desert, feedlots, land cleared for subdivisions, silty washes and river bottoms, dirt roads, ATV trails, sand-and-gravel operations.” “The storm rolled over vast stretches of public lands managed by the state Land Department and the Bureau of Land management. They are riddled with wildcat trails and roads and leases for grazing, though this spring there was not enough forage for cattle.”

“Monson, of the USGS, said land management is key. Overgrazing not only removes vegetation that keeps dust from blowing, it also breaks the desert’s natural crust, the one defense left when the vegetation is gone.” page 12, col 4. (From Arizona Daily Star, September 25, 2011. “Swirling dust is our destiny,” by Tom Beal. Pages A1, 12.)

Comment Number: 100121-5

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

Air quality in and near the planning area is significantly affected by vehicular traffic. The Phoenix area exceeds federal health-based standards for both ozone and coarse particulates (PM10). Because of this, the DRMP/DEIS must carefully examine the air quality impacts of any planned actions, include any route designations. Transportation and off-road vehicle activities contribute significantly to PM10 emissions, and cars and trucks are also a major factor relative to ozone precursors.

Comment Number: 100121-6

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

In addition to the specific public health issues, BLM must address any impacts to Class I airsheds.

Comment Number: 100126-86

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

As required by the Clean Air Act (CAA), the Secretary of Interior has an “affirmative responsibility” to protect the air quality related values of Class I airsheds. Clean Air Act, 42 USC § 7475(d)(2)(B). Thus, the BLM and Interior Department’s decisions in the RMP must also comply with this CAA mandate. There are several areas in the proximity that are designated Class I airsheds, including nearby wilderness areas and Saguaro National Park. Decisions in the RMP, such as designating a route transportation network may have direct and cumulative impacts

on the air quality and visibility of these areas. BLM must analyze the impacts to these areas from decisions in the RMP in the EIS. BLM must also protect the air quality and visibility of these areas from decisions in the RMP.

Comment Number: I00151-16

Organization: Arizona Off Highway Vehicle Coalition

Commenter: Jeff Gursh

Comment Excerpt Text:

Please see AZOHVC draft State Air Quality 5% plan General Dust permit and letter showing the exemption of OHV MANAGED and or Designated routes and the Best Management Practices to address dust issues. These will have a bearing on OHV use in the PM 10 areas of your RMP.

Comment Number: LSFO-SDNM-DRMP--I-18211-1

Commenter: Angela Roach

Comment Excerpt Text:

Please ensure that OHV vehicle routes are located well-away from I-8 and other State Highways. OHV activities can generate dust which may limit the visibility of drives on major roads. Thank you.

Summary

Commenters recommended additional analysis of several impacts related to air resources, including (1) impacts of livestock grazing, (2) impacts to Class I airsheds, and (3) impacts from route designations and travel management.

Response

Section 4.2 of the DRMP/DEIS identifies potential impacts from livestock grazing on air quality, including negligible short-term, localized dust emissions from livestock movement and from surface disturbance related to rangeland improvements. Impacts from all action alternatives except for Alternative D were determined to be similar in magnitude to baseline conditions. Additional information has been added to the impacts analysis in **Section 4.2** of the Proposed RMP/Final EIS to describe potential indirect dust impacts that could result from removal of vegetative cover and destruction of soil crusts by livestock.

An analysis has been conducted to determine if the Proposed RMP (Alternative E) is in conformance with state implementation plans for air quality. The results of this analysis have been included in **Section 4.2** of the PRMP/FEIS.

Best management practices (BMPs) and standard operating procedures (SOPs) for soil resources and livestock grazing described in **Appendix H** and guidelines for grazing administration described in **Appendix L** would be followed to minimize erosion impacts from livestock grazing.

6.2.11 CLIMATE CHANGE

Comment Number: I00121-8

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

The DRMP/DEIS does not demonstrate how the BLM will manage these lands within the broader landscape to promote ecological connectivity and resilience in the face of climate change and as directed in Secretarial Order 3289.[Footnote 4] This order requires that the BLM “consider and analyze potential climate change impacts when undertaking long range planning exercises...[and] developing multi-year management plans....” The DRMP/DEIS does not contain an analysis of the cumulative carrying capacity for the region and how the Monument fits into that picture. There are also no decisions regarding managing the landscape during periods of stress so that the Monument objects and ecological function and condition will not be irreversibly harmed. All of this should be addressed in the RMP.

Comment Number: I00123-2

Organization: Friends of the Sonoran Desert National Monument

Commenter: Thomas Hulén

Comment Excerpt Text:

Passive restoration of degraded resources should be used when appropriate. Unfortunately there are areas in the Sonoran Desert National Monument such as the Vekol Valley Grassland, areas around North Tank and Gap Well as well as all the livestock waters located in the Sonoran Desert National Monument that have suffered considerably from activities such as unsustainable grazing and irresponsible OHV use. The Bureau of Land Management should develop and implement a plan that will put the restoration of these and other areas on a faster track for recovery. The Bureau of Land Management has been directed through the Omnibus Public Land Management Act to “conserve, protect and restore nationally significant landscapes for the benefit of current and future generations.” By engaging in a more aggressive restoration program the Bureau of Land Management will fulfill their duty to manage for climate change as outlined in Secretarial Order (S.O.) 3289 which unequivocally mandates all agencies within the Department of Interior to “analyze potential climate change impacts when undertaking long-range planning exercises, setting priorities for scientific research and investigations, developing multi-year management plans, and making major decisions regarding potential use of resources under the Department’s purview.” S.O. 3289, incorporating S.O. 3226. This planning process falls squarely under this guidance and Bureau of Land Management must assess impacts from the proposed actions that may directly, indirectly, or cumulatively result in exacerbating climate change within this document.

Comment Number: I00126-90

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

BLM must analyze greenhouse gas (GHG) emissions in the planning area as part of the RMP revision. In determining what levels of GHG emissions to measure as “significant” under NEPA, the agency should look at the relative percentage of GHG emissions reductions that an alternative could produce compared to the baseline carbon performance for the planning area. This is the approach taken in the President’s Executive Order 13514.

Setting an actual numerical threshold of significance is ill-advised as it is against the current policy trends of CEQ and other agencies and because it ignores the cumulative nature of climate change.

As a general approach, BLM should first assess and, wherever possible, quantify or estimate GHG emissions by type and source by analyzing the direct operational impacts of their proposed actions. Assessment of direct emissions of GHG from on-site combustion sources is relatively straightforward. For many projects, energy consumption will be the major source of GHGs. The indirect effects of a project may be more far-reaching and will require careful analysis. Within this category, agencies should evaluate, inter alia, GHG and GHG-precursor emissions associated with construction, electricity use, fossil fuel use, downstream combustion of fossil fuels extracted or refined by the project, water consumption, water pollution, waste disposal, transportation, the manufacture of building materials, and land conversion.

Because failure to conserve carbon sinks results in direct and quantifiable GHG emissions as well as indirect effects from reduction in carbon sequestration, the GHG effects of destruction of carbon sinks should be analyzed as part of the EIS. The GHG effects of destruction of carbon sinks should be analyzed both in terms of carbon already stored in the landscape and soil itself and in terms of the landscape's ongoing carbon-capturing properties. Such an analysis requires that an initial inventory of carbon storage potential be conducted for each landscape. The environmental review should assess and where possible quantify all the various component carbon pools – live trees, other vegetation, dead trees or vegetation (coarse, woody debris and snags), logs, litter, duff, and mineral soil – and the fluxes of carbon to and from these pools, due to natural processes like decay and fire, and those associated with management, harvest and/or manufacture of extracted resources, including the burning of fossil fuels needed to remove, transport, and process those materials. In conducting this assessment, fluxes associated with fire management and the restoration of the resilient native ecology should be accounted for separately. Net fluxes from terrestrial pools to the atmosphere may occur from management activities, such as prescribed and natural fire management, but may be considered beneficial, if they enhance the long-term carbon storage ability of the ecosystem and enhance ecosystem integrity.

Comment Number: I00126-91

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

general statements that BLM will conduct monitoring are also not an appropriate form of mitigation. Simply monitoring for expected damage does not actually reduce or alleviate any impacts. Instead, a vigilant science-based monitoring system should be set out in the RMP in order to address unforeseeable shifts to the ecosystem. A detailed monitoring approach is also required under the BLM's planning regulations:

Comment Number: I00140-5

Organization: US Environmental Protection Agency

Commenter: Kathleen Goforth

Comment Excerpt Text:

The BLM should consider whether a quantitative comparison of projected GHG emissions for the preferred alternative, as well as the other alternatives, would be useful to decision-makers and the public, and, if so, include this information in the Final EIS. The PEIS should also identify options for minimizing and mitigating greenhouse gas emissions.

Comment Number: I00140-6

Organization: US Environmental Protection Agency

Commenter: Kathleen Goforth

Comment Excerpt Text:

The BLM should include a climate change mitigation and adaptation plan in the adaptive management plan for the Lower Sonoran and Sonoran Desert National Monument RMP.

Summary

Commenters expressed concern that the DRMP/DEIS did not adequately analyze impacts related to climate change or describe how the BLM would address these impacts. Commenters recommended that the RMP/EIS include (1) a cumulative carrying capacity analysis for the region, (2) management strategies to reduce impacts on SDNM objects and ecological function during periods of stress, (3) institute a more aggressive restoration program to manage for climate change, and (4) develop an adaptive management plan that addresses climate change.

Commenters requested quantitative analyses of greenhouse gas (GHG) emissions in the planning area and recommended utilizing methods stipulated in Executive Order 13514 to analyze the significance of GHGs pursuant to NEPA.

Response

Per current BLM guidance, including Secretarial Order 3289, **Section 3.2.3** of the RMP/EIS discusses climate change, including global and regional trends, the effects of climate change on Federal land and water resources in general, and the effects on resources within the RMP planning area. **Section 3.2.3** includes a discussion of the effects that climate change may have in the planning area, including increased temperatures, reduced water availability, longer and more intense fire seasons, increased air pollution, and changing vegetation regimes and subsequent effects on species. A regional carrying capacity is not required and is beyond the scope of the RMP/EIS.

Additionally, the BLM has revised **Chapter 4**, Environmental Consequences to incorporate qualitative analysis for climate change. See **Section 4.3**, Climate Change. BLM has reviewed current climate change guidance alongside the management actions, and has found that air quality management, vegetation, wildland fire, livestock grazing, mineral resources, recreation, and travel management actions are the management actions that could contribute most to climate change in the Planning Area, though overall impacts would be minimal. Vegetation and wildland fire management actions could also mitigate climate change by creating healthy vegetation and soils that sequester greenhouse gases.

Due to the nature of GHG emissions into the atmosphere, it is impossible to link a specific GHG emission and a specific climate change indicator. Short- and moderate-term direct and indirect impacts on climate from any of the alternatives would be negligible in nature. Long-term cumulative GHG emissions from certain actions on public lands and other sources within the Planning Area do contribute to total global emissions. These, in turn, could contribute to future long-term, anticipated climate changes to a very minor degree. Overall, the contribution would be a very small portion of the total impact from other sources of a regional and global nature.

6.2.12 CULTURAL AND HERITAGE RESOURCES

6.2.12.1 Baseline Information

Comment Number: 100045-2

Organization: Hopi Tribe

Commenter: Leigh Kuwanwisiwma

Other Sections: 10.2

Comment Excerpt Text:

We understand only 4% of the Lower Sonoran Decision Area has been surveyed for cultural resources with almost 600 sites recorded, and only 6% of the Sonoran Desert National Monument has been surveyed with almost 300 sites discovered, suggesting there could be 13,000 archaeological sites in the Lower Sonoran and 5,000 within the Sonoran Desert National Monument Decision Areas. Therefore, we recommend the BLM make a priority of surveying the remaining 95% of the Decision Areas.

Comment Number: 100129-20

Organization: Center for Desert Archeology

Commenter: Andy Laurenzi

Comment Excerpt Text:

Page 265. It unclear why there is not quantified information on damage from intentional vandalism, OHV damage and artifact collecting. BLM participates in the Site Steward program and as a starting point an examination of Site Steward reports for a ten year period should provide some quantified information on site impacts. In addition, by your own estimate roughly 70-90 sites are visited each year so BLM has data over the last ten years for hundreds of sites. AZSITE and BLM site records often have some information on site condition. At a minimum, a summary of this information is necessary to provide at least some quantified data to better guide management decisions. We request that this information be reviewed and evaluated and reported on in the final plan documentation.

Comment Number: 100129-3

Organization: Center for Desert Archeology

Commenter: Andy Laurenzi

Comment Excerpt Text:

The narrative regarding cultural resources is an accurate depiction but is lacking in descriptive information. Some context on the nature of the known cultural resources (e.g. rock art sites, habitation sites, historic trails) and their prehistoric and current cultural affiliation is needed to get a better sense of the resources. More importantly, cultural resources are inherently diverse and as such are affected by decisions in different ways that require better articulation in the plan. For example, village sites and petroglyph areas, caves and rock shelters are more prone to vandalism impacts while artifact scatters and trails are more often damaged by off highway vehicles and road/route construction (Ahlstrom 1992; Williams 1978). A good example is provided in the Ironwood National Monument Final RMP page 3-32 through 3-35.

Comment Number: I00145-23

Organization: National Park Service

Commenter: Naomi Torres

Comment Excerpt Text:

p. 264 This section seems to infer that the Anza/Mormon/Butterfield trails follow the same route through the entire planning area. Please clarify that while these trails overlap in some locations, such as at Maricopa Pass, they may diverge in other areas while still being separate or parallel. For instance, along the lower Gila River Corridor we believe some trails were on different sites of the river. In striving to provide historically accurate interpretation to visitors, we should be careful not to leave the public the impression that all these different parties followed exactly the same route on the ground. However, it's certainly fine to interpret the area and build/identify a recreational trail on a combined route.

Comment Number: I00148-12

Commenter: Jon M Shumaker

Comment Excerpt Text:

263 Cultural and heritage resources are a major component of what is supposed to be protected in SDNM, yet this section only rates a scant four pages? This section is incomplete and not acceptable in its present form. BLM made no effort to adequately identify, describe, and analyze cultural resource situation in SDNM. You have had ten years to do this...% of types of sites doesn't add up (also p. 264).

Comment Number: I00148-14

Commenter: Jon M Shumaker

Comment Excerpt Text:

264 Table data meaningless. What do "Percentage of all surveys" and "Density (sites/mile)" mean?

Comment Number: I00148-3

Commenter: Jon M Shumaker

Comment Excerpt Text:

Cultural resources: the cultural analysis here is hopelessly defective and incomplete. There is no summary of existing work completed in either SDNM or the LS area. There isn't even a reference to the initial Class I overview done for the Monument in the bibliography. There is no evidence of any research done for this document re: archaeology. An AZSite check was reportedly done in 2003 (eight years ago!!!) without acknowledging the very serious problems with AZSite data and AZSite being out-of-date. For both LS and SDNM, there is no summary of sites, no summary of surveys, no review of what has been done for cultural resources over the past ten years in either management area

Comment Number: I00148-7

Commenter: Jon M Shumaker

Comment Excerpt Text:

Estimates are admittedly based on incomplete and ambiguous data. BLM has had ten years to get a handle on this. There is also no summary of sites, site types, their national Register eligibility, no summary of surveys done, reports, citations, etc. This section is woefully incomplete.

“Evaluating the significance of archaeological and historic sites recorded on public lands is an ongoing aspect of BLM’s cultural resource management program.” This is, to put it kindly, a bunch of hooey. BLM has done no systematic inventory, no Section 110, and work is totally undertaking-driven with an overburdened staff. And no one ever reviews the work.

Approx. 70% of sites are NR eligible? Based on what? Has BLM consulted with SHPO and tribes about this?

Summary

Commenters noted that the description of cultural resources was lacking some baseline text and recommended addition of information, including (1) context of known cultural resources, (2) prehistoric and current cultural affiliation, (3) the location, route, and overlap of historic trails, and (4) additional descriptive information on cultural resources in the SDNM.

Response

The CEQ regulations require an environmental impact statement to “succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration. The description shall be no longer than is necessary to understand the effects of the alternatives. Data and analyses in a statement shall be commensurate with the importance of the impact, with less important material summarized, consolidated, or simply referenced. Agencies shall avoid useless bulk in statements and shall concentrate effort and attention on important issues” (40 CFR 1502.15). EIS **Chapter 3, Section 3.2**, Resources, contains baseline data sufficient to support the decision being made in this EIS.

The requisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the actions under consideration. Background information for cultural resources in this RMP is summarized in documents currently available online on the BLM Web site at http://www.blm.gov/az/st/en/prog/cultural/cultural_pubs.html. BLM’s information pertaining to vandalism and damage of cultural sites is only partial and qualitative. It is useful for management decisions on a site-specific basis, but not for landscape-level decisions such as those in an RMP. Site-specific cultural resources field inspections are required before any proposal is approved, and impacts on cultural resources are either avoided or mitigated.

The description of the Historic trails in the Planning Area in Chapter 3 (**Section 3.2.4**, Cultural and Heritage Resources) was not intended to be a comprehensive description of the trails, but a general description for purpose of a general understanding. More detail is (or will be some time in the future) provided in maps and brochures interpreting these trails.

Within the larger Planning Area (including all landownership), 94 percent of the cultural resources survey projects completed were conducted outside of the boundaries of SDNM (see **Table 3-1**, Estimated Extent of Cultural Resources Survey and Recorded Resources). Six percent of the survey projects were completed on land (regardless of ownership) within the boundaries of the SDNM. Within the Decision Areas (on BLM lands only), 55 percent of the survey projects were completed in the Lower Sonoran Decision Area and 45 percent were completed on the SDNM Decision Area.

Density has been edited to read sites per square mile in **Table 3-1**.

6.2.12.2 Impacts and Threats

Comment Number: I00045-2

Organization: Hopi Tribe

Commenter: Leigh Kuwanwisiwma

Other Sections: 10.1

Comment Excerpt Text:

We understand only 4% of the Lower Sonoran Decision Area has been surveyed for cultural resources with almost 600 sites recorded, and only 6% of the Sonoran Desert National Monument has been surveyed with almost 300 sites discovered, suggesting there could be 13,000 archaeological sites in the Lower Sonoran and 5,000 within the Sonoran Desert National Monument Decision Areas. Therefore, we recommend the BLM make a priority of surveying the remaining 95% of the Decision Areas.

Comment Number: I00073-1

Organization: Arizona State Historic Preservation Office

Commenter: Ann Valdo Howard

Comment Excerpt Text:

Please note that scientific archaeological/historical site mitigation performed by professional archaeologists in the form of excavation or any type of data recovery (including surface collection) does NOT reduce impacts to these heritage resources. As per the Section 106 regulations, data recovery is an adverse effect and cannot be “mitigated down” to a lesser effect or impact. Thus, the text references on pages 429 and 432 stating that scientific data recovery is a “minor” or “negligible” impact need to be corrected.

Comment Number: I00126-30

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

As stated in the Draft RMP, only around 6% of the Sonoran Desert National Monument has been surveyed for cultural resources. PRMP at 264. Given the recognized impacts to cultural resources and the fact that these resources have priority status as Monument Objects, BLM should have a more complete inventory before allowing uses that impact these resources to continue. BLM should prioritize the most sensitive, important, and at-risk areas for cultural resources and commit to performing surveys before making final resource allocations in the RMP. This includes areas in close proximity to routes proposed for designation in the RMP.

Comment Number: I00126-31

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

In this particular case, BLM failed to undertake cultural resource inventories in association with proposed route designations as required by BLM Instruction Memorandum (IM) 2007-030 and also failed to consider information provided by Peter Bungart, an archaeologist with particular archaeological expertise in this area, concerning historic properties within the national monuments.

By neglecting to inventory proposed route designations for cultural resources pursuant to IM 2007-030, BLM failed to make a reasonable and good faith effort to identify historic properties in the Monuments. IM 2007-030 provides

guidance to BLM on implementing the requirements of Section 106 for ORV designations and travel management. BLM IM 2007-030. A 100 percent survey of the planning area is not required by the IM. See Proposed Plan, p. 5-66. Rather, BLM must inventory only those areas potentially affected by two specific types of designations: 1) new routes; and 2) existing routes when a “reasonable expectation” exists that proposed decisions will shift, concentrate, or expand travel into areas likely to have cultural resources. BLM IM 2007-030. Consistent with the regulations implementing Section 106, the IM requires a cultural resources inventory prior to designation of routes for ORV use. Id.

Recommendation: BLM must satisfy its obligation to identify and inventory cultural resources within the area of potential effects associated with each proposed road. Such information is vital to BLM’s ability to adequately meet their responsibilities under Section 106 of the NHPA. BLM IM 2007-030 supports the requirement that BLM complete an identification and inventory process prior to issuing records of decision for the RMPs.

Comment Number: I00129-15

Organization: Center for Desert Archeology

Commenter: Andy Laurenzi

Comment Excerpt Text:

We also believe that some targeted survey efforts are needed to better inform decision-making in the plan. This is especially true in the Monument where a higher standard of management is required for Monument objects, such as cultural resource sites. At a minimum we propose that in the Sonoran Desert National Monument surveys be conducted within .5 mile either side of the road/route centerline to more fully inform travel management decisions. With little quantified information in the plan, it is unclear how decisions have been made with respect to protection of these Monument objects. In areas outside the Monument, we urge that a site condition assessment be conducted on all NRHP listed properties within .5 miles of the centerline of a known road/route to develop a better understanding of impacts to cultural sites.

Comment Number: I00129-16

Organization: Center for Desert Archeology

Commenter: Andy Laurenzi

Comment Excerpt Text:

3. Impacts on Cultural & Heritage Resources 4.4

This section lacks even minimal information upon which to assess impacts. We are left with vaguely worded, generalized statements and little to no documentation to evaluate the adequacy of the analysis nor how to evaluate differences in impacts among alternatives. Given that there is a fair amount of information in hand as discussed earlier and that targeted surveys in sensitive areas is not unreasonable we believe the impact assessment presented herein is totally inadequate. This is especially problematic for lands within the Sonoran Desert National Monument since cultural resource sites are Monument objects.

Comment Number: I00129-17

Organization: Center for Desert Archeology

Commenter: Andy Laurenzi

Comment Excerpt Text:

Page 908. 4.25.2. From Table 30 it appears that many analysis areas of the National Monument were not analyzed at all with respect to Archaeological and Historical Sites. This is not acceptable and the analysis performed should

occur Monument-wide. The first assumption states that the APE considered is .25 mile either side of all routes. This is a good step forward in travel management impact assessment but given that the literature varies on this distance threshold, a more expansive approach would extend the APE to .5 mile either side of all routes. Since cultural resource sites are Monument objects and their long-term protection is paramount, an expansive approach is justified at least for purposes of analysis. Sixth assumption should make reference to motorized uses facilitating access such that decisions on travel management can have a direct bearing on reducing impacts to Monument objects.

Comment Number: 100129-18

Organization: Center for Desert Archeology

Commenter: Andy Laurenzi

Comment Excerpt Text:

Page 909. First paragraph draws attention to the lack of inventory information. For all of the reasons stated above this is unacceptable, and using the example of Ironwood National Monument, we request that all routes/roads that are currently proposed open to motorized use be surveyed within 1/2 miles of the route/road center line to inform final travel management decisions on the Monument. We would be willing to discuss helping to organize volunteer assistance in this effort.

Comment Number: 100129-4

Organization: Center for Desert Archeology

Commenter: Andy Laurenzi

Comment Excerpt Text:

Page 265. Specific reference should be made to vandalism in and of itself as a significant threat especially for petroglyph areas which are often subject to spray painting, target shooting and occasionally removal by chipping, or if the rocks are small enough, theft.

Comment Number: 100129-5

Organization: Center for Desert Archeology

Commenter: Andy Laurenzi

Comment Excerpt Text:

Page 265. The impacts attributed to ATV use or motorized vehicle uses are understated. In particular, there is solid documentation that the proximity of sites to routes open to motorized use typically experience higher rates of vandalism than sites that are farther from routes open to motorized use. These indirect impacts are discussed by Schroeder on pages 15-16 of the Apache-Sitgreaves Cultural Resource Specialist report (2010) prepared in support of Forest wide Travel Management Planning for the Apache-Sitgreaves National Forest and in Chapter 3 of the Coconino National Forest Final Environmental Impact Statement for Travel Management pages 95-107 (2011). In both cases the discussions are directly relevant to public lands managed by BLM. These reports specifically reference Ahlstrom 1992, Lightfoot et al. 1978, Nickens 1981 and Plog et al. 1978. We include three of these reports for your review along with our own research on the Tonto National Forest (Center for Desert Archaeology 2010). We did not enclose Ahlstrom et al. 1992 since this was a Bureau of Land Management study that involves lands managed by the BLM in the Phoenix District and we assumed you have ready access to this report. Each of these studies demonstrates a significant relation between site proximity to routes open to motorized use and vandalism, including looting and casual surface artifact collection. Our research on the Tonto National Forest found that sites closer to roads open to motorized uses were classified in poor condition in greater frequency than sites classified in fair or good condition.

Williams (1978) provides an overview of types of damages, causes of site damage and site management recommendations. Other than outright removal, road closure was identified by surveyed land managers as the most effective protection strategy for sites subject to vandalism. His recommendation was that roads be closed within .5 mile of sensitive sites. Absent compelling information to the contrary, we strongly recommend this standard be applied to roads/routes in the Sonoran Desert National Monument.

Comment Number: I00129-6

Organization: Center for Desert Archeology

Commenter: Andy Laurenzi

Comment Excerpt Text:

Page 403. 5th paragraph BLM states: “Many uses e.g. LUAs and livestock facilities, may have secondary effects because they create new vehicle ways, which often lead to inadvertent damage from vehicle traffic and increases in the threat of vandalism (emphasis added) of fragile cultural resources”. This indicates to us that BLM is aware of the indirect impacts of motorized road access. It stands to reason that if new roads increase the threat of vandalism, than existing roads pose an existing threat from vandalism. This would then suggest that travel management decisions must take this into account as part of the decision-making on motorized route/road designation.

Comment Number: I00129-7

Organization: Center for Desert Archeology

Commenter: Andy Laurenzi

Comment Excerpt Text:

Page 405. 1st complete paragraph. We strongly disagree with this statement regarding quantification of impacts. There are Site Steward reports, BLM internal inventories, and the need to actually conduct targeted surveys as part of the planning effort. In addition, there are numerous AZSITE and BLM records that provide some measure of quantification with respect to site type, location and potential relationship to impacts (i.e. proximity to roads).

Comment Number: I00129-9

Organization: Center for Desert Archeology

Commenter: Andy Laurenzi

Comment Excerpt Text:

Page 431. 3rd complete paragraph. We strongly object to the lack of inventory statement as it relates to travel management and route designation for the SDNM. Compliance with cultural resource management objectives requires that a reasonable effort be made to inventory .5 mile either side of the centerline of a route/road in areas where there is a high likelihood of encountering cultural resource sites subject to vandalism and looting including casual surface artifact collecting. BLM acknowledges this impact earlier in this section as it relates to new roads and as we point out in our comments above, the same rationale should necessarily apply to existing roads.

Summary

1) Commenters expressed concerns about the description of certain threats and impacts on cultural resources in the DRMP/DEIS and requested additional analysis and documentation to support the BLM’s conclusions. Specifically, commenters noted that the BLM did not use findings from existing studies to evaluate potential impacts on sites, and BLM did not conduct additional studies in accordance with the Section 106 process.

- 2) In addition, commenters requested that vandalism be considered as a threat to cultural resources.
- 3) Commenters suggested that BLM did not accurately describe the magnitude of impact associated with data recovery.
- 4) BLM is out of compliance with IM 2007-030 and the area of potential effect (APE) should be expanded to 0.5 mile rather than 0.25 mile.
- 5) “BLM must satisfy its obligation to identify and inventory cultural resources within the area of potential effects associated with each proposed road” (per IM 2007-030). Commenters stated that the APE should be expanded to .5 mile rather than .25 mile.
- 6) Commenter disagrees that cultural resources cannot be quantified.

Response

- 1) The DRMP/DEIS for cultural resource actions within the Lower Sonoran Field Office contains only planning actions and does not include any implementation actions; therefore, the impacts analysis is more generalized. As the planning actions for the SDNM Decision Area are more specific, the BLM has augmented the analysis to better clarify the nature, intensity, and context of anticipated impacts (see **Section 4.5**, Impacts on Cultural and Heritage Resources) resulting from these decisions, including revising impacts associated with data recovery, vandalism, and the travel management decisions.
- 2) The BLM considers actions to address vandalism on archaeological sites to be administrative and outside the scope of an RMP.
- 3) BLM has clarified the difference between evaluation of impacts under Section 106 of the NHPA and NEPA in **Chapter 4, Section 4.5**, in the introductory discussion of the Impacts on Cultural and Heritage Resources.
- 4) BLM’s analysis is in compliance with IM 2007-030, which does not require surveys unless impacts along specific routes are expected to affect sites. Analysis used Bungart road survey results, Air Force UXO road survey results in the SDNM, as well as BLM inventories and AZ Site information. BLM has clarified the methodology description to outline procedures used in analysis. Upon implementation of the RMP, site-specific inventories would be conducted for any activity proposal that would potentially affect cultural resources. Potential impacts on sites would be avoided or mitigated before any activity was approved. Surveys would continue in the Monument as funds and staffing allow, and would be prioritized based on the management questions the survey is intended to explore.
- 5) BLM has reviewed the reports presented by the commenter and has made route recommendations based on direct observations in the SDNM.
- 6) The data available for cultural resources site locations and types remain insufficient to develop reliable predictive or sensitivity models. This means that the impacts related to cultural resources resulting from landscape-level decisions normally made in an RMP cannot be quantified. Targeted surveys would be conducted, primarily within the SDNM, as funding and staffing allow. However, enough is known about sites and site locations to make decisions appropriate to RMP-level planning.

6.2.12.3 Management Actions

Comment Number: 100121-7

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

We do not agree that restricted motorized access would limit monitoring of archaeological sites, as indicated on page 427. Such monitoring can be accomplished via non-motorized access, and the benefits of reducing public access to these sites outweigh limited monitoring and scientific access.

Comment Number: 100129-11

Organization: Center for Desert Archeology

Commenter: Andy Laurenzi

Comment Excerpt Text:

Page 56. We do not support identification of Butterfield West as a Public Use allocation. Alternatively, we recommend that portion of the Butterfield Overland Stage Route east of the Painted Rocks Campground site. It's proximity to the main paved road will facilitate Public Use as opposed to the proposed area which is remote and in close proximity to sensitive petroglyph sites.

Comment Number: 100129-12

Organization: Center for Desert Archeology

Commenter: Andy Laurenzi

Comment Excerpt Text:

Page 56. We request that the following management actions be included in the final preferred alternative:

“Complete Class II (sample) field inventories to identify cultural resource sites and evaluate their eligibility for listing on the National Register of Historic Properties in accordance with Section 110 of the NHPA. Priority shall be given to the Lower Sonoran Desert National Monument, and the Saddle Mountain and Lower Gila Terraces and Historic Trails ACECs.”

“Follow guidance developed by the BLM_SHPO Cultural Resources Data Sharing Partnership (CRDSP). Ensure that cultural resources information is provided in an acceptable format for entry into the AZSite database.”

Comment Number: 100129-13

Organization: Center for Desert Archeology

Commenter: Andy Laurenzi

Comment Excerpt Text:

Page 57. We request that the following management actions be included in the final preferred alternative: “Maintain and expand annual monitoring program that focuses on condition assessment of listed and eligible NRHP cultural resource sites with priority given to Lower Sonoran Desert National Monument, and the Saddle Mountain and Lower Gila Terraces and Historic Trails ACECs.”

Comment Number: I00129-8

Organization: Center for Desert Archeology

Commenter: Andy Laurenzi

Comment Excerpt Text:

Page 405. 5th complete paragraph please add that motorized use of routes/roads fosters public access to sites.

Comment Number: I00159-16

Commenter: Roy Pierpoint

Comment Excerpt Text:

We need a cherry stem from S. Enterprise Road up to the Red Rock Canyon Archaeological Site so that we can check it for vandalism; the site has been hit hard by vandals in years past.

Summary

Commenters recommended several revisions and additions to management actions to increase protection of cultural resources, including (1) following SHPO Cultural Resources Data Sharing Partnership guidance, (2) initiating an expanded annual monitoring program for cultural resources and historic trails, (3) designating a portion of the Butterfield Overland Stage Route east of Painted Rocks as a public use allocation instead of Butterfield West, (4) completing Class II inventories to identify cultural resource sites and evaluate their eligibility for listing on the National Register of Historic Properties, and (5) add “motorized access to sites fosters public access to sites” to EIS.

Response

The DRMP/DEIS considered a range of alternatives designed to meet the BLM’s legal duties and purpose and need for action. The purpose and need section in the DEIS clearly states that the purpose of the agency action includes compliance with applicable laws for both decision areas, including the SDNM Proclamation and the National Historic Preservation Act (see **Section 1.1**, Purpose and Need for the RMP).

1) The BLM would continue to follow the guidance and procedures outlined in the National Programmatic Agreement and Protocol for Arizona. The BLM followed guidance for Section 106 consultation as prescribed in IM-2007-030 for Travel Management decisions. See **Section 5.3.3** of the PRMP/FEIS for a full discussion regarding BLM’s consultation with the Arizona SHPO.

2 & 4) The BLM’s range of alternatives for cultural resources management represented a full spectrum of options. Alternatives analyzed include a No Action Alternative, three action alternatives, and the preferred alternative. For cultural resources management, the range of alternatives includes setting use allocations for known cultural resource sites, and protections against destruction or damage due to other actions/uses in the alternatives. However, as the actions being considered as part of this RMP are planning-level actions, the BLM is not making cultural resources determinations for implementation-level actions, standard operating procedures and administrative actions (e.g., changes to the existing site stewardship and monitoring program), and requirements for cultural resource surveys (Class II or III level surveys). Conducting inventories and monitoring are not RMP-level management decisions. They are considered administrative actions. BLM would continue to conduct cultural inventories in conformance with Section 110 of the NHPA as funds and staffing allow. Monitoring would also continue.

3) This portion of the Butterfield Overland Stage Route is interpreted at Painted Rock Petroglyph Site, which is currently allocated for public use. The Butterfield West site meets the criteria for a public use allocation (see **Appendix B**, Applicable Laws, Regulations, and Policies, for criteria), and gives BLM the ability to develop the site for interpretation.

5) Known cultural resources within the SDNM were taken into consideration when designating routes as open, limited, or closed to motorized use during development of the SDNM Travel Management Plan, and the associated impacts are disclosed in the FEIS (see **Section 4.5**, Impacts on Cultural and Heritage Resources). BLM has noted in **Section 4.5** that increased access to sites can increase the risk from vandalism.

The travel management planning decisions for the Lower Sonoran did not include route designations, and therefore did not include the same level of detail as provided for the SDNM designations. However, the impacts analysis did discuss the impacts of motorized use on cultural resources in a general sense (see **Section 4.5**). Once the ROD for the Lower Sonoran RMP is signed, the Lower Sonoran Field Office would follow up with specific route designations in a Travel Management Plan that would specifically consider the impacts of open and limited motorized routes on the known cultural resources that occur on or near the routes.

6.2.12.4 Section 106

Comment Number: 100126-29

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

BLM has not complied with the requirements of Section 106 of the National Historic Preservation Act (NHPA), 16 USC § 470f, for the designation of roads and route in the Proposed Plan. A federal “undertaking” triggers the Section 106 process, which requires the lead agency to identify historic properties affected by the action and to develop measures to avoid, minimize, or mitigate any adverse effects on historic properties. 16 USC § 470f; 36 C.F.R. §§ 800.4, 800.6. Because the designation of roads and routes in a resource management plan is an “undertaking,” Section 106 review must occur prior to approving these designations in the record of decision.

I. Designation of roads and routes for off-road vehicle use in a resource management plan is an “undertaking”

Prior to authorizing a proposed action, BLM must determine whether the proposed action is an undertaking under the NHPA. 36 C.F.R. § 800.3; *Mont. Wilderness Ass’n v. Fry*, 310 F. Supp. 2d 1127, 1152 (D. Mont. 2004). The Draft RMP contains no evidence that BLM undertook the analysis required by 36 C.F.R. § 800.3 nor does it reveal that BLM made a finding as required by this regulation.

Comment Number: 100126-69

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

In accordance with NHPA, BLM must initiate and complete the Section 106 process prior to the designation of roads and routes located within the National Monuments, which will occur through the approval of the RMP and Record of Decision. BLM should not designate any roads without a proper cultural survey along those roads. The

recommendations from the Bungart Report should be incorporated fully into the RMP for the Sonoran Desert National Monument. BLM should only designate the minimum road network necessary for the protection of the Monument objects.

Comment Number: 100129-10

Organization: Center for Desert Archeology

Commenter: Andy Laurenzi

Comment Excerpt Text:

Because of the sensitive nature of cultural resources and the corresponding lack of specific information about cultural resources in the plan, our comments to the proposed resource management plan do not meet the requirements under Section 106 to consult with interested parties. As such we request that formal consultation be initiated and completed before issuance of the Record of Decision.

Summary

Commenters expressed their opinion that the BLM did not comply with Section 106 of the National Historic Preservation Act (NHPA) regarding travel management and route designations.

Commenters also requested formal consultation with interested parties, including Tribal councils and governments pursuant to Section 106 of the NHPA prior to the completion of the document.

Response

Both Section 106 and Tribal consultation processes were initiated at scoping when the RMP/EIS project began in 2002. The BLM consulted with the Arizona State Historic Preservation Office (SHPO) and Tribal governments throughout development of the DRMP/DEIS, and the SHPO and several tribes submitted comments on the DRMP/DEIS. Consultation is ongoing and would be completed as part of the planning process. Documentation of BLM's consultation processes and results are described in the new **Chapter 5**, Consultation and Coordination, in the PRMP/FEIS. **Section 5.3.3** describes the Section 106 process, and **Section 5.3.2** describes tribal government-to-government consultation. With regard to Travel Management decisions, BLM followed guidance for Section 106 consultation as prescribed in IM 2007-030. The Bungart Report was taken into consideration in the transportation analysis and in the route network designated in the SDNM.

6.2.13 PALEONTOLOGICAL RESOURCES

6.2.13.1 Edit

Comment Number: 100121-23

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

On page 434, under 4.5 IMPACTS ON PALEONTOLOGICAL RESOURCES, it states, "In the Lower Sonoran, the Sentinel Plain lava flow is considered geologically significant. No other geologically significant areas have been identified in the Decision Areas; however, locally significant areas may be present." As a side note, we think that unique volcanic geological features should have a separate section rather than being listed under paleontological

resources. While fossils are sometimes found in volcanic ash flows, they are never found in basalt rock that was once hot magma.

Summary

One commenter requested that unique volcanic geological features have a separate section rather than being listed under paleontological resources since fossils are not found in basalt rock.

Response

The Geological and Paleontological Resources section has been reorganized in the FEIS to clarify the separate information for the two programs. See **Section 3.2.5**, Geological and Paleontological Resources, for the affected environment clarifications, and **Section 4.6**, Impacts on Geological and Paleontological Resources, for impact analysis clarifications.

6.2.14 WILDLIFE, INCLUDING SPECIAL STATUS ANIMAL SPECIES

6.2.14.1 Data Issues

Comment Number: I00142-27

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

Section - 276

Page - Line 13-17

Line - 3.2.6.3

Comment/Suggestion

Change: “including the water retention dikes in the Vekol Valley” to “including the water retention spreader dikes in the Vekol Valley”

After “such as the Sonoran green toad (*Bufo retiformis*),” Add “lowland burrowing treefrog (*Smiliscafordiens*),” -- This species is one of the most important members of the Vekol Valley amphibian assemblage and should be mentioned in particular.

Change “including the non-native bullfrog” to “including the invasive American bullfrog”

Comment Number: I00142-28

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

Section -279

Page - Line 10 - 11

Line - 3.2.6.4

Comment/Suggestion

Remove Mediterranean geckos (*Hemidactylus turcicus*) from this list. There is no evidence to suggest that they are invasive. In fact, there is no evidence to indicate that they are able to survive outside of human-made structures.

The crayfish *Orconectes virilis* is far more widespread than *P. clarki*

Comment Number: 100142-29

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

Section - 344

Page - Vekol Valley Grassland

Line - 3.4.3.2

Comment/Suggestion

Change “The dike system also provides valuable Grassland resting areas for migrating waterfowl and shorebirds. “

To: “The dike system also provides valuable resting areas for migrating waterfowl and shorebirds, and essential breeding habitat for a community of seven species of desert anurans.”

Comment Number: 100142-30

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

Other than the Jones et al. (1983) report, there is Grassland no evidence to suggest *Bufo debilis* occurs in the Vekol Valley. The Jones et al. (1983) report is quite likely in error (although a specimen exists, its collection data are in doubt). Years of extensive surveying of anurans in Vekol Valley have never produced another record. See papers by Enderson and Bezy (2005. Amphibians of the Vekol Valley. *Sonoran Herpetologist* 18: 74-79; 2011. Herpetofauna of the 100-Mile Circle, *Anaxyrus debilis* (Girard 1854). *Sonoran Herpetologist* 24: 82-85).

Also, it is not necessarily rare to find *B. retiformis* and *G. olivacea* together, and it is relatively common on the Tohono O’odham Reservation. However, the fact that the Vekol sites support 7 species of desert anurans is notable. *B. retiformis* are also known from Organ Pipe Cactus National Monument; the Vekol sites are not the only occurrence on public lands.

Therefore:

Change: “The deep clay/loam soil and grass cover provide a relatively mesic environment for Sonoran green toads (*Bufo retiformis*), green toads (*Bufo debilis*), and Great Plains narrow-mouthed toads (*Gastrophryne olivacea*) (Jones et al. 1983). It is extremely rare to find these toad species occurring together, and it is the only known occurrence of the Sonoran green toads on public lands.

To: “The deep clay/loam soil and grass cover provide a relatively mesic environment for Sonoran green toads (*Bufo retiformis*), green toads (*Bufo debilis*), and Great Plains narrow-mouthed toads (*Gastrophryne olivacea*) (Jones et al. 1983). It is extremely rare to find seven anuran species occurring together and it is the only known occurrence of burrowing tree frogs (*Smilisca fodiens*) on public lands.

Comment Number: I00142-31

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

Section - I246

Page - RA-8

Line - Appendix K

Comment/Suggestion

If possible, Rio Grande leopard frogs (*Lithobates berlandieri*) should be added to this list of nonnative species.

Comment Number: I00142-33

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

Make the following changes to Appendix J (and elsewhere), including adding SGCN tiers IA and IB into the 4th column.

Great Plains narrow-mouthed toad; *Gastrophryne olivacea*; BS; - ; - ; v

Lowland burrowing treefrog; *Smilisca fodiens*; BS; SGCN-IB; - ; v

Lowland leopard frog; *Lithobates yavapaiensis*; BS; SGCN-IA; - ; v

Sonora mud turtle; *Kinosternon sonoriense sonoriense*; BS; SGCN-IB; - ; v

Sonoran desert tortoise; *Gopherus morafkai*; C; SGCN-IA; - ; v

Sonoran green toad; *Bufo retiformis*; BS; SGCN-IB; - ; v

Tucson Shovel-nosed snake; *Chionactis occipitalis klauberi*; C; SGCN-IA; - ; v

Sonoran desert toad; *Dufo alvarius*; BS; SGCN-IB; - ; v

Gila Monster; *Heloderma suspectum* ; - ; SGCN-IA ; - ; v

red-backed whiptail ; *Aspidoscelis xanthonota* ; - ; SGCN-IB ; - ; v

Arizona mud turtle ; *Kinosternon arionese* ; - ; SGCN-IB ; - ; v

Goode's horned lizard ; *Phrynosoma goodei* ; - ; SGCN-IB ; - ; v

regal horned lizard; *Phrynosoma solare*; - ; SGCN-IB; - ; v

Mexican rosy boa; *Lichanura trivirgata trivirgata*; - ; SGCN-IB; v

Saddle leaf-nosed snake; *Phyllorhynchus browni*; - ; SGCN-IB; V

Sonoran Coralsnake; *Micruroides euryxanthus*; - ; SGCN-IB; V

variable sandsnake; *Chilomeniscus stramineus*; - ; SGCN-IB; V

Sonoran whipsnake; *Masticophis bilineatus*; - ; SGCN-IB; - ; h

tiger rattlesnake; *Crotalus tigris*; - ; SGCN-IB; - v

Summary

Commenters recommended several specific corrections and revisions to various wildlife sections and the alternatives, including addition of certain species to text and species lists, revision of species range and occurrence, and other clarifications and corrections.

Response

Text has been revised where appropriate to BLM sensitive species lists and known occurrences of species, including but not limited to the addition of certain species to the text and species lists, and revision of species range and occurrence (see **Section 3.2.13**, Wildlife and Special Status Species). Revised text is highlighted in the PRMP/FEIS. BLM policy (BLM Manual 6840; IM No. AZ-2011-005) does not recognize state species, so these were not included in the analysis. Species names are in accordance with US Fish and Wildlife Service (USFWS) standards.

6.2.14.2 Edits

Comment Number: 100136-102

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

The DRMP/DEIS states that there are five special status species and two candidate species under the ESA within the planning area. DRMP/DEIS at 269. The Sonoran desert tortoise is also a candidate species, and this error should be corrected in the final RMP.

Comment Number: 100142-14

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

Appendix I

Section -

Page - throughout

Comment/suggestion - Change "Sonoran population of the desert tortoise" to "Sonoran desert tortoise" ____ For each reference to the Sonoran desert tortoise, change "Gopherus agassizii" to "Gopherus morafkai"

Comment Number: 100142-15

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

Section - liii

Page - Priority Wildlife Species and Habitat

Line - Executive Summary

Comment/Suggestion

To: Change "As of December 2010, the Sonoran desert tortoise has been federally listed as an endangered species

candidate. The population deemed vulnerable and declining over much of its range due to habitat loss, degradation, and fragmentation; genetic contamination; collection; and disease (AGFD 1996).”

“As of December 2010, the Sonoran desert tortoise is a candidate for listing under the Endangered Species Act. The USFWS considers the species to be vulnerable and declining over much of its range due to habitat loss, degradation, and fragmentation; genetic contamination; and collection (USFWS 2010).”

Comment Number: I00142-19

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

Section - 2.7.6.2

Page - 87

Line - SL 1.1.16

Comment/Suggestion

Water catchment facilities for developing or redeveloping wildlife waters may be developed in washes or 100 year floodplains

Comment Number: I00142-21

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

Section 267

Page - Line 17-20

Line - 3.2.6

Comment/Suggestion

Replace sentence beginning with, “Instead of maintaining ...” with the following:

The AGFD has a list of Threatened Native Wildlife in Arizona (AGFD 1988) that has not been updated in recent years. However, the Arizona State Wildlife Action Plan provides a treatment of priority species called Species of Greatest Conservation Need (SGCN), each of which meets one or more vulnerability criteria and is priority ranked as Tier IA or IB (AGFD 20 II draft).

Comment Number: I00142-22

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

Section - 269

Page - 18-29

Line - 3.2.6.2

Comment/Suggestion

Update reference to USFWS website due to changes since June 2009.

Remove bald eagle from species listed under the ESA.

Change last sentence in second paragraph to “Three species occurring or potentially occurring ... (*Coccyzus americanus*), and the Tucson shovel-nosed snake (*Chionactis occipitalis klauberi*), and the Sonoran desert tortoise (*Gopherus morakai*)

Comment Number: I00142-23

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

Section - 271

Page -

Line - 3.2.6.2

Comment/Suggestion

Modify the bald eagle section to reflect its change in status

Comment Number: I00142-24

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

Section - 274

Page-

Line - 3.2.6.2

Comment/Suggestion

Change: “There are two populations of desert tortoise: the Mojave and the Sonoran. The Mojave population is federally listed as a threatened species and inhabits the area north and west of the Colorado River. The Sonoran population includes tortoises south and east of the Colorado River in Arizona and extends south into Mexico (Arizona Interagency Desert Tortoise Team 2000.”

To: “Two species of desert tortoise are now recognized: the Mojave and the Sonoran. The Mojave desert tortoise (*Gopherus agassizii*) is federally listed as a threatened species and inhabits the area north and west of the Colorado River. The Sonoran desert tortoise (*G. morakai*) includes tortoises south and east of the Colorado River in Arizona and extends south into Mexico (Murphy et al., 2011).”

Comment Number: I00142-25

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

Section - 274

Page-

Line - 3.2.6.2

Comment/Suggestion

Change: Only the Sonoran population occurs in the Planning Area, and in December of 2010, the Sonoran population was added to the USFWS’s candidate species list (FR Vol. 75, No. 239, page 78094). The Sonoran population is vulnerable to habitat loss and degradation, habitat fragmentation, genetic contamination, collection,

and disease (AGFD 1996). The BLM has a disproportionate responsibility for the conservation of desert tortoise because the agency manages the majority of desert tortoise habitat across the species' entire range (BLM 1990).

To: Only the Sonoran desert tortoise occurs in the Planning Area, and in December of 2010, the Sonoran population was added to the USFWS's candidate species list (FR Vol. 75, No. 239, page 78094). Sonoran desert tortoises are vulnerable to habitat loss and degradation, habitat fragmentation, genetic contamination, and collection (USFWS 2010). The BLM has a disproportionate responsibility for the conservation of desert tortoise because the agency manages the majority of desert tortoise habitat across the species' Arizona range (BLM 1990)

Comment Number: I00142-26

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

Note: this section differs from the sentence on p. liii (above); here it says tortoises are 'vulnerable' rather than "declining." AGFD would not dispute the vulnerability.

Comment Number: I00142-32

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

Section - 1251

Page - Reptiles

Line - Appendix k

Comment/Suggestion

Change "Implement management actions for the Desert Tortoise, Sonoran population, as appropriate as developed by the Rangewide Strategy."

To: "Implement management actions for the Sonoran Desert Tortoise as appropriate as developed by the Arizona Interagency Desert Tortoise Team, draft State Conservation Agreement. "

Summary

Commenters noted that catchment facilities may be developed in washes or 100-year floodplains, which misinterprets the management action in the soils section.

Commenters requested text corrections related to species range and distribution for desert tortoise and Sonoran pronghorn, revision of sensitive species lists and classifications, and clarification of different populations of sensitive species (e.g., Mojave versus Sonoran desert tortoise).

Response

The soils section (**Section 4.7**, Impacts on Soil Resources) has been revised to include an exception for floodplains. Management actions under wildlife (**Section 2.10.12**, Wildlife and Special Status Species) have been revised for consistency with soils management actions (see **Table 2-18**, Management Actions and Allowable Uses for Wildlife and Special Status Species).

Revisions regarding species range and distribution for desert tortoise and Sonoran pronghorn, and number of special status species and candidate species, have been completed as appropriate. Species names have been checked to ensure they are in accordance with USFWS standards. Revised text is noted with grey highlighted in the PRMP/FEIS.

BLM policy (BLM Manual 6840; IM AZ- AZ-2011-005) does not recognize state species, so these were not included in the analysis.

6.2.14.3 Impacts

Comment Number: I00136-80

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

Desert bighorn sheep have a social intolerance for livestock. Nearly three decades ago, the BLM recognized this and planned to, “Decrease cattle densities in bighorn habitat to relieve competition between bighorn and livestock for space, water and browse.” Lower Gila North Framework Plan of 1983; DRMP/DEIS at 65. On the SDNM, where bighorn sheep are a Monument object to be protected, the BLM has acknowledged no such need, and the preferred alternative makes no such adjustments. DRMP/DEIS at 79. In fact, the BLM doesn’t even analyze the requirements for “space” or “water,” just minor consideration of forage availability. Instead, the plan authorizes additional waters in high elevations. The agency failed to analyze or disclose whether this might actually increase competition with livestock (which are known to use high elevation areas of the SDNM in times of forage scarcity).

Comment Number: I00136-91

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

Distribution of Sonoran desert tortoise in the LSFO and SDNM is not limited to rocky outcroppings. This makes them vulnerable to trampling by livestock and increases the need for monitoring forage competition. Desert tortoise preferentially select for annual native vegetation. Jennings 1997. Annual livestock authorizations are based on this same ephemeral forage production, meaning that that boom years of vegetation production that would otherwise benefit the tortoise result in higher competition with livestock. The DRMP/DEIS does not analyze or disclose the effects of the permitted levels of livestock grazing on this imperiled species.

Roads and non-native species are also known to impact the desert tortoise. Non-native species are spread by livestock (see below) and cause direct and indirect harm to tortoise. Averill-Murray and Averill-Murray 2002, Heaton 2007. On the SDNM and in the LSFO, the preferred alternative keeps many roads open for administrative use, including for the maintenance of range developments and ranching activities. Therefore, the indirect effects of livestock grazing on roads and invasive species and to desert tortoise are cumulatively substantial and must be analyzed. The DRMP/DEIS fails to analyze these impacts.

Comment Number: I00136-92

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

The BLM claims, “Very few livestock grazing practices fragment wildlife habitat.” DRMP/DEIS at 452. This is not true. Wildlife habitat is affected in myriad ways by livestock grazing, from infrastructure altering landscape use patterns to predator control measures affecting food webs to wholesale alteration of vegetation communities. Where BLM would like to believe that wildlife and livestock grazing can peacefully coexist, there is a wide range of evidence to the contrary, including Hall and others (2005), which was provided to the agency and is a comprehensive review of the impacts of livestock grazing on species within the planning area.

Summary

- 1) Commenters indicated that the BLM did not adequately analyze the effects on bighorn sheep and their habitat from cattle grazing.
- 2) Commenters expressed concern that the DRMP/DEIS did not adequately analyze impacts on sensitive species, including the Sonoran pronghorn and desert tortoise.
- 3) Commenters recommended including the SDNM as a potential reintroduction site for Sonoran pronghorn.
- 4) Commenters disputed BLM’s finding that very few livestock grazing practices fragment wildlife habitat.

Response

As required by 40 CFR 1502.16, the Draft EIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the proposal be implemented, the relationship between short-term uses of man’s environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. It presents the decision maker with detailed information to aid in determining whether to proceed with the RMP or make a reasoned choice among other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

1 & 2) BLM reviewed the sections regarding impacts from livestock grazing on bighorn sheep, Sonoran pronghorn, and desert tortoise and made revisions, where appropriate (see **Section 4.14**, Impacts on Wildlife and Special Status Species).

3) As discussed in **Section 3.2.13**, Wildlife and Special Status Species, the SDNM is outside the current range of Sonoran pronghorn. The BLM has coordinated with the Sonoran pronghorn recovery team regarding management of the species and potential habitat. It is not within BLM’s authority to determine where endangered species would be released to create 10J populations. That is the authority of the USFWS.

4) References to fragmentation of habitat due to livestock grazing have been removed from the PRMP/FEIS because BLM does not have data to support this conclusion.

6.2.14.4 LHE Data Analysis

Comment Number: 100136-2

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

Using the LHE to determine whether livestock grazing is compatible with the protection of Monument objects such as desert tortoise, gray fox, or red-backed whiptail lizards is insufficient, unscientific, and contrary to law. BLM claims that the evaluation of vegetation communities addresses suitable habitat for these species. DRMP/DEIS at 1066. This methodology is insufficient to measure direct impacts to Sonoran desert tortoise from livestock including crushing and trampling, impacts that the BLM should be well aware of. Hall, et al. 2005, at 8.10. Nothing in the DRMP/DEIS evaluates this impact or otherwise determines that having cows crush tortoises is compatible with the protection of this Monument object. (More on desert tortoise, below.) Other impacts to small mammals and ground-dwelling creatures were also not considered, such as impacts to dens, burrows, or on predation behavior. Because BLM doesn't even identify which data sets in the LHE are relevant to many of the species found on the SDNM, the analysis and disclosure is insufficient under NEPA.

Comment Number: 100136-29

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

The DRMP/DEIS dismisses any evaluation of impacts of livestock grazing on Sonoran pronghorn by stating, "Does not occur in the Monument." DRMP/DEIS at 1097. The purpose of Endangered Species Act protection is to conserve and recover species, and the Monument Proclamation specifically lists this species as an object to be protected. As such, the BLM should be considering how livestock grazing affects the potential habitat for this species.

Comment Number: 100136-3

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

Using the LHE to evaluate the impacts of livestock grazing on birds is also insufficient, particularly where the data are incomplete. As noted below, many of the study plots failed to evaluate vegetation composition and only reported on cover. This incomplete data was considered by BLM as sufficient to determine whether Land Health Standards were being achieved, which in turn is used to claim there are no harms to Monument objects including birds. Vegetation composition has an impact on which species of birds will be abundant in a given area. Hall, et al. 2005 at 8.14. The BLM does not evaluate this in the Compatibility Determination and nothing in the DRMP/DEIS evaluates the specific vegetation composition impacts of grazing on these Monument objects.

Comment Number: I00136-4

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

Using the LHE to determine the impacts of livestock grazing on raptors is likewise insufficient because raptors rely on prey communities that differ compositionally in response to grazing. Hall, et at. 2005 at 8.16. BLM did not identify the prey communities of the SDNM and did not assess grazing impacts on these species, which makes the claims regarding raptors unsupported. Moreover, raptors like elf owls and western screech owls (specific Monument objects) are impacted by range infrastructure, including fencing, something utterly ignored in the Compatibility Determination and in the LHE.(7) The DRMP/DEIS does not enumerate the miles of fencing or other range developments that affect these species and the Compatibility Determination ignores these impacts in its conclusion.

Comment Number: I00136-42

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

Using the LHE to determine compatibility with the protection of desert bighorn sheep is insufficient because there is nothing in the LHE that evaluates either the overlapping habitat of bighorn and cattle. DRMP/DEIS at I064. Conflict between bighorn and livestock is not strictly an issue of forage competition, but also social intolerance, rangeland developments including waters and fences, and subsequent genetic isolation of remote populations (such as the Maricopa and Sierra Estrella Mountains). Hall, et at. 2005, at 8.24. The BLM has been told that livestock use the high elevation areas of the SDNM when forage is scarce in the lowlands; nothing in the Compatibility Determination or the DRMP/DEIS discusses this effect, and none of the key area data are collected from high elevation parts of the Monument.

Comment Number: I00136-81

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

The DRMP/DEIS doesn't take a hard look at the effects of livestock grazing on the Sonoran desert tortoise (*Gopherus morafkai*). In its description of the affected environment, BLM's description of the desert tortoise-specially-protected Monument object amounts to recounting Wikipedia. It does not discuss the Maricopa Mountains monitoring plot that has been studied for decades on the Big Horn allotment. Exhibit E. It does not admit that the quantitative monitoring conducted by the tortoise researchers on the granitic hills within tortoise habitat shows the area fails to meet the vegetation objectives BLM lays out in the DRMP/DEIS. Exhibit E at 59-60, DRMP/DEIS at I115

Comment Number: I00136-83

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

The greatest percentage of desert tortoise diets is composed of annual forbs and perennial forbs. The LHE doesn't differentiate the species of annual forbs and simply lumps them all together in the monitoring data it reports.

DRMP/DEIS at I 154-I 166. This makes it impossible to evaluate whether sufficient standing cover of desert tortoises' preferred food sources is actually available, and conclusions about the impacts to desert tortoise from livestock grazing are unsupported. The usefulness of the data presented by the BLM in support of its decision is highly questionable, and do not indicate that the agency took a sufficient hard look at the proposed action. Given the scant data included in the plan, the BLM has not and apparently cannot demonstrate that it is meeting the resource objective for desert tortoise habitat management (DRMP/DEIS at I 187) or protecting and preserving this important Monument object.

The only mitigation measure for this species in the DRMP/DEIS is the plan to "address" on a case-by-case basis the construction of livestock waters in Category I and Category II habitat. DRMP/DEIS at I 47. This is insufficient to protect the desert tortoise-a Monument object and a species at risk of extinction.

Summary

- 1) Commenters felt that the DRMP/DEIS did not take a hard look at, or adequately analyze, how livestock grazing on the Monument affects desert tortoise and Sonoran pronghorn. Commenters indicated that the affected environment section for desert tortoise needed to be expanded. Commenter also felt the Maricopa Mountain tortoise monitoring plot was not appropriately used.
- 2) Commenter suggests the LHE is unsuited to analyze the direct impacts of livestock grazing on a number of wildlife species, including whiptail lizards, birds, raptors, tortoise, and others.
- 3) Commenter suggests that BLM did not adequately analyze the effects of livestock grazing on the movements and social intolerance of bighorn sheep.
- 4) Commenter suggested that BLM's lack of detail monitoring data on annual forbs does not assure sufficient forage availability for desert tortoise.

Response

1) Federal regulation directs the authorized officer to take appropriate action to ensure that the Fundamentals of Rangeland Health, as identified in the grazing regulations, are being met (43 CFR § 4180.1). Within the SDNM, the objectives to achieve standards have been designed to measure the Monument objects as described in **Appendix E**, Compatibility Analysis: Livestock Grazing on the Sonoran Desert National Monument, **Table E-2**, Monument Objects Specific to the SDNM. Standard 3 addresses desired future conditions for upland sites, which includes all the species mentioned in the comments. Plant community objectives are determined with consideration for all multiple uses, including wildlife and habitat, such that if an area is meeting land health standards, then the habitat would be sufficient to maintain Sonoran pronghorn, Sonoran desert tortoise, and other species. The Maricopa Mountain desert tortoise monitoring plot was established to monitor Sonoran desert tortoise populations and not the vegetative component within the plot. There is no information that would indicate that any vegetation changes on the plot are caused by livestock. Use of vegetation data collected by researchers on the plot is not applicable to determining if vegetation is meeting objectives.

2) As described in **Table I-3**, Sonoran Desert National Monument Objects, of the EIS, the protection criteria for the "Wildlife" object is "Maintain viable populations of wildlife species, focusing, as appropriate, on foraging habitat, hiding cover, nesting/roosting habitat, escape cover, and thermal cover. Prevent avoidable loss of special status species." The emphasis in the Proclamation is on protection of

habitat. The LHE is a suitable method of examination to determine if habitat objectives are being met. The “wide variety” of habitats is reflected in the objectives of the LHE. The LHE does not measure direct impacts of livestock (crushing, trampling) on desert tortoise. The LHE was used to satisfy the requirement of the SDNM Proclamation to determine the extent of grazing compatible with protection of the Monument’s objects. Analysis of direct impacts of livestock to desert tortoise was not conducted because BLM has no evidence that those impacts are significant or have an effect on tortoise populations.

3) Livestock use of the “high country” is light to negligible because of the steep, rugged and rocky terrain. In addition, most of the “high country” is a great distance from available water, a severe limitation to livestock use. For these reasons, impacts of social intolerance were not analyzed in the EIS because social interactions are expected to be rare.

There are no rangeland developments in the “high country” to interfere with bighorn movement, and developments in the “lowlands” have been designed to allow wildlife movement consistent with BLM policy.

4) Annuals are not appropriate species for long-term monitoring because: a) annuals complete their life cycle in one year and production fluctuates year to year based on precipitation levels, and b) cover data collection is often complicated by the presence of annuals that are live plants early in the season, only to become litter later in the season. Cover data from perennial plants is more reliable for measuring changes in cover over time.

BLM sets utilization targets that are intended to assure sufficient forage availability for all wildlife. The LHE and the Utilization/Use Pattern Mapping provide a means to determine where those targets have been met and sufficient forage is available for desert tortoise and other wildlife species.

6.2.14.5 Management Actions

Comment Number: 100126-37

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

As mentioned above, pursuant to the Proclamation and other laws and policies, BLM must inventory for all Monument objects, including wildlife, and manage for the protection of those objects above all other uses. For example, BLM should map the habitat for all Monument species and restrict uses that have a known impact on that species or its habitat.

Recommendations: The Draft RMP fails to prioritize and protect wildlife and habitat under the Proclamation and other laws and policies. The RMP should restrict all uses that damage Monument objects, including wildlife species listed in the Proclamation, including off-road vehicle use, designated routes, livestock grazing, and other uses that may lead to the damage of the wildlife resources in the Monument.

Comment Number: I00142-11

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

Section 2.8.2.2, Goal 11 prohibits the grazing of domestic goats and sheep within 9 miles of bighorn sheep habitat in Alternative B. The Department recommends adding this prohibition to Alternative E. This will be consistent with management in the LS region.

Comment Number: I00142-16

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

Section - 2.3.3.5

Page - 39

Comment/Suggestion

Bullet 1 - Modify to include maintain, redevelop existing

Bullet 2 - Modify 'When appropriate passive restoration ...' to When necessary active restoration will be used to restore or enhance Monument resources

Comment Number: I00142-18

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

Section - 2.7.5.2 Priority Wildlife Species

Page - 83

Line - Bullet 5

Comment/Suggestion

Add provision to remove fencing when fencing is no longer needed or other options meet need

Summary

Commenters indicated that the RMP should restrict all uses that damage Monument objects, including wildlife species listed in the Proclamation. Specifically, commenters requested that BLM restrict off-road vehicle use, designated routes, livestock grazing, and other uses that may lead to damage of wildlife resources in the Monument.

Commenters suggested revisions to wildlife management actions, including: 1) Arizona Game and Fish Department's request that domestic goat prohibition in Section 2.8.2.2, Goal 11 (PS-11.1.2) be included in Alternative E, 2) changing the restoration approach from passive to active, and 3) adding a provision to remove fencing when no longer needed.

Response

The Sonoran Desert National Monument Presidential Proclamation (included as **Appendix A** in the RMP/EIS), Presidential Proclamation 7397, created the Monument to protect an array of scientific, biological, archaeological, geological, cultural, and historical objects. Purpose and significance of the Monument, as well as management vision and overarching goals, are presented in **Section 1.4.2**, Sonoran Desert National Monument Decision Area Planning Guidance. The EIS considered a range of alternatives designed to meet the BLM's legal duties and purpose and need for action. The purpose of the agency action includes compliance not only with the Presidential Proclamation, but with all applicable laws. The range of alternatives reflect these multiple purposes, including Alternative A, the No Action Alternative; Alternative B, emphasizing the widest potential array of uses and opportunities for those uses; Alternative C, an attempt to balance resource protection with human use and influence; Alternative D, which would place the greatest emphasis on resource protection/conservation; and Alternative E, the BLM's proposed plan for protection of objects of the Monument, balanced with continued appropriate levels of multiple use.

Revisions to wildlife management actions have been applied where appropriate, including changing the restoration approach from passive to active when necessary, and adding domestic goat prohibition to **Section 2.10.12**, Wildlife and Special Status Species, Goal 11, Objective 11.1, Management Action WL-11.1.2 (see **Table 2-18**, Management Actions and Allowable Uses for Wildlife and Special Status Species).

Removal of fencing within the SDNM is an implementation level decision and would be analyzed by BLM after the RMP is completed. BLM owns all livestock waters, corrals, and fencing south of Interstate-8.

6.2.14.6 Priority Species

Comment Number: 100056-1

Organization:

Commenter: Carol Millette

Comment Excerpt Text:

Desert Tortoise Habitat is categorized as Category II. Desert Tortoises are present and healthy on Saddle Mountain as witnessed by several people who have hiked the Mountain during 2011. We would like this upgraded to Category I.

Comment Number: 100119-2

Organization: Friends of Saddle Mountain

Commenter: Chris Meachum

Comment Excerpt Text:

- Desert Tortoise Habitat in the preferred alternative E, lists Saddle Mountain and the Palo Verde Hills as being categorized as "level 2". While we do not have much data for the Palo Verde Hills, the FoSM has found the tortoise population at Saddle Mountain to be intact, abundant and healthy. In recent inventories, we have found and photographed numerous Desert Tortoises and as a result would like to see the Saddle Mountain area upgraded to Category I to aid in their management and further protection. Documentation of our findings is available upon request.

Comment Number: I00120-17

Organization:

Commenter: Bill Broyles

Comment Excerpt Text:

14. Bring back Sonoran pronghorn. The Monument is part of their historic grounds –we even have Antelope Peak. With livestock grazing gone, the pronghorn should have a good habitat (certainly better than the southern Kofa).

Comment Number: I00123-11

Organization: Friends of the Sonoran Desert National Monument

Commenter: Thomas Hulen

Comment Excerpt Text:

In addition the Bureau of Land Management should include management prescriptions for rare species such as, Lowland burrowing tree frogs, Sonoran desert green toads, Sinaloan narrow mouth toads, and Arizona mud turtles found in the Sonoran Desert National Monument but not identified in the Draft Management Resource Plan.

Comment Number: I00123-3

Organization: Friends of the Sonoran Desert National Monument

Commenter: Thomas Hulen

Comment Excerpt Text:

The endangered Sonoran pronghorn is listed in the Monument Proclamation as a Monument object even though Sonoran pronghorn are not currently found on the Sonoran Desert National Monument. It was intended by the framers of the Proclamation to include the Sonoran pronghorn so that future Bureau of Land Management activities should include this species in management plans.

The endangered Sonoran pronghorn's historic range includes the Sonoran Desert National Monument and the interagency committee responsible for the Sonoran pronghorn's recovery has identified the Sonoran Desert National Monument as a site for future reintroductions of this important animal.

Currently there are two distinct populations of Sonoran pronghorn free ranging in the world. The Cabeza Prieta National Wildlife Refuge in the United States and one population in the northern Mexican state of Sonora. Both of these populations are suffering from the effects of climate change and border issues facing United States and Mexico such as human and drug smuggling.

Several wildlife managers in the United States responsible for Sonoran pronghorn recovery claim they are unduly restricted by Wilderness Act regulations on the Cabeza Prieta National Wildlife Refuge to meet their recovery goals under the Endangered Species Act.

By establishing a Sonoran pronghorn herd in non-wilderness areas on the Sonoran Desert National Monument wildlife managers will have greater flexibility in recovering the Sonoran pronghorn and will allow the BLM to comply with the intent of the Omnibus Public Land Management Act to “conserve, protect and restore nationally significant landscapes for the benefit of current and future generations.”

Comment Number: I00153-1

Organization:

Commenter: Fred Goodsell

Comment Excerpt Text:

Please check your plan on page 73, Vol. I, PS-3.1.3. Please add SDNM as a potential reintroduction site.

Please also include in your plan, language to allow the construction, on SDNM, of a pen for Sonoran Pronghorn familiarization with the area. Additionally, please include language that would encourage an invitation by BLM for Arizona Game and Fish and the U.S. Fish and Wildlife Service to initiate a reintroduction of Sonoran Pronghorn to SDNM as soon as possible.

Comment Number: I00159-13

Organization:

Commenter: Roy Pierpoint

Comment Excerpt Text:

Reference: Map 3-3, "Wildlife & Plant Federally Protected Species." Historically, the area on the east side of the Gila Bend Mountains has been "tortoise territory." (We are submitting a photo of a tortoise from the Ft. Pierpoint Archaeological Site, on the east side of the mountains). For that reason, we feel that since tortoises are still able to exist here, along with the big homed sheep, Gila monsters, borrowing owls, herds of mule deer, and the intention to reintroduce the Sonoran pronghorn, the area should be raised to a Category I.

Comment Number: I00159-14

Organization:

Commenter: Roy Pierpoint

Comment Excerpt Text:

For some reason, the plight of the Gila monster has been ignored in this study. We see them on or near our property rarely, and everyone needs to remember that their habitat area is very small; this is the only area of the world where they exist

Summary

Commenters recommended several specific revisions to management, management actions, analysis, and other text associated with sensitive species, including the Sonoran Desert tortoise, Sonoran pronghorn, and the Gila monster. Specifically, commenters, 1) requested parts of the Gila Bend Mountains and Saddle Mountain be designated Class I tortoise habitat, 2) asked that a Sonoran pronghorn antelope herd be reintroduced in the SDNM and identified for reintroduction on page 73 of the DRMP/DEIS, and 3) requested that the plight of the Gila monster be addressed in the Draft EIS/RMP.

Response

1) As described in **Table 2-18**, Management Actions and Allowable Uses for Wildlife and Special Status Species, habitat categories and boundaries were determined using the criteria in the 1988 Rangewide Plan (BLM 1988b). The Gila Bend Mountains and Saddle Mountain did not meet these criteria for Category I.

2) The SDNM is included in the 10-J area for Sonoran pronghorn, as delineated by the USFWS, and BLM supports their eventual release. BLM is responsible for managing the habitat within a portion of the 10-J area. However, release of Sonoran pronghorn into the 10-J area is under the jurisdiction of the USFWS, since that agency is responsible for managing the species. If the USFWS proposes reintroduction to BLM then BLM would comply, assist and would manage the habitat accordingly.

3) The Gila monster is a BLM sensitive species and is managed as such according to BLM Manual 6840, Special Status Species. The DEIS provided sufficient analysis for this species in accordance with BLM's Manual 6840. Although it is not considered a management issue within the planning area, the management actions described in **Chapter 2, Section 2.10.12**, are designed to maintain their populations throughout the planning area.

4) BLM's management for rare and sensitive species centers on maintaining the health of the habitat. The management actions developed in **Chapter 2** for Wildlife and Special Status Species (**Section 2.10.12**), although not specifically mentioning the species referenced, are designed to maintain the health and vitality of their populations.

6.2.14.7 Wildlife Waters

Comment Number: 100121-17

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

The DRMP/DEIS fails to address the impacts of the development of artificial waters on wildlife, nor does it make the case for additional construction of water developments. Studies have shown that artificial waters may have negligible or even negative effects on wildlife species. [Footnote 6] This document must include a full explanation of not only how water has been demonstrated to increase any bighorn sheep numbers, but also how these bighorn population increases will affect other flora and fauna, including bighorn, over the long-term. It should also include bighorn population trend data for all other Sonoran Desert mountain ranges in Arizona.

Comment Number: 100121-18

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

Moreover, the RMP should include a case-by-case description and evaluation of each existing, maintained, and newly proposed artificial water source. This description and evaluation should include, at a minimum which species use the source, how many animals use each source, in which seasons this use occurs, the effect on these species and individuals, an outline of each source's maintenance schedule and requirements, an analysis of whether each source should be retained or decommissioned, and a discussion of whether data regarding these individual sources could be gathered either remotely or by air. After collecting the foregoing data, the RMP should also address whether any of the existing individual water catchments should be either abandoned or removed.

Comment Number: I00121-20

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

The RMP should include a site-specific analysis of the use of, the need for, and the environmental impacts of each individual existing, upgraded, and/or potential future water development. The existing catchments and the environment surrounding each one should be examined in detail. Such an assessment of the individual catchments would go a long way toward ensuring that subsequent project-level decisions regarding these catchments are made in keeping with sound management practices

Comment Number: I00148-15

Organization:

Commenter: Jon M Shumaker

Comment Excerpt Text:

There are various discussions regarding developing wildlife waters. There has been no research or analysis of this topic in the current document—it is extremely controversial and should not be allowed within the boundaries of SDNM as it would violate the Presidential Proclamation and the purpose of the Monument.

Summary

Commenters recommended management actions for wildlife waters and requested additional analysis associated with development of artificial water sources for wildlife, including impacts on bighorn sheep and evaluation of each existing, maintained, and proposed artificial water source.

One commenter requested the RMP address whether any of the existing individual water catchments should be abandoned or removed.

Response

Section 4.14, Impacts on Wildlife and Special Status Species, includes reference to Rosenstock et al. 2004. Evaluation of each water source would be a site-specific implementation action. Implementation-level decisions regarding wildlife waters are outside the scope of this planning effort. Implementation-level decisions will be made after the Approved RMP/ROD and will require site-specific NEPA.

The decision to install, abandon, or modify an individual catchment would not be a planning-level decision but a site-specific issue, based on cooperation with the AGFD for the removal of existing catchments. Catchments are strategically placed in areas based on recommendations from the AGFD. AGFD proposes the placement and type of catchment to the BLM, and BLM completes NEPA for these site-specific projects.

6.2.14.8 Wildlife Corridors

Comment Number: I00001-12

Organization:

Commenter: Jim Vaaler

Comment Excerpt Text:

Your future desired condition for this WMC should be to preclude uses that would render it more difficult for wildlife to use.

Comment Number: I00001-7

Organization:

Commenter: Jim Vaaler

Comment Excerpt Text:

Why are wildlife movement corridors not designated as ACEC's? The WMC that connects the Sierra Estrella Wilderness Area to the SDNM is the most critical WMC in the Decision Area. Innovative ways need to be utilized to make sure this WMC retains its viability.

Comment Number: I00119-3

Organization: Friends of Saddle Mountain

Commenter: Chris Meachum

Comment Excerpt Text:

Wildlife Corridors as shown on Map 2.2 D are preferred by the FoSM. While we understand the BLM is not able to manage State Trust lands, we feel that showing and/or at least acknowledging corridor "C" shown on this map is crucial even if the majority of lands are managed in corridor C is the responsibility by other agencies. FoSM has documented and continues to monitor Bighorn Sheep and Mule Deer Movement through this linkage as well as a host of other species. We feel that keeping this linkage open is crucial to the long term survival of Saddle Mountain's Bighorn sheep and is the sole remaining corridor north of Saddle Mountain.

Comment Number: I00121-10

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

In order to prevent degradation of the WMCs and ensure their use and viability in the long term, every effort must be made to keep them in a natural condition. Converting state trust land and private land into the public domain must be made a priority for these areas in order to maintain these areas' natural condition and to enhance their viability as WMCs.

Comment Number: I00121-11

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

The WMC that extends from the Sierra Estrella Wilderness Area through Seven Mile Mountain and eventually connects with the SDNM is one of the most at risk WMCs in the decision area due to potential developments in the area. Innovative ideas and strong protections will be necessary to ensure that this WMC remains viable for

wildlife. One possibility would be to close the redundant route between the existing Sierra Estrella Wilderness Area and Seven Mile Mountain and to expand the Sierra Estrella Wilderness Area to include Seven Mile Mountain. The remainder of this WMC from Seven Mile Mountain to the SDNM could be designated as an ACEC

Comment Number: 100121-9

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

We endorse the WMCs offered in Alternative D as depicted on Map 2-2d and appreciate that these corridors utilize existing wilderness areas or areas that contain wilderness characteristics as their termini. Activities that have the potential to damage these areas must be limited in order to provide for adequate wildlife movement. Such activities include utility-scale renewable energy development and exploration sites and all locatable and leasable mineral exploration and development sites. All WMCs must be withdrawn from mineral entry. Further, all linear and nonlinear land use allocations such as power lines and their attendant right of ways, communication sites, underground pipelines, freeways and parkways, and all new road construction need to be prohibited in these corridors. Existing gravel roads should be maintained at the status quo level with no widening or re-routing permitted.

Comment Number: 100126-81

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

BLM should reexamine the limitation for 3 miles of road per section or less within the wildlife movement corridors to focus instead on route densities for all priority wildlife in the planning area. We recommend that BLM commit in the RMP to calculating road density within the WHAs and WMCs as well as transportation effect zones in accordance with scientific literature and evaluate the likely impacts of potential route networks on wildlife species, habitat, and migration corridors. Overall goals of the transportation plan should include reductions in road density and edge effects and increases in core areas to provide greater habitat security.

Comment Number: 100142-10

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

The 6 proposed staging areas in the Buckeye Hills East RMZ conflict with wildlife connectivity goals for the area and specifically with wildlife corridors "D" and "E". The Department proposes to work with BLM to locate the staging areas to minimize the conflicts with wildlife connectivity.

Comment Number: 100166-4

Organization:

Commenter: Steve Saway

Comment Excerpt Text:

Comment: Table 2.5 reflects that the Preferred Alternative E would allocate 255,700 acres in the Gila Bend Mountains as a wildlife habitat area (WHA). No other WHAs are proposed. As shown on Map 2-2e, this is a very large area that encompasses much of the Lower Sonoran decision area. My concern is that together with the

proposed wildlife movement corridors (WHCs) A, B, C, and D, this may create an unbalanced and concentrated focus on wildlife habitat management for the Gila Bend Mountains. This could overly complicate and restrict multiple use activities such as grazing, recreation, and off-highway vehicle (OHV) travel in the Gila Bend Mountains. Why not designate WHAs and wildlife movement corridors in or adjacent to the SDNM which provides a more protected setting for wildlife habitat management? Or why not designate multiple WHAs in the Lower Sonoran decision area instead of one huge WHA for the Gila Bend Mountains? Recommend BLM reconsider the amount of lands to be allocated for a wildlife habitat area and wildlife movement corridors in or adjacent to the Gila Bend Mountains. This area is also important for other values and uses.

Comment Number: I00166-5

Organization:

Commenter: Steve Saway

Comment Excerpt Text:

Comment: Management Action PS-12.1.5 states that road density would be limited to 3 miles of road per section or less within the wildlife movement corridors in accordance with the Habitat Guidelines for Mule Deer (Mule Deer Working Group 2006). I have two concerns here. One, the travel management process should be the exclusive methodology for determining the status of existing or proposed new roads. In my view, a road density restriction is somewhat arbitrary and does not consider the multiple factors that must be considered during a travel management evaluation.

Comment Number: LSFO-SDNM-DRMP--I-18563-2

Organization: Sustainable Arizona

Commenter: John Neville

Comment Excerpt Text:

Include the Priority Wildlife Areas and Wildlife Movement Corridors in the plan to help facilitate the recovery of imperiled species and maintain important landscape linkages between mountain ranges.

Summary

Several commenters recommended management to maintain and protect Wildlife Management Corridors (WMCs), including:

- 1) land acquisitions to maintain WMCs,
- 2) limiting destructive activities such as energy and minerals development in WMCs,
- 3) withdrawing WMCs from mineral entry, and
- 4) prohibiting widening or re-routing of roads in WMCs.
- 5) Commenters also recommended reexamining the limitation for 3 miles of road per section or less within WMCs and focusing instead on route densities for all priority wildlife in the planning area.
- 6) To protect WMCs, one commenter recommended closing the redundant route between the existing Sierra Estrella Wilderness Area and Seven Mile Mountain and expanding the Sierra Estrella Wilderness Area to include Seven Mile Mountain.

7) Commenters questioned why WMCs are not designated as ACECs and one commenter noted that a portion of the WMC that extends from the Sierra Estrella Wilderness Area through Seven Mile Mountain and eventually connects with the SDNM should be designated as an ACEC.

8) Commenters noted that management of some resource programs conflict with WMCs, including proposed staging areas in the Buckeye Hills East RMZ. Commenters also recommended BLM reduce the amount of land allocated for WMCs in or adjacent to the Gila Bend Mountains and manage for more multiple uses in this area.

Response

1, 2, 3 & 4) WMCs were created to allow BLM flexibility to work with partners to allow ingress and egress of species as related to human occupation and development. The WMCs are a starting point for BLM to cooperate with private, state, and other federal agencies to facilitate movement of wildlife in a relatively safe manner. The BLM has no mechanism for designating WMCs, as there is no policy for allocation or designation. However, as part of setting the desired future condition for the wildlife program within BLM, the RMP has defined the goals, objectives, and management actions for WMCs in **Chapter 2, Sections 2.10.12** (see Goal 12 and Objective 12.1 in **Table 2-18** and associated management actions). Implementation of the RMP would require that activities authorized in WMCs must be in conformance with the goals and objectives of the RMP.

5) BLM does not have data regarding appropriate road densities for all priority wildlife species. Therefore, it would be inappropriate to establish target road densities in a blanket approach across the planning area in the RMP. BLM has established goals and objectives for sensitive species in **Chapter 2, Section 2.10.12** that would guide travel and transportation planning, as well as other potential habitat alterations.

6) These suggestions are outside the scope of the Lower Sonoran RMP. Travel Management Planning and route designation for the Lower Sonoran Decision Area would be completed within five years of plan completion. In addition, BLM does not have authority to either establish or change Wilderness designation or Wilderness boundaries.

7) BLM has no information indicating that the subject area has significant historic, cultural, or scenic values; fish or wildlife resources, including threatened or endangered species; or natural hazards satisfying the relevance and importance criteria required for designation as an ACEC.

8) After reviewing the comments, the BLM has revised management actions to eliminate any potential conflicts between management actions of other programs on the wildlife corridor management actions.

6.2.15 SOIL

6.2.15.1 Management Actions

Comment Number: 100166-7

Organization:

Commenter: Steve Saway

Comment Excerpt Text:

Comment: Management Action SL-2.1.2 (for Lower Sonoran decision area) states that the density of roads and trails would be reduced during route designation within areas known to have sensitive soils. In my view, road density should be based on the travel management process and site-specific conditions. Road density is one factor to consider but should not be the exclusive reason to determine a travel management designation. Recommend the wording of the management action be revised to reflect that approach. Or change the word “would” to “may” in the first sentence of the management action.

Comment Number: 100166-8

Organization:

Commenter: Steve Saway

Comment Excerpt Text:

Comment: Management Action SL-2.1.5 (for SDNM decision area) states that vehicle parking and camping would be limited to 25 feet from the road centerline or designated sites in areas determined to have sensitive soils. Recommend that the wording of SL-2.1.5 be the same as SL-2.1.4, i.e., change the restriction from 25 feet to 100 feet from the road centerline. Rationale is as follows. From a user perspective, it is very difficult if not impossible to pick a campsite that is only 25 feet or less from the road centerline. One can view existing campsites in the SDNM and see that people who camp there want a buffer from the road to provide some measure of privacy and to avoid vehicle noise and dust. If a management action is too restrictive, it will not encourage compliance. The restriction of 100 feet from the road centerline would be more consistent throughout the Lower Sonoran and SDNM decision areas and easier to administer. Ideally, BLM should designate suitable campsites using existing sites so that new areas do not need to be disturbed.

Summary

Commenters expressed concern that management actions to protect sensitive soils were too restrictive and recommended they be based on site-specific conditions rather than uniformly applied to the entire planning area.

One commenter stated that Management Action SL-2.1.5 addressing the SDNM decision requiring that vehicle parking and camping in sensitive soil areas would be difficult to apply, is too restrictive for the user and is inconsistent with the Lower Sonoran Decision Area.

Response

The BLM acknowledges that additional site-specific information on sensitive soils would aid analysis for soil resources. The FEIS has been revised to include additional location-specific information for sensitive soils in the planning area, including a sensitive soils map to identify regions of the planning area that would be impacted by management decisions specific to sensitive soils (see **Section 4.7**, Impacts on Soil

Resources). Soil resources are fundamental to all other resources and resource uses. Additional information has been presented to link protective measures for soil resources with other resource decisions, including but not limited to measures for water quality, vegetation health, and special status species protection.

Management actions such as SL-2.1.5 are intended to consider a range of alternatives designed to meet the BLM's legal duties to protect soil resources and satisfy the purpose and need for action. BLM has revised SL-2.1.5 to state that "Vehicle parking and camping would be limited to reasonable use of the shoulder or adjacent area. Designated sites in such locations would be inventoried, mapped and signed. If monitoring results show effects that exceed limits of acceptable change, motorized vehicles would not be allowed to pull off a designated route." (See **Table 2-8**.)

Campsites would eventually be designated in the SDNM as deemed necessary per management action RM-3.2.6. In the interim, visitors would use existing campsites and park/camp along designated roads per SL-2.1.5.

Section 2.11.5, Travel Management, was reviewed to ensure consistency with Instruction Memorandum AZ-2005-007, which notes in "National Monuments, National Conservation Areas and along National Trails, motorized use shall keep within the designated route with reasonable use of the shoulder and immediate roadside, allowing for vehicle passage, emergency stopping, or parking unless otherwise posted."

6.2.15.2 Grazing LHE

Comment Number: 100136-19

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

The LHE's analysis of soils is spotty and incomplete, and doesn't quantify levels of erosion, compaction, disturbance, or destruction caused by livestock. The BLM claims that meeting LH Standard I is sufficient to ensure against erosion of Monument soils. However, the BLM only has a single monitoring episode for key area data. Standard I is "Signs of accelerated erosion are minimal or diminishing for the ecological site as determined by monitoring over an established period of time." Thus, conclusions about soil health on the Monument are not supported by the data BLM apparently ignored expert reviewers who had the same concerns. Ruyle 2009 at 6.

The BLM then ignored the data it did have and selectively included only summaries of the ground cover conditions in the DRMP/DEIS.

- On the Bighorn allotment, transect BH-2 saw a 100 percent increase in bare ground between 2004 and 2009, a reduction in cover by cryptogams from 18 percent to 5 percent between 2004 and 2009, and a reduction in vegetation canopy from 7 percent to 5 percent. Exhibit Bat 27.
- BH-3 had a 150 percent increase in bare ground between 2004 and 2009. Ibid.
- BH-4 had a 40 percent increase in bare ground between 2004 and 2009 and a 2/3rds reduction in cryptogams. Ibid.
- BH-5 saw a 2/3rds reduction in cryptogams between 2004 and 2009. Ibid.

- BH-7 saw a nearly 30 percent reduction in cover by cryptogams between 2004 and 2009. Ibid.
- On the Belloat allotment, transect B-4 went from 0 percent bare ground to 8 percent bare ground, with a reduction in vegetation canopy from 42 percent to 13 percent between 2004 and 2009. Ibid.
- On the Hazen allotment, BLM only has a single year of monitoring data pertaining to ground cover. Id. at 28.
- On the Lower Vekol allotment, transect LV-2 went from 0 percent to 4 percent bare ground between 2004 and 2009; vegetation canopy decreased by over 1/3rd. Ibid.
- Transect LV-3 saw nearly 100 percent increase in bare ground. Ibid.
- Transect LV-4 increased bare ground and decreased cryptogams between 2004 and 2009. Ibid.
- On the Arnold allotment, cover by cryptogams decreased from 25 percent to 16 percent between 2004 and 2009. Ibid.

BLM did not include these data in the DRMP/DEIS but should have. They are quite revealing and undermine the conclusions of the agency that all allotments are meeting Rangeland Health Standard I. Guidelines for Standard I say, "Management activities will maintain or promote ground cover. . ." DRMP/DEIS at 1265. Here, it is apparent that on many key areas, ground cover is not being maintained or promoted, but is obviously experiencing grave declines.

Summary

Commenters expressed their belief that the Land Health Evaluation of soils was not adequate and the conclusions about soil conditions on the Monument and Rangeland Health Standards on allotments were not supported by the data. Commenters specifically noted that the DRMP/DEIS: 1) did not quantify impacts on soils as a result of erosion, compaction, and disturbance from livestock grazing, and 2) did not appropriately characterize ground cover conditions and trends on several allotments.

Response

The CEQ regulations require an environmental impact statement to "succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration. The description shall be no longer than is necessary to understand the effects of the alternatives. Data and analyses in a statement shall be commensurate with the importance of the impact, with less important material summarized, consolidated, or simply referenced" (40 CFR 1502.15).

1) Following the CEQ regulation, data for soil resources were collected in greater detail than presented in the EIS. As discussed in detail in **Appendix F**, Arizona Land Health Evaluation for the Sonoran Desert National Monument Management, data collected to determine planning area existing conditions and adherence to Rangeland Health Standards were extensive and followed established guidelines for determining rangeland condition and trends.

Data collected included the following:

1. Rangeland soil and vegetation survey utilizing the BLM's rangeland inventory method and the Natural Resources Conservation Service (NRCS) methods was collected for all allotments from 1979 to 1981.
2. Monitoring for key sites used methodology described in Technical Reference-1734-4, "Sampling Vegetation Attributes" (USDA, Forest Service and BLM 1996).
3. Rangeland and health assessment methods as described in Technical Reference 1734-6, Version 4, "Interpreting Indicators of Rangeland Health" (BLM 2005f).
4. Pacific Biodiversity Institute (PBI) study plots starting in 2002. Data include estimates of vegetative canopy cover by species in relation to disturbance location.
5. Reference sites closed to livestock grazing since the 1940s, and correlated to ecological sites present in both the Barry M. Goldwater Range and Area A.

2) Quantitative assessment of ground cover condition and trends are just some of the variables that may be examined to determine site conditions. For the soil series in the project area, cover data (i.e., bare ground, gravel, litter) were determined to be highly variable for the soil series present. In addition, the type of ecological sites that were evaluated have large interspaces between plants. Therefore, bare ground, gravel, and litter cover data in the planning area was not found to be a good indicator of site conditions. Cover data was collected and is available in allotment site monitoring files at the BLM Phoenix District Office. Overall cover data was not summarized in the EIS, as vegetation canopy cover (canopy cover data) was determined to be the most appropriate measure for future monitoring.

The 2009 transects did not follow the same methodology as either the 2004 or the 1980 transects; therefore, the data is not comparable for a long-term trend analysis.

6.2.16 VEGETATIVE COMMUNITIES

6.2.16.1 Data and Analysis Issues

Comment Number: 100126-38

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

BLM is currently drafting a rapid ecoregional assessment (REA) of the Sonoran Desert ecoregion, which will cover the entire planning area and beyond. Information on the REA is available at: <http://www.blm.gov/wo/st/en/prog/more/climatechange/reas/sonoran.html>. One of the "change agents" that will be addressed in the Sonoran Desert REA is invasive species. We understand that BLM will be publishing the REA in early 2012. This is timely and significant information that BLM should incorporate into the RMP, changing management prescriptions as necessary to respond to this data. BLM should also incorporate the information into its EIS for the planning area and allow for a supplemental comment period on the RMP/EIS to respond.

Summary

Commenters requested that information from the 2012 rapid ecoregional assessment (REA) be considered and incorporated into the RMP/EIS upon release.

Response

The BLM's Rapid Ecoregional Assessments (REAs) are currently under development. The latest document available for the Sonoran Desert REA is the Final Work Plan, which presents the management questions, identification of data needs, and definition of the methods and models that would be used in the analysis. Information about the REAs is available on the REA Web site at: <http://www.blm.gov/wo/st/en/prog/more/climatechange/reas.html>. The BLM may incorporate information from the REA analysis and findings into the FEIS if it is available and appropriate to EIS analysis prior to publication of the FEIS.

6.2.16.2 Grazing LHE Data and Analysis Issues

Comment Number: 100136-50

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

b. The limy upland is also an important ecological site for saguaros, making the integrity of these data critically important to Monument object protection. An earlier version of the LHE set the objective for young saguaro per plot based on the PBI study that showed this level of recruitment in areas currently open to livestock grazing. Exhibit A, Draft LHE at 39. The current version of the LHE downgrades the occurrence to 0.96 young saguaros per plot (and doesn't mention that this is set to the status quo conditions of grazed plots). DRMP/DEIS at 1114. The cover data in the LHE do not explicitly quantify the number of young saguaros, only cover by saguaros, which is insufficient to ensure recruitment in saguaro forest. BLM's key area plot data does not demonstrate that the agency actually measured this parameter for these plots.

Comment Number: 100136-56

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

The BLM is simply ignoring the perennial grass component of Sandy Wash ecological sites in order to avoid admitting the near-absence of perennial grasses in the in the northern portion of the Monument. While it is true that the subset of plots selected by BLM for comparison have a relatively low grass component, it does not explain why BLM didn't either assess more sites or admit to these widespread deficiencies in the northern portion of the Monument.

Comment Number: I00136-57

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

Similarly, the BLM ignored the evidence that it gathered regarding the decrease in key components of rangeland health: ground cover, including vegetation copy, vegetation basal cover, and cryptogams. The BLM claims that quantitative cover data for vegetative and “microbiotic crust cover areas are appropriate across the majority of the ecological sites assessed,” but the DRMP/DEIS does not contain the data to support this. DMRP/DEIS at 1055.

Comment Number: I00136-77

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

The DRMP/DEIS claims, “The results of the PBI saguaro study indicate that recruitment of saguaros is occurring within the grazed portion of SDNM north of I-8 at appropriate rates compared to Area A and BGR.” DRMP/DEIS at 1056, 1067. “Appropriate” is not defined, and the statement contradicts what the PBI report actually says.

In fact, what the PBI 2002 report says is, “We recommend further analysis of the saguaro demographic data and the relationship of the saguaro population demographics to the natural community cluster groups, environmental gradients, and disturbance gradients. Our hypothesis developed during field observations is that the distribution of small saguaros is closely associated with certain cluster groups and is influenced by the level of livestock activity.” Morrison, et at. 2002 at 104. In fact, those observations indicated that there were fewer small saguaros (less than 1 m in height) in areas with intensive livestock activity than in areas without signs of livestock grazing. See Declaration of Peter Morrison, attached as Exhibit D at 17. BLM’s statement in the DRMP/DEIS is unsupported and blatantly disregards (or worse, intentionally misconstrues) the reality of livestock grazing and saguaro recruitment.

Comment Number: I00136-84

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

The DRMP/DEIS lists but does not analyze or disclose impacts of specific at risk plant species. DRMP/DEIS at 286-287. In particular, we note the absence of even general location information for the Tumamoc globeberry. Ibid. This species has been adversely affected by livestock grazing on the SDNM and may be at risk in the sandy washes in the northern portion of the Monument. The key area monitoring is insufficient to assess threats to this species, and the DRMP/DEIS fails to provide special monitoring plans or protocols to ensure its survival.

Comment Number: I00155-1

Organization:

Commenter: Hans Smith

Comment Excerpt Text:

I would like to state for the record that Pacific Biodiversity Institute never conducted a “Saguaro Study” within the Sonoran Desert National Monument between 2002 and 2006.

The assertion contained within Appendix F of the August 2011 version of the Lower Sonoran/SDNM DRMP/DEIS that Pacific Biodiversity Institute conducted any type of “Saguaro Study”, and or published data or tables of the nature contained in F.22. Attachment 5 is completely false and misleading.

I would appreciate the Bureau of Land Management work to correctly cite the source of the data currently being attributed to a non-existent Pacific Biodiversity Institute 2004 Saguaro Study.

Comment Number: 100161-11

Organization: Pacific Biodiversity Institute

Commenter: Peter Morrison

Comment Excerpt Text:

PBI never produced the statistical analysis shown in the DRMP/DEIS and I demand that you remove our name from Table F.22. Any conclusions derived from this data are solely those of the BLM and do not reflect my empirical observations, statistical conclusions, or represent in any other way the work of PBI or any of our staff. In fact, BLM appears to be using these data to support the opposite conclusion than the one I reached in my four years of study of the Monument’s ecosystems, stating instead that grazing is not having an adverse effect on small saguaros. This is untrue and unproven, and goes against all the other scientific reports that have studied such things and what we observed in the field.

Comment Number: 100161-2

Organization: Pacific Biodiversity Institute

Commenter: Peter Morrison

Comment Excerpt Text:

One of the most blatant issues that I have become aware of in the DRMP/DEIS is that some of the work that we did do is distorted and misapplied and that other statements and information included in the DRMP/DEIS is incorrectly attributed to PBI when it has no resemblance to the work we did and the reports that we published and distributed to TNC and the BLM. In one glaring example of this, on page 1186, the BLM attributes Table F.23 to “Pacific Biodiversity Institute Saguaro Study,” In truth, PSI was never contracted for a saguaro study and explicitly told the BLM in our 2003 report, “We recommend further analysis of the saguaro demographic data and the relationship of the saguaro population demographics to the natural community cluster groups, environmental gradients, and disturbance gradients. Our hypothesis developed during field observations is that the distribution of small saguaros is closely associated with certain cluster groups and is influenced by the level of livestock activity.” We noted fewer small saguaros in areas proximate to intensive livestock grazing, but explicitly clarified that we could not make any definitive statements because our study was not focused specifically on saguaro recruitment.

Summary

A) Commenters expressed several concerns regarding the data and analysis for vegetation in the DRMP/DEIS. Specifically, commenters noted that additional information is needed for: 1) the Land Health Evaluation for young saguaros, 2) baseline information for perennial grasses in the northern portion of the SDNM, and 3) data quantifying decreases in key components of rangeland health.

B) Commenters also noted that the DRMP/DEIS did not provide baseline information or analyze impacts to specific at-risk plant species, including the Tumamoc globeberry, and did not include monitoring plans or protocols to protect this species.

C) Several commenters noted inappropriate uses of Pacific Biodiversity Institute (PBI) data and reports in the DRMP/DEIS. Commenters indicated that BLM inaccurately attributed a “Saguaro Study” of the SDNM cited in the DRMP/DEIS to the PBI and requested the source be correctly identified. Commenters also noted that conclusions related to livestock grazing and saguaro recruitment in the DRMP/DEIS contradicted information in reports prepared by the PBI.

Response

A) The CEQ regulations require an environmental impact statement to “succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration. The description shall be no longer than is necessary to understand the effects of the alternatives. Data and analyses in a statement shall be commensurate with the importance of the impact, with less important material summarized, consolidated, or simply referenced” (40 CFR 1502.15).

Following the CEQ regulation, data for vegetation resources was collected in greater detail than presented in the EIS. Vegetation data collected to determine planning area conditions and adherence to Rangeland Health Standard 6 was extensive and followed established guidelines for determining rangeland condition and trends. This is discussed in detail in **Appendix F**, Arizona Land Health Evaluation for the Sonoran Desert National Monument (LHE). Data collected to determine planning area existing conditions and adherence to Rangeland Health Standards were extensive and followed established guidelines for determining rangeland condition and trends. Data quantified in the LHE includes, but is not limited to, plant frequency, plant cover (including saguaro cover), composition, relative production diversity, and utilization.

Comparison of transect data collected over several years in the key areas by BLM was not analyzed in this case, for assessments of long-term trend. The 2009 data were the most recent data for the area. The 2004 and 1980 transects used different study designs and therefore were not comparable to 2009 and could not be used to measure trends in the LHE.

Data collected and information compiled included the following:

- Rangeland soil and vegetation surveys utilizing the BLM’s rangeland inventory method and NRCS methods were collected for all allotments from 1979 to 1981 (described in **Section F.6**, Inventory and Monitoring Methodology, Range Survey subsection of the LHE).
- Monitoring of key areas using methodology is described in Technical Reference-1734-4, “Sampling Vegetation Attributes” (USDA, Forest Service and BLM 1996) (described in **Section F.6**, Key Areas subsection and **Attachment 3**, Key Area Data of the LHE).
- Land health assessment methods as described in Technical Reference 1734-6, Version 4, “Interpreting Indicators of Rangeland Health” (2005) (described in **Section F.6**, Land Health subsection of the LHE).
- Applicable PBI study plots starting in 2002 (described in **Section F.6**, Pacific Biodiversity Institute Site Data subsection, and **Map F-4**, SDNM Grazing Allotments & Monitoring Sites, of the LHE). Data include estimates of vegetative canopy cover by species in relation to disturbance location.

- Use pattern mapping and utilization measurements (described in **Section F.6**, Utilization Studies subsection, and **Map F-5**, SDNM Grazing Allotments and Use Pattern Mapping, of the LHE).
- Saguaro Cover and Stem Count Information (**Table F-23**).
- Landscape-level vegetative communities (described in detail in **Section 3.2.7**, Vegetation Resources, **Appendix E**, Compatibility Analysis: Livestock Grazing on the Sonoran Desert National Monument, and **Appendix F**, and illustrated in **Map E-1**, SDNM Grazing Allotments and Vegetation Communities, of **Appendix E**).

Reference sites closed to livestock grazing since the 1940s, and correlated to ecological sites present in both the Barry M. Goldwater Range and Area A.

B) According to a BLM botanist, Tumamoc globeberry only occurs south of Interstate-8 where livestock grazing has been eliminated.

Tumamoc globeberry is a BLM sensitive species. Baseline information has been updated and provided for all special status plant species (federally listed, federal candidate, and BLM sensitive) with the potential to occur in the Decision Area (see **Section 3.2.7**, Vegetation Resources). Under all alternatives, surface-disturbing activities would be required to protect special status plants, so monitoring and protocols were not deemed necessary at the planning level. Monitoring plans would be required for site-specific actions after the planning effort as necessary and appropriate.

C) According to the Pacific Biodiversity Institute report: *The Natural Communities and Ecological Condition of the Sonoran Desert National Monument and Adjacent Areas*, "...significant demographic data were collected on the number of saguaros in each natural community plot and their height" (PBI 2004:104).

BLM contracted The Nature Conservancy (who in turn contracted PBI) to collect data within the SDNM for the purposes of providing BLM data to determine ecological conditions within the Monument. BLM used PBI plots to increase the number of key areas, where appropriate. See **Section F.6**, Pacific Biodiversity Institute Site Data subsection, of Appendix F.

While PBI's method for collecting the vegetation attributes was acceptable, many of the plot locations did not fit BLM's criteria for selection of key areas. Several of the plots overlapped multiple ecological sites, and soil survey mapping units and some plots were located too close to livestock waters, which are not representative of the overall landscape-level conditions within the Monument. For these reasons, BLM was unable to use some of the analysis that was provided. In addition, the majority of the plots were located south of Interstate-8 on the allotments that were closed to livestock grazing as required under the SDNM proclamation and within the Barry M. Goldwater Range on ecological sites that do not occur north of Interstate-8.

PBI's study was of limited use because it did not address the intensity, frequency, timing, class of livestock, season of use, ecological sites, precipitation patterns, and other variables the BLM needs to address the effects of current livestock grazing practices on the objects of the Monument. However, BLM did use some of PBI's plot data (where applicable) to address vegetation attributes when defining Ecological Site and Key Area desired plant community (DPC) objectives.

6.2.16.3 Invasive Species

Comment Number: 100121-15

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

Buffel grass has invaded the Monument but is still vulnerable to extirpation. Buffel grass removal efforts should have high priority. Every effort should be made to keep other exotic plants from entering or spreading within the Monument. Removal of non-native invasive species programs should focus on non-toxic methods that will not damage Monument water tables, wildlife, or native plants.

Comment Number: 100136-101

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

The DRMP/DEIS entirely neglects to take a hard look at invasive plant species. The description of, “Affected environment, Vegetation resources,” fails to mention the current conditions regarding native/non-native/invasive species on the SDNM, which deprives the reader and the decision-maker of an understanding of the context in which the land use decision is being made. While the, “Environmental consequences,” section briefly discusses the various land use impacts that cause the spread and infestation, the discussion here does not constitute a “hard look” either. The BLM did not include the data it does have on invasive/non-native species in the SDNM or how this relates to roads, livestock waters, or other disturbance. The BLM did not discuss individual invasive species that are spread by livestock and have the potential to increase their abundance as a result of the preferred alternative. This entire section is lacking and needs revision before the final.

Comment Number: 100136-93

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

The DRMP/DEIS does a grossly inadequate job of assessing the effects of livestock grazing on invasive species for both the LFSO and the SDNM. Livestock promote the spread and colonization of alien plants, which can increase fire frequencies. Billings 1990, Billings 1994, Rosentreter 1994, Belsky and Gelbard 2000. Disturbance is a reliable indicator of alien dominance in vegetation composition, and livestock grazing is a significant disturbance to desert ecosystems. Brooks and Berry 2006.

This is particularly important in the low deserts of the planning area because, often, forage estimates for ephemeral authorizations include non-native species, which thereby exacerbates the on-the-ground situation. To use non-native species as forage ensures that disturbance in colonized areas will continue, that seeds will be spread through coats and feces, and that relative productivity estimates will be skewed towards a changed desert. Further, weed invasions are strongly associated with livestock watering sites. Brooks et al. 2006. The DRMP/DEIS contains no discussion of this impact on the vegetation communities, subsequent effects to wildlife, or the changes in fire regimes that this can create.

Catastrophic wildfires in Arizona and California’s desert have been linked to weed invasions, including weeds present in the planning area. Altered fire regimes and weed invasions have deleterious effects on wildlife habitat,

especially for the desert tortoise, which relies on native species as preferential forage. Desert tortoise have a strong preference for native species of annual plants even where non-natives are abundant, and desert tortoise preferentially select ten native plant species even in areas where these species are uncommon or rare. Jennings 1997. Weed composition and the subsequent diminished forage availability is serious threat to the recovery of the species.

When weeds dominate biomass production in both wet and dry years, it can be assumed that weeds will more successfully colonize new areas over time. Brooks and Berry 2006. The dominance of weeds during even exceptionally dry years indicates that drought disproportionately increases competition between wildlife and livestock for native annuals in these seasons. The DRMP/DEIS's failure to address any of these issues for either the LFSO or the SDNM is a major failure of the plan.

Summary

Commenters requested additional information and analysis related to invasive species in the SDNM. Information requested included description of current conditions and analysis of management and land uses that lead to establishment, infestation, and spread of invasive species, especially livestock grazing.

Response

Existing information is presented in **Section 3.2.7**, Vegetation Resources, and the goals and objectives of the RMP were developed to reduce invasive species on a planning level. Additional information regarding existing conditions for invasive weed species has been added to **Section 3.2.7**, Vegetation Resources. During implementation, site-specific NEPA analysis will include more detail regarding the potential for spread and introduction of invasive species. Prevention actions and measures would also be incorporated into all project plans and as terms and conditions in contracts and special use permits and authorizations, particularly with surface-disturbing activities. Text in **Chapter 4** has been clarified (**Section 4.8**, Impacts on Vegetation Resources) to include the methods of weed transportation associated with the weed vectors mentioned under each alternative.

In addition, the SDNM grazing analysis has been revised to clarify the role of livestock grazing and other vectors in invasive species spread. These vectors may include livestock, wildlife (deer, bighorn sheep, rabbits, rodents, etc.), and humans.

BLM cooperates with other partners in the established cooperative weed management areas. Additionally, we use an integrated approach to contain and treat the spread of noxious weeds. BLM methods include: 1) education/awareness, 2) prevention/detection, 3) inventory, 4) treatment, 5) cultural methods (practice modification), 6) monitoring, and 7) rehabilitation.

6.2.16.4 Livestock Impacts

Comment Number: 100121-13

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

The comments on pages 512 and 514 that indicate that the impacts to vegetation from eliminating livestock grazing would generally be small is indefensible. Livestock have a significant impact on vegetation, including on annuals,[Footnote 5] which is not really addressed in the DRMP/DEIS

Comment Number: 100121-14

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

The comments regarding fire are also questionable. Elimination of livestock grazing primarily will affect native plant species. However, it is the non-native grasses that contribute to unnatural fire conditions. Eliminating livestock grazing can help reduce the spread of non-native species and provide a greater opportunity for native species to recover. Non-natives should be eliminated where possible, and their spread to a wider area must be carefully managed. Spot removal of species such as buffel grass can be very effective.

Summary

Commenters disagreed with the BLM's analysis of impacts on vegetation as a result of eliminating livestock grazing, noting several potential positive impacts on vegetation from eliminating grazing. Commenters indicated that grazing has a significant impact on vegetation and eliminating grazing would provide opportunity for recovery of native species and would also reduce non-native grasses that contribute to unnatural fire conditions.

Response

As required by 40 CFR 1502.16, the Draft EIS provided a discussion of the environmental impacts of the alternatives, including the proposed action, any adverse environmental effects that cannot be avoided should the proposal be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. As part of this discussion, the BLM analyzed the impacts of livestock grazing on vegetative communities under the various alternatives. As a result of the comments, BLM has revisited the analysis of the impacts from eliminating grazing on vegetative communities. See **Section 4.8.6** for a discussion of vegetation impacts under Alternative D from eliminating grazing.

BLM has no information supporting the premise that eliminating livestock grazing would reduce nonnative species, thereby reducing fire risk. Recently produced fuel models (USDA Forest Service General Technical Report RMRS-GTR-153, 2005) show that livestock grazing can shift grassland fuel models from high fire-spread models to a GR-I. Fires in GR-I have low intensity and low spread rates.

The analysis presents the decision maker with detailed information to aid in determining whether to proceed with the PRMP or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

6.2.16.5 Out of Scope

Comment Number: 100161-12

Organization: Pacific Biodiversity Institute

Commenter: Peter Morrison

Comment Excerpt Text:

The GIS data provided by BLM on the DRMP/DEIS website on vegetation does not match the vegetation map that is included in the DEIS.

Summary

Commenters indicated GIS data provided by the BLM on the DRMP/DEIS Web site does not match the vegetation map in the DRMP/DEIS.

Response

The issue has been resolved so that the FEIS maps appearing on the BLM Web site correctly correspond to the maps appearing in the printed FEIS.

6.2.17 VISUAL RESOURCES

6.2.17.1 Allocations

Comment Number: 100159-3

Organization:

Commenter: Roy Pierpoint

Comment Excerpt Text:

The Monument land was chosen to begin with because of its unspoiled character and therefore should command a class I rating. The Gila Bend Mountains is a viewscape directly across the valley on the northwest side of the Monument and therefore should receive at least a classification of II as indicated in Alternate D. The Woolsey Peak Wilderness area is part of the Gila Bend Mountains; the eastern portion of the mountains should be considered part of the viewscape for this wilderness area also.

Summary

Commenters suggested changes to VRM decisions in the alternatives, including VRM Class I management in the SDNM and the eastern part of the Gila Bend Mountains (as part of the Woolsey Peak Wilderness area) and VRM Class II management in the Gila Bend Mountains.

The Monument land was chosen to begin with because of its unspoiled character and therefore should command a Class I rating. The Gila Bend Mountains is a viewscape directly across the valley on the

northwest side of the Monument and therefore should receive at least a classification of II as indicated in Alternate D. The Woolsey Peak Wilderness area is part of the Gila Bend Mountains; the eastern portion of the mountains should be considered part of the viewscape for this wilderness area also.

Response

The BLM considered a reasonable range of alternatives during the Lower Sonoran and SDNM planning process, in full compliance with NEPA. The CEQ regulations (40 CFR § 1502.1) require that the BLM consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment. While there are many possible alternatives or actions to manage public lands in the Lower Sonoran and SDNM planning area, the BLM used the Proclamation, Interim Guidance, and scoping process to determine a reasonable range of alternatives. As a result, four alternatives were analyzed in detail in the RMP/EIS that best addressed the issues and concerns identified by the affected public.

The BLM performed a visual resource inventory, which takes into account scenic quality, viewer sensitivity, and distance zones. The visual resource inventory classification provides an indicator of the existing landscape. The BLM then assigns a VRM classification to all lands based on the desired future condition for the land, including the need to manage certain areas for other uses such as recreation, energy development, and livestock grazing. As such, the VRM class assigned in the RMP may be different from the identified VRI class where the BLM would manage the landscape for either a lower or higher level of acceptable change to the landscape.

The Proclamation for the SDNM does not specifically identify scenic resources as a value to be protected. However, the visual quality of the Monument's landscapes inherently contributes to the natural and cultural resources for which the Monument was established. In Alternative D, more than 94 percent of the SDNM acreage would be managed as Class I. The remaining acreage would be designated Class II.

The Gila Bend Mountains were analyzed as a Class II area under Alternative D. The BLM analyzed a reasonable range of alternatives for the eastern portion of the Gila Bend Mountains.

6.2.17.2 Impacts

Comment Number: 100136-27

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

There is no analysis of the impacts of livestock grazing under the preferred alternative on the visual resources of the SDNM. DRMP/DEIS at 535. The only discussion of the impacts of livestock grazing on the visual resources on the SDNM claims that impacts are expected to be minor. Id. at 525.

Summary

One commenter noted that the BLM did not adequately consider potential impacts on visual resources as a result of livestock grazing activities in the SDNM under the preferred alternative.

Response

The Lower Sonoran/SDNM PRMP/FEIS assesses and discloses the environmental consequences of the Proposed Plan and alternatives in **Chapter 4**, as required by 40 CFR § 1502.16. In **Section 4.9**, Impacts on Visual Resources, the BLM discusses impacts from livestock grazing in the SDNM on visual resources as it applies to all alternatives. The discussion also incorporates the analysis of impacts from livestock grazing on visual resources described for the Lower Sonoran planning area and applies it to livestock grazing practices north of I-8 under Alternatives A, B, C, and E.

Developments associated with livestock grazing management (e.g., fences, windmills, wells, earthen dams, corrals, access roads, and stock tanks) would be required to meet VRM objectives. The analysis in Section 4.9 has been augmented to better convey the impacts.

6.2.17.3 Management Actions

Comment Number: 100121-16

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

Dark-sky-friendly technologies should be required within the planning area. Current installations that do not meet dark-sky-friendly technology should be converted to dark-sky friendly standards whenever possible

Summary

A commenter suggested adding new stipulations requiring the use of “Dark-Sky-Friendly” technology.

Response

The following statement is in Chapter 2 (**Section 2.10.7**, Visual Resources): All permitted actions on public land are evaluated to minimize impacts on visual contrast with the landscape, including impacts on the night sky. VRM classes acknowledge existing visual contrasts, and more restrictive requirements would not be retroactively applied to existing projects.

The following action is considered in Alternative B (**Table 2-II**, Management Action VR-2.1.2): The use of dark-sky-friendly technology would be emphasized when placing facilities on public lands. Measures may include, but not be limited to: directing all light downward, using shielded lights, using only the minimum illumination necessary, using lamp types such as sodium lamps (less prone to atmospheric scattering), using circuit timers, using motion sensors, or using flight proximity detectors.

The following action is considered in all alternatives (**Table 2-II**, Management Action VR-2.1.1): Permanent outdoor lighting would not be allowed in VRM Class I areas.

The following action is considered in Alternatives C, D, and E (**Table 2-II**, Management Action VR-2.1.3): Development on public lands would be required to use dark-sky-friendly technologies in VRM classes I through IV and in the Sentinel Plain area to provide opportunities for stargazers and amateur astronomers and to maintain conditions favorable to nighttime military operations. Measures may include, but not be limited to: directing all light downward, using shielded lights, using only the minimum

illumination necessary, using lamp types such as sodium lamps (less prone to atmospheric scattering), using circuit timers, using motion sensors, or using flight proximity detectors.

BLM cannot mandate the conversion of existing facilities to meet dark-sky-friendly standards unless an authorization expires. Upon expiration, the BLM could apply the aforementioned standards as new conditions for the authorization.

6.2.18 WATER

6.2.18.1 Impacts

Comment Number: I00136-89

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

We note that the preferred alternative is expected to have the same effect as the “No Action” alternative on water resources in the planning area. DRMP/DEIS at 559. The Gila Bend Basin has high levels of organic matter impairing water quality.(32) The DRMP/DEIS should have taken a hard look at how the authorized livestock grazing on public lands in the LSFO and SDNM is contributing to this problem

Summary

One commenter requested the BLM further analyze how authorized livestock grazing on public lands in both the Lower Sonoran and SDNM Decision Areas is contributing to high levels of organic matter that is impairing water quality in the Gila Bend Basin.

Response

The requisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decision. The baseline data provided in Chapter 3 and various appendices in the DRMP/DEIS supports the environmental impact analysis resulting from the management actions presented in the RMP/EIS.

The Lower Sonoran-SDNM DRMP/DEIS water baseline data was reviewed and revised to include information about factors contributing to impaired water quality in the Gila Bend Basin. Within the decision areas, the Environmental Protection Agency (EPA) listed the Gila River (from the Sand Tanks to Painted Rocks Reservoir) as a Category 5 impaired water for pollutants, including DDT, toxaphene, and chlordane (in fish tissue). There are no known waters in the decision areas listed as impaired for organic matter as a result of livestock grazing activities (see **Section 3.2.9**, Water Resources).

6.2.19 WILD HORSES AND BURROS

6.2.19.1 Out of Scope

Comment Number: 100115-5

Organization:

Commenter: Ralph Hudson

Comment Excerpt Text:

The Ajo block has a large and growing population of feral burros untended by their owners. These less regulated BLM areas also need protection to allow the viability of the same native species. This area is in many ways similar to the SDNM. Burros do not belong here and they could be moved by their owners, or auctioned or given away to clear the Block and allow deer, sheep, and other native species to survive. The herd of burros has grown to the point they are wandering into town from the surrounding BLM lands. Some controls need to be included in the plan

Comment Number: 100160-6

Organization: Tonopah Area Coalition

Commenter: Craig Weaver

Comment Excerpt Text:

Wild Burro(s) Recent review of Saddle Mountain by T AC has raised concerns about wild burro(s) now being within the SM-PVH area (N33.428983 W113.031048 wga84). This is not a herd area and should not be allowed to become dominated by wild burros.

Summary

Commenters expressed concern regarding growing populations of wild burros in certain areas, including the Ajo Block and the Saddle Mountain area and recommended controls to manage the location and abundance of wild burros.

Response

The only wild horse and burro Herd Area in the Planning Area is the Painted Rocks Herd Area, west of Gila Bend. Any burros in the Ajo area are trespass domestic livestock treated as unauthorized livestock and removed following guidance in the grazing regulations (43 CFR 4140 - Prohibited Acts and 43 CFR 4150 - Unauthorized Grazing Use).

Any wild burros found in the Saddle Mountain area are likely from the Harquahala Herd Area and, because they are outside the designated Herd Area boundaries, are considered nuisance wild burros. Nuisance wild burros are handled according to the BLM's Wild Horse and Burro policy (43 CFR 4720).

Both situations outlined above are covered by regulation and standard operating procedures and do not require RMP-level decisions.

6.2.20 WILDERNESS CHARACTERISTICS

6.2.20.1 Impacts

Comment Number: 100121-26

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

Regarding both of these comments, is there any research that indicates that there is less hunting in areas that are designated wilderness areas or areas managed as wilderness characteristic areas? Many wilderness areas are rough topographically, and this may be a reason for less hunting in some wilderness areas. The conclusion that a special land classification tends to preclude hunting is questionable. It does mean less impact, however, due to the limits on motorized travel.

Summary

Commenters questioned some of the BLM's conclusions regarding impacts from managing lands as wilderness characteristics, including a conclusion in the RMP that less hunting would occur in areas managed for wilderness characteristics.

Response

BLM lands managed for protection of wilderness characteristics do not preclude or limit hunting. The biggest change in the hunting experience would be the degree of change in motorized access to or within areas managed to protect wilderness characteristics. Motorized access gradations vary within the range of alternatives for wilderness characteristic management.

The BLM Phoenix District has had wilderness areas designated by Congress for over 20 years. In conversations with hunters, BLM recreation specialists have found that hunting activities may be conducted differently in areas designated as wilderness and managed for wilderness characteristics due to reduced motorized access and increased difficulty of access. Protecting lands with wilderness characteristics could mean some areas or motor routes would be closed to vehicular travel. This would constrain hunter access to such lands. Individuals more willing to hike or ride stock for longer distances in order to hunt more remote locations would not be impacted. Some hunters actively seek out more remote lands with fewer hunters and less motorized access, while other hunters may prefer to hunt in front country or passage settings, which are landscapes with greater motorized access.

6.2.20.2 Inventories

Comment Number: 100121-12

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

The protection of natural quiet has been recognized as a land resource for many years. In 1949, President Harry Truman issued an executive order establishing an airspace reservation for certain areas of the national forests. The order prohibited flights over specified regions of the forest below certain altitudes. Congress later incorporated

this executive order into the Boundary Waters Canoe Area Wilderness Act. Congress first took specific action concerning natural quiet at Grand Canyon National Park (GCNP) in the Grand Canyon National Park Enlargement Act of 1975. In 1987, President Reagan signed a much stronger law – The National Parks Overflights Act, which called for “substantial restoration of the natural quiet” at GCNP (Public Law 100-91). We recommend that BLM address natural quiet as a resource to be protected within the Monument and any lands with wilderness characteristics

Comment Number: 100121-31

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

All six of the wilderness characteristic areas mentioned above were never properly inventoried by the BLM. We ask the BLM to include these areas as lands with wilderness characteristics in the final RMP. Generic reasons such as views of land disturbed by farming or solar installations or the visibility of cars, trucks, and trains on infrastructure corridors are not acceptable reasons for not listing these as areas that contain wilderness characteristics. These reasons have been used in the past by the BLM to exclude areas that are now officially designated wilderness areas. Areas being managed for their wilderness characteristics should be managed in such a way as to preclude practices that would compromise their wilderness potential.

Comment Number: 100121-65

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

The lands listed in Alternative D represent an incomplete inventory of lands that contain wilderness characteristics, however. Perhaps that is due to the fact that BLM has not updated its wilderness inventory since the early 1980s. In developing the RMP, BLM should inventory and protect all lands with wilderness characteristics.

Comment Number: 100125-1

Organization:

Commenter: George Alderson

Comment Excerpt Text:

We would like to see BLM do a wilderness study of the Sand Tank Mountains as part of this RMP project. The area is now part of the Sonoran Desert NM but was under the Defense Department during the original BLM wilderness inventory in 1978-80, so it was never considered for wilderness. A wilderness inventory and study should be completed, and suitable areas should be recommended for wilderness designation. Margies Peak and Butterfield Stage wilderness units should also be included in the SDNM wilderness inventory.

Summary

1) Commenters expressed concerns that inventories of lands with wilderness characteristics were incomplete and requested the inventories be updated in the final RMP.

2) Commenters specifically indicated lands with views of farmland, solar installations, or transportation corridors were not appropriate for exclusion from the inventories and should be managed to protect their wilderness potential.

3) Commenters also requested the BLM conduct a wilderness study of the Sand Tank Mountains and include the Margie's Peak and Butterfield Stage units in the SDNM wilderness inventory.

4) Commenters recommended the BLM address natural quiet as a resource to be protected in the SDNM and in lands with wilderness characteristics and requested the BLM include linear land use allocations to protect lands with wilderness characteristics.

Response

1) Based on public comments received and in compliance with BLM Instruction Memoranda 2011-154, Requirement to Conduct and Maintain Inventory Information for Wilderness Characteristics and to Consider Lands with Wilderness Characteristics in Land Use Plans (July 25, 2011), the BLM conducted wilderness characteristics inventories. The PRMP/FEIS has been revised to reflect wilderness inventory information updated by BLM in 2004, 2011, and 2012. Summarized results of the inventories can be found in **Section 3.2.11**, Wilderness Characteristics, of the PRMP/FEIS. Individual unit assessments are available from the Phoenix District Office upon request.

2) Views of human development and outside sights and sounds were not considered as over-riding criteria when determining the degree of a unit's naturalness or the potential quality of its solitude opportunities. However, outside sights and sounds noticeable within an inventory unit are described in the unit's inventory findings.

3) BLM conducted a wilderness study of the Sand Tank Mountains, White Hills, Margie's Peak, and Butterfield Stage Memorial units within the SDNM in 2004, 2011, and 2012. The findings are summarized in this RMP/EIS.

4) Natural quiet conditions are not a wilderness characteristic attribute presented in the Wilderness Act of 1964 or BLM Instruction Memorandum-2011-154.

6.2.20.3 Management Actions

Comment Number: 100121-28

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

Closed vehicle routes within wilderness characteristic areas could be converted to equestrian and hiking trails but will not be used for bicycles or wheeled game carrier devices. We find it odd that such an option was not offered in the block diagrams seen on pages 110–113.

Comment Number: 100121-33

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

We believe that it is essential that minor and nonlinear land use allocations (LUA) be managed as exclusion areas for lands containing wilderness characteristic areas. We do not believe there should be any exceptions granted as these areas represent potential future wilderness areas. Linear land use allocations such as high voltage

transmission lines and the attendant right of ways must absolutely be excluded from any lands that are to be managed for their wilderness characteristics. We do not understand why linear land use allocations are not included in the block diagram on page 110.

Comment Number: 100121-50

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

We cannot imagine any instance in which commercial, organized group and competitive activities and other activities that may require a special recreation permit would be allowed in wilderness characteristic areas. This would include vending operations and concession leases, as well. Such activities run counter to the very concept of wilderness. We cannot overemphasize the need to manage wilderness characteristic areas as wilderness to protect the wilderness qualities until a day when Congress acts to provide permanent wilderness protection. Future desired conditions for wilderness characteristic areas need to be the same as areas already designated as official wilderness areas.

Summary

Commenters noted the BLM did not consider a full range of management actions to protect areas with wilderness characteristics. Specifically, commenters recommended that 1) wilderness characteristic areas be allocated as land use authorization exclusion areas, and 2) closed vehicle routes be converted to equestrian and hiking trails. 3) Commenters also indicated that SRPs should not be allowed in areas managed for wilderness characteristics.

Response

1, 2, 3) The BLM Lower Sonoran and SDNM considered these in the range of alternatives and ultimately developed a range of scenarios addressing the three possible outcomes discussed previously. On some lands with wilderness characteristics, other multiple uses would be a priority over protecting wilderness characteristics and areas, emphasizing other multiple uses while applying management restrictions (conditions of use, mitigation measures) to reduce impacts to wilderness characteristics. In other areas, the protection of wilderness characteristics would be a priority over other multiple uses. This is supported by the goal and objective of managing lands with wilderness characteristics, which are as follows (See **Section 2.10.10**):

Goal 1: Areas to be managed to protect wilderness characteristics should retain a high degree of naturalness where the imprint of humans on lands and resources is substantially unnoticeable. Furthermore, outstanding opportunities for solitude and primitive or unconfined types of recreation should be maintained or enhanced.

Objective 1.1: Manage lands to protect wilderness characteristics to maintain a high degree of naturalness and offer outstanding opportunities for solitude or primitive, unconfined recreation by reducing impacts to these values while considering manageability and competing resource demands.

6.2.20.4 Recommendations/Support

Comment Number: 100001-6

Organization:

Commenter: Jim Vaaler

Comment Excerpt Text:

There are areas in the Painted Rock Mountains and one Sentinel Plain north of Interstate 8 that are large enough (over 5000 acres) to be considered as areas that contain wilderness characteristics. Sentinel Peak itself, plus the Gila River Canyon are 2 areas in the Sentinel Plain that need to be looked at. There is an existing route that bisects the painted Rock mountains. Both areas north and south of this existing route may contain areas over 5000 acres and thus qualify as areas containing wilderness characteristics.

Comment Number: 100078-1

Organization:

Commenter: Judith C Shaw

Other Sections: 24.3

Comment Excerpt Text:

3. ACEC. Having visited south side of Saddle Mountain many times, I know that that area contains Wilderness Characteristics; the ACEC should be expanded to approximate 20,000 acres as outlined in Tonopah Area Coalition proposal of 2005 and Arizona Wilderness Coalition recommendations.

I have seen many saguaro cacti damaged and/or killed as a result of being shot. To better protect ACEC values target shooting should not be allowed in the ACEC area. Likewise, there are many places where OHVs have left designated trails and created new trails damaging vegetation. OHV travel should be stopped completely in this ACEC area.

Comment Number: 100110-7

Organization:

Commenter: Tyler Kokjohn

Comment Excerpt Text:

Tracts with Wilderness Characteristics The agency preferred alternative fails to adequately protect tracts known to possess wilderness attributes. This contradicts statements in the Executive Summary which indicate that not only do previously surveyed lands harboring wilderness character still exist within the planning area, more acres now warrant inclusion in this category (page li). More areas and total acreage should be managed to conserve wilderness features.

Comment Number: 100119-1

Organization: Friends of Saddle Mountain

Commenter: Chris Meachum

Comment Excerpt Text:

- In regard to "Lands Managed to Protect Wilderness Characteristics", we feel that the preferred alternative showing Saddle Mountain on Map 2-4E is too small. The land mass allotted does not adequately protect the wildlife and cultural resources found at Saddle Mountain. In particular Desert Bighorn Sheep and Desert Tortoise are found at Saddle in considerable numbers outside of the area preferred as is several natural water catchments being used by them. FoSM would like to see the land area increased to reflect what has been suggested in the current

Sonoran Desert Heritage Campaign proposals and/or the proposal submitted to BLM by the Arizona Wilderness Coalition in 2004 and being used by the BLM in alternative D.

Comment Number: 100121-29

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

The Sentinel Plain Complex meets all the requirements for protection under the Wilderness Act of 1964 and deserves the protection that only a wilderness designation can bestow. The unique geologic landscape is “untrammled” by human use and contains the wilderness characteristics that qualify it for consideration and protection as wilderness, including providing tremendous opportunity for solitude and remoteness. Sentinel Plain also offers great opportunities for research for those who are focused on geology, plus it is an area that offers the history of human use through the historic period.

Central Unit: The Southern Pacific Railway and Interstate 8 infrastructure corridor make up the southern boundary of this unit. The western boundary is formed by state trust lands and the gravel access road from I-8 to Oatman Flat. The eastern boundary from state trust land is the gravel access road from I-8 to the Painted Rocks Campground. The northern boundary is a gravel connector road between the Painted Rocks campground road and the access road to Oatman Flat.

Northeast Unit: A gravel access road from I-8 to Painted Rocks Dam Campground forms the eastern boundary. The southern boundary utilizes the gravel connector road from I-8 to Painted Rocks Campground and the gravel access road from I-8 to Oatman Flat. The northern boundary is where public land joins private and state trust lands, and the western boundary is private land, the I-8 to Oatman gravel access road, and its extension north across the Gila River. This is the Wild Horse Canyon area and has an intricate complex of shallow canyons eroded into the shield volcano. These shallow canyons flow northwest into the Gila River.

Northwest Unit 1: The eastern boundary is formed by the power line from I-8 to the gravel road at the base of Oatman Mountain. The northern boundary is a heavily used gravel road at the base of Oatman Mountain. The western boundary was principally determined to be where public lands meet state and private lands, and the southern boundary was largely determined to avoid two large state trust land parcels.

Northwest Unit 2: The eastern boundary is formed by the gravel access road from I-8 to Oatman Flat. The northern boundary is a heavily used gravel road at the base of Oatman Mountain. The western boundary is the power line that runs north from I-8 to the gravel road at the base of Oatman Mountain, and the southern boundary was largely determined to avoid two large state trust land parcels. This area has numerous historical artifacts that are associated with the Juan Batista de Anza National Historic Trail corridor, as well as numerous prehistoric artifacts along the Gila River corridor.

There are approximately 30 miles of recommended route closures, all of which receive light use and, due to the surface topography, will be relatively easy to reclaim. There is one cherry-stemmed road in the Northeast Unit.

All of these areas meet the minimum 5,000 acre requirement for wilderness.

Comment Number: I00121-30

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

Painted Rock Mountains

The Painted Rock Mountains wilderness characteristic areas are divided into two approximately equal-sized areas by an existing route. Southern Painted Rock Mountains:

The southern Painted Rock Mountains wilderness characteristic area is bounded by I-8 and state trust land. To the west, this area is bounded by inventoried route 8231. To the north, this area is bounded by the aforementioned existing route. To the east, this area is bounded by private land and state trust land. This area is characterized by highly tilted fault blocks that dip generally to the west with steep east-facing escarpments. There are panoramic views of the Sentinel Plain lava field. This area has at a minimum the 5,000 acre requirement for a potential wilderness area.

Northern Painted Rock Mountains: The northern Painted Rock Mountains wilderness characteristic area is bounded to the south by an existing route. To the north, this area is bounded by the Painted Rock Dam Road and state trust land. To the east, this area is bounded by private land. To the west, this area is bounded by inventoried route 8231 and the camping areas associated with the Painted Rock Park. This area is more gentle in nature than the southern unit and is characterized by numerous isolated peaks. It has excellent views of the Sentinel Plain lava field. There is what appears to be the remains of an ancient volcanic caldera in the southern part of this unit; however, this needs to be independently verified. The “Painted Benchmark peak” located at the north end of this unit has a small structure on its summit and two communication towers that were built in 1947 that have now fallen over. All of it has been out of use for many decades and now represents the historical past in this area and, as such, does not compromise the idea of wilderness. We have been unable to determine the purpose for these structures.

Comment Number: I00121-32

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

There is an opportunity to expand the Sierra Estrella Wilderness Area by closing an existing but unmaintained route between Seven Mile Mountain and the Sierra Estrella Wilderness Area. This would make Seven Mile Mountain a part of the Sierra Estrella Wilderness Area. We recommend that BLM include this area as an area with wilderness characteristics to protect its “untrammeled” nature and unique values and to further protect the wildlife linkage in that area

Comment Number: I00121-67

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

the Yellow Medicine Butte area needs to be broken down into two separate units. There is a heavily roaded corridor running down the approximate center of this unit. Inventoried routes 8223 and those portions of 8221 that are not located in desert washes have compromised the integrity of this area. We are proposing that the area

east of inventoried route 8223 be listed as a separate area containing wilderness characteristics and that it be called the Dixie Peak wilderness characteristic area.

Comment Number: 100126-100

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

[Sentinel Plain Wilderness Complex Citizens' Proposal]

#6: This route is not accessible from the Route #1, which is the major access route to the Sentinel Plain area. Route is being reclaimed by natural processes as evidenced from satellite photos and should be closed because of lack of use and to protect the roadless core of this area.

Comment Number: 100126-101

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

[Sentinel Plain Wilderness Complex Citizens' Proposal]

The wilderness proposal is situated in the main body of the SAVF located south of the Gila River and west of the Painted Rock Mountains ~25km west of the Town of Gila Bend, primarily within Maricopa County, Arizona (Figure 1). The public lands within the Sentinel Plain are bordered to the south by the Barry M. Goldwater Air Force Range. Interstate 8 bisects the lower third of the main body of the SA VF and northern area is roughly defined by the Gila River channel where columnar basalt cliffs line the river from just west of the Dendora Valley downstream to the Maricopa County line.

Comment Number: 100126-102

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

[Sentinel Plain Wilderness Complex Citizens' Proposal] The Sentinel Plain proposed wilderness units “generally appear to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable” as outlined in The Wilderness Act of 1964 and IM 2011-154. A major contributing factor to lands within Sentinel Plain meeting this minimum qualification for wilderness is that much of the area has experienced limited human use due to its remote nature, limited topographic relief, low mineral potential and scant vegetation resources suitable for livestock grazing.

Comment Number: 100126-103

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

[Sentinel Plain Wilderness Complex Citizens' Proposal]

The wilderness proposal is broken into 5 contiguous units, termed Sentinel Plain_South, Sentinel Plain_Central, Sentinel Plain _ NorthwestA, Sentinel Plain_NorthwestB and Sentinel Plain_Northeast. Recent route inventories

by the BLM (BLM 2011) indicate that only 55 miles of routes are located within the roughly 80,000 acre complex and all of these are lightly used (BLM 2011).

Wilderness Characteristics

All five units meet the size criteria as set out in BLM Instruction Memorandum (IM) 2011-154 as all are “roadless areas with over 5,000 acres of contiguous BLM Lands.”

Central Unit - 18646 acres

Northeast Unit - 10555 acres

NorthwestA Unit - 8197 acres

NorthwestB Unit - 9570 acres

South Unit- 32348 acres

Total – 79316 acres

Comment Number: 100126-104

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

[Sentinel Plain Wilderness Complex Citizens’ Proposal]

Solitude

The BLM’s IM 2011-154 and Wilderness Inventory and Study Procedures Handbook H-63 10-1.22 section (b)(1) gives direction on the assessment of solitude in inventory units. In this section five features for evaluating solitude are given.

a. Size and configuration: The units meet the 5,000-acre size criteria, and it is not long and narrow and does not have irregular extensions or cherry-stems.

b. Topographic screening: There are no significant topographic features in this unit other than Sentinel Peak and one other unnamed shield volcano which provide slight undulation in the terrain. However there are many, small shallow basins that can easily screen overnight campers. Wildhorse Canyon in the Northeast is bordered by irregular basalt cliffs and provides excellent opportunities in its upper end for solitude. Visitors can experience solitude from others simply from the fact that there are no topographic features to provide views of the surrounding terrain; the flatness is the topographic feature that provides isolation. In many ways the sparseness of the landscape coupled with the lack of any evidence of human use across large vistas are significant factors in providing a sense of remoteness and isolation.

c. Vegetative screening: In the flats and on the lava fields vegetation is sparse, not providing for a high degree of vegetative screening, but in and around small basins and drainages, microphyllous woodland is better developed and vegetative screening increases. The areas found along the Gila River provide complete solitude given the density of shrub and tree canopy throughout the Gila River floodplain in this area.

d. Ability of user to find a secluded spot: seclusion on the Sentinel Plain starts immediately with the feeling of vastness that is all encompassing when walking in the wide open flats with little topography to provide reference for travelers and except at the edges no sign of human uses. Visitors must use their orienteering skills to effectively navigate this vast plain.

e. Presence of outside sights and sounds: The Barry M. Goldwater Air Force Range creates noise impacts from their training maneuvers, but this is a disturbance for all southwestern AZ wilderness areas. Many desert wilderness travelers call this, “The sound of fascism”. The other noise disturbance present in the southern portion is that of the highway traffic on Interstate 8, which provides the southern boundary of the Central Unit and northern boundary of the Southern Unit. The Endangered American Wilderness Act of 1978 addressed the issue of “purity” and how Congress did not intend for wilderness designation to be completely isolated from the “sights and sounds” of man (H. R. 95-540).

Comment Number: 100126-105

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

[Sentinel Plain Wilderness Complex Citizens’ Proposal]

Primitive and Unconfined Recreation

The Sentinel Plain allows a variety of primitive and unconfined recreational activities as required and described in IM 2011-154. Various levels of hiking, backpacking, hunting, horseback riding, photography, bird watching, and sightseeing for botanical, zoological, and especially cultural and geological features are all possible as well as primitive and unconfined recreational opportunities within the Sentinel Plain.

Comment Number: 100126-106

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

[Sentinel Plain Wilderness Complex Citizens’ Proposal]

Geologic Values:

The geology of the Sentinel Plain is unique and distinctive in character. The striking SAVF is one of the youngest displays of volcanism in Arizona. Its basalt lavas date from the Pliocene to the middle Miocene, making them just a few million years old. Geological studies undertaken at Arizona State University (Cave 2007) suggest that the SAVF, lightly mantled by aeolian dust and basaltic rubble, is similar to surfaces seen in Mars imagery. The SAVF also represent basaltic plains-style volcanism, an emplacement style of volcanism intermediate between classic flood volcanism and large shield-building volcanism which has been previously recognized on Mars. This clearly qualifies as unique geologic values.

Comment Number: 100126-107

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

[Sentinel Plain Wilderness Complex Citizens’ Proposal]

Wildlife Values:

The Sonoran pronghorn (*Antilocapra americana sonoriensis*) is federally listed as endangered and is wildlife of special concern in Arizona according to the Arizona Game & Fish Department Heritage Data Management System. This

species is a historic inhabitant of southwest Arizona. They require a variety of habitats for forage and migration. Some of these habitats include open creosote-bursage areas, allowing for expansive views to locate and escape predators. The Sonoran pronghorn populations are quickly decreasing due to habitat fragmentation and loss. Protection of any population in the state is crucial to their survival. Habitat protection is the only way this species will not be extirpated from Arizona. On two separate occasions Sonoran pronghorn tracks and scat have been observed in the Southern Unit, once in 2000 and another time during a road inventory in 2005.

Comment Number: I00126-108

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

[Sentinel Plain Wilderness Complex Citizens' Proposal]

Archeological/Cultural Values:

One of the most significant values associated with the Sentinel Plain is in the Northwest A&B and Northeast Units along the basalt cliffs that line the southern and northern banks of the river and on flat mesa-like areas immediately adjoining the cliffs. Here the river forms a "narrows" of sorts and at several locations are significant and extensive petroglyph assemblages of prehistoric Patayan and Hohokam cultures. Three sites in this area have been reported in the literature and speak to significance of these sites in both size, time depth (Archaic period through to the Historic period) as well as stylistic element of two major prehistoric cultures (Hedges 1993). Additionally are the historic inscriptions that bear witness to some of the earliest Euro-American travelers in the area. Many of the petroglyphs sites found farther upstream have been irrevocably damaged by inundation from Painted Rocks reservoir and extensive vandalism. Wilderness will provide a significant level of long-term protection to these sites.

Comment Number: I00126-15

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

BLM fails to fully document the rationale for its decisions regarding the management of lands with wilderness characteristics in the Draft RMP. We understand and appreciate that BLM is planning on compliance with IM 2011-154 before the release of the Proposed RMP/Final EIS. BLM should provide this information and allow for a supplemental comment period to address the agency's decisions.

Comment Number: I00126-16

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

I. Black Mountain: We fully support the inclusion of the entire area for protection of its wilderness characteristics. BLM has not provided a documented determination of its rationale for excluding the area from its preferred alternative for managing to protect this area as lands with wilderness characteristics as required under IM 2011-154. In fact, the report for identification of this area's wilderness characteristics states the following:

On-the-ground OHV route inventories and associated travel management actions, and all other considered land use allocations, may have significant influence on the final determinations of lands managed, or not managed, to

protect or maintain wilderness character. BLM must update its wilderness character inventory and complete a thorough ground assessment of the area to determine the presence or absence of wilderness character attributes.

It is clear that BLM has not even given this area's wilderness characteristics due consideration, let alone document its rationale for not protecting those wilderness characteristics. We recommend that BLM acknowledge the wilderness characteristics as provided in the AWC proposal and protect the entire area as managed to protect wilderness characteristics.

Comment Number: 100126-17

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

2. Cuerda de Lena Wash: We fully support the inclusion of the entire area for protection of its wilderness characteristics. BLM has not provided a documented determination of its rationale for excluding the area from its preferred alternative for managing to protect this area as lands with wilderness characteristics as required under IM 2011-154. In fact, the report for identification of this area's wilderness characteristics states the following:

On-the-ground OHV route inventories and associated travel management actions, and all other considered land use allocations, may have significant influence on the final determinations of lands managed, or not managed, to protect or maintain wilderness character. The area appears to contain over 20 miles of vehicle or OHV route.

It is clear that BLM has not even given this area's wilderness characteristics due consideration, let alone document its rationale for not protecting those wilderness characteristics. We recommend that BLM acknowledge the wilderness characteristics as provided in the AWC proposal and protect the entire area as managed to protect wilderness characteristics.

Comment Number: 100126-18

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

5. Sentinel Plain Complex: We support the protection of the entire Sentinel Plain Complex as lands with wilderness characteristics. This includes the Northwest, Northeast and Central units as provided in the proposal submitted by the Arizona Wilderness Coalition and Center for Desert Archaeology in Attachment 2. Also included in Attachment 2 is updated information on routes within the AWC proposed unit. This includes maps, photographic documentation and detailed descriptions of the current conditions of some of the routes within the proposal. We urge BLM to carefully consider this information when it is updating its own data for the Sentinel Plain unit.

BLM has not provided a documented determination of its rationale for excluding the area from its preferred alternative for managing to protect this area as lands with wilderness characteristics as required under IM 2011-154. In fact, the report for the Sentinel Plain unit as proposed (south of I-8) states the following:

BLM also needs to complete a ground assessment of the uninventoried western area and reassess it with the two combined initial inventory units, 2-123 and 2-153.

It is clear that BLM has not even given this area's wilderness characteristics due consideration, let alone documented its rationale for not protecting those wilderness characteristics.

In its original 1979 inventory, BLM split the unit into 2 areas and finding that one area was too small to qualify as wilderness and that the other was too large to be able to manage without difficulty. These rationales must be reassessed given proposal to combine the two units to manage as one and BLM's modern day management policy with regard to lands with wilderness characteristics.

With regard to the Northwest, Northeast and Central units as proposed in Attachment 2, we are unaware of any past or current information or inventory performed by BLM for these areas. BLM lists "Painted Rocks South" on its list of inventoried units in 1980. We do not have enough information to know if there is significant overlap with the areas being proposed. Regardless, BLM seriously consider the areas proposed for wilderness characteristics protection as required under IM 2011-154 in order to maintain a current inventory.

Comment Number: 100126-19

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

6. Yellow Medicine Butte: We fully support the inclusion of the entire area for protection of its wilderness characteristics. BLM has not provided a documented determination of its rationale for excluding the area from its preferred alternative for managing to protect this area as lands with wilderness characteristics as required under IM 2011-154. In fact, the report for identification of this area's wilderness characteristics states the following:

An inventory will be conducted by BLM and public comments will be received on the draft land use plan. The on-the-ground OHV route inventories and associated travel management actions, and all other considered land use allocations, may have significant influence on the final determinations of lands managed, or not managed, to protect or maintain wilderness characteristics

It is clear that BLM has not even given this area's wilderness characteristics due consideration, let alone document its rationale for not protecting those wilderness characteristics. Also, the original BLM inventory combined the Yellow Medicine Butte and Dixie Peak areas. BLM should take this into consideration when it reinventories the area for wilderness characteristics.

We recommend that BLM acknowledge the wilderness characteristics as provided in the AWC proposal and protect the entire area as managed to protect wilderness characteristics.

Comment Number: 100126-20

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

7. Face Mountain: We fully support the inclusion of the entire area for protection of its wilderness characteristics. BLM has not provided a documented determination of its rationale for excluding the area from its preferred alternative for managing to protect this area as lands with wilderness characteristics as required under IM 2011-154. In fact, the report for identification of this area's wilderness characteristics states the following:

On-the-ground OHV route inventories and associated travel management actions, and all other land use allocations, may have significant influence on the final determinations of lands managed, or not managed, to protect or maintain wilderness characteristics.

It is clear that BLM has not even given this area's wilderness characteristics due consideration, let alone document its rationale for not protecting those wilderness characteristics. We recommend that BLM acknowledge the wilderness characteristics as provided in the AWC proposal and protect the entire area as managed to protect wilderness characteristics.

Comment Number: I00126-21

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

8. Saddle Mountain: We fully support the inclusion of the entire area for protection of its wilderness characteristics. BLM has not provided a documented determination of its rationale for excluding the area from its preferred alternative for managing to protect this area as lands with wilderness characteristics as required under IM 2011-154. In fact, the report for identification of this area's wilderness characteristics states that BLM did not complete well-documented or detailed wilderness inventories for areas outside the former Saddle Mountain WSA and in the Palo Verde Hills area directly to the east. The Saddle Mountain wilderness inventory was an accelerated inventory completed in 1978 to accommodate the demand for the Palo-Verde/Devers power transmission line. BLM states that it will perform a field inventory and on-the-ground OHV inventories.

It is clear that BLM has not even given this area's wilderness characteristics due consideration, let alone document its rationale for not protecting those wilderness characteristics. We recommend that BLM acknowledge the wilderness characteristics as provided in the AWC proposal and protect the entire area as managed to protect wilderness characteristics.

Comment Number: I00126-22

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

9. Gila Bend Mountains: We fully support the inclusion of the entire area for protection of its wilderness characteristics. BLM has not provided a documented determination of its rationale for excluding the area from its preferred alternative for managing to protect this area as lands with wilderness characteristics as required under IM 2011-154. In fact, the report for identification of this area's wilderness characteristics states that BLM will reassess the area to complete a final determination and ascertain if conditions have modified or if motorized routes have been naturally reclaimed.

It is clear that BLM has not even given this area's wilderness characteristics due consideration, let alone document its rationale for not protecting those wilderness characteristics. We recommend that BLM acknowledge the wilderness characteristics as provided in the AWC proposal and protect the entire area as managed to protect wilderness characteristics.

Comment Number: I00126-23

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

10. Oatman Mountains: We fully support the inclusion of the entire area for protection of its wilderness characteristics. BLM has not provided a documented determination of its rationale for excluding the area from its

preferred alternative for managing to protect this area as lands with wilderness characteristics as required under IM 2011-154. We recommend that BLM acknowledge the wilderness characteristics as provided in the AWC proposal and protect the entire area as managed to protect wilderness characteristics.

Comment Number: I00126-24

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

11. Cortez Peak: We fully support the inclusion of the entire area for protection of its wilderness characteristics. BLM has not provided a documented determination of its rationale for excluding the area from its preferred alternative for managing to protect this area as lands with wilderness characteristics as required under IM 2011-154. We recommend that BLM acknowledge the wilderness characteristics as provided in the AWC proposal and protect the entire area as managed to protect wilderness characteristics.

Comment Number: I00126-25

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

12. Margie's Peak: We fully support the inclusion of the entire area for protection of its wilderness characteristics. BLM has not provided a documented determination of its rationale for excluding the area from its preferred alternative for managing to protect this area as lands with wilderness characteristics as required under IM 2011-154. In fact, the report for identification of this area's wilderness characteristics states that BLM will reassess the area to complete a final determination and ascertain if conditions have modified or if motorized routes have been naturally reclaimed.

It is clear that BLM has not even given this area's wilderness characteristics due consideration, let alone document its rationale for not protecting those wilderness characteristics. We recommend that BLM acknowledge the wilderness characteristics as provided in the AWC proposal and protect the entire area as managed to protect wilderness characteristics.

Comment Number: I00126-26

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

13. Butterfield Stage Memorial: We fully support the inclusion of the entire area for protection of its wilderness characteristics. BLM has not provided a documented determination of its rationale for excluding the area from its preferred alternative for managing to protect this area as lands with wilderness characteristics as required under IM 2011-154. In fact, the report for identification of this area's wilderness characteristics states that vehicle management and target shooting issues would have to be addressed to maintain solitude and naturalness and that "on-the-ground OHV route inventories and associated travel management actions, and all other land use allocations, may have significant influence on the final determinations of lands managed, or not managed, to protect or maintain wilderness characteristics."

It is clear that BLM has not even given this area's wilderness characteristics due consideration, let alone document its rationale for not protecting those wilderness characteristics. BLM states that AWC did not submit a detailed

narrative that shows how information significantly differs from info in prior inventories. We respectfully disagree and submit the AWC proposal for the area for BLM's reconsideration (Attachment 3).

We recommend that BLM acknowledge the wilderness characteristics as provided in the AWC proposal and protect the entire area as managed to protect wilderness characteristics.

Comment Number: 100126-27

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

15. Sand Tank Mountains East: We fully support the inclusion of the entire area for protection of its wilderness characteristics as proposed in Alternative D. BLM has not provided a documented determination of its rationale for excluding some of the area from its preferred alternative for managing to protect this area as lands with wilderness characteristics as required under IM 2011-154. We also recommend the route network for this area as shown in Alternative D. We recommend that BLM acknowledge the wilderness characteristics as provided in the AWC proposal and protect the entire area as managed to protect wilderness characteristics.

Comment Number: 100126-28

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

16. Sand Tank Mountains West: We fully support the inclusion of the entire area for protection of its wilderness characteristics as proposed in Alternative D. BLM has not provided a documented determination of its rationale for excluding some of the area from its preferred alternative for managing to protect this area as lands with wilderness characteristics as required under IM 2011-154. We also recommend the route network for this area as shown in Alternative D. We recommend that BLM acknowledge the wilderness characteristics as provided in the AWC proposal and protect the entire area as managed to protect wilderness characteristics.

Comment Number: 100126-95

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

[Sentinel Plain Wilderness Complex Citizens' Proposal]

Routes recommended to remain open

1: Provides access to the BLM land to the west, the Sentinel Plain proposed wilderness to the east, and the Barry Goldwater Range to the south. Route is in excellent condition, is well-maintained and bladed. It is the route south of the Sentinel exit off Interstate 8.

Comment Number: 100126-96

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

[Sentinel Plain Wilderness Complex Citizens' Proposal]

Routes recommended for closure

#2: This route traverses a large lava field and there are several archeological and cultural resources along it. This route is being reclaimed and eventually disappears (see last photo point along the route). It does not lead to other routes or to the Range. Therefore, because it does not provide access to any features or destination and it encourages continuing incursions into the roadless core of this area, it should be closed to protect the biological, archeological, and cultural resources of this landscape. Just south of the junction of this route and route #1 is Hill 849, which provides a scenic overlook of the entire Sentinel Plain area. The spur that leads to this elevated feature would make an excellent trail to the overlook.

Comment Number: I00126-97

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

[Sentinel Plain Wilderness Complex Citizens' Proposal]

#3: This route heads south and then southeast to the Range. Unfortunately, the road crosses large areas of fragile biological soil crusts. Damage to these crusts from off-route vehicle travel as well as trash dumping has occurred along this route. This route should be closed to protect the roadless core of this area and protect the other biological, archeological, and cultural resources of this landscape.

[Photo #38: Biological soil crusts along route #3]

Comment Number: I00126-98

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

[Sentinel Plain Wilderness Complex Citizens' Proposal]

#4: This route heads southeast into to the Range but is being reclaimed by natural processes and vegetation as shown in the photo below. Therefore, this route should be closed to allow the area to completely re-vegetate and to protect the roadless core of this area.

[Photo SP-34: Route is being reclaimed by vegetation]

Comment Number: I00126-99

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

[Sentinel Plain Wilderness Complex Citizens' Proposal]

#5: Northern half of this route has eroded and is being reclaimed by natural processes. The southern half of this route crosses areas of fragile biological soil crusts. It should be closed protect the roadless core of this area and protect the other biological, archeological, and cultural resources of this landscape.

[Photo #48: Route dies off at Northern end]

Comment Number: I00129-14

Organization: Center for Desert Archeology

Commenter: Andy Laurenzi

Comment Excerpt Text:

In addition, we request that lands within the Sentinel Plain area north and south of Interstate 8 be managed for wilderness characteristics in the final preferred alternative (Figure 1). A proposal that we assisted in preparing for this area is included in comments submitted by The Wilderness Society. To the best of our knowledge the lands identified in Figure 1 have not been inventoried by BLM at any time in the past.

Comment Number: I00160-8

Organization: Tonopah Area Coalition

Commenter: Craig Weaver

Comment Excerpt Text:

Consider adding Sentential Peak (SP) area to list of Wilderness Characteristics areas - like Sentential Plain. This volcanic vent defines part of a vast flow that stretches northeast and south. Henry Hunt (Hidden Trails of the Sonoran Desert) states this is one of the most fragile areas in lower Colorado Sonoran desert due to a lack of rain. But SP also provides excellent open and easy hiking, isolation and solitude, plus it is a 'land that changes so slowly you have no trouble seeing the past'. Protecting this area is needed to avoid it being forever damaged by a trash dump, energy project, gravel/decorative rock mine, or cell telephone tower. This small peak defines the horizon and is a key to the region but its Wilderness Characteristics are vulnerable and need special designation.

Comment Number: I00160-9

Organization: Tonopah Area Coalition

Commenter: Craig Weaver

Comment Excerpt Text:

Columbus Peak is another area we know that contains the qualities that deserve consideration outlined in Protecting Wilderness Characteristics Alternative D.

Comment Number: LSFO-SDNM-DRMP--I-18563-1

Organization: Sustainable Arizona

Commenter: John Neville

Comment Excerpt Text:

We suggest that the Margies Peak and Butterfield Stage wilderness units are also included in the Monument's wilderness inventory. Please increase the number and size of areas managed for wilderness characteristics in non-Monument lands to 270,000 acres of wilderness lands, including Face Mountain, Columbus Peak, and Yellow Medicine Butte. It is important to limit motorized vehicles to only designated routes. This is a critical step in reducing the proliferation of roads across the landscape.

Summary

Commenters indicated the BLM did not fully document its rationale for its decisions regarding wilderness characteristics and specifically noted the RMP was not in compliance with IM 2011-154.

1) Commenters expressed concern that several areas were not included as areas managed to protect wilderness characteristics. Commenters submitted recommendations, along with supporting

documentation, of areas for the BLM to consider managing for wilderness characteristics, including: Black Mountain, Cuerda de Lena Wash, Sentinel Plain Complex, Yellow Medicine Butte, Seven Mile Mountain, Face Mountain, Saddle Mountain, Gila Bend Mountains, Oatman Mountain, Cortez Peak, Margie's Peak, Butterfield Stage Memorial, Sand Tank Mountains East, Sand Tank Mountains West, Dixie Peak, Sentinel Peak, Columbus Peak, South Painted Rock Mountains, and North Painted Rock Mountains.

2) Several commenters supported wilderness characteristic management and protection for Columbus Peak, the Eagletail Mountains additions, and the East Clanton hills.

Response

The BLM conducted a wilderness characteristics assessment or inventory as part of the planning process. Per Instruction Memorandum 2011-154, Requirement to Conduct and Maintain Inventory Information for Wilderness Characteristics and to Consider Lands with Wilderness Characteristics in Land Use Plans, the inventory evaluated wilderness characteristics as defined in Section 2(c) of the Wilderness Act and incorporated in FLPMA. In order for an area to qualify as lands with wilderness characteristics, it must possess sufficient size, naturalness, and outstanding opportunities for either solitude or primitive and unconfined recreation. In addition, it may also possess supplemental values.

IM 2011-154 Attachment 2, directs BLM to "Consider a full range of alternatives for [lands with wilderness characteristics] when conducting land use planning." The RMP explores the full range of alternatives from managing no lands to protect wilderness characteristics in Alternative A, to managing all lands with wilderness character to protect wilderness characteristics in Alternative D. The decision regarding whether or not to protect wilderness characteristics must consider all resource objectives.

1) The BLM has considered the nominated areas in accordance with Instruction Memorandum 2011-154. The summary results of the assessments by inventory unit can be found in **Section 3.2.11** of the PRMP/FEIS. Copies of the reports required by IM-2011-154 are available upon request from the Phoenix District Office. The alternatives for managing to protect wilderness characteristics in **Chapter 2 (Section 2.10.10)**, and the description of the current baseline condition in **Chapter 3 (Section 3.2.11)** have been revised to reflect the results of that inventory.

2) The suggested inventory units requested for protection of wilderness characteristics are in the Colorado River district, so are out of scope of this RMP.

6.2.21 LANDS AND REALTY

6.2.21.1 Land Tenure

Comment Number: 100075-1

Organization:

Commenter: Shirley Ann Hartman

Comment Excerpt Text:

It has been brought to our attention that BLM lands suitable for disposal will be for sale. In planning for disposal of these lands Native American tribal communities must have guidelines in order to purchase BLM land. The Native American communities must agree not to change the land into Trust land with sovereign rights.

Comment Number: I00102-1

Organization: Superstition Area Land Trust

Commenter: Roy Fuerherm

Comment Excerpt Text:

We are a 501c3 non-profit all-volunteer land trust conserving lands since 1992. Our mission is to conserve and protect land around the Superstition Mountains of Arizona. We have been particularly interested in the following parcel:

Township 1 South, Range 10 East of the Gila and Salt River Meridian, Pinal County Arizona:

Section 6: Lots 6-7, E2SW;

Section 7: Lots 1-2, E2NW, NE.

This parcel is located in the vicinity of the land designated as Open Space in the Superstition Area Land Plan published by SALT in 2002, and later incorporated into Pinal County's Comprehensive Land Plan. It has come to our attention recently that this land is ready for disposal by BLM.

This letter is to inform you that SALT would like to obtain all or a portion of this parcel for conservation. This property is shown as a Regional Park in the Pinal County Parks and Trails Master Plan. We believe that one way for our land trust to acquire this parcel or a portion of it would be through the Recreation and Public Purposes Act.

Comment Number: I00111-5

Organization: National Park Service

Commenter: Lee Baiza

Comment Excerpt Text:

The NPS currently advocates for an expansion of OPCNM to include a portion of the BLM Ajo Block. NPS acquisition of such a parcel could help alleviate a number of issues within OPCNM that are shared by numerous other agencies. These issues regard access limitations, critical housing shortages, a safer environment for staff and families away from the border, reduced commuting time, and others. Part of the Ajo Block is adjacent to utilities and infrastructure in Why, AZ and expanding OPCNM to include this area would greatly reduce the cost of infrastructure development and facilitate a means to address access issues described below. The NPS is concerned that the proposed Land Use Authorizations would preclude further development of needed infrastructure should the BLM continue to manage the Ajo Block under its current configuration.

Comment Number: I00120-14

Organization:

Commenter: Bill Broyles

Comment Excerpt Text:

8. Acquire private inholdings. The public deserves the full use of the Monument, and those land owners deserve fair payment for their lands. The parcels along I-8 will be especially important to add to the Monument pronto before they become truck stops or solar farms.

Comment Number: I00134-1

Organization: Maricopa County Parks and Recreation

Commenter: Teresa Retterbush

Comment Excerpt Text:

• San Tan Mountains is identified for all disposal methods. It should be noted that Maricopa County and Pinal County currently have an agreement for the management of San Tan Mountains; disposal should be limited to these government agencies.

Comment Number: I00137-24

Organization: Fennemore Craig P.C.

Commenter: Dawn Meidinger

Comment Excerpt Text:

It appears that Alternative E proposes certain land not previously identified for disposal near Ajo and Miami and that other land south of Ajo that was previously eligible for disposal would no longer be available. Notwithstanding, because the Map 2-6 series is not supplemented with any specific legal descriptions, it is not possible to provide detailed comment on the determination that the parcels are suitable for disclosure. To the extent legal descriptions are available, Freeport encourages publication of that data for supplemental public review and comment.

Comment Number: I00145-11

Organization: National Park Service

Commenter: Naomi Torres

Comment Excerpt Text:

Lands Suitable for Disposal and Acquisition (p. 123.)

NPS requests that public lands within the Anza NHT corridor or lands identified on a draft or adopted plan as being within the alignment for the Anza Recreational Trail (retracement route) be excluded from transfer from federal ownership. We also request that lands meeting these criteria be identified for acquisition, or be protected through other suitable protection means.

Comment Number: I00160-5

Organization: Tonopah Area Coalition

Commenter: Craig Weaver

Comment Excerpt Text:

Section 2N 8W Section 34 of BLM land north of Saddle Mountain should also be removed from disposal category considering new information regarding wildlife linkage and wildlife habitat in significant Basque that has formed along County 'Saddleback' retention dam

Comment Number: LSFO-SDNM-DRMP--I-18665-1

Organization:

Commenter: Cyndi Ruehl

Comment Excerpt Text:

The Pinal County Open Space and Trails Master Plan, adopted in 2007, shows the intention of implementing several regional parks throughout the county, all of them currently BLM land. This land use strategy is based on

Maricopa County's model of developing and establishing a regional park district through the partnership and RPPA with BLM. It looks as though all the planned regional parks in your district is being proposed as "suitable for disposal". This alternative may be detrimental for ever the hope of Pinal County ever establishing open spaces for its children and residents. While the Pinal County citizens are moving forward with the fortitude to implement the county's open space and trails plan, we may be too late if some of the regional park parcels are sold off. I would like to see BLM's continued presence, management and partnership potential continue to be available to the citizens of Pinal County particularly for these parcels designated as regional parks on the Pinal County Open Space and Trails Master Plan

Summary

Commenters requested several adjustments to land tenure classifications, including: 1) retaining and acquiring all public lands along the Anza NHT corridor or within the alignment for the Anza Recreational Trail, 2) removing BLM-administered land north of Saddle Mountain from the disposal category, 3) the inclusion of lands suitable for disposal north of the Organ Pipe National Monument, 4) identifying private inholdings for acquisition to add to the SDNM, and 5) the retention of certain parcels in Pinal County to be consistent with local plans in that area.

Commenters also requested clarification regarding the information on legal descriptions for lands that were identified as being suitable for disposal and regarding the use of disposed lands once they are removed from Federal ownership.

Response

Public lands selected for disposal typically are those lands that meet the following criteria:

- Isolated and fragmented from larger tracks of BLM-managed lands,
- Adjacent to urbanizing private and state lands, which could be subject to future development,
- Currently leased under the R&PP Act and are eligible to be patented, and/or
- Present an economic and management challenge to retain under public ownership.

Properties north of Saddle Mountain have been analyzed and all action alternatives retain ownership due to potential cultural resource conflicts.

The lands north of Organ Pipe National Monument were reviewed for disposal potential and determined to be retained by BLM due to the fact that BLM plans to meet the management objectives set forth for managing the Cuerda de Lena ACEC, which borders the northern boundary of the Organ Pipe National Monument. Also, the BLM lands north of the Organ Pipe National Monument are not isolated and fragmented from larger tracks of BLM-managed lands; therefore, they do not meet the criteria for being identified for disposal. Additionally, the request for these lands north of Organ Pipe National Monument came from another federal agency; transfer of land to another federal agency is beyond the scope of the Lower Sonoran-SDNM RMP (this type of transfer requires an act of Congress).

See response to Lands and Realty – Consistency with Other Plans regarding consistency with Pinal County land use plans.

The parcels within the National Historic Trail corridor are not identified for disposal and, therefore, would be retained in public ownership. The EIS has been revised to include a management action to enable acquisition of properties that display appropriate National Historic Trail character within both trail corridors from willing sellers.

Proper legal descriptions for all disposal lands will be included in an appendix in the ROD.

6.2.21.2 Out of Scope

Comment Number: I00104-3

Organization:

Commenter: Tom Taylor

Comment Excerpt Text:

3. map 2-7d offers more excluded areas for utility and renewable energy placements. i would go on to say that i believe blm, other gov agencies should look at buildings to place solar panels. instead of developing raw landscape for alt energy why not look at areas already developed, or buildings already built to place alt energy ... utilizing areas/buildings already in use or abandoned saves that much more habitat for wildlife needs.

Summary

Commenters requested the BLM identify locations for distributed renewable energy facilities (such as on rooftops), and avoid development on undeveloped land.

Response

This issue has been discussed in the BLM Solar Programmatic EIS; documents including the Draft PEIS and Supplement to the Solar PEIS are available online at: <http://solareis.anl.gov/documents/index.cfm>. As noted in **Chapter 2, Section 2.5.1**, Distributed Generation, of the Draft Solar PEIS, the BLM has no authority or influence over the installation of distributed generation systems, other than on its own facilities.

6.2.21.3 Renewable Energy

Comment Number: I00126-43

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

We appreciate the BLM completing an analysis of resource sensitivity to renewable energy development and the identification of areas as Prohibited/High sensitivity/Moderate sensitivity/Low known sensitivity for development. "Zoning" for renewable energy development in such a manner is critical for protection of wildlands and wildlife habitat and facilitation of permitting and construction of responsible projects with limited conflicts, controversy and delay.

While limited information regarding the exact process by which the screening was completed is included in the DRMP/DEIS or Appendix N, which is devoted to this issue, the list of screens used and the resulting areas identified under Alternative E appear reasonable overall.

It is not clear whether the BLM incorporated bighorn sheep habitat or movement corridors data into their analysis. If this has not been done, the BLM should do so for the Final EIS/RMP, and if it has, the BLM should indicate so in the Final EIS/RMP.

Comment Number: 100126-44

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

We also analyzed overlap of the Arizona Game and Fish Department (AGFD) Gila Bend-Sierra Estrella wildlife linkages and the proposed renewable energy zoning under Alternative E.14 While most of the AGFD identified linkages on BLM land are properly classified as Prohibited for renewable energy, there are three areas totaling 843 acres identified as Low sensitivity. BLM should change the sensitivity level for these three areas to Prohibited.

Comment Number: 100126-85

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

A GIS analysis of overlap between Arizona Wilderness Coalition's Citizens' Wilderness Inventory (CWI) units and the proposed renewable energy zoning under Alternative E produced the following results:

- Prohibited: 267,544 acres of overlap
- High sensitivity: 132,108 acres of overlap
- Moderate sensitivity: 3,198 acres of overlap
- Low sensitivity: 863 acres of overlap

Renewable energy development is not appropriate in CWI units, and the BLM should also classify as Prohibited areas all CWI units.

Comment Number: 100140-11

Organization: US Environmental Protection Agency

Commenter: Kathleen Goforth

Comment Excerpt Text:

It is unclear in the DEIS, however, what the renewable energy development scenario is for the Lower Sonoran Decision Area. In the Executive Summary (page lii of the DEIS), is the comment that "the Lower Sonoran Decision Area has the potential to support utility-scale renewable energy development; however no suitable locations for such developments exist in the Decision Area." Page 316 of the DEIS, however, states that "as of spring 2011, there were seven pending applications for utility-scale solar-energy developments in the Lower Sonoran." Later, on the same page, is a reference to nine applications for solar.

Comment Number: I00140-4

Organization: US Environmental Protection Agency

Commenter: Kathleen Goforth

Comment Excerpt Text:

The EPA recommends that the BLM provide additional information in the FEIS detailing the suitability of renewable energy projects in the Lower Sonoran Planning Area, anticipated renewable energy and transmission projects (both pending, and reasonably foreseeable), and how changes resulting from the Solar Programmatic EIS and the Arizona Restoration Design Energy Project will be incorporated into the Lower Sonoran and Sonoran Desert National Monument RMP.

Comment Number: I00145-10

Organization: National Park Service

Commenter: Naomi Torres

Comment Excerpt Text:

Map 2-7e Alternative E (the Agency Preferred Alternative), Utility Scale Renewable Energy Conflict Areas designates nearly all the Planning Area as Avoidance Areas with High and Moderate Sensitivity. While NPS appreciates this designation near high sensitivity and Prohibited areas such as the Wilderness Areas, ACECs, and the SDNM, we understand that “Avoidance” does not equal “Prohibited.” Therefore, it must be assumed that utility scale renewable energy development could occur in any of the Avoidance Areas. We do not feel that designating Avoidance Area provides adequate protection to the Anza Trail historic corridor. NPS is currently a cooperating agency with BLM in the preparation the Hyder Valley Solar Project EIS. The 325 MW concentrating solar trough project is proposed on 2,750 acres about 1 mile north of the Anza NHT corridor, west of Oatman Mountain, in what appears to be a proposed Avoidance Area under the Agency’s Preferred Alternative.

Comment Number: I00162-7

Organization: The Anza Trail Foundation

Commenter: Elizabeth Stewart

Comment Excerpt Text:

Map 2-7 e Alternative E, ATF requests that the SDNM and the Lower Historic Trails SCRMA and the viewshed of both be designated a Prohibited Area (instead of an Avoidance Area) for Utility Scale Renewable Energy development.

Comment Number: I00166-14

Organization:

Commenter: Steve Saway

Comment Excerpt Text:

However, there is a credibility issue here because the Draft Programmatic Environmental Impact Statement for Solar Energy Development (Solar PEIS) has proposed the establishment of a solar energy zone (SEZ) within BLM lands in the Lower Sonoran decision area that are included in the “high and moderate sensitivity” conflict areas. The Solar PEIS was apparently prepared with input from the Arizona BLM, yet the proposed Gillespie SEZ would pose significant conflicts with the Draft LS/SDNM RMP. The Gillespie SEZ is located along the proposed Agua Caliente Backcountry Byway and within 2 to 3.5 miles respectively of the Woolsey Peak and Signal Peak Wilderness areas. The SEZ would adversely affect wilderness values of these areas, and would also degrade the scenic viewshed of the Saddle Mountain area (which is proposed for a WC designation). Another major concern is

that the Gillespie SEZ would result in closure of inventoried OHV routes that provide the primary access to the Woolsey Peak and Signal Peak Wilderness areas as well as to other destinations within the Gila Bend Mountains. In my view, the BLM must address this disconnect and explain to the public (1) how the Gillespie SEZ is considered compatible with the Draft LS/SDNM RMP, (2) what mitigation actions will be required to resolve the conflicts, or (3) what action will be taken to better inform the Solar PEIS and resolve the conflicts by relocating or eliminating the Gillespie SEZ

Summary

Commenters recommended several revisions to renewable energy-related management, which would include the extension of utility-scale renewable energy development prohibition areas for: 1) bighorn sheep habitat, 2) wildlife movement and linkage corridors, 3) Citizens Wilderness Inventory Units, 4) the Anza Trail historic corridor, 5) SDNM, and 6) the Lower Gila Historic Trails SCRMA and their viewsheds.

Commenters requested several text additions related to renewable energy in the RMP, including a description of anticipated renewable and associated transmission projects in the Decision Area and a description of how decisions in the Solar PEIS and the Arizona Restoration Design Energy Project will be incorporated into management in the Decision Area.

Response

Numerous federal and state BLM initiatives are currently underway to promote renewable energy development. The Solar Energy Development Programmatic EIS (PEIS), currently being prepared by the US Department of Energy and BLM, assesses environmental impacts associated with the development and implementation of agency-specific programs that would facilitate environmentally responsible utility-scale solar energy development in six western states, including Arizona. On the basis of the analyses presented in the Solar PEIS, the BLM anticipates making land use planning decisions that would establish the foundation for a comprehensive Solar Energy Program. The Record of Decision for the Solar Energy Development Program is anticipated for September 2012.

The Arizona BLM is preparing an EIS for the Restoration Design Energy Project (RDEP) to identify which lands across Arizona are most suitable for the development of renewable energy and consider establishing a baseline set of environmental protection measures that would apply to such projects on public lands (see **Section 1.6.1** for a description of the RDEP).

These plans are identifying lands for renewable energy development that are disturbed and/or have low resource sensitivity. Lands with low resource sensitivity are areas that are unlikely to contain resources protected by statute or policy, that currently do not have special designations or uses, that are unlikely to contain other recognized values, or for which impacts from development cannot be mitigated. The BLM collected relevant information from BLM datasets, cooperating agencies, stakeholders, universities, and other public sources. The data were loaded into a geographic information system (GIS) and analyzed to geographically identify low sensitivity lands that could be suitable for renewable energy development.

BLM land use plans in Arizona, including the Lower Sonoran-SDNM RMP, would be amended to adopt the findings and measures in both the Solar PEIS and RDEP EIS.

Management decisions related to the authorization of utility-scale renewable energy developments were guided by the Analysis for Renewable Energy Sensitivity (**Appendix N**), which used GIS data to depict varying degrees of resource sensitivity to utility-scale renewable energy development on federal lands. The Analysis for Renewable Energy Sensitivity characterizes public lands in one of four sensitivity categories used to make decisions on where to permit utility-scale renewable energy developments on federal lands. These sensitivity categories include: prohibited, high, moderate, and low known sensitivity. The categories were then used to identify utility-scale renewable energy development exclusion and avoidance areas.

Section 4.1.6, Reasonably Foreseeable Development Scenarios, discusses the increased demand for infrastructure in the future. There would be an increase of approximately three to four major linear land use authorizations (LUAs), including ROWs for high-voltage power lines, large pipelines, and solar power plants every year. Other minor linear and nonlinear LUA requests, such as for roads, or smaller voltage transmission lines, would increase to an additional seven to eight proposals per year.

6.2.21.4 Transportation Corridors

Comment Number: 100106-1

Organization: Maricopa Association of Governments

Commenter: Tim Strow

Comment Excerpt Text:

MAG has completed several transportation studies in the past few years including the Interstate 10/Hassayampa Valley Transportation Framework Study and the Interstate 8/10 Hidden Valley Transportation Framework Study that has identified transportation networks that will be needed to accommodate the future growth and travel demand in Maricopa County.

None of the transportation recommendations that were included in the MAG studies are included or illustrated in the draft RMP/EIS,

Comment Number: 100106-2

Organization: Maricopa Association of Governments

Commenter: Tim Strow

Comment Excerpt Text:

The travel management section of the draft EIS also does not accurately reflect the existing transportation networks of the cities or towns that are located in the draft RMP/EIS study area. When proposing alternatives to the public for comment, MAG would recommend that you accurately illustrate the existing and future transportation networks in Maricopa County

Comment Number: 100106-3

Organization: Maricopa Association of Governments

Commenter: Tim Strow

Comment Excerpt Text:

I. Map 3-24, Travel Management: Please include existing and future transportation plans for the cities and towns located within or in close proximity to the DRMP/EIS study area. This also includes but not limited to the following transportation plans:

- Interstate 10/ Hassayampa Valley Transportation Framework Study (<http://www.bqaz.org/>)
- Interstate 8/10 Hidden Valley Transportation Framework Study (<http://www.bqaz.org/>)
- Maricopa Association of Governments Regional Transportation Plan (<http://www.azmag.gov>)
- Hidden Waters Parkway Feasibility Study (<http://www.mcdot.maricopa.gov>)

Comment Number: I00106-4

Organization: Maricopa Association of Governments

Commenter: Tim Strow

Comment Excerpt Text:

2. Map 3-24, Travel Management: Please add the Hassayampa Freeway as a “proposed transportation corridor”

Comment Number: I00106-5

Organization: Maricopa Association of Governments

Commenter: Tim Strow

Comment Excerpt Text:

3. Map 3-24, Travel Management: In addition to roadways, please identify the all Union Pacific Rail lines in the study area. This includes the union pacific sunset line, wellton branch, phoenix subdivision etc.

Comment Number: I00112-1

Organization: Arizona Department Of Transportation

Commenter: Justin White

Comment Excerpt Text:

The north-south corridor from US 60 in Apache Junction to I-10 near Eloy may impact an area of BLM land included in the RMP. Information regarding this project can be found at <http://www.azdot.gov/northsouthcorridorstudy/>. Currently, this new alignment is not designated as a transportation corridor in the draft RMP. However, the project team has been in discussion with BLM staff regarding resource needs and alternative selection.

Comment Number: I00112-2

Organization: Arizona Department Of Transportation

Commenter: Justin White

Comment Excerpt Text:

Also, in the planning process are the SR 303L which will connect to I-10 in the east valley near Cotton Lane and continue south to meet up with the planned SR 30 which will run south and parallel to I-10. These corridors and the interchange at the SR 303L and SR30 may impact BLM lands depending on the final preferred location. These highway corridors were not identified in the draft RMP, but the project teams have been in contact with BLM staff in the planning process. For more information regarding alternative selection of these corridors please visit <http://www.azdot.gov/Highways/vpmjindex.asp> for project information and maps depicting corridor locations. It should be noted that the development of these and any other improvements to existing roadways or new highways on BLM land will be planned, designed and constructed according to the ADOT Guidelines/or Highways on BLM and US Forest Service Land - 2008.

Comment Number: I00112-4

Organization: Arizona Department Of Transportation

Commenter: Justin White

Comment Excerpt Text:

The ADOT Multimodal Planning Division is also working on several long range framework studies that may impact lands within the draft RMP in the long term. The I-10 Hassayampa Study and the I-8 and I-10 Hidden Valley Study consider lands for future transportation corridors near BLM lands and may need to be considered within the draft RMP. Further information on these and future framework studies can be found at <http://www.bqaz.gov/>.

Comment Number: I00116-1

Organization:

Commenter: Harold Shull

Comment Excerpt Text:

An important point missed by both your RMP and EIS is ...mention of the NAFTA highways which will connect Mexico to Canada. Puerto Vallarta, Guyamoas, and Hermosillo are ports and a staging area that are part of a proposed system to move goods through Nogales and Duartzita, Arizona. These NAFTA “roads” will be multiland highways, railroads, power lines, pipelines, and fiberoptic communications in a 400 yard wide swath across the US. There are 80 of them proposed, 2 to 3 through Arizona’s deserts.

Summary

Commenters noted that the DRMP/DEIS did not consider or identify all of the existing and proposed transportation corridors or regional transportation plans relevant to the area, including: 1) Hassayampa Freeway, 2) north-south corridor from US 60 in Apache Junction to I-10 near Eloy, 3) corridors and the interchanges at State Route 303 (Loop 303) and State Route 30, 4) I-10/Hassayampa Valley Transportation Framework Study, 5) I-8/I-10 Hidden Valley Transportation Framework Study, 6) Maricopa Association of Governments Regional Transportation Plan, 7) Hidden Valley Parkway Feasibility Study, and 8) several NAFTA “roads,” including highways, railroads, power lines, pipelines, and fiber optic communications.

Commenters also requested that Map 3-24 identify all Union Pacific rail lines in the study area, including the Sunset Line, Wellton Branch, and Phoenix Subdivision.

Response

Section 3.3.5, Travel Management, acknowledges that the Maricopa Association of Governments (MAG), Maricopa and Pinal counties transportation departments, and ADOT all are studying additional freeway, parkway, and arterial connectors throughout the Planning Area. Many of these would bisect public lands. **Section 4.25** discusses cumulative impacts on travel management. When analyzing cumulative impacts on travel management, the study area would extend beyond the planning area so that connectivity to regional centers beyond the planning area’s boundaries (such as Yuma, Arizona and Quartzite, Arizona) are analyzed. Therefore, the general nature of cumulative impact analysis on travel management considered these types of existing and proposed transportation projects.

The scope and nature of the specific proposed action drives what level of analysis must be done to comply with the requirements of NEPA. Environmental analyses of RMPs are used to evaluate broad

policies and provide an analytical foundation for subsequent project-specific NEPA documents. The cumulative analysis in the DRMP/DEIS considered the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable (not highly speculative) federal and non-federal actions, taking into account the relationship between the proposed action and these reasonably foreseeable actions. This served as the determining factor as to the projects selected for the cumulative impact scenario, and the level of analysis performed and presented. Therefore, the BLM has complied fully with the requirements of 40 CFR § 1508.7 in preparing a cumulative analysis based on the broad nature and scope of the proposed management options under consideration at the RMP stage.

Multi-use utility corridors (which may include transportation facilities) are designed to constrain where utilities or other linear facilities would be placed. The purpose of these corridors is to reduce impacts on natural resources by limiting the location to places deemed suitable for this type of use. BLM has not identified corridors for all of these transportation studies to allow for maximum flexibility in siting.

Map 3-25, Travel Management (Map 3-24 in the DRMP/DEIS) illustrates current principle highways used to reach public lands in the Planning Area, not all modes of transportation (e.g., trains). The BLM also revised and corrected the map to remove routes that are speculative at this time.

6.2.21.5 Utility Corridors

Comment Number: 100122-1

Organization: Tucson Electric Power Company

Commenter: Shannon Breslin

Comment Excerpt Text:

TEP has reservations related to Alternatives C, D, and the Preferred Alternative E. These alternatives do not recognize TEP's existing 345kV line and approval for a future 345/500kV line as a utility corridor through the Sonoran Desert National Monument (SDNM). In order for TEP to support these alternatives, they would need to recognize TEP's existing land use authorizations and allow for their renewal. These are state regulated transmission lines, authorized through the Arizona Corporation Commission (Line Siting Case #15). In addition, TEP has maintained and paid for a valid land use authorization (Grant 7274) from BLM since July 1975.

TEP's facilities were authorized and constructed well before the SDNM was established, and only after a thorough environmental impact study and public process had been conducted. It is understood that the management objectives of the SDNM are to protect the biological, scientific, and historic resources and objects located within the Monument, however these objectives cannot be met to the detriment of all else, including the availability and affordability of energy resources.

Comment Number: 100122-3

Organization: Tucson Electric Power Company

Commenter: Shannon Breslin

Comment Excerpt Text:

The utility corridor illustrated and described between Ajo and Why is not associated with Tucson Electric Power.

Comment Number: I00122-4

Organization: Tucson Electric Power Company

Commenter: Shannon Breslin

Comment Excerpt Text:

In short, a utility corridor has already been created through what is now known as the Sonoran Desert National Monument. Considerable financial investment has been made and environmental impacts have been addressed. Recognizing TEP's transmission line easements as a utility corridor will minimize any future impacts to the very resources this plan is trying to protect

Comment Number: I00122-6

Organization: Tucson Electric Power Company

Commenter: Shannon Breslin

Comment Excerpt Text:

As you will see from our attachments, the existing transmission system components and the plans for future system enhancements paralleling those components were pre-approved well before the contemplation of the Monument designation for the area (See ACC Case 15 and Case 50). TEP, therefore recommends that the final Phoenix South/SDNM Resource Management Plans include retention of both the existing system components and the plans for system enhancements that were previously approved by the United States Department of Interior (BLM) and the Arizona Corporation Commission.

Comment Number: I00122-7

Organization: Tucson Electric Power Company

Commenter: Shannon Breslin

Comment Excerpt Text:

More recently TEP has been working as a participant with the Central Arizona Transmission Study (CATS) Committee to coordinate plans for future EHV transmission lines. As an alternative to their Palo Verde to Saguaro 500 kV transmission line, TEP is considering a Pinal West to Saguaro 500 kV line. In addition TEP is also planning both Southeast Valley to Winchester and Saguaro to Winchester 500 k V transmission lines to meet future growth in Southern Arizona. Winchester Substation located in Section 28 Township 14 South, Range 21 East in northeast Cochise County, has been approved by the State of Arizona Power Plant and Transmission Line Siting Committee and is scheduled to be in service in the spring of 2004.

It is imperative that the Phoenix South Resource Management Plan also include these more recently planned lines as they are a necessary part of the future electric service to areas adjacent to the Phoenix South Project boundary.

Comment Number: I00137-15

Organization: Fennemore Craig P.C.

Commenter: Dawn Meidinger

Comment Excerpt Text:

Alternative E the Gila Bend to Ajo corridor, the Tucson Electric Power corridor and the El Paso Natural Gas corridor. Absent non-compliance with the terms of an existing LUA, BLM has no authority to terminate prior existing rights in these corridors through land use planning. Accordingly, the notion of "elimination" of corridors must be re-considered. Critical backbone infrastructure supplying power, water and natural gas to the communities of Gila Bend, Ajo and Why is located within these corridors and they cannot simply be "eliminated."

If the termination of existing rights and/or the prohibition against locating new utilities in these corridors is actually intended, the economic impact would be extremely significant and analysis of those impacts would be mandated pursuant to NEPA, along with the identification of potential mitigation measures. No such consideration is present in the DRMP/EIS.

Comment Number: I00145-9

Organization: National Park Service

Commenter: Naomi Torres

Comment Excerpt Text:

Alternatives A & B, Maps 2-5a-b include two utility corridors within the SDNM along Highway 238 (G: Gila Bend – Santa Rosa) and Interstate 8. Alternative C, Map 2-5c would permit only an underground multiuse utility corridor along Hwy 238 through SDNM.

Alternatives D & E, Maps 2-5 d-e, exclude utility corridors along Highway 238 and Interstate 8 from within SDNM. NPS would prefer one of these alternatives to protect viewsheds within SDNM from disruption by large electrical transmission lines or other significant alterations from to the landscape.

Comment Number: I00147-2

Organization: Arizona Public Service Company

Commenter: Michael Neal

Comment Excerpt Text:

The proposed RMP/EIS should clearly address and analyze the needs of BLM ROW holders including APS, as facilities currently exist within these areas and must be continuously inspected, upgraded, and maintained.

Summary

Commenters requested that the RMP/EIS modify and recognize existing and approved transmission and utility corridors and several recently planned EHV (Electric High Voltage) transmission lines.

Commenters also requested that at least one of the alternatives manage utility corridors to protect viewsheds in the SDNM from disruption by large transmission lines.

Response

Section 3.3.1, Lands and Realty, acknowledges major utility systems such as transmission lines greater than 230kV, pipelines greater than 10 inches in diameter, and primary paved roads, as defined by the BLM's Planning and Conducting Route Inventories Technical Reference Guide 9113-1, that have been authorized within these corridors. Where planning decisions have previously been made that still apply, those decisions would be carried forward into the RMP (see **Section 1.5.1**, General Planning Criteria Common to Both Decision Areas). Under the Proposed RMP, eight of the existing multiuse corridors would be designated in which all compatible major linear utility LUAs would be allowed unless otherwise specified by the authorizing official (see LR-1.2.4, Table 2-22, Management Actions and Allowable Uses for Lands and Realty). **Section 4.25** discusses cumulative impacts on utility corridors (lands and realty section). Therefore, the general nature of cumulative impact analysis on transmission and utility corridors considered these types of existing and proposed transmission and utility projects.

The scope and nature of the specific proposed action drives what level of analysis must be done to comply with the requirements of NEPA. Environmental analyses of RMPs are used to evaluate broad policies and provide an analytical foundation for subsequent project-specific NEPA documents. The cumulative analysis in the DRMP/DEIS considered the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable (not highly speculative) federal and non-federal actions, taking into account the relationship between the proposed action and these reasonably foreseeable actions. This served as the determining factor as to the projects selected for the cumulative impact scenario, and the level of analysis performed and presented. Therefore, the BLM has complied fully with the requirements of 40 CFR § 1508.7 in preparing a cumulative analysis based on the broad nature and scope of the proposed management options under consideration at the RMP stage.

Management action LR-1.2.8 (Alternative C) designates two ½-mile wide multiuse utility corridors in the SDNM which all compatible major linear LUAs would be allowed unless otherwise specified by the authorizing official (see **Table 2-22**, Management Actions and Allowable Uses for Lands and Realty). This action would provide protections to viewsheds in the SDNM from utility corridors.

6.2.21.6 Consistency with Other Plans

Comment Number: I00144-1

Commenter: Gina D'Abella

Comment Excerpt Text:

Upon viewing the alternatives as presented in your proposed draft, I was concerned with the lack of acknowledgement and connectivity with the existing plans from the Pinal County Comprehensive Plan, Pinal County's Open Space & Trails Master Plan and the City of Maricopa's Parks, Trails & Open Space Master Plan - specifically in Western Pinal County. The areas for which your draft management plan affect Pinal County's plans, relate to: 1) Travel Management (motorized vs non-motorized vehicle), 2) Recreational Management, and 3) Lands Suitable for Disposal.

Summary

Commenters expressed concern that the DRMP/DEIS did not fully consider local and regional plans, including the Pinal County Comprehensive Plan, Pinal County's Open Space and Trails Master Plan, and the City of Maricopa's Parks, Trails and Open Space Master Plan.

Response

The FLPMA section 202 (c)(9), 43 USC Section 1712(c)(9); 43 CFR Section 1610.3-2(a) instruct BLM to "to the extent consistent with the laws governing the administration of the public lands, coordinate the land use inventory, planning, and management activities of or for such lands with the land use planning and management programs of other Federal departments and agencies and of the States and local governments within which the lands are located. However, BLM land use plans must also be consistent with the purposes, policies, and programs of FLPMA and other federal laws and regulations applicable to public lands. To this end, the Lower Sonoran-SDNM DRMP/DEIS makes reference to and complements, to the maximum extent, many other federal, state, and local plans and policies.

The BLM has worked closely with state and local governments during preparation of the Lower Sonoran-SDNM DRMP/DEIS (see **Chapter 5**, Consultation and Coordination). Because it may not be

possible for the BLM to be consistent with the plans and policies of all state and local agencies, the statutory guidance to the BLM is to provide consistency to the maximum extent. The BLM works to find a balance among uses and needs as reflected in these local and state government plans, and has done so in the preparation of the RMP/EIS. The BLM has developed **Chapter 5.3.7**, Local Government, and revised **Appendix C**, State, County, Local and Other Related Agency Plans, to include discussions of the Pinal County Comprehensive Plan, Pinal County Open Space and Trails Master Plan, and the City of Maricopa's Parks, Trails and Open Space Master Plan.

The BLM's land use plans, including the Lower Sonoran-SDNM RMP, are designed to balance the public demands for various land uses while ensuring appropriate levels of resource protection. While there may be times when the BLM cannot meet the needs of all segments of public land users concurrently, the BLM strives to address concerns. The Lower Sonoran-SDNM RMP/EIS, to the maximum extent, is consistent with state and local plans, thereby meeting the intent and purpose of the FLPMA.

6.2.22 LIVESTOCK GRAZING

6.2.22.1 Lower Sonoran RMP Analysis Issues

Comment Number: 100121-35

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

The conclusion that the elimination of cattle from the Decision Area will result in a greater fire hazard is also open to serious debate, as noted in our comments previously. In fact, the opposite argument has strong foundations in science. When the soil surface is disturbed and native vegetation is removed by cattle grazing, it provides more opportunities for non-native species to gain a foothold. There is clear evidence that cattle grazing helps spread non-native invasive species.[Footnote 8]

Comment Number: 100136-32

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

If the BLM is claiming that the areas potentially affected by livestock use are limited, it fails to parse with the preferred alternative to keep 930,200 acres open to grazing in the LFSO. If the DRMP/DEIS is attempting to reference table 3.2, it should say so. The sensitive soil distribution should be identified to allotment or at least geographic region. Otherwise, this information does not help to analyze or disclose the impacts of livestock grazing on soils.

Comment Number: 100136-33

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

For the lands of the LFSO, the analysis of effects of livestock grazing on vegetation is inadequate. The BLM analysis of the preferred alternative is limited to a brief mention of reduced plant vigor, alteration of plant communities and cover, reduction of individual plant species, and increased soil instability. DRMP/DEIS at 515, 499. A review of

scientific literature specifically pertinent to livestock grazing in Arizona found significant impacts, including the decreased abundance of perennial grasses and native shrubs. Fleischner 1994. The removal of livestock increases species richness as well as canopy cover in some vegetation classes, and reduces herbaceous vegetation by more than half. Id. These effects are not analyzed or disclosed in the DRMP/DEIS.

Comment Number: 100136-88

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

Grazing livestock compact the soil, so instead of rainfall soaking down toward the aquifer it flows faster and in greater volume overland. Belsky et al. 1999, Jones 2000. The RMP does not identify livestock watering sites, or “biospheres” where impacts are the greatest. Brooks, et al. 2006. The BLM’s qualitative S&G process does not capture all of these impacts, even where the BLM has S&G evaluations. Land Health Standard I requires multiple visits to monitoring sites; it is not clear from the DRMP/DEIS the BLM has visited the LFSO allotments even once. By failing to address these impacts, the BLM has failed to take a “hard look” at the preferred grazing alternative

Comment Number: 100136-90

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

Desert dry wash corridors may have significantly more grass in the absence of cattle grazing. Halvorson and Gebow 2000. Livestock exclusion is the probable cause of increased in composition and density of perennial grasses and shrubs at some sites in the Sonoran Desert. Blydenstein, et al. 1957. The long-term exclusion of livestock from Organ Pipe Cactus National Monument is also considered to be one of the reasons for this area’s exceptional beauty and vegetation abundance and diversity. 34 All of these results are highly relevant to the analysis of the proposed action in the DRMP/DEIS, but BLM failed to incorporate such evidence of the benefits of livestock exclusion.

Summary

Commenters requested additional analysis and information on livestock impacts associated with 1) vegetation, 2) washes, 3) soils, and 4) fire.

Response

A land use planning-level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM realizes that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan-level decisions. Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1). The BLM would conduct subsequent project-specific NEPA analyses for projects proposed for implementation under the land use plan (40 CFR 1502.20, 40 CFR 1508.28). As required by NEPA, the public would have the opportunity to participate in the NEPA process for site-specific actions.

Programmatic or RMP-level analysis addresses impacts from RMP-level decisions, which are decisions set forth to achieve the goals and objectives of a specific program area within the RMP. Analyses for these

decisions are broad in scale and focus on the scope of the individual alternatives and environmental effects. Programmatic analysis is typically regional in scope and accounts for differing land use scenarios, including cumulative effects from multiple activities and future projects (of which the location and details are not yet known). Refer to **Sections 4.2 through 4.24** for RMP-level impact analysis.

At this programmatic level, impacts from livestock grazing on vegetation, washes, soils, and fire were analyzed and can be found in **Sections 4.8, 4.10, 4.7, and 4.13** of the RMP/EIS, respectively. Impacts on livestock grazing from livestock exclusion are addressed in **Section 4.16**.

6.2.22.2 Planning Area-wide Data Issues: General

Comment Number: 100018-2

Organization: Sierra Club

Commenter: Don Steuter

Comment Excerpt Text:

The Final RMP should detail how in the future data will be collected so actual use can be known. Apparently such information has not been collected in the past, especially regarding ephemeral grazing.

Comment Number: 100136-31

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

The DRMP/DEIS never identifies how many forty-four allotments have been evaluated thus far and/or what the schedule will be for completion of the evaluations. This defies NEPA's guidance to provide relevant information to the public and decision-maker.

Summary

- 1) Commenter requested to know if actual use information was going to be collected by BLM in the future.
- 2) Commenter requested evaluation status and completion schedule for all 44 allotments.

Response

1) BLM regulations allow for collection of actual use data. However, most existing permits within the Lower Sonoran and SDNM Decision Areas do not require the permit holders to provide this information. As permits are reissued, terms and conditions may be added to the permits to require actual use information to be provided.

2) The rangeland health evaluation status and completion schedule for the allotments is outside the scope of an RMP decision. Instead, these would be addressed on a case-by-case basis through the permit renewal process, in consultation, coordination, and cooperation with the permittees, stakeholders, and the interested public, as required by BLM and CEQ regulations.

6.2.22.3 Planning Area-wide Edits

Comment Number: 100136-103

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

It is not clear how this list was derived, or whether BLM created it from the extant data set. Without supporting references, it is impossible for the decision-maker or reader to evaluate whether these objectives make sense.

Comment Number: 100136-45

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

It is also unclear, since the DRMP/DEIS doesn't specify, how ongoing use will be altered to ensure against future failures. Given the extent to which management decisions regarding harms to Monument objects hinge on meeting the land health standards, this section needs further clarification and elaboration.

Comment Number: 100136-65

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

Additionally, the description of alternatives included in the DRMP/DEIS is confusing. For example, under the preferred alternative, portions of the Santa Rosa and Big Horn allotments outside of the SDNM would need to be fenced in order to facilitate future use. DRMP/DEIS at 145. It is unclear why the BLM is encouraging additional range infrastructure given its plans to continue grazing use on these allotments inside the SDNM. This should be explained in the final RMP/EIS and an analysis of the impacts of this kind of infrastructure should be provided.

Summary

Commenters identified editorial issues associated with livestock grazing information, including unclear content, alternative numerical discrepancies, vague statements, and inconsistencies.

Response

The PRMP/FEIS document has gone through a complete review for quality assurance and quality control to check for numerical and textual inconsistencies. All discrepancies found during this review were rectified prior to release of the PRMP/FEIS.

6.2.22.4 Planning Area-wide Management

Comment Number: I00053-1

Organization: Arizona Public Lands Foundation

Commenter: Beau McClure

Comment Excerpt Text:

We question that it is necessary or appropriate to permit yearlong livestock grazing on the allotments shown as Perennial or Perennial/Ephemeral on Alternative E Livestock Grazing Map 2-8e of the Draft report. Most of the livestock use of these desert lands in the Lower Sonoran area and the Sonoran Desert National Monument occurs in the Spring, after winter rains have produced a lush, short-lived crop of annual vegetation. The Executive Order that established the Sonoran Desert National Monument, provided that livestock grazing would eventually be terminated on public lands south of Interstate-8, and there are continuing court actions over livestock use on Monument lands north of Interstate-8. BLM is managing prime Sonoran desert habitats on public lands adjacent to a major metropolitan area. Why would you want to have a few cows on these lands year-round to stir up the environmental controversies commonly associated with livestock grazing?

We strongly recommend that the Perennial Allotments and the Perennial/Ephemeral Allotments shown on Map 2-8e be re-designated as Ephemeral Allotments, and used for livestock grazing only when annual vegetation is present on the lands.

Comment Number: I00120-2

Organization:

Commenter: Bill Broyles

Comment Excerpt Text:

Your plan to allow grazing during productive times limits the public's ability to enjoy seasonal wildflowers, for those are precisely the times you propose to let cattle eat the flowers, leaves and all. Those "green-up" times are ecologically crucial, when the vegetation and seed bank restore themselves, when seeds and plants lay a store of food for all levels of the ecological chain, from ants to hawks, from cottontails to mountain lions.

Comment Number: I00120-5

Organization:

Commenter: Bill Broyles

Comment Excerpt Text:

Ephemeral grazing on degraded Sonoran Desert lands is exactly the wrong way to nurture recovery. Desert ecosystems need many years to recover. And that recovery may only happen during rare years of above-normal rainfall and without grazing. Ephemeral grazing – allowing grazing during those rare abundant rainfall years --- will inhibit and doom the ability to recover at all.

Comment Number: I00136-62

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

There is no reason or explanation for why the BLM didn't consider the reasonable alternative of reclassifying the allotments as ephemeral and allowing use periodically rather than year after year.

Comment Number: I00137-19

Organization: Fennemore Craig P.C.

Commenter: Dawn Meidinger

Comment Excerpt Text:

One concern, however, is Management Action GR-I.1.19 which states that BLM will use the guidelines described in the “Not Likely to Adversely Affect” section of “Guidance Criteria for Determinations of Effects of Grazing Permit Issuance and Renewal on T&E Species” (BLM and USFS Arizona and New Mexico, 1999). DRMP/EIS at 146. These guidelines are outdated, inconsistent with the ESA, and to the extent BLM wishes to utilize them for purposes of permit decisions or permit updates, the guidelines must be promulgated as a rule under the Administrative Procedure Act. 5 USC § 553. At a minimum, they should be disclosed for public review and comment. Their guidelines expand the scope of the ESA to areas where members of listed species are not present and critical habitat does not exist. The determination of livestock grazing uses should be on a case by case basis involving the permittee. Prohibitions of use resulting from consultation under § 7 of the ESA should only arise where threatened and endangered species are present or critical habitat has been designated. 16 USC § 1533 (a)(2).

Summary

Commenters recommended several revisions to livestock grazing management in the DRMP/DEIS to support multiple uses, protect resources, and encourage recovery of vegetation. Specific recommendations included: 1) reclassifying allotments as ephemeral allotments, 2) establishing, analyzing, and disclosing meaningful management parameters for ephemeral use, 3) allowing only periodic grazing instead of year-round grazing, and 4) consultation with the permittee(s) and the interested public regarding livestock grazing on public lands with threatened, endangered, and/or special status species.

Response

The DRMP/DEIS considered a range of alternatives designed to meet the BLM’s legal duties and purpose and need for action. The PRMP provides a rationale why some alternatives were considered but subsequently eliminated from further analysis (see **Section 2.5**, Alternatives Considered but not Further Analyzed). In accordance with NEPA, the public was given an opportunity to provide input on what issues should be addressed in the plan during the scoping phase of the planning process. Suggestions for alternatives that would not meet the purpose and need articulated in the plan were not given detailed consideration. All of the alternatives were designed to comply with BLM’s resource protection and multiple use mandates as identified in FLPMA.

1) An alternative was considered regarding the potential conversion of some or all perennial and perennial/ephemeral livestock grazing allotments to strictly ephemeral use only (see **Chapter 2, Section 2.5.4**). This alternative was not evaluated further, as these decisions can be determined on an individual allotment basis. As stated in **Section 2.11.2**, Livestock Grazing, Management Action GR-I.1.14, allotments may be reclassified as ephemeral in accordance with the Special Ephemeral Rule published December 7, 1968 through Rangeland Health Evaluations. The Special Ephemeral Rule is described in **Section 3.3.2**, Livestock Grazing.

2) Management parameters for ephemeral use are established by BLM policy and regulation.

3) Periodic or year-round grazing are implementation-level decisions not normally made during resource management planning. However, the range of alternatives in the PRMP provides for season of use adjustments as needed, based on monitoring during the permit renewal process.

4) The management action referenced (GR-I.1.19) has been removed in the PRMP/FEIS. Relevant guidelines have been incorporated into management objectives in the RMP.

6.2.22.5 Lower Sonoran RMP and Planning Area-wide Out of Scope

Comment Number: 100111-4

Organization: National Park Service

Commenter: Lee Baiza

Comment Excerpt Text:

Fence breaks and associated maintenance and repair issues along with trespass livestock issues in wilderness and along unfenced portions of State Route 85 regularly occur in relation to the Ajo Block. The NPS currently spends considerable effort, numerous times a year, repairing fences in order to keep livestock out. Despite these efforts, the NPS continues to respond to trespass livestock issues. The draft document needs to fully consider the implications of continued livestock grazing in the Ajo Block within the framework today's border environment.

Comment Number: 100140-8

Organization: US Environmental Protection Agency

Commenter: Kathleen Goforth

Comment Excerpt Text:

EPA requests that the BLM provide additional information describing the resources it will commit to implementing and enforcing the grazing practices and strategies of the preferred alternative.

Comment Number: 100140-9

Organization: US Environmental Protection Agency

Commenter: Kathleen Goforth

Comment Excerpt Text:

Additionally, we recommend that the BLM staff commit to in-season monitoring, as well as in-season enforcement, when needed, to stem overgrazing and ensure functioning ecological conditions.

Summary

Commenters submitted several comments that were outside the scope of the RMP/EIS, including 1) requesting the RMP further analyze livestock grazing in the Ajo Block, and 2) requesting additional information regarding the resources the BLM would commit to enforcement and monitoring of grazing practices.

Response

A land use planning-level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM realizes that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan-level decisions. Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on

site-specific actions (BLM Land Use Planning Handbook H-1601-1). The BLM would conduct subsequent project-specific NEPA analyses for projects proposed for implementation under the land use plan (40 CFR 1502.20, 40 CFR 1508.28). As required by NEPA, the public would have the opportunity to participate in the NEPA process for site-specific actions.

- 1) The Ajo Block falls within the Lower Sonoran Decision Area. Detailed, implementation-level analysis is outside the scope of the RMP and would be addressed during the permit renewal process.
- 2) Resource allocation for enforcement and monitoring is an administrative and budgetary issue that falls outside the scope of an RMP.

6.2.22.6 Lower Sonoran RMP Range Improvements

Comment Number: 100142-17

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

Section - 2.7.5.2

Page - 82

Line - 14.1.2

Comment/Suggestion

Add provision that facilitates maintenance of livestock waters through cooperation with AGFD and/or a third party. BLM will consult with AGFD on viability of waters for removal.

Bullet 3 - Add provision to remove fencing when fencing is no longer needed or other options meet need

Summary

Commenter recommended provisions to benefit wildlife when livestock improvements are no longer needed.

1. BLM should consult with AGFD when considering removal of livestock waters;
2. BLM should maintain waters for wildlife use in cooperation with AGFD or other parties; and
3. BLM should remove fencing when no longer needed or when options, other than fencing, would meet livestock management needs.

Response

BLM would coordinate with AGFD on disposition and maintenance of developed waters when they are no longer needed for livestock use.

BLM has added a management action in Chapter 2 stating that when BLM and the livestock grazing permit holder agree, livestock fencing would be removed when no longer needed.

6.2.22.7 Lower Sonoran RMP Baseline Data Issues

Comment Number: 100136-34

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

While the BLM claims that its studies show sufficient protection for saguaro forests on the SDNM, it has offered no such assurances for the LSFO, and no inventory of these resources is presented in the DRMP.

Summary

A commenter requested an inventory of saguaro forests for the Lower Sonoran Decision Area.

Response

An inventory of saguaro forests in the Lower Sonoran Decision Area is outside the scope of broad-scale RMP-level analysis. These kinds of analyses are conducted as a part of the Land Health Evaluations, which are allotment specific implementation actions.

6.2.23 MINERALS

6.2.23.1 Allocations

Comment Number: 100137-25

Organization: Fennemore Craig P.C.

Commenter: Dawn Meidinger

Comment Excerpt Text:

In addition, Freeport encourages the BLM to consider and evaluate an additional alternative that increases utilization of public land in the planning area for mineral development

Comment Number: 100137-28

Organization: Fennemore Craig P.C.

Commenter: Dawn Meidinger

Comment Excerpt Text:

Despite the abundance of mineral resources in the planning area and the high potential for development in certain areas, not a single alternative evaluated in the DRMP/EIS evaluates opportunities to promote the expansion of mineral resource development. Instead, every alternative proposes the closure of public land for mineral activities in varying degrees.

Comment Number: 100137-5

Organization: Fennemore Craig P.C.

Commenter: Dawn Meidinger

Comment Excerpt Text:

It is worthy of note that only one of the four alternatives identified (i.e., Alternative B) includes an increase in opportunity for utilization of public lands. Alternative B, however, primarily evaluates expanded recreation uses as

opposed to expanded opportunity for renewable energy or mineral development. This is in stark contrast to federal law and policy encouraging federal agencies to increase utilization and development of domestic mineral resources. For example, the Federal Mining and Minerals Policy Act (84 Stat. 1876; 30 USC § 21(a)) and the Domestic Minerals Program Extension Act of 1953 (50 USC § 2181) set forth United States Congressional policy to foster and encourage mineral development, including mineral deposits located on public lands.

Comment Number: 100159-8

Commenter: Roy Pierpoint

Comment Excerpt Text:

Mining of surface and even subsurface minerals leaves permanent scars on the land. One of these scars has occurred quite recently with the mining of the red/orange sandstone in the Citrus Valley area (northwest side of the Gila Bend Mountains). There is also the danger of abandoned mine shafts left open here and throughout the state. The Monument and Gila Bend Mountain areas should be closed to preserve the area's "pristineness." Alternate E fails to adequately address this issue.

Summary

- 1) Commenters noted that the BLM did not include an alternative to promote the expansion of mineral resource development.
- 2) Commenters suggested that the Sonoran Desert National Monument be closed to mineral development.
- 3) Commenters suggested that the Gila Bend Mountains be closed to mineral development.

Response

1) Congress enacted FLPMA to provide BLM with a unified legislative mandate. In FLPMA, Congress defined the term "multiple-use" management for BLM as "management of the public lands and their various resource values so that they are utilized in the combination that would best meet the present and future needs of the American people." The intent of FLPMA's multiple-use mandate is not to promote any one resource or resource use, but rather to balance uses of the public land with productivity of natural resources.

The range of alternatives proposed in Chapter 2 meets goals and objectives outlined by each resource and resource use program. Alternatives A and B would have the least restrictions on mineral resource development.

- 2) The presidential proclamation that established the Sonoran Desert National Monument closed the area within the Monument to mineral development, subject to valid existing rights. As such, the Monument is closed to mineral development under all alternatives.
- 3) For the Lower Sonoran Decision Area, there is a full range of alternatives for mineral development, including closing the Gila Bend Mountains to all mineral development in Alternative D.

6.2.23.2 Impacts

Comment Number: I00137-17

Organization: Fennemore Craig P.C.

Commenter: Dawn Meidinger

Comment Excerpt Text:

Remarkably, the BLM concludes that the effects of the “Avoidance and Exclusions Areas” on future mineral development and other industries are “negligible.” DRMP/EIS at 240. This result is due to the fact that the impacts were not properly considered. II [Footnote II An internal inconsistency in the DRMP/EIS is noted in that the executive summary of impacts classifies the range of intensities from impacts due to LUA restriction in Alternative E as “negligible -major.” DRMP/EIS at Ixii.] The direct effects analysis relative to the elimination/prohibition of LUAs identifies only a single impact which is that the few remaining multi-use utility corridors might “interfere with or eliminate mineral exploration and development” within their linear boundaries. DRMP/EIS at 678. This completely insufficient level of analysis demonstrates a fundamental misunderstanding about the impact of prohibiting the lifeblood of mining and industry from being allowed within the vicinity of the mineral resources that exist on public lands.

Comment Number: I00137-20

Organization: Fennemore Craig P.C.

Commenter: Dawn Meidinger

Comment Excerpt Text:

The lack of any meaningful direct, indirect or cumulative effects impact analysis in the DRMP/EIS resulting from the proposed closure of public lands to mineral entry for locatable, leasable and saleable minerals is disconcerting and fails to comply with the fundamental requirements of NEPA. See 40 C.F.R. § 1502. 16(a) and (b).

Summary

Commenters pointed out that the impacts from other program areas (specifically land use authorizations) on mineral development were not properly considered and analyzed.

Response

The creation of "Avoidance and Exclusions Areas" applies to actions approved under the Lands and Realty regulations, not mining. Per BLM's Land Use Planning Handbook 1601-1, land and realty allocation decisions include identifying right-of-way avoidance or exclusion areas. An avoidance area is “to be avoided but may be available for location of right-of-ways with special stipulations” and an exclusion area is “not available for location of right-of-ways under any conditions.” The impact analysis discussed the effects of these allocation actions on other resources and programs, including mineral resources within the decision areas. BLM found that these land use authorizations do not, by definition, preclude mineral development; therefore, they would have negligible impacts on mineral development (see **Section 4.17** for detailed discussion).

With regard to impacts on mineral development from other resource program goals, objectives, and management actions, the level of resource information detail for minerals precludes a quantitative analysis, and even qualitative analysis could be considered speculative.

6.2.24 RECREATION

6.2.24.1 Camping

Comment Number: I00098-1

Organization:

Commenter: Gerry Bruder

Comment Excerpt Text:

Specifically, in Chapter 2, RR-1.2.18 through RR-1.2.27 the reference to “provided the campground does not remain at 100 percent capacity for thee (3) consecutive nights.” In a campground without designated sites this is an unenforceable, unknowable criterion. Even more so if there is no stated distance between rigs required.

Comment Number: I00098-4

Organization:

Commenter: Gerry Bruder

Comment Excerpt Text:

RVerS could be limited to designated sites. But a managed campground would ruin the uniqueness of Gunsight Wash. Site designation can be done inexpensively and with very low impact. In fact we are already using vertical mulching techniques to improve the soil and discourage driving in places around the campground.

Comment Number: I00098-5

Organization:

Commenter: Gerry Bruder

Comment Excerpt Text:

We also currently need a designated distance between units. Because many other campgrounds with undesignated sites have a lower level of shrubbery than Gunsight Wash, people can park as close to each other as they like. A minimum rig distance (10 meters) would serve two purposes. It would prevent newcomers from parking on top of campers until their two weeks is up thereby intimidating them into leaving (we’ve seen it happen). It would also protect the vegetation around a site from being chipped away at by trying to get too many rigs into a spot (also a first-hand experience).

Comment Number: I00098-6

Organization:

Commenter: Gerry Bruder

Comment Excerpt Text:

A workable alternative is to allow campers to stay at the camp for as long as they want, but insist that they change sites every two weeks.

We can use our current system of two week registrations to manage it.

It keeps the current level of fairness for everyone, but also allows people to spend more time and money in the area. There are already low-priced, season-long, stay-in-one-place alternatives in the community. The economy needs neither another managed campground nor an LTVA. These are already existing options. The community will appreciate having a unique camping opportunity that will bring other, different campers into the area.

Comment Number: 100120-7

Organization:

Commenter: Bill Broyles

Comment Excerpt Text:

By the same token, BLM needs to develop a plan that accommodates campers who need tables and fire grates. The day may come when visitation exceeds our predictions and we campers can't just pitch a tent or park the truck anywhere. The agency needs to monitor, set thresholds, design campgrounds, and begin to budget for them. I think this is what you intend in section 4.17. We have seen what growing valley populations have meant in the Ussery Mountains, White Mountains, and certainly South Mountain.

Comment Number: 100121-2

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

BLM must also carefully plan and manage recreation opportunities that do not conflict with the protection of the Monument objects, including the Sonoran Desert ecosystem itself. Camping should be limited to designated, dispersed, undeveloped sites. Clear interpretive signing should inform all visitors of the transportation plan and designated campsites, as well as any other restrictions

Comment Number: 100134-2

Organization: Maricopa County Parks and Recreation

Commenter: Teresa Retterbush

Comment Excerpt Text:

- Overnight camping is prohibited within the Buckeye Hills East SRMA. Overnight camping should be allowed in designated campgrounds or areas.

Comment Number: 100164-1

Organization:

Commenter: Everett Huddleson

Comment Excerpt Text:

A suggestion that would be more feasible and cost effective, would be to allow a longer use time than the 14 days, allowing for a one time 14 day extension, with the requirement, however, to relocate your camp site to another spot of at least 300 ft. from the original location. This would lessen the impact on the land, as returning campers tend to migrate back to their "favorite " spot.

Comment Number: 100166-27

Organization:

Commenter: Steve Saway

Comment Excerpt Text:

Management Action RR-1.3.8: Standard camping amenities, interpretive displays, and improved access would be constructed at the Sundad public use site to facilitate visitation.

Comment: See my comment pertaining to Management Action RR-1.3.1. Recommend the Management Action RR-1.3.8 be deleted as it would be incompatible with a Dispersed Use RMZ in an Undeveloped SRMA

Comment Number: LSFO-SDNM-DRMP--I-18361-1

Organization: Offroading and off road racing

Commenter: Douglas Martin

Comment Excerpt Text:

I would like to see the length of stay extended for camping. There are winter visitors that would stay longer than that.

Comment Number: LSFO-SDNM-DRMP--I-18361-6

Organization: Offroading and off road racing

Commenter: Douglas Martin

Comment Excerpt Text:

Also, I don't understand the "move 25 miles or off public land" part. It seems to me these lands are public and belong to the citizens. I'm not sure anyone should be telling them to leave an area designated as multi use, camping, or any unrestricted use.

Comment Number: LSFO-SDNM-DRMP--I-18762-2

Organization: National Park Service

Commenter: Catherine Bradley

Comment Excerpt Text:

Close to home camping opportunity

Comment Number: 2

Cited Content: RR-1.2.5.1: Overnight camping would be prohibited unless specifically authorized.

Cited Section ID: 2.8.4.2 Action Alternatives for Recreation Management (RM)

Comment Title: Close to home camping opportunity

Issue: 10756

Comment:

It could be a great benefit to provide close-to-home camping experience opportunities in the Buckeye Hills RMZ to foster youth outdoors and as future stewards of the resources.

Summary

Commenters expressed concerns regarding camping at Gunsight Wash, Buckeye Hills SRMA, and Sundad and recommended new and revised management actions to address issues. Recommendations for management included: 1) a minimum distances for rigs/units at campgrounds, 2) extending camping timeframes, 3) limiting camping to designated, dispersed, undeveloped sites, and 4) installing amenities at campsites, including tables and fire grates.

Commenters recommended designating campsites in the SDNM and suggested interpretive signage to inform visitors of the location of designated campsites, additional amenities, vehicle restrictions, and other restrictions. Commenters also suggested that the agency develop an activity-level plan for camping management, including monitoring and adaptive management.

Commenters also requested changes in BLM's general camping policy, including the 14-day stay limit and the 25-mile-radius rule.

Response

Establishing minimum distances between rigs and installing amenities at campgrounds are implementation-level decisions outside the scope of this RMP effort. Likewise, designating campsites and developing activity plans are implementation-level decisions outside the scope of this RMP effort.

The dispersed camping policy for public lands in the Phoenix District was established in 1989 and the 14-day stay limit is standard for most public lands in the western states. The 25-mile radius rule is BLM Arizona-wide and is the same or similar to those established in other western states as well. This camping policy would remain in place.

The camping stay limit for Gunsight Wash Campground has been revised back to the 14-day stay limit for the proposed alternative. BLM can make adjustments as needed as long as recreation objectives are being met. (see Management Actions RM-1.1.2, RM-2.1.2, RM-2.1.3, RM-2.1.4, RM-2.1.17, and RM-2.2.3 in **Table 2-31**, Management Actions and Allowable Uses for Recreation Management).

Camping in the SDNM has been revised. See **RM-5.2.3, RM-5.2.4, RM-5.2.5 and RM-5.2.6** in Chapter 2 for clarification (see **Table 2-31**). An activity plan would be developed to determine how camping would be managed. This plan would include provisions for monitoring and adaptive management.

6.2.24.2 Edits

Comment Number: I00134-3

Organization: Maricopa County Parks and Recreation

Commenter: Teresa Retterbush

Comment Excerpt Text:

Under Recreation Management actions and allowable uses, Buckeye Hills West is identified as 100% front country in RR-1.2.36 but in RR-1.2.37 it is identified as 40% front country, 58% back country and 2% passage zone.

Comment Number: LSFO-SDNM-DRMP--1-18311-6

Organization: Competitive racing (whiplash, ATR, AMRA, etc.)

Commenter: Douglas Martin

Comment Excerpt Text:

Not clear what is meant on this one.

Comment Number: 6

Cited Content: RR-2.1.17: Except as otherwise provided, motorized competitive speed events would not be permitted.

Cited Section ID: 2.8.4.2 Action Alternatives for Recreation Management (RM)

Comment Title: Not clear what is meant on this one.

Issue: I0758

Comment:

“Except as otherwise provided”. I’m not clear as to the meaning of this.

Summary

Commenters requested several edits to the recreation management actions in the DRMP/DEIS, including requests 1) to clarify the meaning of “except as otherwise provided” in relation to BLM’s decision to not permit speed events, and 2) to clarify a discrepancy in recreation setting information.

Response

1) To clarify, motorized speed events would be prohibited in certain areas such as ACECs, Special Cultural Resource Management Areas, and areas being managed for wilderness characteristics, as allocated in the Lower Sonoran and SDNM RMPs. In the areas where motorized speed events are not specifically prohibited, the events may be considered during the site-specific travel management plans developed when BLM begins implementing the decisions in the RMPs. Suitability for this activity would be based on soils, vegetation, public safety, community support, air quality, and BLM’s ability to manage and sustain this activity.

2) Recreation Objective 2.3 of the FEIS has been revised to include this clarification: The physical, social and administrative recreation settings would be managed for 100% Community Interface in Alternatives B and E, and 100% Front Country in Alternatives C and D (see **Table 2-31**).

6.2.24.3 Firewood

Comment Number: 100142-7

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

Section 2.7.7.2, Objective 4.2 prohibits the collection of dead, down and detached wood for personal campfire use on the SDNM in front country and passage zones. The Department supports prohibitions when use levels of the dead, down and detached wood is demonstrated to have negative impacts on this resource. The Department recommends that the prohibition objective be replaced with an adaptive management objective that prohibits use when monitoring indicates that negative impacts are occurring.

Comment Number: 100142-8

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

The Department also recommends clarification as to whether bringing firewood into the SDNM for campfires is an allowable action.

Comment Number: 100166-28

Organization:

Commenter: Steve Saway

Comment Excerpt Text:

Management Action RR-2.1.12: Collection of dead, downed, and detached ironwood and mesquite for any use would be limited to three pieces at any one time unless otherwise restricted.

Comment: I don't believe the management action as worded is appropriate or realistic for managing vegetation impacts in an undeveloped, backcountry setting. A better option in my view is to use the limits of acceptable change (LAC) method to monitor impacts and establish a management action as needed. Thus, recommend the management action RR-2.1.12 be re-worded to reflect use of the LAC method to monitor vegetation impacts of firewood usage

Comment Number: 100166-9

Organization:

Commenter: Steve Saway

Comment Excerpt Text:

Comment: Management Action VM-4.2.2 states that the collection of dead, down, and detached wood for personal campfire use while camping on public lands would be prohibited in the passage and front country recreation settings. From a user perspective, the recreational setting of camping on the SDNM should include the opportunity to have a campfire. Most camping occurs in the winter months when a campfire is most needed. Is it realistic to impose this restriction on campers in the passage and front country recreation settings? I think this restriction is unnecessary and would degrade the recreational experience that folks expect when they visit the SDNM. A better option in my view is to use the limits of acceptable change (LAC) method to monitor impacts and establish a management action as needed. Thus, recommend the management action VM-4.2.2 be re-worded to reflect use of the LAC method to monitor vegetation impacts of firewood usage

Summary

Commenters expressed concern over the prohibition on collecting dead, down, and detached wood for personal campfire use and suggested different management strategies to address the issue, including establishing limits of acceptable change and adaptive management strategies. One commenter noted that firewood collecting should only be prohibited when use levels demonstrate negative impacts in front country and passage zones.

Commenters also requested clarification as to whether bringing firewood into the SDNM would be allowed.

Response

Management actions and analysis for firewood collection have been revised to improve clarity, lessen restrictions in the Lower Sonoran Decision Area, and allow for adaptive management (see Management Actions RM-1.1.8, RM-1.1.24, RM-2.1.15, and RM-2.2.13 in **Table 2-31**).

BLM would allow firewood to be brought into the SDNM and the Lower Sonoran Decision Areas for personal use and campfire burning. Burning wooden pallets would be prohibited.

6.2.24.4 Management Actions

Comment Number: 100072-3

Organization:

Commenter: Barry Krayer

Comment Excerpt Text:

The ban on racing appears to just be laziness on this field office's part, the Hassayampa field office has two areas of approximately 30,000 acres each where motorized racing is allowed. The Buckeye Hills, east of Hwy 85, Saddle Mtn, Ajo and Gila Bend have been areas where racing was allowed. You could at least allow the areas furthest from Phoenix, Ajo and Gila Bend to remain open to racing. The terrain in much of your field office is very similar to the Lake Havasu Field Office which hosts the Parker 400 race annually.

Comment Number: 100119-4

Organization: Friends of Saddle Mountain

Commenter: Chris Meachum

Comment Excerpt Text:

Travel Management. Map 3-24 of alternative E shows Road 8201 to remain open and encircling Saddle Mountain. The FoSM has made considerable effort over the years to close and manage this road at the half way point on both sides of Saddle Mountain per the recommendation of the BLM and AZGFD. Closing the southern portion of this road is needed to protect multiple cultural resources and archaeological sites just off the roadway and to keep motorized vehicles away from the water catchment placed by the Desert Bighorn Sheep Society and the AZGFD. FoSM would like to see this particular road remain closed on the southern half of the loop per AZGFD's recommendations. Exact closure points would remain where the BLM has already placed closure signage.

Comment Number: 100119-5

Organization: Friends of Saddle Mountain

Commenter: Chris Meachum

Comment Excerpt Text:

The Community Interface shown on Map 2-12E at the north side of Saddle Mountain is of concern to the FoSM. As our group moves forward with trying to gain wilderness protection for Saddle Mountain as outlined in the Sonoran Desert Heritage Campaign, we feel that further development in this area would be detrimental in our protection efforts. The FoSM would like to see this area removed from the draft in order to keep the lands at Saddle Mountain as natural and free of human building as possible.

Comment Number: 100126-36

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

The BLM Handbook on Recreation Permit Administration (H-2930-1) clearly states that field offices can and should develop guidelines for issuing SRPs. The Handbook states: "Field Offices are encouraged to develop thresholds through land use planning for when permits are required for organized groups and events for specific types of recreation activities, land areas, or resource settings" H-2930-1 at 13. While the preferred alternative for the SDNM establishes that organized groups of more than 25 participants will require an SRP (DRMP 177), no such threshold is established for the Lower Sonoran Decision Area. In addition to establishing a threshold number

of participants that would require an SRP, BLM should establish other types of thresholds that would trigger the need for an SRP, such as environmental impacts, area size and duration of use.

Comment Number: I00126-80

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

The RMP should put more meaningful management prescriptions in place to ensure that RMAs designated for quiet recreation activities such as hiking, hunting and wildlife viewing truly protect those experiences. RMAs and RMZs that primarily emphasize non-motorized recreation opportunities should be rights-of-way exclusion areas and closed to surface occupancy to preserve the natural landscape and associate viewsheds and soundscapes.

Comment Number: I00151-19

Organization: Arizona Off Highway Vehicle Coalition

Commenter: Jeff Gursh

Comment Excerpt Text:

Your own sister field office, the Hassayampa field office, has only two other areas of approximately 30,000 acres each where motorized racing is allowed.

The terrain in much of your field office RMP is very similar to the Lake Havasu Field Office which hosts the Parker 400 race annually. They are able to sustainably allow trucks, buggies and smaller vehicles to participate in these events. They only race once per year, use some county roads to connect trails and it's a benefit to the local and state economy. The Buckeye Hills, east of Hwy 85, Saddle Mtn, Ajo and Gila Bend have been areas where racing was allowed.

We ask you to consider allowing these areas furthest from Phoenix, Ajo and Gila Bend to remain open to racing on a limited number of events per year basis.

Comment Number: I00162-10

Organization: The Anza Trail Foundation

Commenter: Elizabeth Stewart

Comment Excerpt Text:

ATF requests that recreational target shooting, paintball, and firewood gathering be prohibited in the Gila Trail SRMA

Comment Number: I00166-31

Organization:

Commenter: Steve Saway

Comment Excerpt Text:

Management Action RR-3.2.7: The designated non-motorized travel system would consist primarily of existing vehicle routes; however, construction of short segments of new vehicle routes to provide experience opportunities consistent with the outcome objective(s) of management zones would be allowed.

Comment: This management action is confusing. I believe the intent would be more clear by deleting the word "non-motorized" in the first sentence

Comment Number: LSFO-SDNM-DRMP--I-17313-2

Organization: RSD Racing

Commenter: Douglas Martin

Comment Excerpt Text:

The trails we wish to use are existing trails. A permit should be allowed on existing trails. Nobody I know of in our sport is against the “no new trails” rule. Each permit should be evaluated on an individual basis, and reasons given if rejected. This is the best way to get the off roading community on board with new regulations. You cannot simply say “none are allowed”.

Comment Number: LSFO-SDNM-DRMP--I-18311-4

Organization: Competitive racing (whiplash, ATR, AMRA, etc.)

Commenter: Douglas Martin

Comment Excerpt Text:

Special Recreation Permit

Comment Number: 4

Cited Content: RR-1.2.66: SRPs would not be authorized for motorized or non-motorized competitive events.

Cited Section ID: 2.8.4.2 Action Alternatives for Recreation Management (RM)

Comment Title: Special Recreation Permit

Issue: 10756

Comment:

I feel this is not part of a planning process.

Comment Number: LSFO-SDNM-DRMP--I-18311-7

Organization: Competitive racing (whiplash, ATR, AMRA, etc.)

Commenter: Douglas Martin

Comment Excerpt Text:

I believe placing a moratorium on speed events should not be part of the planning process at all. It would be more suited in the implementation process. However, I’m against it completely and I appreciate the opportunity to explain why.

I realize there can be issues with racing. I also realize the crash in Johnson valley Ca. was a terrible experience for everyone involved, including the BLM. But to place a moratorium on “all events having an element of speed” is just not the right course of action. There are many racing organizations that do very well in controlling their spectators, staging areas, and trash. The ATR (Arizona Trail Riders) and the non-profit clubs of the AMRA (Arizona Motorcycle Racing Association) are very good at what they do. They have minimally evasive courses with great control in their staging areas. Whiplash Off-Road Racing also understands these concerns and is in the process of making changes to their program. In the past, many issues have been settled through mitigation. I’ve seen ranchers paid to move their cattle, and were happy to do so. Damage to lands and plants have also been corrected through mitigation. Off Road racing, and other events, bring a lot of money to the surrounding towns. As long as mitigation is possible, these events should be allowed to continue.

Comment Number: LSFO-SDNM-DRMP--I-18311-8

Organization: Competitive racing (whiplash, ATR, AMRA, etc.)

Commenter: Douglas Martin

Comment Excerpt Text:

All areas of public lands should be open for SRP's with each evaluated on a case by case basis. Competitive events do not always cause damage and injury. Most serious and fatal injuries to OHV users on public lands happen because of head on collisions. This doesn't happen in competitive events with courses marked.

Comment Number: LSFO-SDNM-DRMP--I-18311-9

Organization: Competitive racing (whiplash, ATR, AMRA, etc.)

Commenter: Douglas Martin

Comment Excerpt Text:

But since it sounds like no competitive events allowed, I'll comment on it. The entire process of allowing competitive events is covered in a SRP. Each should be considered on a case by case basis. There are areas near Painted rock where private lands border BLM lands giving these land owners possible opportunities to rent their lands as staging areas for events. That kind of thinking and planning minimizes the damage to public lands. Please do not forbid SRP's in relation to competitive events.

Comment Number: LSFO-SDNM-DRMP--I-18361-5

Organization: Offroading and off road racing

Commenter: Douglas Martin

Comment Excerpt Text:

Also, any trail system on public land that is open to motorized travel should be available to SRP, including competitive events.

Comment Number: LSFO-SDNM-DRMP--I-18762-1

Organization: National Park Service

Commenter: Catherine Bradley

Comment Excerpt Text:

Need description (size) of buffer zone between motorized and non-motorized

Comment Number: I

Cited Content: RR-1.2.30: The Buckeye Hills East RMZ would be established (25,800 acres) for a balanced mix of motorized and non-motorized recreation opportunities adjacent to the communities of Buckeye, Avondale and Goodyear.

Cited Section ID: 2.8.4.2 Action Alternatives for Recreation Management (RM)

Comment Title: Need description (size) of buffer zone between motorized and non-motorized

Issue: I0756

Comment:

Successful balance of providing for motorized and non-motorized recreation in this area will depend on the size of the buffer zone between them and how/where the access points are for each user group.

Summary

1) Commenters recommended revisions and additions to recreation and travel management prescriptions, including a) balancing motorized and non-motorized vehicle use, b) protecting non-motorized opportunities through land use authorizations, c) clarifying management associated with motorized vehicles in recreation management areas, including buffer sizes in Buckeye Hills East RMZ, d) prohibiting target shooting, paintball, and firewood collection in Gila Mountain RMZ, e) closing routes in Saddle Mountain SRMA, and f) removing the Community Interface area on the north side of Saddle Mountain shown on Map 2-12e, Alternative E Recreation Management.

2) One commenter requested the BLM comply with the BLM Handbook for recreation permit administration (H-2930-1) by establishing thresholds to manage organized group and event activities.

3) Commenters expressed concern with management in the RMP to close the planning area to racing and other competitive events without adequately considering all available information and options. Commenters suggested the BLM consider mitigation strategies and methods used by other Arizona BLM field offices to manage these activities and, rather than close the planning area, the BLM should evaluate allowing competitive events through the Special Recreation Permit process on a case-by-case basis. Commenters also requested that certain areas remain open to racing, including areas in Ajo and Gila Bend.

4) Commenters expressed their opinion that closing public land to competitive events is an implementation decision and should not be addressed during the planning process.

Response

The Draft EIS considered a range of alternatives designed to meet the BLM's legal duties and purpose and need for action. The purpose and need section in the Draft EIS clearly stated that the purpose of the agency action included compliance with applicable laws, including FLPMA and the SDNM Proclamation (see **Section 1.1**). According to the CEQ regulations and the Department of the Interior NEPA regulations, “[t]he range of alternatives includes those reasonable alternatives (paragraph 46.420(b)) that meet the purpose and need of the proposed action, and address one or more significant issues (40 CFR 1501.7(a)(2–3)) related to the proposed action. Since an alternative may be developed to address more than one significant issue, no specific number of alternatives is required or prescribed” (43 CFR 46.415(b)).

Since the preparation of the DRMP/DEIS, the BLM has issued a new recreation policy (IM 2011-004). This policy provides new definitions and requirements for RMA allocation. After reviewing the RMAs in the DRMP/DEIS, the recreation allocations have been modified consistent with the IM; revisions may be found in **Section 2.11.4** and in **Appendix R**, Special and Extensive Recreation Management Area Worksheets. Several of the SRMAs have been changed to ERMAs to support the multi-resource management emphasis for those areas. For instance, the Buckeye Hills SRMA has been changed to the Buckeye Hills East SRMA and the Buckeye Hills West ERMA and the objectives adjusted accordingly.

1a-c, f) The BLM's range of alternatives in the DRMP/DEIS represented a full spectrum of recreation and travel management options that included emphasizing motorized travel in one alternative to emphasizing non-motorized travel in another alternative, with a couple of alternatives presenting a mix of both motorized and non-motorized objectives and management actions. Revisions in management actions and

prescriptions have been made in some RMAs to better clarify intended outcomes. Many of the requested actions would be addressed through subsequent implementation planning such as how motorized and non-motorized recreation uses in the RMAs would be planned for and managed.

Id) Under the revised recreation RMAs, the Lower Gila Historic Trails SRMA would be defined as ERMA and managed commensurate with other resources and resource uses. In accordance with current BLM policy, target shooting and firewood collection would be prohibited within any recreational site developed in the ERMA. These uses in the dispersed areas have not been identified as concerns and therefore are not prohibited. If conflicts arise in the future, adaptive management strategies would be implemented and addressed in subsequent implementation planning.

Ie) **Map 3-25**, Travel Management, is an inventory map showing the existing routes under current management, and presents a travel management map of existing roads that would remain available until further site-specific travel management planning has been completed. Under BLM policy (BLM Land Use Planning Handbook 1600-1), routes in the Lower Sonoran Decision Area, outside the SDNM, would be designated in a travel management plan within five years of RMP approval. Public participation would be an integral part of that process. Inventory maps have been revised, as appropriate, to reflect current management decisions.

2) Although the BLM Handbook for Recreation Permit Administration (H-2930-1) encourages offices to set thresholds during land use planning, only a few thresholds were warranted and have been established for organized group activities. Threshold for SRPs is set for the SDNM as groups numbering 25 or greater. This threshold may be reevaluated and revised during subsequent implementation planning and analysis, as warranted by land management prescriptions and management actions established by this plan.

3) The BLM has revised the RMA management actions and allowable use alternatives to include a broader range of actions for competitive speed events (see Management Actions RM-1.1.13, RM-2.1.14, RM-2.2.12, RM-2.3.6, RM-2.3.12, RM 2.5.8, RM-2.5.13, RM-3.1.15, RM-3.1.17, RM-3.2.8, RM-3.2.11, and RM-3.4.8, which have been revised with clarifying language). Revisions may be found in **Table 2-31** of **Section 2.11.4** in the SRP section, in the individual sections for the SRMAs and ERMAs, and in **Appendix R**.

Additionally, BLM has included the rationale for prohibiting competitive speed events in RMZs, where applicable.

4) Any management action that proposes closing large geographic areas of BLM land to a certain type of activity needs to be addressed in a land use plan. However, it is recognized that the decision whether to leave an area open or closed to SRPs or certain types of SRPs is best addressed by RMA; therefore, RMA management actions and allowable use alternatives have been revised to include a range of alternatives for competitive speed events.

6.2.24.5 Out of Scope

Comment Number: I00001-4

Organization:

Commenter: Jim Vaaler

Comment Excerpt Text:

There have been citizen proposals for National Conservation Area (NCA) designations within the SDNM and the Lower Sonoran Decision Area. Why are these NCA proposals not been recognized in any of the listed alternatives?

Comment Number: I00061-1

Organization:

Commenter: Gordon

Comment Excerpt Text:

To fully achieve this vision it is necessary to rethink the park's funding and management. A park district needs to be implemented. In close proximity to the park are residents of the San Tan Foothills (5,000 people), San Tan Valley (80,000 people) and Queen Creek (25000 people). The park district should include all these areas (110,000 people). If capital expenses are tied to impact fees, Friends of the Park events and voluntary donations, and if the operational budget were substantially increased to \$500,000 and if 4 people/household is assumed the tax per household would be about \$18/yr. Admittedly, this is off the top of the head stuff, but it is likely realistic. Park management would be directed by a governing board made up of representatives from Pinal and Maricopa Counties, Queen Creek, San Tan Valley and the San Tan Foothills and guided by BLM requirements.

Comment Number: I00120-19

Organization:

Commenter: Bill Broyles

Comment Excerpt Text:

15. For better protection of Lower Gila lands, consider creation of a National Conservation Area for major portions. This could improve cooperation and work with neighboring agencies and private-owner stakeholders, facilitate wildlife corridors, and encourage a regional conservation ethic.

Comment Number: I00126-34

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

The Lower Sonoran and SDNM Draft RMP fails to implement IM 2011-004, and instead prescribes recreation management based on "benefits based" management, recreation-tourism markets and the two-category system of Recreation Management Areas wherein all public lands are designated as an SRMA or ERMA. The Draft RMP acknowledges the updated guidance and states that required changes will be included in the Proposed RMP. Draft RMP at I. We appreciate the LSFO's commitment to update the recreation management alternatives for this RMP and adhere to the new guidance; however, postponing those changes to the Proposed RMP does not allow for adequate public review and comment. BLM should issue the revised recreation alternatives as a supplement to the Draft RMP for the LSFO and provide an opportunity for public comment.

Comment Number: I00126-77

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

For the Lower Sonoran Decision Area, BLM must entirely revise the recreation management discussion and alternatives to comply with the guidance. The recreation management language in chapters 2 and 3 of the DRMP must be updated to reflect the revised Recreation and Visitor Services Land Use Planning Guidance. While much of the analysis informing the recreation management alternatives may still be applicable, BLM must use the new SRMA and ERMA templates instead of the Benefits Based Recreation Worksheets included in Appendix R, and also evaluate Recreation Management Area designations using the new three-category system in which ERMA's require robust objectives, management actions, and implementation decisions, and some lands are not designated as RMA's. Attached are excerpts from the management framework for proposed SRMA's and ERMA's from the Colorado River Valley Draft RMP, which utilize the new guidance and templates. (Attachment 4).

Because the SDNM is fully contained in an SRMA through the range of alternatives, BLM could minimally update the recreation management plan for the Monument by replacing the RMZ Worksheets for the SDNM Planning Area (Appendix R) with the new SRMA template provided with IM 2011-004. The new templates reflect changes to the Land Use Planning Handbook resulting from the new guidance, including outcomes based management and elimination of market strategies.

Recommendations: BLM must update the recreation management analysis and alternatives to reflect the guidance set forth in IM 2011-004. The BLM should offer a supplemental comment period on the revised recreation alternatives prior to releasing the Proposed RMP for the LSFO.

Comment Number: I00126-79

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

While we agree that recreation impacts to Monument objects should not exceed 2001 levels, the Recreation Impacts report indicates that in some areas the 2001 levels do not match desired conditions for the Monument. The RMP should therefore also commit to identifying recreation sites where baseline conditions indicate unacceptable impacts and taking action to reduce those impacts, regardless of the 2001 levels. The RMP should also establish a specific monitoring program for recreation impacts to Monument objects using the baseline physical data and management recommendations developed for the Recreation Impacts report.

Comment Number: I00126-89

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

In order to effectively preserve the natural soundscape in wilderness and other quiet recreation areas, BLM must quantitatively measure (1) the decibel (dB) levels of the natural soundscape; and (2) ORV dB levels on the natural soundscape. Quantification of ORV traffic volume, duration, and frequency are thus necessary components of soundscape analysis.

There are many tools available to BLM to adequately measure noise impacts and set prescriptions to prevent negative impacts. The Wilderness Society recently created a GIS model based on the System for the Prediction of Acoustic Detectability (SPreAD), a workbook issued by the Forest Service and Environmental Protection Agency for land managers to “evaluate potential ... acoustic impacts when planning the multiple uses of an area.” The Wilderness Society adapted the SPreAD model to a GIS environment so that potential noise impacts could be integrated with other variables being considered in the planning process. We can provide the most up-to-date version of this software at your request. The SPreAD-GIS model can be implemented in your existing ArcGIS software at no additional cost. The SPreAD-GIS model was developed for the Forest Service, but its applicability extends seamlessly to BLM lands, as the inputs include vegetation and topography.

We encourage BLM to use the SPreAD-GIS model to determine what sounds will impact visitors in each segment of the planning area, and what steps must be taken to mitigate these impacts. It is important to note that the original SPreAD operates under the premise that in wilderness and other primitive recreation areas, no noise should be audible above the natural soundscape.

Recommendations: We recommend BLM conduct a soundscape analysis to guide formulation of intended user experiences, for example by analyzing how topography and vegetation might reflect or propagate vehicular sound and how that might affect quiet users, neighboring homeowners and wildlife habitat effectiveness. We ask that the alternatives specifically compare impacts of, and the potential for the increase of ORV noise on natural sound and other resources, consistent with the BLM’s regulations.

Comment Number: 100158-1

Organization:

Commenter: Bob Bryant

Comment Excerpt Text:

My big concerns with the Coffee Pot Mountains area is that the drug and human smuggling are at an all-time high in this area. During the hunting seasons over the last two years hunters who camped out along the pipeline road have experienced illegal immigrants showing up in their camps at night. There were Vehicle driving down the roads in the dark of night without lights on try to avoid detection and Border Patrol helicopters lighting up their camps in the middle of the night. Restricting camping to only the Pipeline Road you are putting the campers in the main path of the smuggling which occurs in the area.

Comment Number: LSFO-SDNM-DRMP--1-17412-1

Organization:

Commenter: Steve Franklin

Comment Excerpt Text:

I have not seen in any land use management studies any surveys by BLM whereby they have attempted to identify who uses our public trust land in the SDNM area and for what purpose do they use it for. By knowing what percentage use is typically seen within SDNM then BLM can better manage the area for that use.

Summary

Several commenters noted that the BLM did not implement the revised guidance for Recreation and Visitor Services per BLM Instruction Memorandum 2011-004, and requested that the BLM develop and provide revised recreation alternatives and allow for public comment before the Proposed RMP is issued.

- 1) Commenter recommended that BLM conduct a soundscape analysis to guide formulation of intended user experiences.
- 2) Commenter questioned whether the BLM has recreation visitor studies in the SDNM and how those studies are used to better manage the area for that use.
- 3) Commenters noted that in the Coffee Pot Mountains area, restricting camping to only the pipeline road puts campers in the main path of smuggling, which occurs in the area.
- 4) Commenter suggests the RMP commit to identifying recreation sites within the SDNM where baseline conditions indicate unacceptable impacts. They also recommend BLM take action to reduce those impacts and establish a monitoring program.
- 5) Commenters requested that BLM consider designating a National Conservation Area (NCA) within the SDNM and modify funding amounts and boundaries to the San Tan Regional Park.

Response

Since the preparation of the DRMP/DEIS, the BLM has issued new recreation policy (IM 2011-004) that provides new definitions and requirements for RMA allocation. After reviewing the RMAs in the DRMP/DEIS, the SRMAs have been modified consistent with the IM and revisions may be found in **Section 2.11.4** and **Appendix R**.

The requisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decision. The baseline data provided in **Section 3.3.4**, Recreation Management, have been updated and revised to address comments; these data, along with **Appendix Q**, Recreation Settings and Descriptions, and **Appendix R**, Special and Extensive Recreation Management Area Worksheets, support, at the general land use planning-level of analysis, the environmental impact analysis resulting from the management actions.

1) BLM used a variety of factors to guide recreation management actions in the alternatives, including user experience related to soundscape (see **Appendices Q** and **R**). These factors are appropriate for land use planning-level decision making.

2 & 4) A land use planning-level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM realizes that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan-level decisions. Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29). The BLM would conduct subsequent project-specific NEPA analyses for projects proposed for implementation under the land use plan. Recreation visitor studies are ongoing in SDNM, but final analyses are not yet available for use in planning. BLM has engaged researchers to develop methods for identifying and monitoring recreation impact areas.

3) Camping is allowed throughout the Coffeepot-Batamote ACEC area. There are several passage roads into the area (Map 2-14e, Alternative E Travel Management) that provide access for camping away from the pipeline road.

5) Both of these requested actions are beyond BLM's authority. An NCA is designated by Congress. The establishment of a park district to fund a recreation park is beyond BLM's authority and under the purview of state and/or local governments. In addition, since the park is on BLM-administered lands, it would have to be authorized under a BLM R&PP lease agreement before any such proposal could occur.

6.2.24.6 Recreational Shooting Alternatives

Comment Number: I00052-2

Organization: National Rifle Association

Commenter: Susan Recce

Comment Excerpt Text:

The only engagement that BLM intends to take regarding recreational shooting is to use its authority under the Federal Lands Policy Management Act to sell land or through its authority under the Recreation and Public Purposes Act to patent land. However, the BLM says that in neither case can this be done because it would not be "compliant with the provisions provided under the Monument proclamation or management goals and objectives identified in the DRMP." Thus BLM did not present or analyze these as alternatives in developing the DRMP.

Comment Number: I00052-7

Organization: National Rifle Association

Commenter: Susan Recce

Comment Excerpt Text:

Not only is it evident in two of the four alternatives that would close the SDNM to shooters, but it is clear that the treatment of recreational shooting in Alternatives B and C is nothing more than a throw away proposal which is designed to recognize the long history of recreational shooting on these public lands and the need for places to shoot, but provides no analysis that supports either management proposal. Alternative B would allow shooting on over 96,000 acres, but the BLM's GIS analysis eliminated all but two sites as highly suitable for recreational shooting because of the presence of Monument objects, desert tortoise habitat, the Anza Historic trail, and unsuitable terrain. Thus, Alternative B has limited to no serious viability as an alternative for public consideration as it pertains to shooting.

Comment Number: I00052-1

Organization: National Rifle Association

Commenter: Susan Recce

Other Sections: 22.7

Comment Excerpt Text:

The DRMP has failed to identify an acceptable and responsible management plan for the continuation of recreational shooting in the SDNM; an activity which the DRMP acknowledges is a traditional and historic use of the area. The DRMP is deficient because:

1. It fails to provide sound justification for closing the SDNM to recreational shooting activities as proposed in Alternatives D and E (the BLM's preferred alternative);
2. It fails to frame recreational shooting in Alternative B and C as viable and realistic proposals for the public's consideration;

3. It fails to provide a reasoned analysis for areas opened for shooting in Alternatives B and C, suggesting that the sites are an arbitrary decision;
4. BLM has preconditioned the outcome of the NEPA process by stating that the recreational shooting is not an appropriate public use in the SDNM;
5. It has ignored the need for access and opportunity by the surrounding community for safe places to shoot; and,
6. It proposes closure as the only response to solving problems associated with recreational shooting and dismisses measures that would effectively reduce and/or eliminate the vast majority of resource impacts.

Comment Number: I00113-2

Organization: Archery Trade Association et al.

Commenter:

Comment Excerpt Text:

This policy contradicts BLM's admission that Arizona has "broad public demand for places to shoot Even in light of this clear need, the DRMP gives only cursory consideration and no analysis to the Alternatives that would continue recreational shooting on the SDNM. It clearly indicates that the BLM has every intention of proceeding with the closure of the SDNM to shooters.

Comment Number: I00113-4

Organization: Archery Trade Association et al.

Commenter:

Comment Excerpt Text:

The BLM needs to take a proactive position of finding suitable sites from the 63 sites that have been used by shooters and commit resources to that purpose, as well as working with the local community of shooters to keep sites clean and promote responsible shooting.

Comment Number: I00113-5

Organization: Archery Trade Association et al.

Commenter:

Comment Excerpt Text:

It fails to acknowledge that there are ways in which impacts can be mitigated.

Comment Number: I00120-11

Organization:

Commenter: Bill Broyles

Comment Excerpt Text:

5. Disallow target shooting. Licensed hunting is a legitimate activity within the Monument, but there must be other places outside of the Monument suitable for target shooting. The general public needs to be able to visit an area in relative safety, not wondering who might be plinking over the next hill or bend in the road. Suitable sites should be available in other BLM Lower Gila or private lands, especially for the rapid-fire and long-range arms currently available.

Comment Number: I00142-2

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

The Department continues to support the allowance of dispersed recreational shooting opportunities on public lands. Further, the Department notes that a target shooting suitability analysis (Appendix G) identified the Gap Tank B and Hidden Valley C sites to be highly suitable for recreational target shooting within the Monument. With projected population increases in the area surrounding SDNM, target shooting opportunities would become more limited over time. The Department recommends BLM reconsider the prohibition on the SDNM and, at a minimum, allow target shooting in the areas determined to be suitable. The Department also recommends adding language allowing the formation of partnerships to effectively manage these sites.

Summary

Several commenters disagreed with management that would close the SDNM to recreational shooting. Commenters expressed their opinion that the BLM did not offer a valid full range of alternatives regarding recreational shooting. They stated that the DRMP/DEIS:

- 1) Did not identify an acceptable and responsible management plan for the continuation of recreational shooting in the SDNM and is deficient because it fails to frame recreational shooting in Alternative B and C as viable and realistic proposals for the public's consideration;
- 2) Has ignored the need for access and opportunity by the surrounding community for safe places to shoot;
- 3) Gives only cursory consideration and no analysis to the alternatives that would continue recreational shooting on the SDNM;
- 4) Needs to reconsider allowing shooting within sites found to be suitable;
- 5) Needs to find suitable places outside of the Monument where the public can safely shoot firearms and be away from rapid-fire and long-range arms; and
- 6) Dismisses measures that would effectively reduce and/or eliminate the vast majority of resource impacts.

Response

1) The BLM considered a range of alternatives designed to meet the BLM's legal duties and purpose and need for action. The purpose and need section in the DRMP/DEIS clearly states that the purpose of the agency action includes compliance with all applicable laws including the Sonoran Desert National Monument Proclamation (see **Section I.1**). To be reasonable, all alternatives in the Monument must satisfy the paramount purpose of the establishment of the Monument: protection of the objects of the Monument. According to the CEQ regulations and the Department of the Interior NEPA regulations, "[t]he range of alternatives includes those reasonable alternatives (paragraph 46.420(b)) that meet the purpose and need of the proposed action, and address one or more significant issues (40 CFR 1501.7(a)(2-3)) related to the proposed action. Since an alternative may be developed to address more

than one significant issue, no specific number of alternatives is required or prescribed” (43 CFR 46.415(b)).

The BLM acknowledges many variations of alternatives could be included in the RMP analysis process. However, the BLM is not required to analyze in detail each variation, including those variations determined not to meet the RMP’s purpose and need or those determined to be unreasonable given BLM mandates, policies, and programs. CEQ states that only a reasonable number of examples covering the full spectrum of alternatives must be analyzed and compared in the EIS (Forty Most Asked Questions Concerning CEQ’s NEPA Regulations, 46 Fed. Reg. 18,026, 18, 03 [March 23, 1981]).

The RMP/EIS provided a reasonable range of alternatives regarding target shooting within the SDNM (see **RM-5.2.14**, **RM-5.2.15** and **RM-5.2.16** in Chapter 2), including allocations that would allow shooting in areas suitable for this activity.

2) Under all action alternatives for the Lower Sonoran Decision Area, shooting opportunities would be provided (see **RM-3.1.11** in Chapter 2). Even though the action alternatives for the SDNM includes one that would close it to target shooting, the proposed RMP would maintain the Monument open to recreational target shooting (consistent with the No Action Alternative) subject to Management and Administrative Actions designed to protect Monument objects. Supplementary rules would be promulgated to provide law enforcement authority to enforce actions deemed necessary to protect Monument objects, other natural resources, and visitor safety.

3, 4 & 6) Current policy guidance provides two methods for allocating public lands for target shooting: direct sale under Section 203 of FLPMA or through patents issued under the R&PP Act of 1926 (Washington Office Instruction Memorandum No. 2008-074). Neither approach is appropriate within the SDNM. Current BLM policy does not allow for designating and managing shooting areas under any other method. The shooting analysis in **Appendix G**, Sonoran Desert National Monument Recreational Target Shooting Analysis, indicated that the measures needed to manage shooting in smaller, more concentrated areas (as in Alternatives B and C) in a manner that protects Monument objects, would require building structures such as backstops and berms that would not be appropriate within the Monument.

3 & 5) The BLM has presented sufficient information (**Appendix G** in DRMP/DEIS) and analysis to reach informed decisions concerning the impacts of target shooting on specific resources such as vegetation (**Section 4.8**), cultural resources (**Section 4.5**), sensitive plant species (**Section 4.14**), and wilderness characteristics (**Section 4.12**). BLM has also revised and updated the impact analysis to describe impacts on the shooting community under Alternative D and the indirect impacts on the Lower Sonoran and other surrounding public lands. This analysis is included in the discussion of recreation management impacts on recreation management, **Section 4.19**.

The PRMP/FIES was revised to make the Proposed Alternative for recreational target shooting in the SDNM the same as current management. The change in the Proposed Alternative and the rationale for making the change are described in Chapter I, section I.7.

6.2.24.7 Recreational Target Shooting Analysis and Criteria

Comment Number: I00052-1

Organization: National Rifle Association

Commenter: Susan Recce

Other Sections: 22.6

Comment Excerpt Text:

The DRMP has failed to identify an acceptable and responsible management plan for the continuation of recreational shooting in the SDNM; an activity which the DRMP acknowledges is a traditional and historic use of the area. The DRMP is deficient because:

1. It fails to provide sound justification for closing the SDNM to recreational shooting activities as proposed in Alternatives D and E (the BLM's preferred alternative);
2. It fails to frame recreational shooting in Alternative B and C as viable and realistic proposals for the public's consideration;
3. It fails to provide a reasoned analysis for areas opened for shooting in Alternatives B and C, suggesting that the sites are an arbitrary decision;
4. BLM has preconditioned the outcome of the NEPA process by stating that the recreational shooting is not an appropriate public use in the SDNM;
5. It has ignored the need for access and opportunity by the surrounding community for safe places to shoot; and,
6. It proposes closure as the only response to solving problems associated with recreational shooting and dismisses measures that would effectively reduce and/or eliminate the vast majority of resource impacts.

Comment Number: I00154-10

Organization: Tucson Rod and Gun Club

Commenter: Don Saba

Comment Excerpt Text:

'The second aspect of this issue identified in the assessment was the potential development of a "criteria for appropriate zones for formal and informal shooting opportunities. " Subcommittee dialog and discussion initially focused on determining whether this concept could be addressed. After significant debate, the subcommittee participants determined that a general criteria would not be useful to help the various agencies locate and manage shooting locations on public land. '

Unfortunately the BLM through the DRMP/EA chose to ignore this finding and proceeded to develop a series of flawed criteria that were then used to exclude practically all of the SDNM from recreational target shooting.

Comment Number: I00154-3

Organization: Tucson Rod and Gun Club

Commenter: Don Saba

Comment Excerpt Text:

The GIS analysis rationale using "criteria" for finding suitable sites for shooting is defective because it excludes recreational target shooting from all areas that:

- are habitat for certain cacti and other trees
- are habitat for desert tortoises

- do not meet certain arbitrary (and invalid) criteria (created by BLM) for safe shooting

This analysis is flawed because:

- The available evidence shows that recreational target shooters are not shooting cacti or other trees or otherwise endangering people or wildlife.
- The DRMP/EA cites no evidence that recreational target shooters are injuring or killing tortoises
- The criteria for finding suitable shooting sites are flawed (see below)

Comment Number: I00154-4

Organization: Tucson Rod and Gun Club

Commenter: Don Saba

Comment Excerpt Text:

Furthermore, the assumption that Monument objects will be damaged or destroyed and desert tortoises will be injured or killed if target shooting is allowed in certain areas of the Monument is contradicted by the fact that game shooting will still be permitted unrestricted in these same areas. The DRMP/EA makes no effort to explain this contradiction

Comment Number: I00154-5

Organization: Tucson Rod and Gun Club

Commenter: Don Saba

Comment Excerpt Text:

The DRMP/EA completely misses the fact that, since shotguns have very short range, that none of the shooting slope, backstop, shooting fan and downrange features criteria could possibly apply to shotgun shooting. In addition, since .22 caliber firearms and pistols are far less powerful than high powered hunting rifles, the same safety criteria for high powered rifles cannot be applied to pistols and .22 caliber firearms.

Comment Number: I00154-9

Organization: Tucson Rod and Gun Club

Commenter: Don Saba

Comment Excerpt Text:

The DRMP/EA states that hunting will be allowed throughout the SDNM whereas target shooting will be restricted or prohibited, even though there is very little practical difference between recreational game shooting and recreational target shooting, as both are practiced by ethical and responsible shooters.

There is a major inconsistency and contradiction in the treatment of hunting compared to recreational target shooting. According to the DRMP/EA, vast tracts of land are deemed unsuitable for recreational target shooting where:

- There are Monument objects
- There are desert tortoises
- Certain arbitrary (and invalid) criteria (created by BLM) for safe shooting are not met

Yet all of these same areas are deemed suitable for shooting when such shooting is done by hunters.

Summary

Commenters questioned and disputed some of BLM's analysis and criteria used for recreational shooting.

One commenter felt the DRMP/DEIS is deficient because:

- 1) It failed to provide sound justification for closing the activity as proposed in Alternatives D and E;
- 2) It failed to provide a reasoned analysis for areas opened for shooting in Alternatives B and C; and
- 3) BLM has preconditioned the outcome of the NEPA process by stating that the recreational shooting is not an appropriate public use in the SDNM.

Another commenter identified several reasons the DRMP/DEIS is flawed, including:

- 4) Presenting an assessment that identified the potential development of a "criteria for appropriate zones for formal and informal shooting opportunities," which the DRMP/DEIS ignored and used flawed criteria;
- 5) Defective GIS analysis rationale;
- 6) It did not address the contradiction between impacts caused by game hunting and those by target shooters; and
- 7) The same criteria should not be applied for shotguns, pistols, and 22-caliber rifles versus high-powered rifles.

Response

CEQ regulations require an environmental impact statement to "succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration. The description shall be no longer than is necessary to understand the effects of the alternatives. Data and analyses in a statement shall be commensurate with the importance of the impact, with less important material summarized, consolidated, or simply referenced. Agencies shall avoid useless bulk in statements and shall concentrate effort and attention on important issues" (40 CFR 1502.15).

The BLM complied with these regulations in writing its affected environment section. The requisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decision. The baseline data provided in **Section 3.3.4**, Recreation Management, and **Appendix G** is sufficient to support the environmental impact analysis resulting from management actions presented in the Draft RMP/FEIS. For example, **Appendix G** in the DRMP/DEIS provided a complete description of the criteria and methodology used for analyzing the areas that would be appropriate for recreational target shooting.

1, 2, 3, 4 & 5) These criteria, developed from discussions with subject matter experts in range management, guidelines published by national shooting organizations, and published surveys of target shooters' attitudes, represented the best information available to BLM. Additionally, an analysis of impacts observed at sites used for target shooting, in contrast to sites not used for target shooting,

found significant impacts on features of the landscape determined to be “objects” of the SDNM at sites used predominantly for target shooting. The GIS analysis used these findings to appropriately describe the potential impacts from target shooting that might be expected to accrue to Monument objects across the SDNM. Nowhere in the document did BLM say that target shooting is an inappropriate use.

6) The BLM does not have data comparing the relative impacts of recreational target shooting to those from hunting; however, the BLM believes the two are distinctly different recreational pursuits. Evidence collected in the Monument has demonstrated that there are areas that have had vegetation removed or destroyed by concentrated target shooting, trash, and litter left by target shooters, such as inappropriate targets (computer terminals, refrigerators) and large quantities of spent ammunition. While hunting also involves discharge of a firearm, the activity is dispersed, involves fewer users, and results in many fewer weapons discharges. It is not unusual for a recreational target shooter to fire more shots in a few minutes than a hunter might fire all hunting season. Impacts on Monument objects resulting from recreational target shooting alternatives are described in **Section 4.26**, Implementation Level Analysis.

7) Although the safety guidelines for shotguns, handguns, and small caliber rifles may in theory be less than for high-powered rifles, in practice a uniform criterion appropriate for all types of weapons must be applied unless management restrictions are enforced on allowable types of weapons. Current BLM policy does not allow for designating and managing shooting areas.

6.2.24.8 Recreational Target Shooting Impacts

Comment Number: I00001-11

Organization:

Commenter: Jim Vaaler

Comment Excerpt Text:

Recreational target shooting threatens the objects listed in the Monument proclamation. User created shooting galleries that have been utilized over a long period of time are visible from a long way off because the desert varnish and outer surface of the rocks have been removed, generally leaving an area that is lighter in color and noticeably devoid of vegetation.

Comment Number: I00052-4

Organization: National Rifle Association

Commenter: Susan Recce

Comment Excerpt Text:

The DRMP does not provide any information as in the effect of closure of the 63 areas within the SDNM on access (travel distance) and opportunities available to those displaced shooters on other public lands. It does not analyze the impact of forcing shooters from SDNM onto other public land, nor how the increase in shooters will affect the safe use of sites elsewhere.

Summary

Commenters provided several comments related to recreation impacts, including 1) target shooting threatens objects listed in the Monument proclamation, and 2) the DRMP/DEIS does not adequately address the impacts from closing the 63 areas within the SDNM to displaced shooters, or the indirect impacts on the surrounding public lands.

Response

As required by 40 CFR 1502.16, the DRMP/DEIS provided a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the proposal be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented.

The BLM has presented sufficient information (**Appendix G** in DRMP/DEIS) and analysis to reach informed decisions concerning the impacts of target shooting on specific resources such as vegetation (**Section 4.8**), cultural resources (**Section 4.5**), sensitive plant species (**Section 4.14**), and wilderness characteristics (DRMP/DEIS at page 4-575). BLM has also revised and updated the impact analysis to describe impacts on the shooting community under Alternative D and the indirect impacts on the Lower Sonoran and other surrounding public lands. This analysis is included in the discussion of recreation management impacts on recreation management, **Section 4.19**.

6.2.24.9 Recreational Target Shooting Out of Scope

Comment Number: I00022-1

Organization:

Commenter:

Comment Excerpt Text:

Has there been an analysis of who is leaving trash behind, i.e. is it illegal immigrants? Drug traffic related? Or locals dumping instead of using landfills?

Comment Number: I00022-2

Organization:

Commenter:

Comment Excerpt Text:

2) How does the spent ammunition left behind by target shooting affect the environment?

Comment Number: I00096-1

Organization:

Commenter: Scott Bergman

Comment Excerpt Text:

I think that the best approach here is to offer incentive to shooters and OHV users that spot a violator and trash (or other) so that BLM can be notified and the criminals brought up on charges, as they should be. Something similar to "Operation Game Thief" would be a good way to go.

Comment Number: I00097-1

Organization:

Commenter: Shelly Bergman

Comment Excerpt Text:

When I go fishing or hunting, if I witness someone breaking the law I can turn them in and get a reward from the Game and Fish Department. Why not transition this program over to our deserts and let US report the bad guys

and take it from there? You could post signs stating so at the entrances to these areas you are so concerned about.

Comment Number: 100113-1

Organization: Archery Trade Association et al.

Commenter:

Comment Excerpt Text:

This statement, coupled with BLM's decision to close Ironwood Forest National Monument to recreational shooters, suggests that BLM is adopting a policy that is contrary to decades of BLM management, has no basis in law, and could lead to the closing of millions of acres of public land to recreational shooting. The designation of national monuments does not preclude recreational shooting. BLM is justifying this policy based on protection of Monument "objects."

Comment Number: 100132-5

Organization: Tread Lightly! Inc.

Commenter: Lori McCullogh

Comment Excerpt Text:

I am curious to know, before deciding to shut the entire SDNM down to recreational shooting, how long the specific issues related to recreational shooting sports have been a problem for land managers at the SDNM? And exactly what has been done over that period of time to protect the resource and inform/educate the public on appropriate/responsible behaviors before deciding to shut the entire National Monument down to recreational shooting?

Comment Number: 100132-9

Organization: Tread Lightly! Inc.

Commenter: Lori McCullogh

Comment Excerpt Text:

I am writing regarding the BLM's proposed closure of the entire 486,499 acre Sonoran National Monument (SDNM) to recreational shooting. This action is completely contradictory to the Department of Interior's priority to protect recreational shooting opportunities on public lands. See the attached memorandum dated November 23, 2011 and signed by Secretary Ken Salazar himself.

To close the SDNM off to recreational shooting also contradicts the DOI & BLM's commitments to enhance recreational access and opportunities for activities like hunting, fishing and the shooting sports through The Recreational Hunting and Wildlife Conservation Plan as directed by Executive Order 13443.

Then there is the Federal Lands Hunting, Fishing, and Shooting Sports Roundtable Memorandum of Understanding, of which the BLM is a signatory on. Its statement of mutual interests and benefits to all parties is to "provide public access to federal lands and enhance opportunities on federal lands to fish, hunt and engage in shooting sports activities."

Furthermore, not only does closing SDNM to recreational shooting hurt efforts to enhance recreational access and opportunities throughout America, it also hurts the concerted efforts at both the federal and state levels to retain and recruit new recreational shooters, hunters and anglers.

Comment Number: I00154-2

Organization: Tucson Rod and Gun Club

Commenter: Don Saba

Comment Excerpt Text:

A third false assumption is that the illegal dumping at some shooting sites was being done by the shooters. Many illegally dumped items found at target shooting sites are clearly not brought there by shooters. Such items include palm fronds, large pieces of broken concrete, newspapers, foam couch cushions, etc. The fact that other household trash items have been shot does not prove that the shooters dumped them there in the first place. The ready proximity of many shooting sites to civilization unfortunately makes these sites ideal for illegal dumping.

Comment Number: I00154-6

Organization: Tucson Rod and Gun Club

Commenter: Don Saba

Comment Excerpt Text:

Other alternatives that the DRMP/EA failed to consider is the use of law enforcement to cite those who violate the law. If there is a lack of sufficient law enforcement personnel to enforce the law, then the case should be made for increased law enforcement funding, not for a total ban on shooting.

Illegal dumping and resource damage especially, should be vigorously cited and stiff fines should be assessed at a level commensurate with all law enforcement and cleanup costs incurred. The BLM has the power to request such action through the executive branch. It should do so immediately.

Comment Number: I00154-7

Organization: Tucson Rod and Gun Club

Commenter: Don Saba

Comment Excerpt Text:

An additional alternative would be to clear, enhance and make hospitable a number of readily accessible areas for shooting so that the damage of the lawless element is minimized. Such enhancements could also include areas where law enforcement could observe the shooting areas without being seen themselves, in order to facilitate catching lawless individuals.

Comment Number: I00154-8

Organization: Tucson Rod and Gun Club

Commenter: Don Saba

Comment Excerpt Text:

A major false assumption propagated throughout the DRMP/EA is the idea that recreational target shooters routinely commit illegal acts and degrade the environment.

The DRMP/EA defines Recreational target shooting on page 978 as:

The discharge of any firearm for any lawful, recreational purpose other than the lawful taking of a game animal. Recreational target shooting does not include firearms use employed in accordance with state hunting regulations and policy regarding recreational target shooting does not apply to hunters in pursuit of game with firearms that are being employed in accordance with such regulations.

Then, in direct contradiction to this definition, the DRMP/EA proceeds to accuse Recreational target shooters of a long list of illegal activities including:

- Intentional shooting of saguaro cactuses
- Shooting trees
- Shooting petroglyphs
- Illegal dumping
- Littering
- Shooting at wildlife
- Killing wildlife
- Committing acts of vandalism
- Shooting signs
- “Drive-by shotgunning”
- shooting restroom doors
- Shooting through block walls of rest rooms
- Destroying BLM trailhead cultural facilities, including interpretive signs and register boxes
- Endangering people

The DRMP/EA then claims that these illegal acts will be alleviated by banning recreational target shooting.

Comment Number: LSFO-SDNM-DRMP--I-1781 I-1

Organization:

Commenter: Greg Gonnerman

Comment Excerpt Text:

This management plan not only overstates the problem, it misdirects the blame. It seems highly unlikely that target shooters are taking major home appliances to the desert for target practice. More likely people are going to the desert to dump trash and are attracted to these easily accessible areas frequented by target shooters. Banning target shooting would not significantly reduce littering.

Summary

1) Commenters indicated that closing the entire SDNM to recreational shooting was contrary to policy as well as DOI and BLM guidance that acknowledge the importance of providing locations for recreational shooting on public land.

2) Commenters indicated that the BLM did not provide adequate justification for prohibiting shooting in the SDNM and did not analyze alternative solutions such as increasing the use of law enforcement, designating shooting sites, rewards and programs for land users to better police shooting, and forming partnerships with various groups to keep sites clean and promote responsible shooting.

3) One commenter expressed their opinion that closure of recreational shooting on National Monuments could lead to future closing of millions of acres of public lands (not addressed in cumulative impacts) and designation of National Monuments does not preclude recreational shooting.

Response

1) Current policy guidance provides two methods for allocating public lands for target shooting: direct sale under Section 203 of FLPMA or through patents issued under the R&PP Act of 1926 (Washington

Office Instruction Memorandum No. 2008-074). However, these types of actions are not consistent with SDNM Proclamation 7397. Dispersed shooting could be allowed, provided it does not interfere with protection of the Monument objects.

2) The BLM has presented sufficient information (**Appendix G** in DRMP/DEIS) and analysis to reach informed decisions concerning the impacts of target shooting on specific resources such as vegetation (**Section 4.8**), cultural resources (**Section 4.5**), wildlife and special status species (**Section 4.14**), and wilderness characteristics (**Section 4.12**). These impacts are described at a level appropriate to an activity-level analysis. The impact analysis has been updated and revised to include additional analysis regarding alternative solutions for managing dispersed target shooting and the cumulative impacts from closing the SDNM to shooting. Although the presence of litter was cited by Appendix G as prevalent at sites used for recreational target shooting, the presence/absence of litter was not used as a criterion for determining the impacts of target shooting to Monument objects. Increased use of law enforcement, reward initiatives, programs for land users to better manage shooting, and partnerships with various groups are tools available to the BLM for managing public land and will be utilized to the extent practical to manage recreational target shooting and to protect the objects of the Monument.

3) Management proposed in this plan has been analyzed in the EIS. The RMP is not proposing closure of any other lands to recreational target shooting other than those in the alternatives presented in Chapter 2. Suggesting any shooting closures made in this EIS will lead to additional closures is speculative. NEPA requires analysis of actions reasonably expected to occur, but not to speculate on future actions.

6.2.24.10 SRMA Allocations

Comment Number: I00098-2

Organization:

Commenter: Gerry Bruder

Comment Excerpt Text:

Make the Gunsight Wash, the actual wash itself, off-limits to ATVs. The sites next to the wash take a terrible beating from erosion when riders drive their ATVs into the wash from the adjacent site. These sites tend to be the favorites for everyone and they suffer enough from over-use. Gunsight Wash, the camp area, with its designated roads for ATV use is a natural conduit to a community wide system of designated roads for the area. It is easy for the ATVs to get from here to there.

Comment Number: I00126-109

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

Additionally, allowing for miles of motorized routes within back country areas by designating passage corridors along those routes does not adequately preserve or promote back country characteristics. The RMP should designate RMAs and/or RMZs that are completely closed to motorized vehicles to create unfragmented blocks of land for primitive, non-motorized recreation.

Comment Number: I00126-78

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

Access to an undeveloped, backcountry experience should not promote the use of motorized vehicles as this use is most appropriate for passage or frontcountry recreation management zones. Both Alternatives D and E are flawed in that they list “four-wheel-drive touring” as a main activity for the undeveloped, backcountry areas of the Monument. BLM should consider an alternative that allocates these backcountry areas of the Monument as non-motorized destinations.

Comment Number: I00151-13

Organization: Arizona Off Highway Vehicle Coalition

Commenter: Jeff Gursh

Comment Excerpt Text:

Please adjust the appendix R sheet for West Buckeye Hills to include the possibility of single track motorcycle trails. For alternatives B, C and E, the described recreation activities include OHV, hunting, photography, wildlife viewing and sightseeing. This seems pretty tame and if OHV and these diverse activities are to get along, OHV will probably be marginalized. We thought the point of choosing the highest and best use was to make it rise to the top - not to choose all possible activities. We would suggest, either break the area into areas where OHV would be maximized, or remove the wildlife viewing, sightseeing and hunting activities from the targeted activities

Comment Number: I00151-18

Organization: Arizona Off Highway Vehicle Coalition

Commenter: Jeff Gursh

Comment Excerpt Text:

Proposal for a youth All-Terrain Vehicle and Motorcycle Park

Build a youth size motorcycle and ATV area at the Vulture Peak Landing strip on BLM land and or at the Buckeye hills County park. Sites would be approximately 10 acres. See the attached sample drawing. If these sites are not suitable, other sites would likely work. The 10 acre size makes this design portable to many other sites. Pairing up the Motorcycle Park with a trail system would be ideal.

Comment Number: I00151-5

Organization: Arizona Off Highway Vehicle Coalition

Commenter: Jeff Gursh

Comment Excerpt Text:

Buckeye Hills Trails SRMA - The recreation sheets for Buckeye Hills Trails SRMA in appendix R explain it being low intensity and lacks a description of single track motorcycle trails. This use is important and seems to be omitted. With a good partner like county parks, it could be managed well on the west side. The park would take the heavy uses like staging, kids riding area, maybe even trials or lower risk motocross.

Comment Number: I00151-6

Organization: Arizona Off Highway Vehicle Coalition

Commenter: Jeff Gursh

Comment Excerpt Text:

Please check the settings as front country and back country area shown as the settings on the appendix R sheet, however the Buckeye Hills East area is shown on map 2-12e as Community Interface, which I believe is a higher level of use than front country. The appendix R sheets should match the recreation setting allocations on map 2-12e and they don't as written.

Comment Number: I00151-7

Organization: Arizona Off Highway Vehicle Coalition

Commenter: Jeff Gursh

Comment Excerpt Text:

8)East Buckeye Hills - By incorporating this dust permit information, Buckeye Hills East could be planned to include significant motorized use. The existing single track is almost exclusively motorcycle use. This is where most of the trails are today. If the trails are closed to motorized use, the demand won't go away, it will simply move and without replacement trails it may reappear in places you don't want it.

Comment Number: I00159-9

Organization:

Commenter: Roy Pierpoint

Comment Excerpt Text:

Alternative E as shown on Map 2-12e, "Recreation Management," would be a good plan so people can enjoy the viewing of animals in their natural environment (much superior to seeing them in a zoo) and enjoy the wilderness experience. The proposed "front country" located as a light green strip on the map across the southeast portion of the Gila Bend Mountains should be omitted. This divides the area and there is no justification, i.e. existing road, power corridor, or other structure present

Comment Number: I00166-20

Organization:

Commenter: Steve Saway

Comment Excerpt Text:

Management Action RR-1.2.28: The Buckeye Hills SRMA would be established (47,900 acres) with a "Community" market strategy for residents of western Maricopa County.

Comment: Based on the recreational values and attractions for both motorized and non-motorized recreational enthusiasts who reside outside of Maricopa County, the Buckeye Hills SRMA should also include a "Destination" market strategy. This is particularly relevant if recreation opportunities include family oriented motorized recreation.

Comment Number: 100166-21

Organization:

Commenter: Steve Saway

Comment Excerpt Text:

Comment: I believe the Buckeye Hills West RMZ should be established for a balanced mix of motorized and non-motorized recreation opportunities as is the proposal for the Buckeye Hills East RMZ. I also disagree with BLM managing this RMZ in partnership with Maricopa County and the Arizona Game and Fish Department. My rationale is that this will bias and constrain the recreation opportunities and policies. BLM managed public lands have a broader group of stakeholders and BLM should strive to provide a balanced mix to both motorized and non-motorized users. I believe BLM should manage these lands in coordination with the non-Federal agencies, but not be constrained by the more restrictive policies of these agencies.

Comment Number: 100166-22

Organization:

Commenter: Steve Saway

Comment Excerpt Text:

Management Actions RR-1.2.39 and RR-1.2.47: The RMZ would be established as a Special Management Area (SMA) and an Individual Special Recreation Permit (ISRP) program may be established to allow for special management and protection of the SMA in partnership with Maricopa County and the Arizona Game and Fish Department. Through a Cooperative Management Agreement, partners may be authorized to share in the collection and management of fees.

Comment: The need to designate these RMZs as SMAs with the potential for ISRPs and recreation fees should be re-evaluated. Is there a business case that supports this designation? Why is it necessary to manage these RMZs in partnership with Maricopa County and the Arizona Game and Fish Department? I recommend a more conservative approach that can be done within BLM capabilities and ramps up from there.

Comment Number: 100166-24

Organization:

Commenter: Steve Saway

Comment Excerpt Text:

Comment: The proposed Gila Bend Mountains SRMA is adjacent to the Yuma East Undeveloped SRMA that was established by the Yuma Record of Decision (ROD) and Approved RMP, dated January 2010. The character and recreational values of the Gila Bend Mountains SRMA match those of the Yuma East Undeveloped SRMA. Recommend the Gila Bend Mountains SRMA be managed similar to the Yuma East Undeveloped SRMA, i.e., establish a Gila Bend Undeveloped SRMA with a Dispersed Use RMZ, a Signal Peak Wilderness RMZ, and a Woolsey Peak Wilderness RMZ (see pages 2-117 and 2-118 of the Yuma ROD and Approved RMP). These distinct RMZs would allow management actions to be more precise and relevant to each RMZ. For example, the Dispersed Use RMZ could have management actions that support semi-primitive motorized recreation, OHV backcountry touring, dispersed camping, and other frontier-like, undeveloped activities in a remote backcountry setting. The Signal Peak and Woolsey Peak RMZs could have management actions that support hiking and other non-motorized dispersed activities in a remote backcountry setting

Comment Number: 100166-26

Organization:

Commenter: Steve Saway

Comment Excerpt Text:

Management Action RR-1.3.3: The Gila Bend Mountains RMZ would be established (253,700 acres) for visitors primarily seeking non-motorized dispersed recreation experiences in a remote backcountry setting.

Comment: See my comment pertaining to Management Action RR-1.3.1. The Gila Bend Mountains are also a destination for visitors seeking motorized recreation experiences. There should be multiple RMZs with distinct management actions for each.

Comment Number: LSFO-SDNM-DRMP--1-18311-3

Organization: Competitive racing (whiplash, ATR, AMRA, etc.)

Commenter: Douglas Martin

Comment Excerpt Text:

Converting Primitive motorized trails to non-motorized

Comment Number: 3

Cited Content: RR-1.2.46: Up to 50 percent of the primitive roads (approximately 63 miles) would be converted to non-motorized trails. Trails could be developed to provide connector and loop opportunities for non-motorized users.

Cited Section ID: 2.8.4.2 Action Alternatives for Recreation Management (RM)

Comment Title: Converting Primitive motorized trails to non-motorized

Issue: 10756

Comment:

I believe converting these trails will cause issues since there will inevitably be both on the same trail. If there is a need for more trails for non-motorized recreation, new trails would be best suited for this. If I'm going to go hiking in the desert or even riding my bike, I'd rather do it on a trail that is not already clapped out from motorized use. Plus, I feel pushing motorized people off their trails will only succeed in causing them to cut in new trails. Without the enforcement personnel in the area, this could not be prevented.

Comment Number: LSFO-SDNM-DRMP--1-18311-5

Organization: Competitive racing (whiplash, ATR, AMRA, etc.)

Commenter: Douglas Martin

Comment Excerpt Text:

OHV area?

Comment Number: 5

Cited Content: RR-1.3.11: The Arlington RMZ would be established (60,600) for visitors primarily seeking dispersed motorized recreation or a family oriented riding experience in a remote Sonoran desert landscape.

Cited Section ID: 2.8.4.2 Action Alternatives for Recreation Management (RM)

Comment Title: OHV area?

Issue: 10756

Comment:

If this area is being developed as an OHV area, then there should be mention of SRP for competitive events in this area.

Summary

1) Commenters recommended several revisions and additions to recreation SRMA and RMZ allocations, and to improve recreational experiences and opportunities for:

- a) Buckeye Hills SRMA – requests emphasis of OHV uses;
- b) Sonoran Desert National Monument SRMA – backcountry settings should be non-motorized; and
- c) the Gunsight Wash RMZ – close washes to ATVs.

2) Commenters recommend new SRMA and RMZ allocations to match the Yuma East Undeveloped SRMA established in their recently approved ROD. Suggestion includes one new SRMA, the Gila Bend Undeveloped SRMA, and 3 RMZs: Dispersed Use, Signal Peak Wilderness, and Woolsey Peak.

3) Commenters also recommended additional OHV recreation areas in the Buckeye Hills and Gila Bend area and for a youth All-Terrain Vehicle and Motorcycle Park at the Vulture Peak Landing strip on BLM land and at the Buckeye Hills County Park.

4) One commenter indicated that management of the Arlington RMZ needs to address SRPs for competitive events.

Response

Since the preparation of the DRMP/DEIS, the BLM has issued new recreation policy (IM 2011-004). This policy provides new definitions and requirements for RMA allocation. After reviewing the RMAs in the DRMP/DEIS, the SRMAs have been modified consistent with the IM, and revisions may be found in **Section 2.11.4** and **Appendix R**.

1a) Buckeye Hills East – BLM has corrected errors found in the **Appendix R** worksheet. Management objectives have been written to balance competing recreational interests in this area. Specific locations of facilities and use decisions would be made during subsequent implementation planning.

b) SDNM SRMA – back country settings are non-motorized in all alternatives. Alternative D provides maximum allocation of the back country setting.

c) Gunsight Wash RMZ – the suggested management action change is an implementation action that is not part of the planning effort for this RMZ.

2) Wilderness areas included in the DRMP/DEIS are not allocated as RMZs because they already have separate Management Plans with specific prescriptions. The proposed Gila Bend Mountains SRMA opportunities and outcomes, as presented in the DRMP/DEIS, are essentially the same as in the Yuma East Undeveloped SRMA. In the PRMP, to conform to recreation planning policy in IM-2011-004, the Gila Bend Mountains are no longer an SRMA but retain the same management on-the-ground as in the DRMP/DEIS.

3) The objectives for the Buckeye Hills West area are being developed in concert with AGFD and Maricopa County Parks (**Appendix R**). A youth all-terrain vehicle and motorcycle park on this parcel would not be consistent with these objectives. The goal of planning is not to select the highest and best use, but the best combination of uses to meet the multiple use mandate of FLPMA.

4) Management actions for the Arlington RMZ would allow SRPs that are consistent with the objectives of the RMZ.

6.2.25 TRAVEL MANAGEMENT

6.2.25.1 Access to Gila Trails RMZ

Comment Number: 100166-15

Commenter: Steve Saway

Comment Excerpt Text:

Management Action RR-1.1.2: The Gila River RMZ would be established (42,300 acres) for regional and national visitors seeking to discover, tour, and learn about the Juan Bautista de Anza National Historic Trail, Arizona history, and natural history of the Sonoran desert.

Comment: I agree with the intent of this management action. However, I wonder how this can be accomplished when, to my knowledge, public access to this RMZ is virtually non-existent. I think the RMP should indicate what actions are proposed to resolve the lack of public access to this area.

Summary

One commenter expressed concern with the lack of management actions that resolve public access to the Gila River RMZ.

Response

While access is currently limited, BLM aims to secure legal access to public lands at all designated road entry points to public land within ten years of completing route designations (See **Chapter 2, Section 2.11.5**, Objective 1.4 and Management Actions TM-1.4.1 and TM-1.4.2).

6.2.25.2 Adaptive Management

Comment Number: 100121-42

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

Only roads that are consistent with protection of the Monument objects should be maintained in the Monument. Temporary road closures that were implemented in order to protect areas from degradation, including destruction of monument objects, should be kept closed unless the BLM can clearly demonstrate that there will be no harm to the Monument objects and that off-road vehicle activities associated with those roads is no longer a problem.

Comment Number: I00126-58

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

Alternative D would close 8.1 miles of route within this area. Closing large areas, with no or limited administrative access to important habitat areas for objects, could create new impacts by eliminating the ability to perform health and habitat assessments as they relate to objects and could result in minor to moderate impacts. DRMP at 923.

This statement overlooks the immense benefits to closing large areas to motorized vehicles that have been demonstrated in the planning area with the temporary closure in place. To the contrary, there is no evidence that BLM or others could not perform health and habitat assessments or other evaluations in closed areas with administrative access to the area or by using means other than a motorized vehicle.

Recommendations: BLM must keep the temporary closure within the Monument in place until it has demonstrated that the adverse effects from off-road vehicles are eliminated and that it has measures in place to prevent recurrence. The Draft RMP fails to make these showings.

Comment Number: I00142-3

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

In Section 2.8.5, page 181 states the closure “is to remain in effect until the RMP is approved or when the damaged lands are restored-whichever is later.” Nearly 3~ years later, the Department continues to be concerned with road closures and access restrictions associated with this temporary closure. The Department understands BLM has made progress in restoring these lands, and recommends adding language to clarify the next steps for restoring public access to the area and a commitment to finishing the project. To ensure this doesn’t become a permanent closure, the Department also recommends identifying quantifiable measures that will be used to determine “when the damaged lands are restored”.

Summary

Commenter recommends adding language to clarify the next steps and quantifiable measures for restoring public access and finishing restoration efforts for areas that were closed to motorized use in the SDNM.

Commenters indicated that the current SDNM route closure area should be kept closed unless the BLM can clearly demonstrate that there would be no harm to Monument objects and that off-road vehicle activities associated with those roads are no longer a problem.

Response

As a result of a court settlement, the BLM must complete the land management planning process through the signed ROD before further action may be taken (i.e., consideration of reopening areas closed to motorized travel and finishing restoration efforts). Additionally, the BLM would continue to follow the regulations at 43 CFR 8341.2, which allow the BLM to keep lands closed to off-highway vehicle traffic unless the authorized officer determines that the adverse effects have been eliminated and

measures implemented to prevent recurrence. Criteria for consideration of re-opening the area and managing the area for OHV use would be included in the Travel Management Plan as part of the Proposed RMP/Final EIS.

6.2.25.3 Allocations

Comment Number: I00044-2

Organization: Desert Protectors

Commenter: Fred Goodsell

Comment Excerpt Text:

Publishing your plan with the statement that there is a 40 acre play area for ATVs in Ajo and showing a map if it was - is - a disservice to the residents of Ajo and a threat to the resources of the Ajo block.

Comment Number: I00076-1

Commenter: William Perry

Comment Excerpt Text:

Volume 2, Chapter 4, Page 380 of your proposed resource management plan for the Lower Sonoran Desert describes a possible ATV recreation area near the town of Ajo. This is a terrible idea for many reasons:

1. This area is currently unknown to and little used by ATV's. Sanctioning and publicizing it will open up a whole new zone to destruction and enforcement problems.
2. A significant percentage of ATV owners scoff at the idea of Federal control of public lands and will flagrantly disregard any rules and boundaries, especially in a remote area.
3. Sanctioning an illegal track is a bad precedent because it rewards ATV outlaws and activists who seek to increase their play areas by making them useless for anything else.
4. There are Pre-Colombian trails in the desert still visible after 1,000 years. This habitat takes an eternity to heal and it will be a sad legacy for future generations if we keep adding to modern destruction.

Comment Number: I00077-1

Commenter: Dorothy Ruef

Comment Excerpt Text:

This proposal will make Ajo a destination for off-road riders who have currently never even heard of Ajo. The very act of legitimizing a previously illegitimate track will attract more ATVers to Ajo than the BLM can police or control. Why not set aside an ATV area in Glamis or Quartzite or Welton-places that have already lost their fight to off-road vehicles?

Comment Number: I00079-1

Commenter: Patricia Turinsky

Comment Excerpt Text:

We are writing this in regards to the new management plan for BLM which states that there will be a 40 acre OHV/ATV recreation area built in a previously disturbed area on the outskirts of Ajo, AZ.

The area that this is planned for is at the edge of Ajo neighborhoods and these residents (as well as the rest of the town) will be greatly impacted by the dust, the noise, the traffic and ultimate abuse of our precious desert

surroundings. This development will bring more of this type of riding to all of the fragile BLM land which surrounds Ajo and will encourage new trails and off road destruction.

How will the area surrounding this park be patrolled?

Comment Number: I00094-1

Organization: Arizona Game and Fish Department

Commenter: Daniel Urquidez

Comment Excerpt Text:

Also, what can we do now about bringing down the ghost fence. I can say the same below a year later.

We met with COE and I felt we had an agreement we would provide the sign and they would sign their appropriate borders and we would call it good. The ghost fence is not deterring access.

I remember you were trying to interpret the closure issue (camping vs traveling through) regarding the Painted Rock Mtn area. I did not find where this was addressed in the SDNM's RMP.

Comment Number: I00107-1

Commenter: Bruce Davis

Comment Excerpt Text:

the proposed OHV/ATV area in the Ajo Sector of your plan. There are, in my opinion, a fair number of reasons that this idea should not be carried forward.

I. This acreage, while already an illegal OHV area, is relatively small so publishing the fact that it is there will overcrowd this area with the result of it growing in size. Plus it looks like you are rewarding the persons who should have been cited for driving out there in the first place.

Comment Number: I00107-2

Commenter: Bruce Davis

Comment Excerpt Text:

There is an established venue for this activity off of Hwy 85 in the area north of the Lewis Prison which does not disturb residents because there aren't any. It is also closer to Phoenix and a four lane highway so the narrow Hwy 85 would not be overcrowded with trailers.

Comment Number: I00115-1

Commenter: Ralph Hudson

Comment Excerpt Text:

The 40 acre free-riding area proposed near Ajo town is a bad idea for some of the reasons mentioned above. The area may have been developed long ago but is an illegal use of government land and should not be legitimized. As proposed it would be the only free-riding OHV area on public lands in your jurisdiction. It will be advertised by your plan and by doing that, a seldom-used local riding area for our neighbors and youth may become a regulated and overused attraction for riders from away. It is close enough from Buckeye and Phoenix for groups to come with many quads, park some trucks and trailers, ride (we hope only inside the area), eat and drink at the site, and return home. Who picks up the trash? Who builds and monitors the perimeter fence, etc.? None of this has any benefit to us in Ajo. Please do not use this plan to drastically change our tiny town. Over time this riding area has

grown and it needs to be limited and controlled, not advertised. Please do not allow events in this area for the same reasons.

Comment Number: 100126-12

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

Of particular concern is an area planned for a de-facto 40 acre off-road vehicle “race track” located in the Ajo SRMA at T12S, R6W, Sec r. DRMP at 155, 168, 185, 380, 398, 448, 476, 486, etc. It is inappropriate for BLM to plan to sanction an illegally created “race track” in the Lower Sonoran. As you can see from the satellite image of this area, it follows a dry wash, crossing numerous times. Sanctioning this illegal use of public lands will not only harm the dry wash habitat, but will also encourage and reward illegal activities on public lands. This area is also located within Sonoran pronghorn range. DRMP at 448.

Simply calling the area “previously disturbed” in the DRMP (at page 380) does not adequately inform the public that this area has been illegally created and used, nor does it inform the public about the significant and permanent losses of natural resources that has occurred.

The area description is in UTM's on NAD7:

NW corner is at approximately: 0322501
3588074

The SW corner is at approximately: 0322408
3587636

The SE corner is at approximately: 0322819
3587696

GPS locations for photo #3 below is at approximately:
0322606
3587970

This race course is very large with steep banked turns and a hundred or more tires delineating curves.

Our specific concerns about this are as follows:

1. This area was illegally built on BLM property and that illegal act should not be rewarded by the government agency charged with enforcing laws designed to protect natural resources.
2. The authorization of this area will greatly encourage an influx of ORV users who are, clearly, not inclined to stay on designated roads or trails.
3. This illegal area has not been publicized outside of the Ajo area. The simple act of showing this area in the Draft RMP will give its existence wide distribution. At present, few people even in Ajo know of it.
4. There is no mention of developing a parking area for this area if it is sanctioned.
5. The area is in wide open desert with no natural barriers. Enforcement in this area will be nearly impossible and is not consistent with Best Management Practices for managing ORVs.

Comment Number: I00128-1

Commenter: Sally Banks

Comment Excerpt Text:

3. If you feel it necessary to develop an OHV/ATV area in the Ajo Block then consider land with easy access off a major highway, rather than routing traffic past and through residential areas. Again, as part of a TMP, such areas might be better identified by the people who actually live here

Comment Number: I00128-3

Commenter: Sally Banks

Comment Excerpt Text:

Since there is no TMP for the Ajo Block, to designate 50 acres for unrestricted ATV use is putting the cart well before the horse.

C. My Specific Comments

1. Nothing of this size or nature should be considered until a Travel Management Plan has been developed, with full public input.

Comment Number: I00128-5

Commenter: Sally Banks

Comment Excerpt Text:

2. Should you decide to proceed with this area, with or without a TMP, detailed plans for monitoring and enforcement should be in place before any development occurs.

Comment Number: I00149-2

Organization: Desert Protectors

Commenter: Fred Goodsell

Comment Excerpt Text:

We find the plan to establish a 40 acre area for unrestricted ATV recreation activities near Ajo to be totally unacceptable. If you do this you are rewarding illegal activity. The area you plan to open already has a race course with over 100 tires implanted on curves that have been enhanced with heavy equipment, drainage patterns disrupted and trash spread around. Including this in your plan will advertise a previously unknown and rarely used area to the world. It will allow commercial events that would bring in an uncontrollable number of participants and open the flat, unprotected desert of the area to more illegal destruction.

Comment Number: I00151-17

Organization: Arizona Off Highway Vehicle Coalition

Commenter: Jeff Gursh

Comment Excerpt Text:

Project Concept

Continued growth of OHV recreation has renewed the interest in the Buckeye Hills and Gila Bend area.

Adding non-motorized and OHV staging / camping areas in County Park to access a managed trail system on both BLM and County property would be a good start in addressing a Managed trail system for this growing area. See Buckeye Hills Map

Comment Number: 100151-2

Organization: Arizona Off Highway Vehicle Coalition

Commenter: Jeff Gursh

Comment Excerpt Text:

We would suggest at least two more open areas and would suggest making them at least 1000 acres in size and dividing them into 250 acre sections where only one section would be open at a time to give the other 3 a chance to regrow plants and harden the soils after use. These two areas could be on the edge of the SRMA you've thoughtfully placed along Agua Caliente Rd.

Summary

Commenters expressed their opinion that the BLM did not properly consider the impacts of establishing a 40-acre OHV play area in Ajo, and provided several reasons why managing this area for OHV open use is not appropriate, including 1) lack of a monitoring or travel management plan, 2) potential damage to cultural resources, 3) impacts to wildlife habitat, 4) enforcement problems, and 5) impacts to nearby residents from noise, dust, and traffic. Commenters further noted the BLM did not address parking for the open use area in the DRMP/DEIS and requested the BLM develop detailed plans for monitoring and enforcement for the area.

One commenter suggested that BLM consider two OHV open areas of 1,000 acres in size divided into 250 acre blocks so use could be rotated and portions could be closed to reclaim.

One commenter questioned the OHV area and route closure issue in the Painted Rock Mountain area and noted that he could not find where it was addressed in the plan.

One commenter asked about the nature of the closure around the Painted Rocks Campground.

Response

Per 43 CFR 8342.1, all BLM-administered land should be designated as open, closed, or limited to designated routes for motorized vehicles. BLM would include a monitoring plan as part of the Travel Management Plan, as required in BLM Manual 1626, that would be completed when the ROD is signed for the Lower Sonoran Field Office RMP. It is consistent with policy to consider designating some lands as open for motor vehicle use in one or more alternative. A detailed plan for the OHV area, including locations for parking, would be developed during activity planning after signing the ROD when BLM begins implementing the decisions.

As required by 40 CFR 1502.16, the DRMP/DEIS provided a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects which cannot be avoided should the proposal be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. Based on the comments received, BLM has re-evaluated the alternatives for the 40-acre

open use area and agrees that designation of this area as an “Open” area for motorized use would not be appropriate and has therefore deleted it from the proposed action. The area would have an allocation of “Limited” and routes would be limited to designated roads, primitive roads and trails, same as the surrounding area. However, the 40-acre area would still be proposed to be managed for the motocross experience and local partners would be obtained to assist in on-site management of the area.

The Painted Rocks Mountains closure was incorrectly identified on the travel maps as a “Closed” OHV area instead of a “Limited” OHV area limited to designated and/or signed open roads, and closed to camping. BLM also failed to note that the decisions were from a Federal Register Notice published January 28, 1999 (Volume 64, Number 18) Notices Page 4461) that was carried forward into all Action Alternatives, including the Preferred (Alternative E). Therefore, the Proposed RMP/Final EIS was revised, in Chapter 2 and also on the travel and recreation maps, to note this clarification, and has created new management actions in the recreation section of Chapter 2.

The Arlington area, where the commenter suggests two OHV open areas, is considered a scenic Sonoran Desert area, enough so that the Agua Caliente Road that traverses the area is being considered as a Back Country Byway. Due to the very dry conditions in the Sonoran Desert, it is not very resilient in recovering from intensive traffic. Prehistoric trails over 1,000 years old remain visible in many places, and tracks from vehicular use 70 years or more also remain clearly distinguishable. For example, tracks from Patton’s training in preparation for deployment in WWII are clearly visible in areas of southern Arizona and California. So, the idea of rotating use to allow recovery of vegetation and soils may require many generations to achieve. The area suggested is not within the PM₁₀ nonattainment area, however it is down-wind and the potential removal of vegetation and disturbance of the soil surface could result in air quality issues in the Phoenix area, such as the haboobs of 2011. The soils in the area suggested are higher in silt content than in many areas, which make them especially vulnerable to wind erosion when the surface is disturbed. There is also an important wildlife movement corridor between Saddle Mountain and the Gila Bend Mountains which BLM and AGFD want to maintain, that could be adversely affected by the vehicle traffic and the disturbance of vegetation.

The RMP was unclear regarding the Painted Rocks Mountains use restrictions. The recreation and travel management area maps have been revised to clarify that the closure in this area is to camping. Vehicle use inside this area is limited to signed open routes until such time route designations are completed in the Gila Bend Mountains travel management plan. The revised PRMP/FEIS has been updated to clarify this distinction.

6.2.25.4 Designations

Comment Number: 100001-10

Commenter: Jim Vaaler

Comment Excerpt Text:

There are a number of short dead ending routes south of the gas pipeline road and north of the SDNM. These dead end routes access user created shooting galleries and need to post as closed and then barricaded.

Comment Number: I00001-15

Commenter: Jim Vaaler

Comment Excerpt Text:

Also, there have been a number of routes designated in this wilderness characteristic area that appear to follow desert washes. Some of these routes are dead end routes and others are redundant in nature. There should be only on designated route between Face Mountain and Yellow Medicine Butte Wilderness characteristic areas.

Comment Number: I00051-1

Organization: Town of Gila Bend

Commenter: Colby Turner

Comment Excerpt Text:

In general, the designations create the following issues: Lack of Handicap/Elderly/Youth Accessibility, Cultural Insensitivity, Lack of Interconnectivity, and Needless Waste of Finite Resources (cutting off connection points to complete loops). Other points of concern were the closing of bladed roads that have been in place since the early 1900's and the term "trail redundancy" used to explain some closings of trails. On a map, these trails can appear redundant, however in the field they provide connectivity to local residents miles apart from other trails, make shorter loops possible on long expeditions, and provide accessibility to views not possible by other trails.

Comment Number: I00051-3

Organization: Town of Gila Bend

Commenter: Colby Turner

Comment Excerpt Text:

Finally, some of the apparent reasoning behind certain closings are scientifically inaccurate. The closing of washes during the summer because wildlife use these areas to escape the heat is only partially correct. During the summer, desert animals either estivate or become nocturnal. During estivation these animals sleep for long periods of time, away from naturally disturbed areas. Washes during the summer are naturally disturbed by our monsoons and spring rains. Which brings us to the nocturnal wildlife. These animals do indeed seek cooler areas (vegetation, washes, mountains) to rest during the day, but are active at night.

Comment Number: I00051-4

Organization: Town of Gila Bend

Commenter: Colby Turner

Comment Excerpt Text:

I have included the following trails by number, a brief notation to support keeping them open or adjusting their hours of closure.

8008H- "Accessibility" "Cultural Sensitivity" "Historic" Sand Tank Well

8008I, 8009E- "Interconnectivity" "Accessibility" Game Catchment

8013A, 8019A- "Local Resident Interconnectivity" "Accessibility"

8013, 8017, 8018, 8019- "Interconnectivity" "Accessibility" Local Residents Use These To Access Points Of Interest "Scientifically Inaccurate" Estivation, Nocturnal Wildlife, Multiple Wash Availability (worst case scenario could adjust summer closures to night time use only)

8016A- "Interconnectivity"

8016B- "Interconnectivity"

8016C- "Interconnectivity" "Cultural Sensitivity" "Historic" Farley's Pass

Comment Number: 100112-6

Organization: Arizona Department Of Transportation

Commenter: Justin White

Comment Excerpt Text:

ADOT has four existing material source sites (see attached map) within the Lower Sonoran Field Office, two of which are in the boundaries of the Sonoran Desert National Monument. Continued use of these sources, including their designated access routes from the interstate highway system, should remain valid. Access control may include coordination with ADOT's encroachment permit group at the individual District Office and regional FHWA Engineer.

Comment Number: 100117-15

Commenter: Douglas Thomas

Comment Excerpt Text:

That being said, there are other factors for BLM to consider in evaluating the ultimate impact, effectiveness, and necessity of such closures by limiting public access to these routes.

Travel in washes offers a unique recreational experience with opportunities to view wildlife and xeroriparian vegetation that does not occur within the upland valley and bajada areas dissected by these washes. Driving in washes is a practice that is used by some hunters, and other visitors, to gain access to locations where game species are more likely to occur.

Comment Number: 100117-16

Commenter: Douglas Thomas

Comment Excerpt Text:

Washes are a traditional travel route and have been used extensively throughout time, Motorized travel in washes should actually be encouraged in certain circumstances as evidence of travel in washes gets 'erased' after even a small flood event.

Floods are part of the natural environment and washes are in a constant state of change because of the nature of floods. Floods have a far greater impact on wash vegetation than the impact of vehicles traveling in a wash. Traveling in washes helps contain fugitive dust and particulate emissions.

The surface of wash beds is of gravely and rocky material that is resistant to erosion, so there are generally no measurable impacts to soils that occur from driving in wash beds. Vehicle activity in washes is not associated with high levels of particulate emissions as the gravel cover in wash beds reduces the airborne suspension of underlying fine silt and sand particles.

Comment Number: 100117-17

Commenter: Douglas Thomas

Comment Excerpt Text:

The preferred alternative “E” proposes seasonal closure (April 15-September 15) of certain primitive roads/routes in the SDNM. The proposed seasonal closures include the Bender Wash (Route 8018, a branch of the bender wash (Route 8019), the Sand Tank Pass Wash (8013) and the cross-cut “Farley’s Cabin Route” (8017) which connects to the west with Route 8013 & 8014.

It is recognized by this Citizen that “... Washes provide important habitat to wildlife as they function as wildlife corridors, provide den and ambush sites for carnivores, provide shade during hot periods, and provide habitat for a wide range of wildlife.” That being said, there are other factors for BLM to consider in evaluating the ultimate impact, effectiveness, and necessity of such closures by limiting public access to these routes:

(1) What indicators are there as to the volume of travel and corresponding impacts that occur on these routes during the summer months and are there alternatives to travel on these closed routes?

Comment Number: 100117-18

Commenter: Douglas Thomas

Comment Excerpt Text:

(2) What volume of travel constitutes a “disturbance” to wildlife habitat by travel through these washes during summer months and what solutions (besides closure) would minimize the level of disturbance on these routes?

Comment Number: 100117-20

Commenter: Douglas Thomas

Comment Excerpt Text:

The Sand Tank Mountains create a natural barrier to route proliferation in the area. The “Sand Tank Pass Route” (Route 8013) is the only route through the mountains to the southern area of the range. The Sand Tank Wash (8013), The Bender Wash (8018), and Farley Cabin Route cross-cut route (8017) all connect Monument lands and routes west of the Sand Tank Mountains with Monument lands and routes east of the Sand Tank mountains without the necessity of round-about travel on Interstate 8. Closing these routes during any season may contribute to route proliferation and would undoubtedly contribute increased particulate emissions and road surface degradation due to increased mileage and travel on Big Horn Road (8011-not a wash) and the “Nine Mile Wash” road (8008- not a wash) in order for visitors to access remote areas south of the Sand Tank Mountains. This lack of connectivity and accessibility will be further exacerbated if the proposed closures of “direct access” to Interstate 8 at ranch gates becomes reality.

Comment Number: 100117-22

Commenter: Douglas Thomas

Comment Excerpt Text:

According to the “preferred plan”, access to the SDNM will be restricted to the Nine Mile Wash Road (Butterfield), Freeman Road and Vekol Rd where existing freeway interchanges are available.

The elimination of direct access gates along both sides of Interstate 8 (in particular MM 124,127.7,133,2 & 136.4) will severely limit public access to the SDNM.

Comment Number: 100117-23

Commenter: Douglas Thomas

Comment Excerpt Text:

- Frequent requirements for Law Enforcement to utilize these direct access gates to interdict Illegal Alien and Drug Smugglers and for Search & Rescue.

Comment Number: 100117-24

Commenter: Douglas Thomas

Comment Excerpt Text:

- If the gates north of Interstate 8 at MM 124 and MM 127.7 are closed, there will be no way to access BLM land in this area.

Comment Number: 100117-25

Commenter: Douglas Thomas

Comment Excerpt Text:

- The proposed access route to the SDNM from the Nine Mile Wash Road where it intersects Route 8019A just happens to be at the confluence of the Sand Tank Wash, the Bender Wash, and all of their branches. Because of the amount of runoff this confluence experiences and the flat nature of the terrain, this area become impassable for days due to ponding in the Nine mile road.

Comment Number: 100117-26

Commenter: Douglas Thomas

Comment Excerpt Text:

- Closing off access to some of the most direct routes to recreational destinations on the SDNM may contribute to route proliferation and would undoubtedly contribute to increased particulate emissions and road surface degradation due to increased mileage and travel on Big Horn Road (8011-not a wash) and the "Nine Mile Wash" road (8008 mostly not a wash) in order for visitors to access remote areas south of the Sand Tank Mountains.

Comment Number: 100117-28

Commenter: Douglas Thomas

Comment Excerpt Text:

According to DRMP/EIS

"...Continuing ADOT's permits to mine and store gravel at two sites south of I-8 requires maintaining access from I-8 at two unimproved exits from the eastbound lane between the Butterfield Trail exit and the Freeman Road exit. Gates providing access to the sites would need to remain in place. Continued public use of these gates might constitute a safety hazard because they could require evasive action for highway travelers to avoid vehicles entering or exiting from the breakdown lane. The loss of public access to these gates would have a moderate effect on access to SDNM south of I-8. Public access has been allowed historically, and the gates could be locked at any time.

It is possible that BLM, as part of their permit for access to the gravel site, could induce ADOT to provide the improvements necessary at the 124 gate so that it would be safe for both ADOT and the public to continue to use

this gate. This would not address the loss of the other “direct access” gates, but would provide and an additional I-8 access to BLM lands west of the Sand Tank Mountains.

ADOT has seen fit to partner with BLM on “Project Daylight” along Interstate 8. Perhaps they would be willing to partner with BLM to find a solution to this access issue.

Comment Number: I00121-45

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

In an area just outside of the SDNM (along the gas pipeline road), there are a plethora of short roads that need to be posted as closed and then barricaded. It appears that some, if not all, of these roads are being used as access roads for user-created shooting galleries. The sights and sounds from these shooting areas impact the SDNM and also present a safety issue for other people who may be using that part of the Monument.

Comment Number: I00121-54

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

The Anza-Butterfield Interpretive Trail in the SDNM, as well as the section of it at the Oatman massacre site and Gila River Canyon, should be closed to all motorized entry. Some off-road vehicle users have demonstrated in the past a complete disregard for staying on the designated road way, which was why a special closure order was necessary to protect resources in the SDNM.

Comment Number: I00121-68

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

Short spur routes and routes located in desert washes need to be closed to vehicle use under all of the alternatives. Short spur routes most generally lead to user-created camp sites and/or user created shooting galleries, both of which represent undesirable land use allocations. Short spur routes may also be used as informal staging areas for off-road vehicle activities and, over time, these areas get expanded through inappropriate off-road vehicle activity.

Comment Number: I00123-7

Organization: Friends of the Sonoran Desert National Monument

Commenter: Thomas Hulen

Comment Excerpt Text:

The Friends of the Sonoran Desert does not wholly support any of the Bureau of Land Management’s alternatives. Alternative D offers the greatest potential protection to the Monument’s objects and other resources and alternative E the Bureau of Land Management’s preferred alternative does not recommend closing enough routes to adequately protect the Monument’s objects and resources. The Friends of the Sonoran Desert National Monument’s recommendations are as follows:

Northern Half of SDNM near North Maricopa Mountains Wilderness Area

Current Signed Roads Recommended to Remain Open

- 8000: Main BLM road that parallels the El Paso Natural Gasoline Road
- 8000U: Provides access to North Maricopa Mountain Wilderness Area
- 8001: Provide Access to Margies Cove West Trailhead
- 8001C: Provides access to North Maricopa Mountain Wilderness Area
- 8001E: Provide Access to Margies Cove West Trailhead
- 8002: Provide Access to Margies Cove East Trailhead
- 8002A: Provide Access to Margies Cove East Trailhead
- 8003: Juan de Anza National Historic Trail-Butterfield Trail
- 8004: Provide Access to Margies Cove West Trailhead and 8003
- 8004A: Provide Access to Margies Cove West Trailhead

Current Signed Roads Recommended to be Closed

- 8000A: Illegal dumping and irresponsible target shooting.
- 8000C: Illegal dumping and irresponsible target shooting.
- 8000D: Illegal dumping and irresponsible target shooting.
- 8000E: Illegal dumping and irresponsible target shooting.
- 8000F: Illegal dumping and irresponsible target shooting.
- 8000G: Illegal dumping and irresponsible target shooting.
- 8000L: Illegal dumping and irresponsible target shooting.
- 8001A: Into proposed wilderness area.
- 8001B: Into proposed wilderness area.
- 8001D: Into proposed wilderness area.
- 8002B: Unnecessary road.
- 8002C: Into proposed wilderness area.
- 8003C: Unnecessary road
- 8004D: Unnecessary road
- 8004G: Unnecessary road
- 8005: Section of Anza Trail badly damaged by OHV use.
- 8005A: Unnecessary access to damaged section of Anza Trail. This section of Anza Trail will be closed to motorized vehicles.
- 8005D: Unnecessary access to damaged section of Anza Trail. This section of Anza Trail will be closed to motorized vehicles.
- 8006H: Into proposed wilderness area.
- 8006I: Into proposed wilderness area.
- 8039C: Into proposed wilderness area.
- 8039D: Into proposed wilderness area.

Comment Number: I00123-8

Organization: Friends of the Sonoran Desert National Monument

Commenter: Thomas Hulén

Comment Excerpt Text:

Area of SDNM between Interstate 8 and State Highway 238 near South Maricopa Mountain Wilderness Area

Current Signed Roads Recommended to Remain Open

- 8029: Provides access to South Maricopa Mountain Wilderness and AZ Game and Fish Wildlife Water. Administrative cherry stemmed road.

8030: Provides access to South Maricopa Mountain Wilderness and AZ Game and Fish Wildlife Water Administrative cherry stemmed road.

8030A: Provides access to South Maricopa Mountain Wilderness and AZ Game and Fish Wildlife Water Administrative cherry stemmed road.

8032: Main road west of South Maricopa Wilderness

8034: Provides access to Gila Bend

8035:

8036: Provides access to Gila Bend

8037: Provides access to northern and eastern portions of the South Maricopa Mountain Wilderness Area

8037A: Provides access to northern and eastern portions of the South Maricopa Mountain Wilderness Area

8037Q: Provides access to eastern portions of the South Maricopa Mountain Wilderness Area

8038: Provides access from Highway 238 to South Maricopa Mountain Wilderness Area

8038A: Provides access from Highway 238 to South Maricopa Mountain Wilderness Area

8038B: Provides access from Highway 238 to South Maricopa Mountain Wilderness Area

8038C: Provides access from Highway 238 to South Maricopa Mountain Wilderness Area

8039: Access along the rail road

Current Signed Roads Recommended to be Closed

8031: Into proposed wilderness area.

8033: Redundant road

8033A: Redundant road

8033B: Redundant road

8034A: Redundant road

8034E: Redundant road

8035A: Redundant road

8037: At railroad crossing. Dangerous!

8037B: Redundant road

8037C: Redundant road

Comment Number: I00123-9

Organization: Friends of the Sonoran Desert National Monument

Commenter: Thomas Hulen

Comment Excerpt Text:

Area South of Interstate 8

Current Signed Roads Recommended to Remain Open

8007: Vekol Road

8007C: Provides access to White Hills

8008: Provides access from Vekol Road to Sand tank Mtns.

8008J: Part of scenic loop

8009: Provide access to Javelina and Sand Tanks Mtns.

8009B: Freeman Road provides access to 8009: Freeman Road

8010: Provides access between Vekol and Freeman Roads

8011: Provides access to Sand tank Mtns.

8012: Getz Well Road provides access to Sand tank Mtns.

- 8013: Seasonal closure
- 8014: Provides access to road 8018
- 8015: Provides access to Javelina Mtns.
- 8016D: Part of scenic loop
- 8017: Seasonal closure
- 8018: Seasonal closure
- 8018C: Provides access to roads 8018 and 8013 from Gila Bend (A favorite route for locals.)
- 8019: Seasonal closure
- 8020: Provides loop between 8011 and 8012; leads to wildlife water
- 8022: Smith Road
- 8022A: Provides access to Table Top Wilderness Area
- 8022B: Provides access to Table Top Wilderness Area
- 8022C: Provides access to Table Top Wilderness Area
- 8022D: Provides access to southeast corner of the SDNM
- 8023: Provides access to eastern edge of SDNM
- 8023C: Provides access to eastern edge of SDNM
- 8023D: Provides access to eastern edge of SDNM
- 8023M: Provides access to eastern edge of SDNM
- 8023N: Provides access to eastern edge of SDNM
- 8024: Provides access to Lava Flow South Trailhead and Table Top Trailhead
- 8024A: Provides access to Lava Flow South Trailhead and Table Top Trailhead
- 8025: Provides access to southeast corner of the SDNM
- 8026: Provides access to Sand Tank Mtns.
- 8026A: Provides access to Sand Tank Mtns.
- 8026B: Provides access to Sand tank Mtns.
- 8026C: Provides access to Sand Tank Mtns.
- 8027: Provides access to Sand Tank Mtns.
- 8042: Access to Lava Flow North Trailhead
- 8042A: Provides access to Antelope Peak
- 8042B: Provides access to Antelope Peak
- 8044: Access to Lava Flow North Trailhead
- 8045: Access to Lava Flow North Trailhead
- 8046: Access to Lava Flow West Trailhead

Current Signed Roads Recommended to be Closed

- 8007B: Unnecessary-redundant
- 8007D: Unnecessary-redundant
- 8007E: Unnecessary-redundant
- 8007K: Unnecessary-redundant
- 8007F: Unnecessary-redundant
- 8008B: Unnecessary-redundant
- 8008H: Unnecessary-redundant
- 8009C: Unnecessary-redundant
- 8009D: Unnecessary-redundant
- 8009E: Unnecessary-redundant
- 8009F: Unnecessary-redundant

8011A: Unnecessary-redundant
8014: Unnecessary-redundant
8015A: Unnecessary-redundant
8016: Unnecessary-redundant
8018D: Unnecessary-redundant
8023B: Unnecessary-redundant
8023G: Unnecessary-redundant
8023J: Unnecessary-redundant
8023K: Unnecessary-redundant
8025A: Unnecessary-redundant
8027A: Unnecessary-redundant
8042B: Unnecessary-redundant
8042C: Unnecessary-redundant
8043: Unnecessary-redundant
8043A: Unnecessary-redundant

Comment Number: 100126-14

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

I. Northern Half of SDNM near North Maricopa Mountains Wilderness Area

Routes Recommended to Remain Open

8000: Main BLM road that parallels the El Paso Natural Gasline Road
8001: Provide Access to Margies Cove West Trailhead
8001C: Provides access to North Maricopa Mountain Wilderness Area
8001E: Provide Access to Margies Cove West Trailhead
8002: Provide Access to Margies Cove East Trailhead
8002A: Provide Access to Margies Cove East Trailhead
8003: Juan de Anza National Historic Trail-Butterfield Trail; recommend non-motorized as proposed in Alternative D.
8004: Provide Access to Margies Cove West Trailhead and 8003
8004A: Provide Access to Margies Cove West Trailhead

Routes Recommended to be Closed

8000A: Illegal dumping and irresponsible target shooting.
8000C: Illegal dumping and irresponsible target shooting.
8000D: Illegal dumping and irresponsible target shooting.
8000E: Illegal dumping and irresponsible target shooting.
8000F: Illegal dumping and irresponsible target shooting.
8000G: Illegal dumping and irresponsible target shooting.
8000L: Illegal dumping and irresponsible target shooting.
8000U: Unnecessary route.
8001A: Into proposed wilderness area.
8001B: Into proposed wilderness area.
8001D: Into proposed wilderness area.

8002B: Unnecessary road.
8002C: Into proposed wilderness area.
8003C: Unnecessary road
8004D: Unnecessary road
8004G: Unnecessary road
8005: Section of Anza Trail badly damaged by OHV use.
8005A: Unnecessary access to damaged section of Anza Trail. This section of Anza Trail will be closed to motorized vehicles.
8005D: Unnecessary access to damaged section of Anza Trail. This section of Anza Trail will be closed to motorized vehicles.
8006H: Into proposed wilderness area.
8006I: Into proposed wilderness area.
8039C: Into proposed wilderness area.
8039D: Into proposed wilderness area.

Comment Number: I00126-32

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

As stated in the Draft RMP, the Anza, Butterfield, and Mormon Battalion NHTs are all named Monument objects. The BLM's transportation planning should prioritize protection of Monument objects. Proclamation 7397 obligates the BLM to develop a transportation plan "that addresses the actions, including road closures or travel restrictions, necessary to protect the objects identified in the proclamation." BLM has already demonstrated that damage to Monument objects has occurred and is likely to continue in the future within the temporary closure in place. Thus, the Draft RMP should not propose opening the routes in the area to motorized use.

In addition, in order for BLM to open up routes that are currently temporarily closed, the agency must make a showing that "the adverse effects are eliminated and measures implemented to prevent recurrence." 43 C.F.R. § 8341.2(a). The Draft RMP does not demonstrate that BLM has eliminated the adverse effects (i.e. abuse from ORVs) that caused damage and does not propose measures to prevent the recurrence of the damage.

Comment Number: I00126-66

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

2. Area of SDNM between Interstate 8 and State Highway 238 near South Maricopa Mountain Wilderness Area

Routes Recommended to Remain Open

8029: Recommend administrative use only for access to AZ Game and Fish Wildlife Water
8030: Recommend administrative use only for access to AZ Game and Fish Wildlife Water
8030A: Recommend administrative use only for access to AZ Game and Fish Wildlife Water
8032: Main road west of South Maricopa Wilderness
8034: Provides access to Gila Bend
8036: Provides access to Gila Bend
8037: Provides access to northern and eastern portions of the South Maricopa Mountain Wilderness Area. Recommend following the same route as proposed in Alternative D.

8037A: Provides access to northern and eastern portions of the South Maricopa Mountain Wilderness Area

8037Q: Provides access to eastern portions of the South Maricopa Mountain Wilderness Area

8038: Provides access from Highway 238 to South Maricopa Mountain Wilderness Area

8038A: Provides access from Highway 238 to South Maricopa Mountain Wilderness Area

8038B: Provides access from Highway 238 to South Maricopa Mountain Wilderness Area

8038C: Provides access from Highway 238 to South Maricopa Mountain Wilderness Area

8039: Access along the rail road

Routes Recommended to be Closed

8031: Into proposed wilderness area.

8033: Redundant road

8033A: Redundant road

8033B: Redundant road

8034A: Redundant road

8034E: Redundant road

8035: Unnecessary route.

8035A: Redundant road

8037: Close at rail road crossing. Dangerous!

8037B: Redundant road

8037C: Redundant road

Comment Number: 100126-67

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

3. Area South of Interstate 8

Routes Recommended to Remain Open

8007: Vekol Road. Recommend following proposed route in Alternative D.

8007C: Provides access to White Hills

8008: Provides access from Vekol Road to Sand tank Mtns. Recommend following proposed route in Alternative D.

8008J: Part of scenic loop

8009: Provide access to Javelina and Sand Tanks Mtns.

8009B: Freeman Road provides access to 8009: Freeman Road

8010: Provides access between Vekol and Freeman Roads

8011: Provides access to Sand tank Mtns.

8012: Getz Well Road provides access to Sand tank Mtns.

8014: Provides access to road 8018

8016D: Part of scenic loop

8018C: Provides access to roads 8018 and 8013 from Gila Bend (A favorite route for locals.)

8019: Seasonal closure

8020: Provides loop between 8011 and

8012; leads to wildlife water

8022: Smith Road

8022A: Provides access to Table Top Wilderness Area
8022B: Provides access to Table Top Wilderness Area
8022C: Provides access to Table Top Wilderness Area
8022D: Provides access to southeast corner of the SDNM
8023: Provides access to eastern edge of SDNM
8023C: Provides access to eastern edge of SDNM
8023D: Provides access to eastern edge of SDNM
8023M: Provides access to eastern edge of SDNM
8023N: Provides access to eastern edge of SDNM
8024: Provides access to Lava Flow South Trailhead and Table Top Trailhead
8024A: Provides access to Lava Flow South Trailhead and Table Top Trailhead
8025: Provides access to southeast corner of the SDNM
8026: Provides access to Sand Tank Mtns.
8026A: Provides access to Sand Tank Mtns.
8026B: Provides access to Sand tank Mtns.
8026C: Provides access to Sand Tank Mtns.
8027: Provides access to Sand Tank Mtns.
8042: Access to Lava Flow North Trailhead
8042A: Provides access to Antelope Peak
8042B: Provides access to Antelope Peak
8044: Access to Lava Flow North Trailhead
8045: Access to Lava Flow North Trailhead
8046: Access to Lava Flow West Trailhead

Routes Recommended to be Close

8007B: Unnecessary-redundant
8007D: Unnecessary-redundant
8007E: Unnecessary-redundant
8007K: Unnecessary-redundant
8007F: Unnecessary-redundant
8008B: Unnecessary-redundant
8008D: Unnecessary-redundant
8008F: Unnecessary-redundant
8008G: Unnecessary-redundant
8008K: Unnecessary-redundant
8008H: Unnecessary-redundant
8009C: Unnecessary-redundant
8009D: Unnecessary-redundant
8009E: Unnecessary-redundant
8009F: Unnecessary-redundant
8011A: Unnecessary-redundant
8013: Unnecessary-redundant
8014: Unnecessary-redundant
8015: Unnecessary-redundant
8015A: Unnecessary-redundant
8016: Unnecessary-redundant

8017: Seasonal closure
8018: Seasonal closure
8018D: Unnecessary-redundant
8023B: Unnecessary-redundant
8023G: Unnecessary-redundant
8023J: Unnecessary-redundant
8023K: Unnecessary-redundant
8025A: Unnecessary-redundant
8027A: Unnecessary-redundant
8042B: Unnecessary-redundant
8042C: Unnecessary-redundant
8043: Unnecessary-redundant
8043A: Unnecessary-redundant

Comment Number: I00129-19

Organization: Center for Desert Archeology

Commenter: Andy Laurenzi

Comment Excerpt Text:

Based on existing information in AZSITE, we enclose three maps of areas in Areas 11 and 18 that depict prehistoric habitation sites and/or petroglyph occurrences. These are sites that are highly prone to casual surface artifact collecting and vandalism, including looting. We recommend specific route/road closures to public use as shown on the attached maps. Given the well documented information on motorized access and site impacts for these types of sites and the lack of any documentation on these sites in the plan, it is unclear how these Monument objects are adequately protected by continuing to designate these routes as open to public use. Proclamation language specifically references the Vekol Valley as “an important prehistoric travel corridor” and that “Signs of large villages and permanent habitations sites occur throughout the area, and particularly along the bajadas of Table Top Mountains”. These sites are representative examples of this Proclamation language.

An additional consideration is that two of the three routes “dead end” at the southern Monument boundary which inadvertently facilitates trespass onto the Tohono O’odham Nation and Barry Goldwater Bombing Range. Given reported concerns regarding use of this area by drug and human smugglers, we would support allowing these routes/roads to remain open for administrative use.

Comment Number: I00142-5

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

The preferred alternative identifies 32.7 miles of primitive roads on the SDNM to be seasonally closed from April 1 to September 15. The routes are all located in the southwest corner of the SDNM. Through these closures the public loses vehicular access to a substantial portion of the SDNM for 5.5 months of the year. September 1 to 15 is the early dove season and the seasonal closures eliminate a substantial portion of the SDNM from dove hunting. The closures will also impact archery hunts. The Department recommends reevaluating the seasonal closures and leaving at least one route open year round to provide year round public access to the southwest corner of the SDNM. We also recommend changing the end date to August 31 to accommodate the dove hunt.

Comment Number: I00142-9

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

There are three routes designated closed on the Alternative E Route Designation Map that the Department recommends be designated open. The routes are circled on the included map. The first route is on the Northwest side of the SDNM. It provides the only access to the north side of Margies Peak area.

The second route is an extension of the Anza trail. This route provides the only access to a large area of the SDNM.

The third route is in the southeastern section of the SDNM. One of the circled routes should be designated open to provide access to the north side of the South Maricopa Mountains Wilderness

Comment Number: I00151-10

Organization: Arizona Off Highway Vehicle Coalition

Commenter: Jeff Gursh

Comment Excerpt Text:

Regarding ATV width trails:

While some OHV enthusiasts would advocate specifically for ATV trails, the difficulty in maintaining a 50" trail in desert environments makes them difficult to keep to 50". UTV/ROVs and jeeps blur the line between jeep roads and ATV width trails. A simple distinction between one track and two track trails is sufficient. If you develop new primitive roads, make them wide enough for 4wd, which would include ATVs, UTVs and motorcycles, too.

Summary

Commenters recommended specific routes in the SDNM be designated as open or closed to motorized vehicle use and provided rationale or documentation to support their position. For example, some commenters recommended that: 1) BLM close short dead end routes south of the gas pipeline, 2) BLM maintain route connectivity, and 3) specific routes were redundant and should be opened and/or closed.

Some commenters recommended closing desert washes to protect sensitive resources, while other commenters recommended desert washes remain open since they: 1) provide access to particular areas, 2) provide a unique recreation experience, and 3) have been used as traditional travel routes. Some commenters questioned if the rationale used for closing desert washes in summer to protect wildlife was scientifically accurate, or 4) commenters asked what volume of travel constitutes wildlife disturbance in washes.

Commenters expressed their opinion that seasonal closures of routes in the SDNM would: 1) limit public access to the Monument during the closure periods, 2) result in route proliferation, and 3) limit access during hunting and archery seasons. Commenters suggested keeping one route in the southwest corner open year round and changing the end date of the closure from September 15 to August 31.

Commenters expressed concerns regarding closing direct access to/from I-8 and restricting travel in the SDNM to those roads accessible from existing freeway interchanges. Commenters indicated this would: 1) reduce public access and connectivity, 2) hinder use by law enforcement related for apprehension and

search and rescue efforts, and 3) result in route proliferation and contribute to particulate emissions and surface degradation. Commenters requested coordinating with ADOT regarding maintaining access to two material source sites, and another commenter suggested improving one of the gates used by ADOT to maintain public access. Commenters noted that one of the access routes to the SDNM could be impassable due its location in an area where several washes converge.

One commenter notes that 50 inch wide trails for ATVs would be hard to maintain in the desert.

Response

The Proclamation's management mandates create an exception to the BLM's general management mandate as set forth in FLPMA. See BLM Instruction Memorandum, No. 2009-115. The Proclamation mandates the protection of the historic, cultural, natural, and scientific objects within the Monument as the highest priority. The BLM's range of alternatives are designed to provide actions that would manage the Monument in accordance with the provisions of the Proclamation and other authorities, such as FLPMA, the National Historic Preservation Act, Endangered Species Act, and the Minerals Leasing Act, where applicable.

The BLM developed the management goals, objectives, and actions under each action alternative with the purpose of protecting Monument objects (see **Section 1.1** for the purpose and intent of the SDNM RMP). The alternatives represent an effort to identify an optimum course of action to protect the Monument objects while allowing for compatible public uses as described in the Proclamation (see **Appendix A**, Sonoran Desert National Monument Presidential Proclamation). For example, the range of alternatives includes those where some washes would be open to motorized vehicles and another where all washes would be closed.

Per the BLM Land Use Planning Handbook H-1601-1 and BLM's Travel and Transportation Manual 1626and IM-2008-014), specific route designations (open, limited or closed) are implementation decisions rather than planning level-decisions made in an RMP. As the scope of the SDNM RMP includes making both planning-level (area designations for open, limited or closed to OHV use) and implementation-level (specific route designations) decisions, the BLM has considered all the comments regarding open and closed routes, and has reviewed the SDNM route network in light of those comments. The route network in the Proposed RMP reflects changes as a result of this review.

Where significant natural barriers to limit vehicle width are not present, it would be difficult to maintain a 50-inch width. Your comment is noted for guidance in preparing future route designations and travel management plans in the LSFO.

6.2.25.5 Edits

Comment Number: I00072-2

Commenter: Barry Krayner

Comment Excerpt Text:

There is an administrative action that should be a management action. It refers to how authorized actions would have to replace access routes. It can be found in the travel management section.

Comment Number: I00110-9

Commenter: Tyler Kokjohn

Comment Excerpt Text:

Route designation is a key process and is not adequately described in the draft.

Comment Number: I00121-39

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

As we noted clearly in our scoping comments, it is critical that the RMP include a legal definition of “road.” The transportation plan in the DRMP/DEIS should be revised to include a legal definition of a road and must prioritize protection of Monument objects. To do this, BLM must clearly define what is on-road travel and what is off-road travel as cross-country travel is prohibited in the Monument.

Comment Number: I00126-4

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

For the purpose of protecting the Monument objects, Proclamation 7397 requires “all motorized and mechanized vehicle use off road will be prohibited, except for emergency or authorized administrative purposes.” In the Draft RMP, BLM interprets this to mean that only “cross-country travel,” or travel off of designated routes, is prohibited. DRMP at 339. While we agree that cross-country travel is prohibited in the Monument, BLM has not distinguished what use constitutes “on road” versus “off road” for the purpose of designating routes.

Comment Number: I00126-53

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

The definition of “road” in the RMP violates both applicable law and agency guidance. The BLM must use a legal definition of a road.

Comment Number: I00151-12

Organization: Arizona Off Highway Vehicle Coalition

Commenter: Jeff Gursh

Comment Excerpt Text:

2) There is an administrative action that should be a management action. It refers to how authorized actions would have to replace access routes. It can be found in the travel management section. Though a “housekeeping” issue, it is important to note.

Comment Number: LSFO-SDNM-DRMP--I-18763-2

Commenter: James Newman

Commenter: Regina Newman

Commenter 3: James Newman

Commenter 4: Christopher Tosh

Commenter 5: Carolyn Newman

Comment Excerpt Text:

Vague statement with no specifics

Comment Number: 2

Cited Content: Emerging recreational activities, some based on recent technologies, has yielded new recreational equipment and increased use of public lands.

Cited Section ID: Executive Summary

Comment Title: Vague statement with no specifics

Issue: 10756

Comment:

This statement is unsupported by any facts or research and should not be considered in any decision unless supporting documentation is added

Summary

Commenters requested several editorial revisions, including: 1) changing an administrative action to a management action (i.e., authorized actions would have to replace access routes), 2) providing a clear definition of a “road,” and 3) clarifying the difference between “on-road” and “off-road” for the purpose of route designation.

One commenter also indicated that route designation is a key process and is not adequately described in the draft.

Response

The BLM has revised the PRMP/FEIS for edits presented by the commenters. The route designation process is described in **Appendix S**, Route Evaluation Methodology and Impact Analysis, and has been revised for clarity.

1) The administrative action referred to by commenters has been changed to a management action, and BLM has clarified the statement to ensure that during project planning, BLM would take the designated Travel Management System into consideration whenever there is a project that may affect the system (see TM-5.1.6 in **Table 2-37**).

2) The glossary (**Chapter 7** of the PRMP/FEIS) provides the definition for “road” as found in BLM Manual 1626.

3) The glossary has been updated to include a definition for off-road and on-road; “Off-road” means cross country travel between designated routes. “On-road” means travelling on designated routes.

6.2.25.6 Management Actions

Comment Number: 100121-49

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

All motorized, non-motorized, and mechanical vehicles, including wheeled game carriers, should be prohibited in wilderness characteristic areas and these areas designated as closed to off-road vehicle use. When removing game from wilderness characteristic areas, the minimum tool rule should be enforced. Vehicle routes within wilderness characteristic areas must be designated as closed, and this must be reflected in subsequent travel management plans.

Comment Number: 100142-6

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

In Section 2.8.5.2, Goal 6 allows vehicles to pull off designated routes a distance of 25 feet from the centerline for purposes of camping. The Department believes this is not a safe distance and recommends allowing vehicles to pull off 100 feet from the centerline. The Department requests BLM reevaluate the restriction. Utilizing a 100 ft. restriction would also provide consistency between other RMP decisions throughout the state, such as those made for the Agua Fria National Monument related to Recreation Management Zones.

Comment Number: 100151-11

Organization: Arizona Off Highway Vehicle Coalition

Commenter: Jeff Gursh

Comment Excerpt Text:

Facilities to support the trail system:

Facilities don't appear to be proposed in this TMP. Although these facilities could be completed as part of a recreation activity plan, we suggest that you identify, programmatically at least, that new information kiosks and parking areas could be developed as needed to address, but not limited to, safety, legal compliance, visitor satisfaction. Consider providing a map in the TMP of likely places where such things might be placed.

Comment Number: 100151-14

Organization: Arizona Off Highway Vehicle Coalition

Commenter: Jeff Gursh

Comment Excerpt Text:

What was the criteria for proposing routes that cross private land?: Are there plans to secure all routes that cross private land, or simply wait for them to be closed, one by one? We would suggest acquiring the main route as an easement or simply acquiring the land if your plan allows. If access or easement cannot be acquired, consider rerouting these connectors on BLM lands similar to proposed relocated routes in the BLM Table Mesa OHV plans.

Game and Fish have worked well with AZOHVC and the Hassayampa FO on this issue at Table Mesa OHV area.

Comment Number: 100151-4

Organization: Arizona Off Highway Vehicle Coalition

Commenter: Jeff Gursh

Comment Excerpt Text:

Regarding the provision in the SDNM that would ban all vehicles with an OHV decal. This is overly restrictive and short sighted. Any street legal, licensed vehicle with a licensed driver should be allowed to access the SDNM. You assume that future changes to the OHV decal laws will not add full size vehicles needing the OHV decal or that as proposed this year (2012) that full size OHV vehicles (over 1800 lbs) can purchase the OHV decal and contribute to the OHV fund to help improve OHV recreation.

Similar protected areas such as the Cabeza Prieta National Wildlife Refuge and the Mojave National Preserve allow licensed vehicles used by licensed drivers.

Comment Number: 100166-34

Commenter: Steve Saway

Comment Excerpt Text:

Comment: Recommend that the wording of management action TM-6.1.1 be the same as management action TM-1.3.7, i.e., change the restriction from 25 feet to 100 feet from the road centerline. Rationale is as follows. From a user perspective, it is very difficult if not impossible to pick a campsite that is only 25 feet or less from the road centerline. One can view existing campsites in the SDNM and see that people who camp there want a buffer from the road to provide some measure of privacy and to avoid vehicle noise and dust. If a management action is too restrictive, it will not encourage compliance. The restriction of 100 feet from the road centerline would be more consistent throughout the Lower Sonoran and SDNM decision areas and easier to administer. Ideally, BLM should designate suitable campsites using existing sites so that new areas do not need to be disturbed

Comment Number: LSFO-SDNM-DRMP--I-18763-5

Commenter: James Newman

Commenter: Regina Newman

Commenter 3: James Newman

Commenter 4: Christopher Tosh

Commenter 5: Carolyn Newman

Comment Excerpt Text:

Prohibited use of Motorized Vehicle while hunting

Comment Number: 5

Cited Content: Hunters may not use motorized vehicles of any type to retrieve injured or killed animals, including hunters with Challenged Hunter Access/Mobility Permits. Outside of wilderness areas, the use of wheeled game carts is allowed and recommended.

Cited Section ID: H.2.4 Recreation

Comment Title: Prohibited use of Motorized Vehicle while hunting

Issue: 10756

Comment:

This restriction is discriminatory in its authority. It prohibits the disabled/challenged from effectively hunting in these areas by themselves due to the inability to access the area to retrieve their animal.

Summary

Commenters recommended several revisions and additions to travel management actions to protect resources, support multiple use management, and provide appropriate access. Recommended revisions included: 1) increasing pull-off distance along designated routes, 2) identifying locations of new travel management facilities (e.g., kiosks along routes) 3) acquiring easements across private lands, 4) banning vehicles with an OHV decal in the SDNM, 5) management of OHV closures that does not put disabled hunters at a disadvantage, and 6) closing all areas with wilderness characteristics to motorized, non-motorized, and mechanical vehicles.

Response

1) The pull-off distance was established based on BLM policy in AZ IM 2005-007, which directed that “In National Monuments, National Conservation Areas and along National Trails, motorized use shall keep within the designated route with reasonable use of the shoulder and immediate roadside, allowing for vehicle passage, emergency stopping, or parking unless otherwise posted.” The management action prescribing a 25-foot distance was removed from Chapter 2 of the PRMP/FEIS and replaced with the language directly from the policy (see Management Action TM-6.1.1 in **Table 2-37**).

2-4) These are all components of travel management planning, which has been included as part of the SDNM Travel Management Plan and included in the SDNM PRMP/FEIS. These components would be considered during the travel management planning for the Lower Sonoran Travel Management Plan, which would be developed following the Approved RMP/Record of Decision as a part of the RMP implementation phase (see BLM Land Use Planning Handbook, Section IV. Implementation, for a description of the follow-on implementation phase of the planning process).

5) The range of alternatives presented for the SDNM travel management plan allow for reasonable access; criteria have been added to the alternatives in **Chapter 2** as well as in the SDNM Travel Management Plan. Additionally, BLM regulations at 43 CFR 8340.0-5(a) exclude emergency and military vehicles from the definition of an off-road vehicle therefore they are not subject to the travel management regulations.

6) Allocation and management actions for lands managed to protect wilderness characteristics are described in the RMP/EIS in **Section 2.10.10** and are consistent with WO IM 2011-154, Requirement to Conduct and Maintain Inventory Information for Wilderness Characteristics and to Consider Lands with Wilderness Characteristics in Land Use Plans and BLM Manual 1626 (Travel Management). The range of alternatives includes closing motorized use within lands managed to protect wilderness characteristics. Additionally, BLM has included alternatives with requirements for licensed drivers/vehicles and prohibitions on OHV plated and decal vehicles. The requirement for licensed and “street legal” vehicles within the SDNM is common to all alternatives (see Management Action TM-3.2.3 in **Table 2-37**).

6.2.25.7 Out of Scope

Comment Number: I00001-13

Commenter: Jim Vaaler

Comment Excerpt Text:

You should close the road between the Sierra Estrella Wilderness Area and Seven Mile Mountain and make Seven mile Mountain a part of the Sierra Estrella Wilderness.

Comment Number: I00072-1

Commenter: Barry Krayer

Comment Excerpt Text:

A road in Dendora Valley is missing from the route inventory. It connects from Oatman Mtn repeaters road to Saddle Road (parallel to RR tracks on south side). It appears on 100k topo maps as well as 24k maps. It's easiest to find from the north end. This road is important because it is completely on BLM land and goes around the big farm in Dendora Valley. It makes hunting and camping in this area feasible.

Comment Number: I00111-3

Organization: National Park Service

Commenter: Lee Baiza

Comment Excerpt Text:

The Armenta Road (aka: 59.4 Road) on OPCNM for example, currently serves as an important access road for NPS and Custom and Border Protection's (CBP) along a narrow travel corridor through designated wilderness. Since the escalation of border issues throughout the region this road has deteriorated greatly, experiencing severe entrenchment. Armenta Road was originally a two-track across the desert to access ranching infrastructure, and was never engineered to sustain the current levels of traffic. The ability to rebuild the road on the Monument is limited by the wilderness boundary and soils unsuitable for road construction. Furthermore the condition of Armenta Road is impacting hydrological processes; having adverse impacts on the soils and vegetation. The next nearest available area to construct an access road is on the Ajo Block and if such a road were to be constructed, it could be properly engineered to mitigate impacts to natural and cultural resources.

Consequently, there is a need for all agencies to consider the potential benefits of road construction on the Ajo Block to facilitate improved access and reduce CBP response time to BLM lands, the western portions of Organ Pipe Cactus National Monument (OPCNM), and the eastern areas of Cabeza Prieta National Wildlife Refuge. Such a road could greatly enhance CBP effectiveness at interdicting illegal traffic which in turn would have numerous benefits to national security, threatened and endangered species, and wilderness.

Comment Number: I00121-46

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

In the Lower Sonoran area within the Face Mountain area of wilderness characteristics, there appear to be a number of inventoried routes that appear to exclusively follow washes. Inventoried route 8230 should remain. All other inventoried routes within the Face Mountain wilderness characteristic area need to be declassified as routes as they are nothing more than desert washes. It is our understanding that a number of these route designations

were done by volunteers who had no BLM supervision and possibly had a predisposition to designate as many routes as possible.

Comment Number: 100121-47

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

In the Lower Sonoran area within the Yellow Medicine Butte wilderness characteristic area, inventoried route 8221A needs to be declassified as a route as is nothing more than a dry wash. Also, that portion of inventoried route 8221 that is a dry wash needs to be declassified as an inventoried route. It is our understanding that these two route designations were done by volunteers who had no BLM supervision and possibly had a predisposition to designate routes in dry washes.

Comment Number: 100121-48

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

The route that exists between the Sierra Estrella Wilderness Area and Seven Mile Mountain is redundant in nature and needs to be closed to all motorized use. An alternate route exists just to the west of Seven Mile Mountain that follows the power line corridor.

Comment Number: 100151-1

Organization: Arizona Off Highway Vehicle Coalition

Commenter: Jeff Gursh

Comment Excerpt Text:

There is an important road in Dendora Valley missing from the route inventory. It connects from Oatman Mtn repeaters road to Poco Dinero (parallel to RR tracks on south side). It appears on 100k topo maps as well as 24k maps. It's easiest to find from the north end. This road is important to OHV and recreation in general because it is completely on BLM land and goes around the big farm in Dendora Valley. It makes hunting and camping in this area feasible. It's been a few years since I've been there. Since all recreation gets to their uses by motorized vehicle, whether motorized or nonmotorized, these type of roads and connections are very important access routes.

Comment Number: 100151-9

Organization: Arizona Off Highway Vehicle Coalition

Commenter: Jeff Gursh

Comment Excerpt Text:

Please make a specially designated route that connects to Phoenix BLM. The Hassayampa BLM identified such routes in the Table Mesa area on a special map. WE have the same concerns on this RMP Please consider long distance access OHV routes between field offices. We worked to get long distance travel goals put into the Hassayampa BLM RMP and would like to see a recognition of long distance connectors such as these. You don't have to improve the road condition, just protect it from closure by things such as solar/wind/geothermal farms, wilderness proposals and large scale mines.

Comment Number: I00159-11

Commenter: Roy Pierpoint

Comment Excerpt Text:

Alternate D might be better, but this would close off a main road between our farm and the farm south of us (Fornes farm). This road (S. Enterprise) is the only way for the Fomesesi Accomazzos to get to their property when the river is running. There would definitely need to be a cherry stem if Alternative D was enacted

Comment Number: LSFO-SDNM-DRMP--I-18361-3

Organization: Offroading and off road racing

Commenter: Douglas Martin

Comment Excerpt Text:

Pipeline road- northeast out of AJO

Comment Number: 3

Cited Content: Eight one-mile-wide multiuse, utility corridors would be designated (a portion of the El Paso Natural Gas Corridor from Ajo to the Tohono O'odham Indian Reservation would be excluded).

Cited Section ID: 2.3.2 Summary of the Lower Sonoran Decision Area Alternatives

Comment Title: Pipeline road- northeast out of AJO

Issue: I0756

Comment:

Am I reading this wrong? This portion of pipe line road would be excluded from multiuse? The pipeline road has been used for years as a loop to enjoy the deserts. I, and many of my friends, use to teach our grandkids how to ride motorcycles on. It's the perfect ride for beginners as well as an after church ride in the desert. I hope this is not on the chopping block.

Comment Number: LSFO-SDNM-DRMP--I-18763-3

Commenter: James Newman

Commenter: Regina Newman

Commenter 3: James Newman

Commenter 4: Christopher Tosh

Commenter 5: Carolyn Newman

Comment Excerpt Text:

inaccurate statement

Comment Number: 3

Cited Content: Nothing in this proclamation shall be deemed to enlarge or diminish the jurisdiction of the State of Arizona with respect to fish and wildlife management.

Cited Section ID: Appendix A Sonoran Desert National Monument Presidential Procla

Comment Title: inaccurate statement

Issue: I0756

Comment:

The simple fact of closing all areas to OHV travel does in fact reduce the ability for Arizona's Game and Fish Department to manage wildlife effectively in these restricted areas due to their inaccessibility

Summary

Commenters recommended specific routes in the Lower Sonoran Decision Area be designated as open or closed to motorized vehicle use and provided rationale or documentation to support their position.

One commenter expressed concern that closing all areas to OHV travel would reduce the ability for the AGFD to manage wildlife effectively. Another comment suggested some routes should be closed because they are in washes, and were inventoried by volunteers.

Commenters requested that the BLM consider designating a long distance OHV route connecting BLM field offices.

One commenter noted that a road in the Dendora Valley was missing from the BLM's route inventory.

Response

The decision on delineating travel and transportation networks for the Lower Sonoran Decision Area is deferred in the land use plan to the implementation phase. This work would be completed within five years of the signing of the Record of Decision (ROD) for the RMP and the public would be given adequate notice and an opportunity to comment on the route delineation process and recommendations.

The route inventory in Chapter 3 would be updated to include the missing road in the Dendora Valley.

The route inventory data displayed for the LSFO and the SDNM and described in Chapter 3 was collected by BLM employees, Forest Service employees via interagency agreement and BLM-funded contractors. No volunteers collected data. BLM has a high confidence level on the route inventory. Washes that displayed intensive levels of vehicle, ATV or motorcycle use were documented. The availability of desert washes for travel would be addressed in site-specific travel management plans.

In reference to the comment about the "multiuse" of the pipeline corridor northeast of Ajo; the term applies to potential development of future utilities, not to travel and transportation planning. Designation of the route as open for public use, closed, or limited would be made a part of future, more site specific planning effort that is out of scope of the RMP.

BLM manages species habitat and not the wildlife itself. As a cooperating agency, the AZGFD has coordinated with LSFO and SDNM to ensure appropriate access. See Section 5.3.6, for a description of the coordination between BLM and the AZGFD.

The RMP would be updated to include a new management action stating that the BLM would consider opportunities for long range trails that provide connectivity to adjacent public lands. Designating individual routes in the LSFO would occur as part of a separate process after the signing of the ROD.

6.2.25.8 Planning Approach

Comment Number: I00117-14

Commenter: Douglas Thomas

Comment Excerpt Text:

There are other reasons for BLM to maintain an extensive network of designated routes though the SDNM.

- an extensive network of designated routes (even redundant) will tend to preclude route proliferation which could lead to closures of routes from misuse and over-use.
- an extensive network of designated routes (even redundant), can be used by Law Enforcement and reduce the necessity (and corresponding damage) of off-road travel.
- an extensive network of designated routes (even redundant) reduces higher concentrations of traffic on anyone route, and therefore reduces the potential for vehicular accidents and associated road degradation.
- an extensive network of designated routes (even redundant) reduces higher concentrations of traffic on anyone route thus decreasing the potential for fugitive dust. Because excessive dust can obscure visibility, this could increase the potential for vehicle accidents.
- an extensive network of designated routes (even redundant) reduces recreational miles traveled in order to access and return from recreational destinations. This reduction in miles traveled will result in a reduction in wildlife disturbance, particulate emissions, road degradation and increased opportunities for remote experience by providing direct and varied access points and routes.

Comment Number: I00121-41

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

We are appalled that BLM is not providing greater protection to desert washes within the Monument. The washes provide important wildlife habitat and critical linkages and were recognized in the Monument proclamation as a Monument object. Driving in washes by motorized recreationists and the Border Patrol is especially egregious. Washes tend to have more cover and serve as areas where many animals, from quail to peccaries and deer, seek shelter to regulate their body temperatures and cover from predators. Stress caused by vehicles can impair their fitness. Mortality to tortoises that burrow along the banks of washes is yet another reason for closing washes to motorized and mechanized traffic. Washes are legally not roads, so vehicles should automatically be prohibited from using them. BLM must develop, consider, and choose an alternative that prohibits vehicles in the Monument's washes.

Comment Number: I00121-43

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

BLM has an overarching responsibility to minimize the damage to any natural resources and to ensure that the Monument's objects are not degraded. To help ensure that BLM is meeting its obligations, BLM should conduct a

baseline inventory and analysis of the existing road network and density, plus evaluate impacts on wildlife and any fragmentation of wildlife linkages. BLM should consider current research on the effects of road densities on wildlife and include that in the RMP. In order to adequately conserve and restore wildlife and plant species, this will be an important and necessary step.

Comment Number: I00121-44

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

In addition to considering the travel issues in the Monument, the BLM should be evaluating and designating a travel network for the Lower Sonoran Field Office concurrent with this RMP, in order to provide more comprehensive landscape-level management of these lands. There has been no demonstration by BLM as to why the agency cannot do this, and there are strong reasons for ensuring that it happens now.

Comment Number: I00125-2

Commenter: George Alderson

Comment Excerpt Text:

The new RMP should provide for a travel plan involving designation of specific routes, with adequate signage and enforcement to make sure vehicles stay on the designated routes. The routes designated should be those capable of withstanding the impacts of ORV traffic without damage to fish and wildlife habitat and without disturbing quiet recreational visitors such as anglers, hunters, wildlife-watchers, hikers and mountain bikers.

Comment Number: I00126-11

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

A defined travel and transportation network (system of roads, primitive roads, and trails) should be delineated concurrently with the development of the land use plan, to the extent practicable (including a reasonable range of alternatives). If it is not practical to delineate a travel and transportation network (through the development of a travel management plan (TMP) during the land use planning process, then a map of the known network of transportation linear features must be developed and made available to the public and a process established to designate a final travel and transportation network within five (5) years. BLM Manual I 626.06B.

BLM has not made a demonstration that it is not practical to designate a transportation network while engaging in the Lower Sonoran Field Office RMP process.

For plans where BLM has made a threshold showing that it is impractical to designate a transportation network concurrently with the RMP, BLM must set out a “clear planning sequence for subsequent road and trail selection and identification, including the public involvement process (focusing on user groups and stakeholders), initial route selection criteria, and constraints” and “[p]rovide a schedule to complete the area or sub-area road, primitive road, and trail selection process.” BLM Manual I 626.06B2d.

Comment Number: I00126-2

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

The BLM's transportation planning should prioritize protection of Monument objects. Proclamation 7397 states that "[f]or the purpose of protecting the objects identified above, all motorized and mechanized vehicle use off road will be prohibited, except for emergency or authorized administrative purposes." As detailed below, the definition of "road" has important implications, necessitating a legal definition be used in this RMP. Furthermore, Proclamation 7397 obligates the BLM to develop a transportation plan "that addresses the actions, including road closures or travel restrictions, necessary to protect the objects identified in the proclamation." In order to comply with Proclamation 7397, the transportation plan set out in the Draft RMP should be revised to include a legal definition of a road and actually prioritize protection of Monument objects.

Comment Number: I00126-35

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

In order to preserve the primitive, undeveloped character of the Monument, BLM must manage the Monument in a way that prohibits any further damage to Monument objects that has already occurred from traditional uses in the area. Objective 3.2 in the Draft RMP is: "Impacts to Monument objects resulting from recreation use do not exceed 2001 levels," which is the year the Monument was proclaimed (Draft RMP at 176). In 2005, Northern Arizona University and Sonoran Institute released a report analyzing impacts to the Monument objects from recreation activities. (Foti et al. 2005). The report documents baseline recreation impacts to natural and cultural resources in the Monument, and identifies sites that are heavily impacted and in need of managerial attention.

One of the findings that stands out from this report is that 73.7 % of the 410 sites visited were impacted by ATV use. Foti et al. 2005, at Table 21. This is second only to "Campsites" for the most prominent recreational use having impacts in the Monument. As demonstrated by the need to issue a temporary closure in a portion of the Monument, ATV use is increasing. BLM should only designate the minimum transportation network that is necessary for protecting the Monument objects in order to protect Monument Objects from further damage.

Comment Number: I00126-56

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

If BLM has found impacts to Monument objects to be anything more than negligible, then it must take measures to close that route in the RMP. Any route that impacts Monument objects automatically cannot meet BLM's burden of proof to show how it contributes to the protection of Monument objects. For example, in the spreadsheet for impacts to Monument objects from the travel network alternatives, the campsites at Gap Well, north of SR 238, BLM has found that the preferred alternative will have mostly minor to moderate impacts on the Monument objects. This is in violation of Proclamation 7397 and BLM laws and policies. As stated in these comments above, the range of alternatives for the Monument should not consider anything less than what is necessary for the full protection of the objects of interest. This example is particularly egregious since BLM has documented the impacts from motorized travel and off-road vehicles in the Gap Well area and has instated a temporary closure due to that damage.

The standard should not be “adequate” protection. The standard is whether the route is furthering the purposes of the National Monument, i.e. if the route conserve, protect, and enhance the Monument objects. Mitigation of impacts does not satisfy the mandates of Proclamation 7397 and BLM policy.

Recommendations: While the methodology for determining protection of Monument objects is a good first step, the application of the methodology for management purposes is fundamentally flawed. The criteria for designing the travel management network in the RMP should be revised to clearly prioritize protection of Monument objects, provide for no new roads to be added to the network, and ensure that the benefits of closing roads are taken into account. Roads should only be kept open if they can be shown to be consistent with conservation, protection and enhancement of Monument objects. These criteria should be applied to revise the proposed travel management network and to ongoing monitoring and management of the network.

Comment Number: 100126-59

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

We also recommend you look at the travel planning criteria set out in the Record of Decision for the Dillon (MT) RMP (relevant sections attached), as an example of criteria that incorporate key aspects of BLM’s ORV regulations as well as ecological metrics. This field office did not complete a comprehensive travel management plan as part of its RMP revision; however, it included road density targets and included an appendix outlining the principles it will use when completing a comprehensive travel management plan during implementation.

A habitat fragmentation analysis is especially important in this planning process where BLM must “undertake activities to conserve and restore plant and animal species and natural communities within [priority biological areas],” as noted above. One such activity that BLM should consider to satisfy this mandate is connectivity of important wildlife habitat areas by decreasing the density of the route network.

Recommendation: BLM should use the information provided in Appendix A to measure habitat fragmentation, conduct a thorough fragmentation analysis, and inform decisions regarding road closure and other limitations on use in the RMP.

Comment Number: 100126-6

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

In a discussion of why BLM did not consider an alternative to open all washes to four-wheel drive travel, the DRMP/DEIS states that “[t]his type of travel is inconsistent with Presidential Proclamation 7397, which expressly prohibits, with the exception of emergency or authorized administration use, all motorized and mechanized vehicle use “off road” in the Monument. Furthermore, washes throughout the Lower Sonoran Planning Area contribute substantially to sustaining healthy, diverse, and productive ecosystems and cultural landscapes.” DRMP at 41. A 2005 Recreation Study performed by Northern Arizona University and Sonoran found that off-road use along roads and in washes is a problem in the Monument (Foti et al. 2005, at 18).

This, along with evidence of impacts to natural and cultural resources from the use of washes as travel corridors, leads to the conclusion that BLM should strongly consider closing all desert washes to motorized travel. In order to satisfy BLM’s obligation to provide a “reasonable range of alternatives” in its NEPA analysis, BLM must look at an alternative that closes all desert washes to motorized vehicles.

Comment Number: 100126-61

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

We support BLM's commitment to complete travel management concurrently with the RMP processes and to seize the opportunity presented by this RMP process to complete comprehensive travel management plan in conjunction with the RMP. BLM has not yet demonstrated that it is impractical to designate a travel network at this time. If BLM does defer it must set a schedule for travel planning. BLM should also prioritize what management areas it will plan for first ensuring that sensitive and important natural and cultural resources are protected from the adverse impacts of motorized use.

Comment Number: 100126-8

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

The Draft RMP has not provided additional plans for signing, enforcing, or educating the public about the route network as required by BLM policy. BLM Manual 1626.06B1d states clearly that TMPs must contain guidelines for managing and maintaining the system of route, which, at a minimum require the following:

- development of route specific road, primitive road, and trail management objectives,
- a sign plan,
- education/public information plan,
- enforcement plan, and
- a process requiring the application of engineering best management practices.

In addition, BLM must include a plan for decommissioning and rehabilitating closed or unauthorized routes and a monitoring plan for implementing the travel plan.

BLM IM 2010-167, att.1 contains performance measures and action items for implementing these plans.

Recommendation: In order to comply with the BLM Travel and Transportation Manual and policy guidance, BLM should provide the requisite management guidelines and plans as mentioned above.

Comment Number: 100126-9

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

In order to manage lands and wildlife at a landscape level, BLM must perform a baseline inventory, as required under NEPA, of the existing route network and its current density. BLM should then review current scientific literature to determine what the effect of certain route densities have on priority wildlife species. Without this important step, the travel management decisions in the Draft RMP and current and future efforts to designate routes are not in accord with laws, regulations and policies regarding BLM land use planning.

Comment Number: 100148-10

Commenter: Jon M Shumaker

Comment Excerpt Text:

Regarding travel management, no routes (roads, primitive roads, trails) may be designated and/or opened within the boundaries of the Monument until they as well as an adequate buffer of at least 200' on either side of each route have been completely surveyed (100%) for cultural resources, and the roads themselves must also be evaluated as to whether or not they are cultural resources. Such surveys must be consulted upon with SHPO and the tribes and the SHPO and tribes must concur with the adequacy of BLM's identification efforts for cultural resources. Additionally, no routes may be designated, opened, or used unless it can be shown beyond a doubt that such action will either protect or enhance protection for the resources the Monument was established to protect.

Summary

1) Commenters expressed concern regarding the BLM's approach to travel management planning in the DRMP/DEIS and requested the BLM commit to:

- a. prioritizing protection of SDNM objects in its transportation plan,
- b. providing adequate signage and enforcement, and developing a complete route inventory, and
- c. conducting a thorough habitat fragmentation and route density analysis to help inform decisions regarding road closure.

2) Other commenters recommended the BLM maintain an extensive network of designated routes throughout the SDNM to

- a. reduce high traffic concentration,
- b. preclude route proliferation,
- c. reduce recreational miles traveled, and
- d. lessen the impacts from travel on air quality and SDNM Monument objects.

3) Commenters also suggested several revisions and clarifications related to the travel management process in the RMP including clarifying the route designation process. Commenters expressed support for designating a travel and transportation network through the development of a travel management plan for the planning area concurrently with the development of the RMP, noting that the BLM had not documented in the DRMP/DEIS why it was impractical to do so, and was therefore not in compliance with BLM Manual 1626 and BLM IM 2010-167.

4) Commenters indicated that the BLM should only designate the minimum transportation network that is necessary for protecting the SDNM objects in order to protect SDNM objects from further damage, and that BLM must look at an alternative that closes all desert washes to motorized vehicles.

Response

1) In response to commenter's expressed concerns:

- a. The Proclamation's management mandates create an exception to the BLM's general management mandate as set forth in FLPMA. See BLM Instruction Memorandum, No. 2009-115. The Proclamation mandates the protection of the historic, cultural, natural, and scientific objects within the National Monument as the highest priority. The BLM's range of alternatives is designed to provide actions that would manage the Monument in accordance with the provisions of the Proclamation and other authorities, such as FLPMA, the National Historic Preservation Act (NHPA), Endangered Species Act (ESA), where applicable.
- b. Signs and enforcement would be addressed in the travel management plan, which are implementation actions. Chapter 3 displays the route inventory for the entire district. Some omissions have been fixed, mostly occurring in the Gila Bend Mountains. All SDNM and LSFO lands have been inventoried for routes with the exception of east valley scattered parcels. An inventory was not completed on these areas due to their discontinuity with BLM lands and most of these parcels are identified for disposal.
- c. Route density calculations were conducted for SDNM route alternatives. While there is no target density to achieve for Sonoran Desert ecosystem health, the density calculations were used as a general indicator of habitat potential. Fragmentation analysis was not conducted due to the lack of targets for habitat patch size. Without such targets, measurement of patch size would be for information purposes only.

2) The BLM developed the management goals, objectives, and actions with under each action alternative with the purpose of protecting Monument objects (see Section 1.1 for the purpose and intent of the SDNM RMP). The alternatives represent an effort to identify an optimum course of action to protect the Monument objects while allowing for compatible public uses as described in the Proclamation (see Appendix A; Appendix S, Section S.2, for a discussion of how BLM determined adequate protection of Monument objects.). This requirement extends to the preparation of the travel management plan. The range of alternatives analyzed for the travel management plan includes alternatives where more and fewer routes (i.e., at concentrated and dispersed densities) are designated for public use. Additionally, Alternative D would close desert washes to motorized vehicles. Air quality in SDNM is an issue that was considered. The PM-10 non-attainment area in the northern portion of the Monument was given highest priority. Route density inside the PM-10 boundary was reduced in all action alternatives.

3) Route designation is an implementation decision and is not required to be made concurrently within an RMP. The decision on delineating travel and transportation networks for the LSFO is deferred in the land use plan to the implementation phase. The BLM chose to defer specific route designations within the Lower Sonoran FO decision area due to the large size and complexity of the area and the desire to ensure meaningful opportunities for public involvement in the process. Designating travel and transportation networks would be completed within five years of the signing of the Record of Decision (ROD) for the RMP and the public would be given adequate notice and an opportunity to comment on the route delineation process and recommendations (BLM Manual 1626).

4) Same as response to point 2) above.

6.2.26 ACEC

6.2.26.1 Designations

Comment Number: I00001-14

Commenter: Jim Vaaler

Comment Excerpt Text:

The rest of the area west of Seven mile Mountain to the SDNM should be designated as an ACEC.

Comment Number: I00137-10

Organization: Fennemore Craig P.C.

Commenter: Dawn Meidinger

Comment Excerpt Text:

[2nd Chart pg. 9, Column 1]

Greater than locally significant qualities, giving special worth, consequence, meaning, distinctiveness, or cause of concern, especially compared to any similar resource.

[Column 2]

BLM Rationale For Determination (DRMP/EIS-Appendix V)

Adjacent to Tohono O'odham Nation and part of their traditional homeland. Broad varieties of cultural sites are represented in the area in higher density than surrounding areas. Important prehistoric obsidian sources for tool materials are located in this area.

[Column 3]

Rationale for Failure to Meeting Statutory and Regulatory Criteria

See comments in "relevance" chart above. Does not meet criteria of greater than local significance.

Comment Number: I00137-11

Organization: Fennemore Craig P.C.

Commenter: Dawn Meidinger

Comment Excerpt Text:

[Chart pg. 10, Row 1 Column 1]

"Importance" Value

Qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened or vulnerable to adverse change.

[Column 2]

BLM Rationale For Determination (DRMP/EIS-Appendix V)

Contains significant wildlife resources for three endangered (priority) species Sonoran pronghorn, lesser long-nosed bat, and CFPO. Area was proposed as critical habitat for CFPO and includes a proposed recovery area for the CFPO. Area provides important fawning habitat for the pronghorn. Several large washes provide suitable CFPO habitat.

Foraging habitat for lesser long-nosed bat.

Habitat for Sonoran desert tortoise and rosy boa.

Strong cultural resource component associated with the area as part of traditional Tohono O'odham homeland and contains much important information about prehistoric settlement and subsistence.

Area is popular with local residents and seasonal winter visitors from U.S. and Canada for dispersed recreation including camping and sightseeing

[Column 3]

Rationale for Failure to Meeting Statutory and Regulatory Criteria

CFPO is not a listed species, nor is critical habitat proposed or designated. No recovery plan for the species was ever finalized.

No demonstration that Sonoran pronghorn occupy anything other than a "small portion" of land in the area. Pronghorn reintroduction efforts are focused elsewhere. Species benefits from ESA protection. No demonstration that the land proposed is "fragile, sensitive, rare, exemplary, or unique."

Foraging habitat is not determinative that land is "sensitive, rare or irreplaceable." The bats utilize columnar cactus and agave for foraging. These plants are widespread throughout Southern Arizona, which is why no critical habitat was designated at the time of the species' listing.

The mere existence of habitat for any particular species is not determinative of the "fragile, sensitive, rare, irreplaceable, exemplary, unique, or endangered status" of the plant species utilized for habitat or the land. Does not meet criteria of being something more than local significance. Cultural recourse that may be present benefit from protection under NHPA among other federal statutes. No special management protection is required.

Non-determinative criteria and no factual basis to conclude that the area proposed for designation is vulnerable to "adverse change" from the sightseeing.

Comment Number: 100137-12

Organization: Fennemore Craig P.C.

Commenter: Dawn Meidinger

Comment Excerpt Text:

[Chart pg. 10 Row 2 Column 1]

"Importance" Value

Protection to satisfy national priority concerns or to carry out mandates of FLPMA.

[Column 2]

BLM Rationale For Determination (DRMP/EIS-Appendix V)

Mandate to protect threatened, endangered and candidate species and their habitats under the ESA.

[Column 3]

Rationale for Failure to Meeting Statutory and Regulatory Criteria

Protection of species under the ESA is the primary responsibility of USFWS. No demonstration the ESA is a “substantially significant” national priority concern or critical to carrying out the mandates of FLPMA (which is primarily the prevention of “unnecessary and undue degradation” to federal lands) has been demonstrated.

Comment Number: I00137-27

Organization: Fennemore Craig P.C.

Commenter: Dawn Meidinger

Comment Excerpt Text:

The proposed 64,000 acre Coffee Pot Batamote ACEC designation suffers from the same deficiencies as those identified for the Cuerda de Lena ACEC. Almost uniformly, the rationale identified for the Coffee Pot Batamote ACEC designation replicates the rationale used for justification of the Cuerda de Lena ACEC

Comment Number: I00137-7

Organization: Fennemore Craig P.C.

Commenter: Dawn Meidinger

Comment Excerpt Text:

The proposed Cuerda de Lena ACEC does not meet the statutory and regulatory criteria for designation. In addition to being duplicative of each other, the BLM’s stated rationale for the relevance and importance criteria do not identify any supporting inventory data and fail to rise to the level of significance. In addition, existing statutory programs provide adequate protections for the resources of concern. There is no effort to explain why those existing protections are inadequate. In separate charts below, the “relevance” and “importance” criteria for ACECs are identified along with the BLM rationale for determination that each criteria has been met. See DRMP/EIS at Appendix V. The reason the BLM’s rationale fails to meet applicable regulatory criteria is set forth in the third column and must be considered in the FEIS.

[Chart pg. 7, Column 1]

“Relevance” Value

Significant Historic, Cultural or Scenic Value.

[Column 2]

BLM Rationale for Determination

Adjacent to Tohono O’odham Nation and part of their traditional homeland. Broad varieties of cultural sites are represented in the area in higher density than surrounding areas. Important prehistoric obsidian sources for tool material are located in this area.

[Column 3]

Failure to Meet Statutory and Regulatory Criteria for Designation

This determination is inconsistent with DRMP/EIS, which states only 4% of the BLM administered land in the planning area has ever been surveyed (DRMP/EIS at 264) and that “no extensive inventories of traditional cultural resources have been completed.” DRMP/EIS at 345-346.

Protection of specific areas of concern could be addressed via use of a specific cultural use allocation in the RMP or a Special Cultural Resource Management Area. See BLM Manual 8110.4 or DRMP/EIS at Appendix I. Special management consideration is not warranted due to other available statutory protection.⁶ [Footnote 6

Preservation Act of 1966, as amended (16 USC § 470 et seq.), Native American Graves Protection and Repatriation Act of 1990 (25 USC § 3001), Indian Sacred Sites (EO 13007, May 24, 1996), Archaeological Resources Protection Act of 1979 (16 USC § 469), Archaeological and Historic Preservation Act of 1974 (16 USC § 469) and BLM Manual 8140 –Protecting Cultural Resources (MS-8140).]

Comment Number: 100137-8

Organization: Fennemore Craig P.C.

Commenter: Dawn Meidinger

Comment Excerpt Text:

[Chart pg. 8 Column 1]

“Relevance” Value

Fish and Wildlife Resources

[Column 2]

BLM Rational For Determination

Only area within the Lower Sonoran Field Office that is managed for endangered Sonoran pronghorn antelope. There are currently Sonoran pronghorn that take up residence on public lands within the proposed bounds of the ACEC.

Suitable and occupied habitat for the candidate species Cactus ferruginous pygmy-owl (“CFPO”).

[Column 3]

Failure to Meet Statutory and Regulatory Criteria for Designation

The current range of the Pronghorn is limited to the Cabeza Prieta NWR, Barry-Goldwater Range, Organ Pipe Cactus National Monument, and a “relatively small block of land to the west and south of Ajo.” EA for Reestablishment of Sonoran Pronghorn (Oct. 2010). 7 [Footnote 7 Map 3-4 in the DRMP/EIS is misleading to the extent the identified “current range” is correctly the Pronghorn’s “historic range” and Area D shown as the “reintroduction area” appears inconsistent with reintroduction areas shown in the EA for Reestablishment of Sonoran Pronghorn (Oct. 2010).]

Failure to demonstrate how the area is not otherwise adequately protected through implementation of Conservation Measures identified in Amended Proposed Action for Five Livestock Grazing Allotments in the Vicinity of Ajo Arizona (02-21-94-F-192), 2004. See DRMP/EIS at Appendix K.

Failure to demonstrate how the proposed ACEC will benefit the species.

Species re-introduction efforts are not being focused in this area but on KOFA NWR and Barry Goldwater Range north and east of Ajo. [d.

CFPO is not a candidate species and listing of the species is not warranted as recently determined by USFWS. See 76 Fed. Reg. 61856 (Oct. 5,2011). CFPO is otherwise protected by the Migratory Bird Treaty Act (16 USC § 703-712). BLM must use best available scientific information in making these determinations.

Comment Number: I00137-9

Organization: Fennemore Craig P.C.

Commenter: Dawn Meidinger

Comment Excerpt Text:

[First Chart pg. 9, Column 1]

“Relevance” Value

Natural Process or System

[Column 2]

BLM Rational for Determination

Saguaro cactus forest situations which are foraging habitat for endangered lesser long-nosed bat. Suitable and occupied habitat for CFPO. Fawning, breeding, loafing and foraging habitat for Sonoran pronghorn.

[Column 3]

Failure to Meet Statutory and Regulatory Criteria for Designation

The presence of suitable/foraging habitat for two endangered species and one non-listed species is not sufficient absent a demonstration the plant species present are “endangered, sensitive, or threatened plant species; rare, endemic or relic plants or plant communities which are terrestrial, aquatic, or riparian. “

CFPO not listed. See 76 Fed. Reg. 61856 (Oct. 5, 2011)

Summary

Commenters question the importance and relevance criteria and rationale used by the BLM to determine ACEC boundaries.

Response

The FLPMA requires the BLM to “give priority to the designation and protection of areas of critical environmental concern.” 43 USC § 1712(c)(3). To be designated as an ACEC, the area must meet the criteria of relevance and importance (as defined in BLM Manual 1613). Areas meeting the relevance criterion possess significant historic, cultural, or scenic values; fish or wildlife resources, including threatened and endangered species; or natural hazards. To meet the importance criterion, the resource must have substantial significance and value. This generally requires qualities of more than local significance and special worth, consequence, meaning, distinctiveness, or cause for concern.

BLM was required to determine if existing ACECs and areas proposed for ACEC designation met the relevance and importance criteria prior to inclusion in the RMP process. BLM completed the ACEC proposal evaluation forms presented in Appendix V, Areas of Critical Environmental Concern (ACEC) Evaluations. Areas that did not meet both relevance and importance were dropped from further consideration for ACEC designation.

The Preferred Alternative reflected the BLM’s proposals for designation and management of ACECs. BLM Manual § 1613.23(A). The BLM’s policy requires that all potential ACECs be carried forward for analysis in at least one alternative in the DRMP/DEIS. All potential ACECs have been analyzed in at least

one action alternative in the DEIS, and all ACEC proposals have been analyzed in Alternative D. Rationale for all ACEC decisions would be provided in the ROD and supported by analysis in the EIS.

Commenters noted areas identified for nomination; the BLM has reviewed these areas to identify those which meet the relevance and importance criteria:

- The BLM has reevaluated the relevance and importance criteria for the Coffeepot-Batamote ACEC (Alternative E) and has adjusted the ACEC boundaries to emphasize management of the acuna cactus.
- The BLM has reevaluated the relevance and importance criteria and management actions for the Cuerda de Lena area and have determined that the area satisfies ACEC designation criteria. Therefore no changes have been made.
- The BLM has evaluated the Seven Mile Mountain area and determined that it does not meet the relevance and importance criteria necessary for designation as an ACEC. The area referenced by commenters was not found to have significant historic, cultural, or scenic values; fish or wildlife resources, including threatened and endangered species; or natural hazards satisfying the relevance and importance criteria. No Threatened and Endangered species are known to occupy the Seven Mile Mountain. There is Category II desert tortoise habitat; however, such habitat is found throughout the Planning Area and not unique to the suggested ACEC area. Cultural resource surveys in the area of eastern Rainbow Valley have resulted in findings of very sparse prehistoric occupation. While there are known historic structures, e.g., historic homesteads, in the area, they, on their own merit, were not found to be important or relevant to designating the area as an ACEC. Finally, there are no noted scenic resources or wildlife habitat values for the area.

6.2.26.2 Impacts

Comment Number: 100137-26

Organization: Fennemore Craig P.C.

Commenter: Dawn Meidinger

Comment Excerpt Text:

Two of the proposed ACECs (i.e., the Coffeepot Batamote ACEC and Cuerda de Lena ACEC) surround Freeport's Ajo operation, and would severely impair future resource development. In fact, the proposed Cuerda de Lena ACEC directly abuts the southern boundary of the Ajo pit, making future expansion in conjunction with development of existing unpatented claims on BLM land virtually impossible without extraordinary mitigation.

Summary

A commenter noted that the BLM did not adequately address impacts of ACEC designations on Freeport McMoran's mining operation.

Response

As required by 40 CFR 1502.16, the DRMP/DEIS **Chapter 4**, Environmental Consequences, provided a discussion of the environmental impacts of the alternatives including the proposed action, any adverse

environmental effects which cannot be avoided should the proposal be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources which would be involved in the proposal should it be implemented.

Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-I, Chapter II, A-B at 11-13 and Chapter IV, B at 29). The DRMP contains only planning actions for ACECs and does not include any implementation actions. **Section 4.17** provides an analysis of impacts on minerals management from Special Designations, including ACECs. Impact analysis in **Section 4.17.3.2** concludes that designation of ACECs could place limitations on leasable and saleable minerals exploration and production and would require plans of operations for all operations beyond casual use for locatable minerals.

6.2.26.3 Management Actions

Comment Number: 100078-1

Commenter: Judith C Shaw

Other Sections: 18.4

Comment Excerpt Text:

3. ACEC. Having visited south side of Saddle Mountain many times, I know that that area contains Wilderness Characteristics; the ACEC should be expanded to approximate 20,000 acres as outlined in Tonopah Area Coalition proposal of 2005 and Arizona Wilderness Coalition recommendations.

I have seen many saguaro cacti damaged and/or killed as a result of being shot. To better protect ACEC values target shooting should not be allowed in the ACEC area. Likewise, there are many places where OHVs have left designated trails and created new trails damaging vegetation. OHV travel should be stopped completely in this ACEC area.

Comment Number: 100111-2

Organization: National Park Service

Commenter: Lee Baiza

Comment Excerpt Text:

In the draft document Maps 2-4 c and d proposed to manage some of the Ajo Block to protect wilderness characteristics. Maps 2-5 b through e, propose the Ajo Block be classified as Land Use Authorizations Avoidance or Restricted. These are some of the most limiting classifications and we are concerned that such designations could affect adjacent lands. NPS wishes to work with BLM to discuss alternatives on how management of the Ajo Block can help address serious issues affecting all agencies in the region, so as to minimize impacts to designated wilderness as well as threatened and endangered species.

Comment Number: 100121-51

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

BLM should also consider prohibitions on recreational target shooting within special designation areas, including all Areas of Critical Environmental Concern and the Saddle Mountain Outstanding Natural Area.

Comment Number: I00121-55

Organization: Sierra Club

Commenter: Jim Vaaler

Other Sections: 24.4

Comment Excerpt Text:

ACEC designations within the SDNM should be retained. Releasing these areas will not help to further the Monument proclamation or protect the Monument objects. Having layered protection of the land can enhance its protections, and there is precedent for it. For example, wilderness areas within the Monument have layered protection. Monument status does not obviate the fact that these ACEC designations were done for a reason – objects within the boundary of the ACEC are at risk

Comment Number: I00121-56

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

Recreational shooting should be limited in the ACECs, as well as the Saddle Mountain Outstanding Natural Area, in order to protect the cultural and natural resources. Recreational shooters have destroyed 4–5 saguaros in the Saddle Mountain area in just the past couple of years. We cannot afford to lose more to these irresponsible activities.

Comment Number: I00126-73

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

The one exception is that all ACECs should be closed to all locatable and leasable mineral exploration and development and mineral material disposals including free use permits. The public lands within ACECs should be recommended for withdrawal. This is provided for in

Alternative D and we strongly recommend BLM choose this alternative with regard to mineral exploration and development to protect the important and sensitive resources found within the ACECs.

Comment Number: I00126-74

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

Coffeepot-Batamote ACEC: As stated in the Draft RMP, the purpose of the Coffeepot-Batamote ACEC is to protect for outstanding botanical diversity of the native and rare plant communities (including the Acuña cactus); lesser long-nosed bat, cactus ferruginous pygmy-owl and desert bighorn sheep habitat; and other wildlife populations along with unique landscape and scenic features. Draft RMP at 196. In order to achieve those goals, BLM should adopt the following additional management actions:

- The route system would be designated to limit wildlife habitat fragmentation, wildlife disturbance, and vegetation damage. Motorized vehicle routes that conflict with maintenance of wildlife habitat and cultural resources would be closed, limited, or mitigated. New route construction would not be allowed except for resource protection.

- Routes within washes would be prohibited.
- Closed to leasable exploration and development.
- Recreational development would be limited to the minimum required to protect resources and provide for public safety.
- Exclusion area for utility-scale renewable energy development.
- No new utility and/or communication facilities.
- Proposed withdrawal from locatable mineral entry
- Apply a VRM Class I or II scenic designation
- Closed to the disposal of mineral materials

Comment Number: I00126-75

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

Cuerda de Lena ACEC: The purpose of this designation is to protect wildlife, including the endangered Sonoran Pronghorn, cactus ferruginous pygmy-owl, and other species, as well as to protect cultural resources. While we are generally supportive of the management actions set out in Alternatives D and E, BLM should apply the following additional management prescriptions to meet this goal:

- The route system would be designated to limit wildlife habitat fragmentation, wildlife disturbance, and vegetation damage. Motorized vehicle routes that conflict with maintenance of wildlife habitat and cultural resources would be closed, limited, or mitigated. New route construction would not be allowed except for resource protection.
- Routes within washes would be prohibited.
- Closed to leasable exploration and development.
- Recreational development would be limited to the minimum required to protect resources and provide for public safety.
- Exclusion area for utility-scale renewable energy development.
- No new utility and/or communication facilities.
- Proposed withdrawal from locatable mineral entry
- Apply a VRM Class I or II scenic designation
- Closed to the disposal of mineral materials

Comment Number: I00126-76

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

Saddle Mountain Outstanding Natural Area ACEC

- The route system would be designated to limit wildlife habitat fragmentation, wildlife disturbance, and vegetation damage. Motorized vehicle routes that conflict with maintenance of wildlife habitat and cultural resources would be closed, limited, or mitigated. New route construction would not be allowed except for resource protection.
- Routes within washes would be prohibited.
- Closed to leasable exploration and development.
- Recreational development would be limited to the minimum required to protect resources and provide for public safety.
- Exclusion area for utility-scale renewable energy development.
- No new utility and/or communication facilities.
- Proposed withdrawal from locatable mineral entry
- Apply a VRM Class I or II scenic designation
- Closed to the disposal of mineral materials

Comment Number: I00129-2

Organization: Center for Desert Archeology

Commenter: Andy Laurenzi

Comment Excerpt Text:

Page 198. AC-1.1.4S. This management action is meaningless in the context of an ACEC designation since it provides no greater level of protection than un designated public lands. We request that a No Surface Occupancy be stipulated. This will not only ensure protection of important cultural resources but further protect the natural area qualities that are the basis for the ACEC designation.

Comment Number: I00137-14

Organization: Fennemore Craig P.C.

Commenter: Dawn Meidinger

Comment Excerpt Text:

In addition to the designation of the area as an ACEC, over 55,000 acres of the ACEC would be managed for wilderness characteristics essentially excluding any intensive surface disturbance. The Coffee Pot Batamote ACEC would expand upon the existing Coffee Pot Botanical ACEC, which evidently contains more than 285 plant species, many with limited distributions in the United States. See DRMP/EIS at 344. This level of plant species diversity is not demonstrated in the expanded ACEC. For this reason, and the others set forth above, the Coffee Pot Batamote area does not meet regulatory criteria for ACEC designation.

Comment Number: I00137-16

Organization: Fennemore Craig P.C.

Commenter: Dawn Meidinger

Comment Excerpt Text:

In addition to the proposed elimination of major utility corridors, Alternative E contemplates LUA “Avoidance Areas” on all BLM land surrounding Ajo.⁹ [Footnote 9 “Avoidance Areas” are defined as “areas with sensitive resource values where minor linear LUAs and nonlinear LUAs ... would be strongly discouraged. Authorizations to be considered within avoidance areas must be compatible with the purpose for which the area was designated and not be otherwise feasible on lands outside the avoidance area.” In addition, the proponent would be required to meet additional mitigation measures set forth by individual program areas that manage the “avoided” designated allocation.” DRMP/EIS at 122.] Within the Cuerda de Lena ACEC and Coffee Pot Batamote ACEC the prohibitions are even greater as “Exclusion Areas” are specified therein.¹⁰ [Footnote 10 “Exclusion Areas” are defined as “areas with sensitive resource values where minor linear LUAs and nonlinear LUAs ... would not be authorized.” In these areas, LUAs would be granted only in cases where there is a legal requirement to provide such access or an immediate public safety concern. Id.] DRMP/EIS at 120, 131-132. No justification is provided in the DRMP/EIS for these restrictive management prohibitions. No inventory or resource data is provided to demonstrate that the areas are so “sensitive” that they cannot withstand surface disturbance resulting from linear LUAs or that impacts cannot otherwise be mitigated. This effective closure of the public lands for utility corridors is an extreme and undue burden on industries dependent on water, power, fuel and available telecommunication for a variety of purposes, including mineral exploration and development. The administration of ACECs to exclude any LUAs is contrary to FLPMA’s multiple use mandate and the effect is akin to a de-facto wilderness designation

Comment Number: I00145-14

Organization: National Park Service

Commenter: Naomi Torres

Comment Excerpt Text:

(Lower Gila Terraces and Historic Trails ACEC) AC-I.1.38-40: It was unclear from our review of the document where does the plan specifies what portions/parcels within the ACEC would be protected from surface disturbance and mineral exploration and development. Please clarify this. We question the value of the ACEC designation if the entire ACEC is not protected as a unit.

Comment Number: I00145-15

Organization: National Park Service

Commenter: Naomi Torres

Comment Excerpt Text:

Related to our comment in 2.8.I Lands and Realty above, we suggest that an additional action be added: Acquire private or State owned parcels within the ACEC that have high resource value or would improve the connectivity of the ACEC, including the connectivity of the Anza Recreational Trail. Acquisition could be accomplished through a land exchange or purchase.

Comment Number: 100160-2

Organization: Tonopah Area Coalition

Commenter: Craig Weaver

Comment Excerpt Text:

However, TAC's 'on the ground' review of Saddle Mountain & Palo Verde Hills over the past two years (2010-11) show that ACEC designation and management would be better supported if additional management categories matched the ACEC goals. Our visits and analysis have shown negative impacts that make Alternative D for Target Shooting Management, Alternative D for Travel Management, Alternative D for Protecting Wilderness Characteristics, Alternative D for Visual Resource Management, Alternative D for Mineral Restrictions Locatables, and Alternative C for Recreation Management - are, in each category, more compatible with ACEC designation for protecting this Outstanding Natural ACEC.

Comment Number: 100160-4

Organization: Tonopah Area Coalition

Commenter: Craig Weaver

Comment Excerpt Text:

Gravel Pit located north of Saddle Mountain (2N 7W Section 31) on BLM land should be retired and lease with Maricopa County ended. Site has not been used for over 10 years, needs invasive tamarisk removed, and elimination of some fencing for Wildlife Linkage #64 AZGF/ADOT should be considered

Comment Number: 100166-35

Commenter: Steve Saway

Comment Excerpt Text:

Management Action AC-1.1.2: Core roadless areas would be maintained for wildlife while new facilities, including motorized routes, non-motorized trails, and trailheads that concentrate or increase use in these areas would be avoided.

Comment: I believe this statement could complicate implementation of recreation and public access objectives for portions of the Lower Gila Terraces and Historic Trails ACEC, i.e., where portions overlap the Gila Bend Mountains SRMA and the Lower Gila Historic Trails SRMA. For example, access to this proposed ACEC and the east and south sides of the Woolsey Peak Wilderness may require additional motorized routes. Recommend the word "avoided" be changed to "minimized" in order to allow some flexibility in establishing adequate access for non-motorized dispersed recreational experiences.

Summary

Commenters recommended additional management actions for the ACECs including: 1) prohibiting target shooting, OHV use, mineral leasing, and exploration and development, 2) withdrawal from mineral entry, 3) exclusion for renewable energy development, 4) changes to route designations, 5) designating VRM Class I or II allocations, and 6) allowing for land tenure adjustments.

Commenters were concerned with the avoidance and exclusion of land use authorizations in the Ajo Block, specifically as they relate to the designation of the Cuerda de Lena and Coffee Pot Batamote ACECs and their associated management prescriptions.

A commenter noted that the gravel pit located north of Saddle Mountain (2N 7W Section 31) on BLM-administered land should be retired and the lease with Maricopa County ended.

Response

The BLM has discretion regarding the formulation of management prescriptions for ACECs. A comparison of estimated effects and trade-offs associated with the alternative leads to development and selection of the preferred alternative. It is not prescribed in the BLM 1613 Manual that a particular potential ACEC's relevant and important values must be protected to the same level or degree of protection in all plan alternatives. The 1613 Manual does state, "The management prescription for a potential ACEC may vary across alternatives from no special management attention to intensive special management attention." Elaborating further, "Situations in which no special management attention would be prescribed (and therefore no designation) include ... those in which the alternative would necessitate the sacrifice of the potential ACEC values to achieve other purposes." Such Manual guidance clearly allows for one or more RMP alternatives to be analyzed that would potentially impact relevant and important values in order to allow management for other prescribed purposes. It is the BLM's interpretation of its ACEC responsibility that relevant and important values must be protected whether designated an ACEC or not.

The management actions in Section 2.12.1 provide a range of management actions which provide protections of resources in ACECs to meet the goal of "Provide increased protection for cultural resources, outstanding and scenic features, and priority and special status species while continuing to provide the public access to enjoy these resources." Each ACEC has a particular set of resource values that BLM is trying to protect. Individual commenters recommended new management actions for ACECs they felt should be added, such as closing to target shooting, closing to mineral sales and leasing, withdrawing from mineral entry, exclusion from renewable energy development, and others. The prescriptions suggested by commenters are not universally warranted based on the relevance and importance resource values present or potential threats to specific ACEC values. For example, prohibiting target shooting or solar development is not warranted in ACECs where such activities are not present or may cause no harm. ACEC management prescriptions are tailored specifically to protect the subject ACEC's relevance and importance values. The suggested management actions made by commenters were considered and BLM applied them where we considered them needed to protect the identified Relevance and Importance values.

Any ACEC designation would still be subject to valid existing rights. The Proposed RMP/Final EIS was revised to include a management action under each ACEC that would allow land tenure adjustments.

Evaluations for all ACECs under consideration can be found in Appendix V, Areas of Critical Environmental Concern (ACEC) Evaluations. The values presented for these ACECs are considered the highest and best use for those lands, and protecting them takes precedence over the BLM's mandate to manage public lands for multiple uses. Avoidance and exclusion of land use authorizations are intended to ensure the BLM meets the goal of "Provide increased protection for cultural resources, outstanding and scenic features, and priority and special status species while continuing to provide the public access to enjoy these resources" for these ACECs.

The gravel pit located north of Saddle Mountain (2N, 7W, Section 31) on BLM-administered land is outside the ACEC boundary and does not impact any of the proposed ACEC's relevance and importance resource values.

The PRMP/FEIS has been revised to allow appropriate land tenure adjustments within ACECs.

6.2.26.4 SDNM

Comment Number: 100121-55

Organization: Sierra Club

Commenter: Jim Vaaler

Other Sections: 24.3

Comment Excerpt Text:

ACEC designations within the SDNM should be retained. Releasing these areas will not help to further the Monument proclamation or protect the Monument objects. Having layered protection of the land can enhance its protections, and there is precedent for it. For example, wilderness areas within the Monument have layered protection. Monument status does not obviate the fact that these ACEC designations were done for a reason – objects within the boundary of the ACEC are at risk

Summary

A commenter requested that ACEC designations within the SDNM be retained.

Response

As stated in Presidential Proclamation 7397, the SDNM was designated to protect “a magnificent example of untrammled Sonoran desert landscape” with an “extraordinary array of biological, scientific, and historic resources” (see Appendix A, Sonoran Desert National Monument Presidential Proclamation). Presidential Proclamation 7397 prevails over FLPMA with regard to multiple-use management of ACECs in the SDNM (See BLM Instruction Memorandum, No. 2009-115).

The designation of the SDNM provides far greater protections for objects within the SDNM than ACECs. The Vekol Valley Grasslands ACEC is currently the only ACEC within the SDNM. The plant and animal communities represented within this ACEC are Monument objects subject to full protection offered by Proclamation 7397. Biological, ecological, wildlife and travel management prescriptions presented by the Preferred Alternative fully exceed the protective management prescriptions of the current ACEC. Therefore the ACEC is no longer needed.

6.2.27 FRED J. WEILER GREEN BELT RESOURCE CONSERVATION AREA

6.2.27.1 Administrative Actions

Comment Number: I00142-12

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

Fred J. Weiler Green Belt Resource Conservation Area (GB) The Department understands BLM will be reevaluating the jurisdictional management responsibility of resources and travel management within the GB. We understand the evaluation will include revisiting established cooperative management agreements between the AGFD, USFWS, and BLM; as well as new laws, policy and guidance that relate to PLO 1015 lands (6,896 acres) within the GB since the time of withdrawal from the Department of the Interior (DOI) to the USFWS in 1954. As stated, the Department has managed these lands since that time for wildlife. The Department has not been previously contacted by BLM regarding the intent to re-evaluate jurisdictional management. At this time we request immediate coordination prior to initiation of the evaluation process, as well as sustained coordination so that our interests and concerns can be adequately researched and staffed. It is our expectation that any management changes that result from this re-evaluation will be resolved to all parties' mutual satisfaction under the guiding legal framework.

Summary

The Arizona Game and Fish Department (AGFD) has requested that BLM coordinate with them on the reevaluation of the jurisdictional management for the Fred J. Weiler Green Belt Resource Conservation Area.

Response

The BLM is committed to continued coordination with the AZGFD regarding the management actions within the Weiler RCA (see Chapter 5, Consultation and Coordination for a description of BLM's coordination with the AZGFD). As stated in Section 2.12.4, "Between the writing of the draft and the proposed RMP, a legal opinion would be requested from the Federal Solicitors Office and any proposed management actions that need to be changed would be done so in the proposed RMP."

6.2.27.2 Edits

Comment Number: I00142-20

Organization: Arizona Game and Fish Department

Commenter: Josh Avey

Comment Excerpt Text:

Section - 2.9.4.2

Page - 208

Line - GB-I-2

Comment/Suggestion

Management action states that the GB would be managed consistent with the Lower Gila Terraces and Historic

Trails SCRMA. However, under Alternatives D&E, these areas would also be designated as ACEC. Recommend correcting the management action to reflect the appropriate designation(s).

Summary

A commenter noted that the Fred J. Weiler Green Belt is identified as a SCRMA and an ACEC in alternatives D and E and requested clarification and correction to reflect the appropriate designation.

Response

The Fred J. Weiler Green Belt is intended to be managed as an SCRMA in Alternative C; and an ACEC in Alternatives D and E. The PRMP/FEIS has been modified to correct Management Action GB-1.2 in Section 2.12.4 to correctly state the appropriate designation.

6.2.28 WILDERNESS

Comment Number: 100121-21

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

We support the list of lands on page 301 in the DRMP/DEIS that the BLM has considered as qualified lands for potential inclusion in our system of wilderness lands given protection under the 1964 Wilderness Act. Map 2-4d shows these lands as part of Alternative D. We recommend that all of these lands be included for wilderness designation

Summary

Commenters proposed that all of the lands listed on page 301 in the DRMP-EIS be included for wilderness designation.

Response

As noted in Section 1.3.4, Issue 2: Wilderness characteristics, the discussion concerning recommending the designation of additional wilderness areas is outside the scope of this RMP/EIS. Only Congress can designate wilderness areas and there is no BLM policy for establishment of WSAs. However, areas that contain wilderness characteristics can be managed by the BLM to protect those characteristics and are described in various alternatives in Chapter 2, Alternatives, of the document.

6.2.29 NATIONAL BYWAYS

Comment Number: 100112-5

Organization: Arizona Department Of Transportation

Commenter: Justin White

Comment Excerpt Text:

Following our meeting, Leroy Brady forwarded the following link to Arizona 's scenic parkways, historic and scenic roads:

http://www.azdot.gov/Highways/Roadway_Engineering/Roadside_Development/PDF/AZ_PARKWAYS_HISTORICAL_SCENIC_ROADS_List_2009.pdf. Some of these are not designated within the draft RMP, but should likely be considered during your planning process.

Summary

Commenter requested the BLM consider additional scenic parkways and historic/scenic roads designated by the State of Arizona in the RMP/EIS.

Response

BLM's Byways Program is a component of the National Scenic Byways Program. BLM State Directors designate BLM Back Country Byways on BLM public lands. Other Byway designations – such as National Scenic Byways, All-American Roads, State Scenic Byways, or National Forest Scenic Byways – may also occur on portions of BLM lands, but must be designated through a State Department of Transportation or other Federal agency.

Because the Gila Pinal Scenic Road and Organ Pipe Cactus Parkway are not predominantly on BLM land, the BLM did not consider them appropriate for designation as Backcountry Byways. Segments of these roads on BLM-administered lands would be managed according to ADOT and NPS management guidelines.

6.2.30 NATIONAL TRAILS

Comment Number: I00121-66

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

This National Historic Trail needs to be closed to all mineral entry and exploration, as well.

Comment Number: I00126-33

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

the Draft RMP states that “[m]anagement would be consistent with the National Park Service (NPS) management plan and in cooperation with the NPS.” Draft RMP at 203. “Motorized vehicles are generally not acceptable on off-road segments of national historic trails.” Comprehensive Management and Use Plan for the Juan Bautista de Anza NHT at 26 (NPS 1996).

“A portion of the Anza route passes through the North Maricopa Wilderness in the Lower Gila Resource Area of the Phoenix District of the BLM in Arizona. The management plan for the area proposes conversion of a 5.6 mile jeep trail to a primitive hiking and equestrian trail within the wilderness.” Comprehensive Management and Use Plan for the Juan Bautista de Anza NHT, The Trail Environment at 3 (NPS 1996). When BLM was considering this action in 1996, there was less of a threat from ORVs in the area and the Sonoran Desert National Monument had not yet been created. It is substantially more important for BLM to consider the conversion of this portion of the Anza NHT as non-motorized as proposed in Alternative D.

Comment Number: I00126-72

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

The Lower Sonoran/Sonoran Desert Draft RMP proposes similar management prescriptions to the Lander Draft RMP, but should also consider additional measures to appropriately protect the management of the NHTs for current and future generations:

- Designate a minimum 5-mile NHT corridor to allow for the protection of the historical and scenic values of the NHT.
- Outside of 5 miles from the NHTs, prohibition on “highly visible projects” and “projects out of scale with the surrounding environment,” unless they will “cause no more than a weak contrast” on the NHTs.⁹
- VRM Class II.
- Remove or reclaim existing visual intrusions, such as roads, facilities and rights-of-way, in order to attain the Draft RMP’s management goals for the NHTs.
- Prohibition on audible or atmospheric disturbances in excess of current levels.

Lander Draft RMP at 192-93, Maps 100, 104 and 132; Id. at 163, Maps 32, 100, 104 and 127.

Recommendations: We strongly recommend that BLM adopt these additional prescriptions as set forth in the Lander Draft RMP for the Lower Sonoran/Sonoran Desert Draft RMP. We support Alternative D with the addition of the above management actions for NHTs in the planning area. This includes the pertinent prescriptions in Sections 2.7.3 and 2.8.5 for the management of resources in relation to the NHTs.

Comment Number: I00145-1

Organization: National Park Service

Commenter: Naomi Torres

Comment Excerpt Text:

NPS has reviewed the DRMP/DEIS and we generally concur with the approach outlined in the BLM’s Preferred Alternative (Alternative E). However, due to the agency’s multiple use mission, we are concerned that some aspects of Alternative E would not afford enough protection for the historic trail corridor, lands adjacent to the corridor, or viewsheds from the corridor. This is especially true of federal lands outside SDNM along the lower Gila River corridor. We would prefer greater protection of the viewshed along the historic trail corridor throughout the planning area as proposed by Alternative D, which would zone much of the Lower Gila River ACEC as VRM Class II instead of VRM Class III, as is proposed by Alternative E.

Comment Number: I00145-16

Organization: National Park Service

Commenter: Naomi Torres

Comment Excerpt Text:

Please add additional text to provide some context regarding the Anza NHT. The Anza NHT commemorates the pioneering Spanish overland colonizing expedition in 1775-76 that brought approximately 240 persons and 1000 livestock from Sonora and Sinaloa to establish a presidio and mission at San Francisco. The expedition doubled the

Spanish population of Alta California. The route was also used by colonists in 1781 to establish the pueblo of Los Angeles and the presidio and mission at Santa Barbara.

Comment Number: 100145-17

Organization: National Park Service

Commenter: Naomi Torres

Comment Excerpt Text:

Please include an explicit definition of the Anza NHT corridor. It appears that the RMP defines the “Anza NHT corridor” as the assumed historic trail corridor as specified by the National Trails System Act, which is the assumed path traveled by the expedition based on original diaries and maps. This assumption is correct, however, a definition should be included so that the term corridor is not misunderstood.

Comment Number: 100145-18

Organization: National Park Service

Commenter: Naomi Torres

Comment Excerpt Text:

We support the development of the recreational retracement route (aka Anza Recreational Trail) throughout the entire planning area. To clarify, the recreational trail need not be located within the mapped historical corridor. The Anza NHT corridor is an important transportation route used by Indian tribes during prehistoric time as well as by many other more recent historic groups. Other historic trail names or events associated with all or portions of the route through the planning area include: the Southern Emigrant Trail, Butterfield Overland Stage, and Mormon Battalion, as stated in the document. NPS welcomes collaboration with BLM and historic trail organizations interested in interpreting the multilayered historical events of the period, and developing one recreational trail alignment that would allow visitors to experience the cultural landscape of this important historic transportation corridor.

Comment Number: 100145-19

Organization: National Park Service

Commenter: Naomi Torres

Comment Excerpt Text:

A buffer zone of should be provided along the historic corridor to avoid detrimental direct indirect effects of incompatible uses. Of most concern to NPS are significant visual impacts from large scale projects such as utility scale renewable energy projects, large mineral extraction activities, landfills etc.

Comment Number: 100145-2

Organization: National Park Service

Commenter: Naomi Torres

Comment Excerpt Text:

In addition, we recommend that the plan consider requiring a substantial buffer on either side of the historic corridor for large scale projects that would result in potentially significant adverse changes to the landscape. Such large projects should be sited and designed to minimize visual contrast to the trail viewshed to the greatest extent feasible.

Comment Number: I00145-20

Organization: National Park Service

Commenter: Naomi Torres

Comment Excerpt Text:

NT-1.1.7 States that the Anza NHT corridor would be an Exclusion Area for major utility-scale renewable energy development and new major linear LUAs. However, this statement only infers protection of the mapped historic corridor from direct impacts. Adjacent lands designated as Avoidance Areas could still allow large scale projects that could result in visual or other impacts to the trail corridor. Utility-scale renewable energy projects proposed within several miles of the historic have the potential for significant visual impacts on the viewshed of the trail. All such projects should be required to provide visual impact analysis for views from the trail corridor, with Key Observation Points selected in consultation with NPS.

Comment Number: I00145-21

Organization: National Park Service

Commenter: Naomi Torres

Comment Excerpt Text:

N.T.-1.1.14 & .15: NPS supports archaeological studies of Anza Expedition campsites and trail corridor subject to the conditions specified in these management actions.

Comment Number: I00145-24

Organization: National Park Service

Commenter: Naomi Torres

Comment Excerpt Text:

4.9 Impacts on Special Designations

Assumptions, National Historic Trails (p.744)

This section contains the following statements:

“The historic setting of the Anza NHT on all Federal Protection Components will have management prescriptions applied to a minimum of three miles from the NHT to the visual horizon, whichever is less.”

“The recreational setting of the Anza NHT on all Federal Protection Components will have management prescriptions applied to a minimum of five miles from National Register eligible properties to the visual horizon, whichever is less, when management concerns warrant.”

NPS would like clarification regarding the exact meaning of the above statements and how they would be implemented. What is meant by “management prescriptions,” and what is meant by “a minimum of three/five miles from the NHT to the visual horizon, whichever is less”? Is the distance (three/five miles) measured from the centerline of the NHT historic trail corridor, or from the sides of the corridor? Also the phrasing of these statements leaves much room for interpretation when applied to specific projects. In some parts of the planning area, the visual horizon for the NHT could be 20 miles or more. Therefore, these statements only will generally afford a degree of management protection to the minimum distance (3 or 5 miles). Some large scale projects proposed in the planning area have the potential to result in significant visual contrast at greater distances, and projects should still be designed to minimize visual contrast if they are within the viewshed of the historic trail corridor and beyond three or five miles. NPS would like to work with BLM on revising this specific language to

clarify how it would be implemented by staff when reviewing applications. Perhaps the specific implementation of these regulations would be specified in the BLM National Scenic and Historic Trails manual (currently under development) or in a similar document specific to the Anza NHT in the planning area.

Comment Number: I00145-27

Organization: National Park Service

Commenter: Naomi Torres

Comment Excerpt Text:

Alternative D (p.802) would offer the highest level of protection from incompatible developments and visual intrusion (through VRM Class II) upon the historic landscape, but it would place significant restrictions on visitor use and even ground disturbing research activities.

Alternative E, Preferred Alternative, (p. 810) would allow more visual impacts (contrast) than Alternative D, especially in the Lower Gila Terraces / Historic Trails ACEC (VRM Class II + Class III). NPS would prefer more protection of the viewshed of the historic corridor than would be offered by Alternative E. We would prefer VRM Class II protection along the Anza NHT viewshed.

Comment Number: I00145-3

Organization: National Park Service

Commenter: Naomi Torres

Comment Excerpt Text:

In addition, all large scale projects proposed within 10 miles of the trail corridor should include a visual impact analysis of the effect on the Anza NHT. Where significant visual effects cannot be avoided, mitigation should be provided to benefit the Anza NHT by improving opportunities to address the key goals outlined above.

Comment Number: I00145-4

Organization: National Park Service

Commenter: Naomi Torres

Comment Excerpt Text:

Section 4.9 refers to the application of management prescriptions to minimize the effects of projects within three to five miles of the trail corridor. NPS appreciates this idea and we would like to discuss this concept with BLM to better understand how the management prescriptions would be applied.

Comment Number: I00145-6

Organization: National Park Service

Commenter: Naomi Torres

Comment Excerpt Text:

CL-1.1.6 NPS prefers the uses allowed under Alternative E, which designates Happy Camp, Christmas Camp, and the Anza-Butterfield Interpretive Trail Area as public and scientific use sites. Due to the size and remoteness of the SDNM, we believe that motorized travel along the Anza-Butterfield Interpretive Trail Area is appropriate, if it is sufficiently restricted to protect the extant physical traces of the historic trail(s) from damage from visitor use. However, we also feel that motorized vehicle access should not be permitted through Maricopa Pass, because it would encourage an unacceptably high level of through traffic and motorized use along the trail corridor. As mentioned in 4.19.7.3 Wilderness Areas, approximately four miles of the Anza NHT trail corridor is adjacent to

the North Maricopa Wilderness. Closing this section of the trail corridor to vehicle access would protect the wilderness values for which the North Maricopa Wilderness is designated.

Comment Number: I00145-7

Organization: National Park Service

Commenter: Naomi Torres

Comment Excerpt Text:

CL-1.1.10 Under All Alternatives but D, camping would be permitted within 100 feet of the centerline of the Anza-Butterfield Interpretive Trail in designated campsites. 100 feet in the relatively open desert landscape does not seem an adequate buffer distance to provide a quality recreational experience for trail users or for campers. We recommend a greater separation from the trail to designated campsites, such as 250 feet.

Comment Number: I00162-1

Organization: The Anza Trail Foundation

Commenter: Elizabeth Stewart

Comment Excerpt Text:

ATF requests that the following be prohibited in the SDNM and in a 3-10 mile buffer zone on either side of the Anza NHT in the Lower Gila Historic Trails SCRMA: renewable energy projects, transmission lines, multi-use utility corridors, mineral activity of any nature, grazing, target shooting, paintball, firewood gathering, landfills, OHV use, and all-terrain vehicles weighing less than 1800 pounds.

Comment Number: I00162-11

Organization: The Anza Trail Foundation

Commenter: Elizabeth Stewart

Comment Excerpt Text:

2.9.3 National Trails - Anza Trail

A buffer zone should be established along the historic corridor to avoid detrimental direct and indirect effects from incompatible uses, particularly the visual impacts from large scale projects such as renewable energy projects, transmission lines, mineral extraction activities and landfills. Additionally, all large scale projects located on adjacent BLM lands should be evaluated for their visual impact on the Anza NHT

Comment Number: I00162-12

Organization: The Anza Trail Foundation

Commenter: Elizabeth Stewart

Comment Excerpt Text:

ATF requests that the historic setting of the Anza NHT on all Federal Protection Components have management prohibitions in addition to prescriptions applied to a minimum of three miles from the NHT to the visual horizon, whichever is greater.

Comment Number: I00162-13

Organization: The Anza Trail Foundation

Commenter: Elizabeth Stewart

Comment Excerpt Text:

ATF requests that the setting of the Anza NHT on all Federal Protection Components have prohibitions in addition to prescriptions applied to a minimum of five miles from National Register eligible properties to the visual horizon, whichever is greater.

Comment Number: I00162-15

Organization: The Anza Trail Foundation

Commenter: Elizabeth Stewart

Comment Excerpt Text:

Visual Resource Management, page 763

ATF prefers that the Anza NHT corridor viewshed be protected through the adoption of Visual Resource Management (VRM) Class II designation to minimize visual impacts from actions on surrounding lands.

Comment Number: I00162-3

Organization: The Anza Trail Foundation

Commenter: Elizabeth Stewart

Comment Excerpt Text:

Motorized travel should not be permitted through the Maricopa Pass or through the approximately 4 miles of the Anza NHT trail corridor adjacent to the North Maricopa Wilderness referenced in 4.19.7.3.

Comment Number: I00162-6

Organization: The Anza Trail Foundation

Commenter: Elizabeth Stewart

Comment Excerpt Text:

Objective 1.3: Special Cultural resource Management Area (SCRMA)

ATF supports the designation of the Lower Gila Historic Trails SCRMA and request that the RMP specify that this area will receive the same protections against visual impacts, ground disturbances, air and water quality degradation and sound disturbances as the SDNM.

Comment Number: I00162-8

Organization: The Anza Trail Foundation

Commenter: Elizabeth Stewart

Comment Excerpt Text:

ATF request that surface disturbing activities be prohibited within the entire buffer zone of 3-10 miles from the Anza NHT and other historic trails instead of being mitigated within one-quarter mile

Comment Number: I00162-9

Organization: The Anza Trail Foundation

Commenter: Elizabeth Stewart

Comment Excerpt Text:

ATF requests that off-highway travel be prohibited within the Anza historic trail corridor to prevent ground, sound, and air degradation and preserve the historic setting

Comment Number: LSFO-SDNM-DRMP--I-18762-3

Organization: National Park Service

Commenter: Catherine Bradley

Comment Excerpt Text:

Mitigation measures

Comment Number: 3

Cited Content: NT-1.1.3: The Anza NHT corridor would remain open to leasable minerals exploration and development actions but any proposed action would contain a No Surface Occupancy stipulation.

Cited Section ID: 2.9.3.2 Management Actions for National Trails (NT) Action Alte

Comment Title: Mitigation measures

Issue: I0756

Comment:

To protect the recreation experience along the Anza NHT, include language about active mineral leases being subject to mitigation strategies for visual impairment within the mid-range viewshed from any direction on the trail.

Summary

Commenters recommended several management actions to further protect cultural and visual resources associated with National Historic Trails (NHTs). Specific recommendations included 1) managing the Anza Trail for non-motorized travel and closing the route in Maricopa Pass, 2) designating buffers and corridors adjacent to NHTs to limit visual and other impacts, 3) developing a recreational retracement route along the Anza NHT, 4) requiring visual impact analysis for views from the trail corridor for large-scale projects, 5) managing the Anza NHT corridor viewshed as VRM Class II, 6) prohibiting audible disturbances in NHTs above current levels, and 7) closing NHTs to mineral entry and exploration.

Commenters requested additional text to describe the history and context of the Anza Trail and an explicit definition of the Anza Trail Corridor.

Response

I, 5, 6, &7) The BLM's range of alternatives for Anza NHT management represents a full spectrum of options. Within the SDNM, the Anza National Historic Trail is a noted object of the National Monument's Proclamation and therefore all alternatives (goals, objectives, and management actions) for the Sonoran Desert National Monument are designed to protect the trail's physical remnants and its landscape setting. For trail management, the range of alternatives in the LSFO included open and closed to mineral development, and open and closed to motorized access. All alternatives include actions that would protect the recreational experience and retain the historic character in both decision areas.

2 & 4) BLM has conducted a viewshed analysis and VRM settings and associated prescriptions have been modified in Chapter 2 to better protect the historic and recreational settings associated with the Anza NHT.

3) Development of a recreational retracement route has already been initiated and is outside the scope of this plan.

Additionally, the actions BLM is considering under its preferred alternatives for the trail in the Lower Sonoran Field Office decision area and SDNM decision area are consistent with the National Park Service's Comprehensive Plan (the Plan is available on the NPS website at <http://www.nps.gov/juba/parkmgmt/juba-cmp.htm> (last visited 12/22/11)). A more fully developed history and context of the trail is outlined in the "History and Significance" section of the National Park Service's Comprehensive Plan.

6.2.31 TRIBAL INTERESTS

6.2.31.1 Edits

Comment Number: 100045-1

Organization: Hopi Tribe

Commenter: Leigh Kuwanwisiwma

Comment Excerpt Text:

We note under Tribal Interests the statement, "Several American Indian tribes have traditional cultural affiliations with the Decision Areas." Pursuant to the Native American Graves Protection and Repatriation Act, cultural affiliation is defined as a shared group identity between an earlier identifiable group and a modern day tribe, not modern day tribes and a place such as the Decision Areas. Tribes are traditionally associated to places.

Summary

A commenter indicated that the BLM did not use the correct language in discussing traditional cultural affiliations.

Response

The Final EIS was clarified to distinguish the relationship of modern American Indian tribes to the locations of their traditional cultural affiliations.

6.2.31.2 Regulatory Compliance

Comment Number: 100148-11

Organization:

Commenter: Jon M Shumaker

Comment Excerpt Text:

There is no indication or documentation that the BLM has actually sat down in person with individual tribal representatives and consulted with each tribe on a government-to-government basis in order to fulfill the BLM's consultation obligations to Native American tribes.

Summary

One commenter indicated the BLM did not provide documentation of government-to-government consultation with Native American tribes.

Response

Documentation of BLM's government-to-government consultation with Native American tribes is described in the new Chapter 5, Consultation and Coordination, Section 5.3.2, of the Proposed RMP/Final EIS.

6.2.32 PUBLIC HEALTH AND SAFETY

Comment Number: 100140-7

Organization: US Environmental Protection Agency

Commenter: Kathleen Goforth

Comment Excerpt Text:

The FEIS should describe the BLM's plans for addressing abandoned mines in the resource area and National Monument. For example:

- What is the universe of current knowledge on abandoned mines in the resource area and Monument (how many, what are the known hazards/conditions, how are they prioritized)?
- What is currently being done to address these sites?
- How is this work being funded, and what are the current and future funding needs for this work?
- How many abandoned mines have been closed and remediated. and have the most significant known problems been addressed?
- Does the BLM have plans to conduct further surveys and investigations of abandoned mines in the resource area and Monument over the life of the RMP?
- How will abandoned mines be surveyed and assessed for physical and environmental hazards?
- How will they be prioritized for remediation, and what are the overall goals of the RMP regarding abandoned mine land remediation?

Summary

Commenters suggested that the BLM did not adequately address the issue of abandoned mine lands in the DRMP/DEIS. Commenters requested the BLM describe the plans for addressing abandoned mines in the RMP/EIS and include information such as plans for future surveys and inventories, remediation priorities, and the overall goals of the RMP regarding abandoned mine land remediation.

Response

Decisions related to abandoned mine lands are found in Section 2.13.1 Hazardous Materials and Public Safety; although they are not called out for specific management actions, they are included within Goal I and its associated objectives and management actions.

In Section 3.5.2 BLM describes the current status of active and abandoned mines in the decision areas. Plans that would specifically address how BLM intends to address the AML issue are considered implementation actions and not included as decisions in the PRMP.

6.2.33 SOCIOECONOMIC RESOURCES

6.2.33.1 Data

Comment Number: 100120-4

Organization:

Commenter: Bill Broyles

Comment Excerpt Text:

Again looking at the 1991 GAO report, grazing in SDNM likely has negligible economic benefit to the region. At that time, under better grazing conditions, “The 33 ranches in the Lower Gila North area of Arizona contributed an estimated 0.32 percent to the total value of livestock and livestock products sold in Yuma, Maricopa, and Yavapai counties” (p. 47). There are reasons that ranches and leases in both Lower Gila North and South have been abandoned. And I’m betting that the economic advantages of retiring grazing – tourism, hunting, environment -- far surpass those of grazing in SDNM, though I didn’t see that information in the management report.

Comment Number: 100126-48

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

The DRMP/DEIS does not account for the non-market values associated with undeveloped wild lands. Non-market values have been measured and quantified for decades. There is a well-established body of economic research on the measurement of non-market values, and the physical changes (decreases in the source of these values) brought about by oil and gas development and motorized recreation are very easy to measure quantitatively.

Comment Number: LSFO-SDNM-DRMP--I-18763-I

Organization:

Commenter: James Newman

Organization 2:

Commenter: Regina Newman

Organization 3:

Commenter 3: James Newman

Organization 4:

Commenter 4: Christopher Tosh

Organization 5:

Commenter 5: Carolyn Newman

Comment Excerpt Text:

In accurate statement on growth

Comment Number: I

Cited Content: Unprecedented regional population growth and urban expansion into surrounding public lands is increasing demand for access to and use of public lands and resources. Growth contributes to dramatic increases in and demands for commodities, utilities, renewable energy, communication, transportation, and infrastructure on public lands.

Cited Section ID: Executive Summary

Comment Title: In accurate statement on growth

Comment:

Much of the area in question has been in a decline in population in the last several years which reduces the need for these resources listed.

Summary

Commenters questioned the data utilized for the analysis of socioeconomic impacts indicating, in some cases, that the data is too old and/or inaccurate to be used.

Commenters also noted that the analysis does not account for nonmarket values associated with undeveloped lands.

Response

Socioeconomic data has been updated as appropriate and available. Updated data more clearly highlights the changes in demographics over the last 5 years.

Non-market values are discussed in Section 3.5.3, Attractiveness of the Decision Space. Non-market values such as sense of place, rural character, open space, and ecological protection, are an important part of the planning area. This was highlighted during the five community socioeconomic meetings conducted as part of the planning process. Non-market and social values (e.g., sense of place) are one of the indicators used for impact analysis (see **Section 4.22**). The Proposed RMP/Final EIS was revised to include additional analysis on the effects of non-market values on areas to be managed to protect wilderness characteristics.

6.2.33.2 Impacts

Comment Number: 100121-34

Organization: Sierra Club

Commenter: Jim Vaaler

Comment Excerpt Text:

The final two sentences of the final paragraph in section 4.15.6.1 Both Decision Areas conclude that there would be dire economic hardships for towns and communities that are dependent on the ranching industry. We question this statement. What towns in the Decision Area are actually dependent upon the livestock grazing industry?

Comment Number: 100122-2

Organization: Tucson Electric Power Company

Commenter: Shannon Breslin

Comment Excerpt Text:

While the DRMP/DEIS briefly discusses the socioeconomic and environmental impacts that would occur to adjacent lands and the costs that would be incurred by utilities and their ratepayers if Alternatives C, D, or E are implemented, it does not quantify these impacts, which would be significant.

Comment Number: 100122-5

Organization: Tucson Electric Power Company

Commenter: Shannon Breslin

Comment Excerpt Text:

This would also include monies necessary for all activities identified in the chronology of events that would lead to the adoption of a change to the EHV Electric system plan and any necessary construction cost increases. Specifically, we respectfully request that the Sonoran Desert Management Plan include a full identification of the social and economic impacts on all of the approved regional EHV electric system components located in Sections 4 and 12, Township 7 South, Range 2 East; Sections 7, 17, 18,21,22,23,25, and 26, Township 7 South, Range 3 East; and Sections 30, and 31, Township 7 South, Range 4 East. These locations are shown on attached Exhibit A.

Exhibit B shows the location of the corridor approved in 1980 (Case 50) by the State of Arizona Power Plant and Transmission Line Siting Committee and Arizona Corporation Commission (ACC), in Sections 15,22, and 27 of Township 14 South, Range 10 East.

Comment Number: 100126-49

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

The Draft RMP does not to fully address the impacts that the management of the planning area will have on the local economy. The economic impact that undeveloped lands have on local economies is well documented and has grown in importance as the U.S. moves from a primary manufacturing and extractive economy to one more focused on service sector industries. This shift means that many businesses are free to locate wherever they choose. The “raw materials” upon which these businesses rely are people, and study after study has shown that natural amenities attract a high-quality, educated, talented workforce – the lifeblood of these businesses.

Comment Number: I00126-92

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

BLM should measure and account for changes in non-market values associated with the level of motorized recreation and other uses and development proposed in this RMP. To do otherwise omits a very important socioeconomic impact that is the direct result of management actions. The BLM must assess the non-market economic impacts to the American public. This analysis must include the passive use values of undeveloped lands such as the lands with wilderness characteristics and the passive use values of irreplaceable cultural resources.

Comment Number: I00126-93

Organization: The Wilderness Society

Commenter: Phil Hanceford

Comment Excerpt Text:

The BLM must collect and analyze actual data on the economic impacts of the alternatives. Some suggested analyses and sources of data can be found in “Socio-Economic Framework for Public Land Management Planning: Indicators for the West’s Economy” (Attachment 7). BLM must make a thorough examination of the full socioeconomic impacts likely to occur if the management alternatives are implemented. These analyses must take into account the impacts that BLM land management actions will have on the surrounding communities, including the added cost of providing services and infrastructure, the long-term costs of the likely environmental damage, and the impacts on other sectors of the economy. The BLM must examine the role that protected public lands (including lands with wilderness characteristics) play in the local economy

Comment Number: I00133-2

Organization: Friends of San Tan Mountain Regional Park

Commenter:

Comment Excerpt Text:

San Tan Mountain Regional Park can be a big economic driver in this area where economic drivers are sparse at best. To lose this Park would be to stifle growth, opportunity and a viable local option where families to reap the health and educational benefits associated with San Tan Mountain Regional Park

Comment Number: I00136-94

Organization: Western Watersheds Project

Commenter: Greta Anderson

Comment Excerpt Text:

The BLM fails to analyze or disclose the socio-economics of the preferred alternative. There are very few beneficiaries of allowing livestock grazing to continue, but many economic losers, including the taxpayers, who must subsidize the federal lands grazing program. The DRMP/DEIS should have discussed the cost of administering ongoing livestock grazing in the planning area (both SDNM and LSFO) relative to the value these lands have for recreation, tourism, wildlife integrity, cultural landscapes, etc.

Comment Number: I00137-22

Organization: Fennemore Craig P.C.

Commenter: Dawn Meidinger

Comment Excerpt Text:

The general theme of failing to evaluate the impacts of withdrawal or other limitations placed on mineral development is unfortunately replicated in the analysis of socio-economic impacts. 12 [Footnote 12 In fact, one of the few mentions of economic benefits of mineral resource development occurs in the effects analysis for the “No Action Alternative” (Alternative A), which states that “[s]ince investment in locatable mineral development in the Planning Area is expected to increase, this alternative is expected to have minor to moderate impacts on local economic growth in employment and income in the surrounding communities.” But even that analysis concludes with “[c]ontinued mineral development could cause a loss of scenic views and natural landscapes, which would decrease the social well-being of those individuals or groups who value these resources.” DRMP/EIS at 840.] There is no consideration of the economic burden on local economies resulting from the management prescriptions for minerals in the DRMP.13 [Footnote 13 Using 2003 data for population and 1999 economic data, the DRMP/EIS cites Ajo as having a 38.5% minority population with a poverty rate of 22.3% (in contrast to the average rate of 13.9% for the balance of the State of Arizona). Miami is identified as having a minority population of 57.0% and a poverty rate of 21.5%. DRMP/EIS at 368-369.] The BLM is encouraged to review available public information about the economic benefits of mining in Arizona and incorporate such information into a proper effects analysis in the FEIS.14 [Footnote 14 See, for example, *The Economic Impact of Freeport-McMoRan Copper & Gold Inc. on the State of Arizona and Selected Counties 2009*, L. William Seidman Research Institute, W.P. Carey School of Business (2010).] In fact, the total estimated direct and indirect economic impact of Freeport’s Arizona operations was approximately \$2 billion, including \$79 million in state and local taxes and the employment of 23,271 Arizonans. To the extent mineral resource development in Ajo is limited or made even more costly as a result of the creation of ACEC or otherwise made impossible through the implementation of Avoidance and Exclusion zones surrounding Ajo, those economic impacts and socioeconomic effects must be evaluated in the FEIS.

Comment Number: I00137-23

Organization: Fennemore Craig P.C.

Commenter: Dawn Meidinger

Comment Excerpt Text:

Similar impacts resulting from withdrawals and limitations on development of leasable and saleable mineral operations should also be considered.

Summary

Commenters requested that the socioeconomic analysis further address certain impacts to local economies in the planning area as a result of management in the RMP. Specifically, commenters noted that the DRMP/DEIS does not adequately discuss potential socioeconomic impacts associated with closing San Tan Mountain Regional Park, approved EHV electrical systems, or impacts on non-market values (specifically on non-developed lands).

Commenters also noted that in some cases the analysis of impacts associated with specific industries including livestock grazing and mineral resources is incomplete and inaccurate.

Response

No alternative in this RMP would close San Tan Regional Park.

The socioeconomic impact analysis has been revised to incorporate updated and new data concerning livestock grazing and minerals in order to provide more context. Additional economic analysis is provided.

6.3 RESPONSES FOR SPECIFIC COMMENTS

BLM received detailed comments regarding livestock grazing decisions in the SDNM, Appendix F, the Land Health Evaluation, and Appendix E, Grazing Compatibility Report, and specific route designation comments for travel management decisions in the SDNM. As these comments related to specific implementation level decisions in the SDNM Decision Area, BLM determined it was appropriate to respond to the individual comments rather than combine the comments into a summarized response. In the following tables, BLM has made note of specific comments with associated level of detail in the response.

6.3.1 SDNM RMP LIVESTOCK GRAZING – ALLOTMENT SPECIFIC

Commenter	Comment Number	Comment Text	Response
Western Watersheds Project, Greta Anderson	100136-14	Big Horn allotment-Limy Upland Ecological Site a. An earlier version of the DRAFT LHE admits, "The Limy Upland ecological site is not meeting but is making significant progress toward achievement of Standard." Exhibit A, Draft DRAFT LHE at 39. The current version states, "The limy upland ecological site is achieving Standard 3." DRMP/DEIS at 1114. This appears to be because BLM changes the site objectives between drafts, downward adjusting the vegetation objectives so that the sites meet the standards instead of confronting the failures of both key areas to meet the original objectives. For example, the original objective was to maintain total vegetative canopy cover at 16 percent. Exhibit A, Draft DRAFT LHE at 39. The two monitoring sites had cover at 14% and 12%. DRMP/DEIS at 1114. The new objective is "Maintain total vegetative canopy cover at 12%." Ibid. Et viola! Both monitoring sites are now achieving the standard. This downgrading is unexplained and causes skepticism that the BLM's new plan is a fair look at the data.	<p>The 2008 preliminary draft LHE was an internal working document that was peer reviewed in 2009. Baseline information was collected through 2010. The 2011 draft LHE that was provided in Appendix F of the Draft EIS contained changes from the 2008 version based on new information and was focused to specifically address impacts to Monument objects. The methodology for the draft LHE is provided in Section F.6 of Appendix F. The methodology for the Compatibility Analysis and Determination process is in Section E.2 of Appendix E.</p> <p>Peer reviewers suggested that a range around the absolute value rather than the absolute value would be more acceptable to judge achievement of resource management objectives because the range around the absolute value better represented real conditions on the ground than the absolute value alone. The 12% composition falls within 80% of the attribute value as explained in Table F.9 and E.2.3.1.</p>
Western Watersheds Project, Greta Anderson	100136-17	LOWER VEKOL ALLOTMENT 1. Lower Vekol -Limy Upland and Limy Upland Deep a. The previous draft of the DRAFT LHE characterized both plots LV-2 and LV-4 as Limy Upland Deep. Exhibit A, Draft DRAFT LHE at 57. The new DRAFT LHE moves LV-4 to "Limy Upland." DRMP/DEIS at 1132. b. Key Area LV-4 only has 10 percent actual canopy cover, as opposed to the 12 percent cover objective. DRMP/DEIS at 1132, 1131. The DRAFT LHE doesn't acknowledge this deficiency.	<p>The Ecological site for LV-4 was misidentified in the 2008 preliminary draft. This was corrected in the DRMP/DEIS Appendix F, Land Health Evaluation.</p> <p>Peer reviewers suggested that a range around the absolute value rather than the absolute value is more acceptable to judge achievement of the resource management objectives. The 80% threshold captures the variability that occurs within the Sonoran Desert Natural Monument for plant canopy cover and plant abundance.</p>

Commenter	Comment Number	Comment Text	Response
			<p>Section F.8.0- Conclusions (also see Table F.13) - Ecological site variability was considered when making the final determination of whether or not a site is achieving Land Health Standard 3 Desired Plant Community Objectives by Key Area and PBI Site. Rather than using the absolute value to determine achievement of the objective, if the canopy cover and/or the composition vegetative attributes measured were within 80% of the attribute value, the site was considered achieving the objective.</p>
Western Watersheds Project, Greta Anderson	100136-23	BLM states that its use-pattern mapping data for the Hazen allotment only relates to wildlife use around two wildlife waters on the allotment, and as such, is not included in the DRMP/DEIS. DRMP/DEIS at 1109. This raises serious questions: how was the map of use patterns from livestock grazing, and the subsequent determinations about use levels on the Hazen allotment, generated? Moreover, how does BLM know that the use is from wildlife instead of historic use by livestock? And, additionally, did BLM average the two years of non-use on the Hazen allotment into the ten-year average use on the allotment?	<p>Section F.7.4, Table F.4 refers to permitted use for the Hazen Allotment. This permitted use data was based on billing information (licensed use). Because no actual livestock use had occurred on the allotment for several years prior to collection of the use pattern mapping data, the use could not have been from livestock foraging (see Section F.7.4). Use pattern mapping is conducted at the end of the growing/grazing season to measure use on that year's forage production, not historic use.</p>
Western Watersheds Project, Greta Anderson	100136-49	Big Horn allotment-Limy Upland Deep Ecological Site a. An earlier version of the LHE admits that utilization of white bursage at key area BH-5 exceeded the wilderness objective of 20 percent utilization. Exhibit A, Draft LHE at 39. This information is not conveyed by the "Utilization and Use Pattern Mapping," in Table F.7.4. DRMP/DEIS at 1109.	<p>BLM has revised Section F.10.2.1.5 to state "the wilderness area objective of 20 percent was exceeded (see Table F.7)."</p>
Western Watersheds Project, Greta Anderson	100136-51	Big Horn allotment-Granitic Hills ecological site a. An earlier version of the LHE states that the goal for this site was to maintain recruitment of saguaros at a rate of 1/young per plot. Exhibit A Draft LHE at 40. The current LHE requires only .83 saguaros per plot. DRMP/DEIS at 1115.	<p>The 2008 preliminary draft LHE was an internal working document that was peer reviewed in 2009. Baseline information was collected through 2010. The 2011 draft LHE that was provided in Appendix F of the DRMP/DEIS contained changes from the 2008 version based on new information and</p>

Commenter	Comment Number	Comment Text	Response
		<p>Four of the nine study plots in this don't have saguaros present at all. Id. at 1172-1189. These are not stem counts, merely cover data, and cannot be used to support the conclusions of the LHE or DRMP/DEIS.</p>	<p>was focused to specifically address impacts to Monument objects. The methodology for the draft LHE is provided in Section F.6 of Appendix F. The methodology for the Compatibility Analysis and Determination process is in Section E.2 of Appendix E.</p> <p>Peer reviewers suggested that a range around the absolute value rather than the absolute value would be more acceptable to judge achievement of resource management objectives because the range around the absolute value better represented real conditions on the ground than the absolute value alone. The 12% composition falls within 80% of the attribute value as explained in Tables F.9 and E.2.3.1.</p> <p>Section F.10.2.1.7 discusses saguaro recruitment on the Granitic Hills Ecological Site within the Big Horn allotment.</p>
<p>Western Watersheds Project, Greta Anderson</p>	<p>100136-52</p>	<p>Beloat allotment -Limy Upland ecological site a. The earlier version of the LHE set the objectives for total vegetation canopy cover at 16 percent. Exhibit A, Draft LHE at 44. The current LHE downgrades the objective to 12 percent. DRMP/DEIS at 1119. The one key area on this ecological site has 13 percent canopy cover, so under the revised objectives, this key area is meeting standards. Ibid. Again, the revision/downgrading of objectives is unexplained, but it appears that BLM tried to make the objectives fit the data instead of fairly and objectively analyzing the data it had. The current LHE states, "The Beloat allotment is not fully achieving Standard 3" based on the limy fan and sandy wash ecological sites. DRMP/DEIS at 1120. These sites compose over half the allotment. Ibid. However, if the BLM hadn't changed its site objectives, the limy upland site would have</p>	<p>The 2008 preliminary draft LHE was an internal working document that was peer reviewed in 2009. Baseline information was collected through 2010. The 2011 draft LHE that was provided in Appendix F of the DRMP/DEIS contained changes from the 2008 version based on new information and was focused to specifically address impacts to Monument objects. The methodology for the draft LHE is provided in Section F.6 of Appendix F. The methodology for the Compatibility Analysis and Determination process is in Section E.2 of Appendix E.</p> <p>Peer reviewers suggested that a range around the absolute value rather than the absolute value would be more acceptable to judge achievement of resource management objectives because the range around the absolute value better</p>

Commenter	Comment Number	Comment Text	Response
		also failed to meet the standards.	represented real conditions on the ground than the absolute value alone. The 12% composition falls within 80% of the attribute value as explained in Tables F.9 and E.2.3.1 .
Western Watersheds Project, Greta Anderson	100136-53	The previous draft LHE found, "The Hazen allotment is not achieving but is making significant progress towards achievement of standard number 3." Exhibit A, Draft LHE at 51. The current draft states, "The majority of the Hazen allotment is achieving Standard 3." DRMP/DEIS at 1128. The difference in conclusions is remarkable, and unexplained. (18)	<p>The 2008 preliminary draft LHE was an internal working document that was peer reviewed in 2009. Baseline information was collected through 2010. The 2011 draft LHE that was provided in Appendix F of the DEIS contained changes from the 2008 version based on new information and was focused to specifically address impacts to Monument objects. The methodology for the draft LHE is provided in Section F.6 of Appendix F. The methodology for the Compatibility Analysis and Determination process is in Section E.2 of Appendix E.</p> <p>Peer reviewers suggested that a range around the absolute value rather than the absolute value would be more acceptable to judge achievement of resource management objectives because the range around the absolute value better represented real conditions on the ground than the absolute value alone. The 12% composition falls within 80% of the attribute value as explained in Tables F.9 and E.2.3.1.</p>
Western Watersheds Project, Greta Anderson	100136-59	It is unexplained why BLM didn't include the data it has on ground cover in the Arnold allotment. Exhibit B at 28.	Data on the Arnold Allotment vegetative canopy cover in the Monument is displayed in Table F.18 , Vegetative Canopy Cover Data in Appendix F of the Proposed RMP/Final EIS.
Western Watersheds Project, Greta Anderson	100136-67	The preferred alternative prorates grazing use on the Big Horn allotment based on "inventory data" and base water properties instead of percentage of public land acreage. DRMP/DEIS at 1085. This method is unexplained and unsupported; if BLM has "inventory" data for the Big Horn allotment, we would be most interested in seeing it and it	Forage is not distributed evenly across the landscape, so "percentage of public land acreage" is not a suitable method for prorating forage. In addition, water is not evenly distributed across the landscape so location of water also affects availability of forage. The footnote to Table F.1 , Appendix F, has been clarified to explain that inventory data

Commenter	Comment Number	Comment Text	Response
		<p>should have been disclosed in the and DRMP/DEIS. As we commented to the BLM in November 2008, the BLM must conduct a complete and NEPA-compliant review of the adjusted boundaries and FLPMA-compliant analysis of the carrying capacity of the remaining lands. The BLM must also provide a thorough analysis of the capacity of the lands on this allotment that would remain in active livestock use with the closures proposed in the preferred alternative.</p>	<p>and water availability were used to determine forage location and availability when prorating AUM percentages inside and outside the Monument.</p> <p>The design of grazing under the preferred alternative (levels of use and season of use) for livestock use North of I-8 are supported by the best available data: monitoring, field observations, ecological site/soil-vegetation inventory data and the Lower Gila south RMP resource protection alternative as represented by the Land Health Assessment and the Compatibility Analysis.</p>
Western Watersheds Project, Greta Anderson	100136-8	<p>The Lower Vekol allotment failed to meet LHE standards and livestock grazing was found to be incompatible with protection of desert washes along 2 miles of washes on this allotment. DRMP/DEIS at 1068. Inexplicably, the BLM hasn't closed any areas of this allotment under the preferred alternative. Map I-8e. This violates the Proclamation, which protects desert washes, as the preferred alternative doesn't offer any protection or mitigation measures. It is inconsistent with the BLM's choices for the Conley allotment and parts of the Big Horn allotment, and this inconsistency is arbitrary and capricious and must be corrected in the final RMP</p>	<p>Approximately 607 acres of the Lower Vekol allotment have been found to be incompatible and has been made unavailable to grazing under the preferred alternative (see Table 2.14). Map 2-8e has been corrected to show the areas that are identified as unavailable.</p>
Western Watersheds Project, Greta Anderson	100136-9	<p>The LHE for the Arnold allotment determined that the sole key area on this allotment within the SDNM does not meet Standard 3 for canopy cover. DRMP/DEIS at 1134. The BLM states that the "Use Pattern Mapping" indicates slight use (6-20 percent) in the allotment and claims that current livestock grazing is not likely the causal factor for non-achievement of Standard 3. Ibid. It then refers the reader to the "Use Pattern Mapping" section, without indicating a page</p>	<p>Section F.6.2 has been updated to clarify the methodology for collecting utilization data. BLM guidance for utilization studies may be found in Technical Reference 1734-3.</p>

Commenter	Comment Number	Comment Text	Response
		<p>number for this. We contacted BLM and were told that the page number is 1141, which is nothing more than a map of the results.(11) This is insufficient and fails to explain the process whereby this map was generated. (12) It is also insufficient to support BLM's decision to keep this allotment open for use under the preferred alternative.</p>	
<p>Western Watersheds Project, Greta Anderson</p>	<p>100136-99</p>	<p>The limy upland on the Lower Vekol allotment is not achieving Standard 3. DRMP/DEIS at 1131. It is not achieving composition objectives. Id. at 1132. The BLM claims that "use pattern mapping indicated light use" and determined that livestock grazing is not a causal factor in failing to achieve this standard. Ibid. However, there are no utilization data for this allotment provided in the DRMP/DEIS. Saguaro contributed to 1 percent of the cover. Id. at 1166. Here, the BLM has downgraded the percent cover "allowed" in the ecological site description from the 2 percent it claimed in the same ecological site on Big Horn (DRMP/DEIS at 1158) to 1 percent, thus meeting the "standard" once again.</p>	<p>The use pattern map represents the utilization data for that allotment. See Section F.6.2 under "Utilization Studies" for explanation of use pattern mapping methodology. BLM guidance for use-pattern mapping may be found in Technical Reference 1734-3.</p> <p>To the extent the comment refers to the 2008 preliminary draft LHE, the 2008 preliminary draft LHE was an internal working document that was peer reviewed in 2009. Baseline information was collected through 2010. The 2011 draft LHE that was provided in Appendix F of the DRMP/DEIS contained changes from the 2008 version based on new information and was focused to specifically address impacts to Monument objects. The methodology for the draft LHE is provided in Section F.6 of Appendix F. The methodology for the Compatibility Analysis and Determination process is in Section E.2 of Appendix E.</p> <p>Peer reviewers suggested that a range around the absolute value rather than the absolute value would be more acceptable to judge achievement of resource management objectives because the range around the absolute value better represented real conditions on the ground than the absolute value alone. The 12% composition falls within 80% of the attribute value as explained in Tables F.9 and E.2.3.1.</p>

6.3.2 SDNM RMP ANALYSIS ISSUES

Commenter	Comment Number	Comment Text	Response
Western Watersheds Project, Greta Anderson	100136-22	<p>The DRMP/DEIS claims that the landscape appearance method found in Technical Reference 1734-3 was used to map out zones of utilization for use-pattern mapping throughout the Monument. DMRP/DEIS at 1106. This method is used to identify use patterns "in order to plan for range improvements and identify necessary changes in management to improve distribution." Id. at 1106-1007. This type of assessment is rapid and qualitative, but does depend upon the establishment of permanent transects. See Technical Reference 1734-3 at 119 et seq.22 The DRMP/DEIS doesn't reveal how many of these transects were established, when they were established, or if the data revealed in Table F.7.4 are derived from these transects or from other types of monitoring. In any case, it is entirely unclear how the BLM used these methods to "map out zones of utilization for use-pattern mapping throughout the Monument." DRMP/DEIS at 1106. If the BLM did establish transects, the final RMP/EIS should include a map and the raw data, as well as a discussion of how this method relates to key area data.</p>	<p>Raw data is available in the Phoenix District Office and summarized in Appendix F, Land Health Evaluation.</p> <p>Appendix F, Land Health Evaluation has been revised to include a description of the methodology use to collect utilization data during use-pattern mapping and on utilization transects (see Section F.6).</p>
Western Watersheds Project, Greta Anderson	100136-26	<p>Where BLM claims this "reflects general pattern of current grazing management practices" and it is "supported by inventory and monitoring data," (Id. at 149) it has not demonstrated this through the plan with the inclusion of relevant actual use, inventory, or monitoring data. The BLM's focus on livestock impacts to vegetation does not include an analysis of ephemeral use. DRMP/DEIS at 502, 515. There is no information or analysis to support this change, and given the resources at stake on the Monument,</p>	<p>Actual use and monitoring data is available in the Phoenix District Office and summarized in Chapter 3, Affected Environment, Appendix E, Compatibility Report, and Appendix F, Land Health Evaluation (see Section F.7.1).</p> <p>The RMP has been revised to address the effects of ephemeral use on vegetation.</p>

Commenter	Comment Number	Comment Text	Response
Western Watersheds Project, Greta Anderson	100136-54	<p>the BLM cannot make this blanket adjustment through the RMP process.</p> <p>It is worth noting that BLM simultaneously determines that livestock aren't the cause of impacts because use levels are negligible to slight and admits that livestock haven't used the allotment in several years. DRMP/DEIS at 1128-1129. Conclusions about whether long-term vegetation changes are the result of livestock grazing are apparently based on years when livestock aren't even present. This defies logic, but also calls into question whether any of the analyses can be used to support the DRMP/DEIS's contentions about the impacts of future livestock grazing.</p>	<p>Conclusions in the Proposed RMP/Final EIS are not solely dependent on utilization data but on the analysis of multiple data sets. The best available data was used to formulate management recommendations and to analyze the various alternatives. The data used has been described in Appendix F, Land Health Evaluation and can be reviewed in the BLM Phoenix District Office.</p> <p>Utilization data on the Hazen allotment indicated that use is best attributable to wildlife because there was no livestock use for several years. (See Appendix F, Land Health Evaluation, Section F.7.)</p> <p>Because Hazen allotment has had no livestock use for several years, BLM cannot conclude that livestock are the causal factor in not meeting Standard 3 on the Hazen Allotment (see Appendix F, Land Health Evaluation, Section F.13.2.2). This analysis was not used to support a conclusion of causation in any other allotment or impacts of future livestock grazing.</p>
Western Watersheds Project, Greta Anderson	100136-63	<p>Because the DRMP/DEIS does not include year-by-year analysis of currently authorized AUM on the Monument, it is impossible for the decision-maker and the public to know how the proposed action compares with current management. Though BLM claims that this change, "Reflects general pattern of current grazing management practices," it does not elaborate anywhere in the plan how this is so. This fails the "hard look" standard of the National Environmental Policy Act.</p>	<p>A land use planning-level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM realizes that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan-level decisions. Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1). The BLM would conduct subsequent project-specific NEPA analyses for projects proposed for implementation under the</p>

Commenter	Comment Number	Comment Text	Response
			<p>land use plan (40 CFR 1502.20, 40 CFR 1508.28). As required by NEPA, the public would have the opportunity to participate in the NEPA process for site-specific actions.</p> <p>Programmatic or RMP level analysis addresses impacts from RMP level decisions, which are decisions set forth to achieve the goals and objectives of a specific program area within the RMP. Analyses for these decisions are broad in scale and focus on the scope of the individual alternatives and environmental effects. Programmatic analysis is typically regional in scope and accounts for differing land use scenarios, including cumulative effects from multiple activities and future projects (of which the location and details are not yet known). Refer to Sections 4.2 through 4.24 for RMP-level impact analysis. The explanation for why a ten-year average was used is given in Appendix F, Land Health Evaluation, Section F.7.1.</p>
Western Watersheds Project, Greta Anderson	100136-64	Moreover, wherever BLM claims that the effects of Alternative E will be similar to Alternative A (Current Management), it has failed to describe potential differences from this changed seasonally-intensive use on Monument lands.	The impacts analysis in Section 4.9.8.3 have been revised to disclose the effects of seasonal use as described in Alternative E.
Western Watersheds Project, Greta Anderson	100136-7	The LHE attributes many key areas' failures to meet land health standards to "other causes" which include "historic livestock grazing, livestock use patterns, fire, drought, OHV use, etc." DRMP/DEIS at 1070-1071. It is unclear how historic livestock use (unspecified time frame) or "livestock use patterns" are considered a cause "other" than livestock grazing.	<p>Table E.9, bottom note has been clarified to read “*May include historic livestock grazing and use patterns , fire, drought, OHV use, etc.”</p> <p>Historic grazing refers to that period described in Appendix E, Section E.1.2. The period considered “historic” has been refined to include grazing prior to the 1970’s. The footnote to Table E.9 has been revised to say “*May include historic livestock grazing and historic livestock use patterns, fire, drought, OHV use, etc.” The determination of compatibility is</p>

Commenter	Comment Number	Comment Text	Response
			<p>based on current ecological conditions and current authorized livestock use.</p> <p>BLM used the inventory of 1980 as baseline vegetation data (Proposed RMP/Final EIS, Appendix F, Section F.6.1). Monitoring data in 2004-2009 indicates very little change in vegetation conditions since that 1980 inventory. BLM does not have information that livestock grazing as currently authorized is the causal factor in not meeting Standard 3, except where indicated in Appendix E and F and subsequently brought forward into the alternative..</p>
Western Watersheds Project, Greta Anderson	100136-70	<p>The use pattern and utilization data are also problematic in that the BLM uses only utilization data to determine that grazing management is a factor in failing to achieve land health standards on only 12 miles of the 490.5 miles of desert wash on the SDNM. DRMP/DEIS at 1057. The BLM claims that while 294 miles are not meeting Standard 3, the utilization data show that livestock are not the causative factor. Ibid. This conclusion is unsupported. BLM only has utilization data for two allotments, the Big Horn and the Conley. DRMP/DEIS at 1109. The BLM claims that livestock use levels were negligible or slight on the Beloat and Hazen allotments, but it does not identify where how this level was ascertained given that it has no utilization data for these allotments. Id. at 1059-1060.23 It also contradicts our observations. See Figures 2-5, Attached as Exhibit F.</p>	<p>Use of utilization as an indicator of livestock as the causal factor is given in Appendix E, Section E.2.3.2. Utilization was collected using ocular estimate while conducting use pattern mapping consistent with Technical Reference 1743-3. While utilization data was not collected at key areas within the Beloat and Hazen allotments, the use pattern mapping does represent utilization data for these allotments (see Appendix F, Map 5).</p>
Western Watersheds Project, Greta Anderson	100136-73	<p>In fact, instead of looking at the livestock concentration areas (water developments, salt licks, etc.), where intensive harms are known to occur, the BLM specifically chose sites distant from areas of concentrated impacts to evaluate the</p>	<p>The methodology for Key Area selection is stated in Section F.6.2, and was conducted in accordance with BLM guidance TR-1734-4. A key area:</p> <ul style="list-style-type: none"> • Is representative of the stratum in which it is located.

Commenter	Comment Number	Comment Text	Response
		<p>effects of livestock. Key areas are intentionally located at a remove from concentration areas, ensuring that BLM is only measuring dispersed impacts. DRMP/DEIS at 1054. For example, the BLM used only data from Pacific Biodiversity Institute plots that were located 1000 meters from livestock disturbance. DRMP/DEIS at 1107. The BLM claims that study sites located closer to water were not representative of what was happening at a broader area. Ibid. The BLM does not disclose how many water developments are on the northern portion of the SDNM, but at each water development, by using this selective sampling method, the BLM has effectively ignored ecological conditions on 775 acres of desert habitat within the more-disturbed perimeter. Each time, the BLM ignores the findings of an area nearly half the size of the Arnold allotment within the SDNM. This is exactly the opposite approach it used to analyze shooting, and one that strongly affects the reliability of the data See Fehmi 2009 at 4. The difference in analytical approach is significant because the PBI study sites located at disturbed areas, 50 m from disturbed areas, 100 meters from disturbed areas, and 500 meters from disturbed areas show that the ecological conditions of plots in close proximity to livestock waters were poor. Phase 2 Report at 97. Vegetation composition and soil structures were highly altered. Ibid. It also concluded that livestock grazing had more statistically significant impacts than off-road vehicle use. Phase 2 report at 116.</p>	<ul style="list-style-type: none"> • Is located within a single ecological site and plant community. • Should contain the key species where the key species concept is used. • Is capable of, and likely to show, a response to management actions. This response should be indicative of the response that is occurring on the stratum. <p>Livestock waters do not meet three of the four criteria above, and are not representative of the overall landscape level conditions within the Monument. For these reasons BLM was unable to use the analysis that was provided by PBI that used study plots in close proximity to water.</p> <p>Appendix F, Map 4 provides locations of water developments in the northern portion of SDNM.</p> <p>The objects of the SDNM are landscape in nature and BLM's analysis is assessing the compatibility of livestock grazing with protection of those Monument objects. Impacts of livestock use have been disclosed in the Proposed RMP/Final EIS in several sections, including Sections 4.8 and 4.9.</p>
Western Watersheds Project, Greta	100136-76	The BLM did not analyze ephemeral authorizations in context of its plan to shift the majority of the livestock grazing (65 percent) to the winter months. DRMP/DEIS at	The impacts analysis in Section 4.9.8.3 have been revised to disclose the effects of seasonal use as described in Alternative E.

Commenter	Comment Number	Comment Text	Response
Anderson		149. By shifting the majority of livestock use to the period between October 1 and April 30, the BLM is actually increasing perennial winter grazing without any evidence that the land can support it. Perennial grazing authorizations are based on yearlong use here, the BLM is using the perennial authorization numbers but distributing it unevenly over the year. This is a significant change that should be based on a "hard look."	
Western Watersheds Project, Greta Anderson	100136-79	BLM's use of utilization and use-pattern mapping to determine impacts to saguaros where standards are not being met is unfortunately ill-suited to the task. Just because livestock are only removing a "light" or "moderate" percentage of the vegetation (use) doesn't mean that they aren't adversely impacting saguaro recruitment through trampling, removal of understory vegetation, or other types of alteration that aren't captured in either cover, composition, or utilization data.	BLM looked at multiple indicators for saguaros. The BLM addressed saguaro cacti in Sections F.5.3.4.6 and F.5.3.4.7 and Table F.22 . This issue has also been addressed in Table F.2 . BLM used recruitment data to determine if saguaro standards are being met.
Western Watersheds Project, Greta Anderson	100136-98	The BLM also relies on Land Health Standard 3 for the limy upland and granitic hills ecological sites to assess "saguaro recruitment objectives." DRMP/DEIS at 1061-1062. This ecological site covers 42 percent of the Monument. Id. at 1087. However, a close look at the data reveal that BLM's LHE didn't actually assess the "diversity, density, and distribution" of plants within the saguaro forest community and didn't obtain much data that refutes PBI's observations. Simply having suitable cover, or meeting the cover objectives, doesn't achieve the indicator of "nurse plants." DRMP/DEIS at 1044.	BLM looked at multiple indicators for saguaros, including raw data from PBI. The BLM addressed saguaro cacti in Sections F.5.3.4.6 and F.5.3.4.7 and Table F.22 . This issue has also been addressed in Table F.2 . BLM used frequency and recruitment data to determine if saguaro standards are being met. BLM used PBI raw data to determine if saguaro objectives have been met.

6.3.3 SDNM DATA ISSUES – BASELINE CONDITIONS

Commenter	Comment Number	Comment Text	Response
Grand Canyon Chapter of The Sierra Club, Jim Vaaler	100001-5	When you are calculating a percentage decreases in cows upon the land, this calculation needs to be based on actual numbers, not on permitted numbers. These numbers are usually not the same. Actual numbers are almost always significantly lower than permitted numbers.	From the standpoint of BLM grazing authorizations (active preference), BLM is proposing a reduction in authorized use. It is not based on actual use because actual use varies from year to year.
Sierra Club, Don Steuter	100018-1	Information on actual annual use of SDNM allotments is not available in the RMP. A 10 year average permitted use [p. 1107] does not give READERS a good picture of how many cattle are actually on the Monument.	BLM did not require reporting of actual use on all allotments. The 10-year average permitted use was based on billing statements and field observations of BLM range conservationists. This information is the best data available to BLM to estimate use. See Section F.7.1 and Table F.4 . The RMP has been revised accordingly (see Table 3-17).
Sierra Club, Jim Vaaler	100121-38	Permitted use levels and actual use levels need to be clearly identified. Use of a chart that shows the percentage grazing reduction per allotment is not useful as this percentage reduction is not tied to permitted use levels or actual use levels. There is no way to determine which number is being used. The statement that permitted numbers and actual numbers are very nearly identical is open to serious question. The BLM seems to rely on the individual permittees to supply them with the number of cattle they have on the land rather than actual observation.	BLM did not require reporting of actual use on all allotments. The 10-year average permitted use was based on billing statements and field observations of BLM range conservationists. This information is the best data available to BLM to estimate use. See Section F.7.1 and Table F.4 . The RMP has been revised accordingly.
Western Watersheds Project, Greta Anderson	100136-11	The BLM used Area A and the Goldwater Range as reference areas for the S&Gs. However, the DRMP/DIES doesn't describe how these areas were selected and whether there were other impacts (burros, campsites, military impacts, etc.) that might have skewed the data in the reference conditions. Several of the plots are on the boundary of the Big Horn allotment, which surely subjects them to grazing influences (invasive species, erosion, etc.) if	Appendix F, Land Health Evaluation, Section F.9 and F.5.3.3 explain how BLM selected BMGR comparison ecological site plots based on occurrence of the same ecological site as north of I-8. Ruyle and several other peer reviewers commented on a preliminary draft of the Land Health Evaluation. BLM considered the comments of all peer reviewers of the preliminary draft. The draft was revised and the current version is in Appendix F of the RMP. See Appendix F,

Commenter	Comment Number	Comment Text	Response
		not grazing (unauthorized use, trespass) itself. Moreover, as Ruyle (2009) points out, the ecological site concept is based on site potential, not the vegetation communities currently present on specific ecological sites. This is misleading, at best, and misapplied.	Compatibility Report, Section F.2.3.
Western Watersheds Project, Greta Anderson	100136-12	Whereas BLM claims that the "Average Number of Perennial Species Per Plot (Diversity) species diversity within the palo verde-mixed cacti and saguaro forest vegetation communities within the SDNM north of T-8 is not reduced from what is found in the BGR and Area A," it has not taken a hard look at the types of vegetation present. Are they native species? Perennial species? Palatable species? Do they represent the same types of vegetation community structure (i.e. tree/shrub/herbaceous/grass cover)? The LHE does not scrutinize these aspects of a "functioning desert community" and relies, inadequately, on alpha diversity rather than beta diversity. (13)	The data that was used to determine diversity may be found in Appendix F, Table F-20 Attachment 3 , Key Area Data, and in Appendix E, Section Step 4, Analysis of the Diversity of Plant Species Biological Object and Table E.6 , Average number of perennial specials per plot
Western Watersheds Project, Greta Anderson	100136-15	a. The earlier draft LHE set the standard of 50 percent cover in the Sandy Wash ecological site (for CFPO, key area #B2). Exhibit A, Draft LHE at 42. The current LHE downgrades this objective to 40 percent. DRMP/DEIS at 1117. The current LHE does not include a scientific reference in support for this reduced cover.	The 2008 LHE was a preliminary draft document that was subsequently revised based upon peer review. Baseline information was collected through 2010. How this standard was developed is described in Appendix F, Section F.5, Ecological Site-Level Desired Plant Community Objectives and meets habitat requirements providing cover, forage, escape, and perching. Additionally, this section has been clarified by adding the citation and information from an AGFD study. The AGFD recommends 35% ground cover for occupied habitat areas for the CFPO (AGFD, Wilcox et al., 1999). The BLM DPC objective is set at 40% ground cover, which exceeds the AGFD recommendations.
Western Watersheds	100136-16	a. The new LHE claims that PBI plot 228 meets the 14 percent composition object for palatable browse on the	The 11.5% composition falls within 80% of the attribute value as explained in Table F.12 and explained in Section F.8.

Commenter	Comment Number	Comment Text	Response
Project, Greta Anderson		Sandy Wash ecological site. DRMP/DEIS at 1127. PBI plot 228 has 11.5 percent palatable browse. Ibid. These are inexplicable conclusions.	There was an error in the Draft RMP text. BLM referenced an incorrect table in Section F.13.2.1.1. This has been corrected in the Proposed RMP/Final EIS; see Section F.13, Analysis of Desired Plant Community Objectives by Key Areas and PBI Sites.
Western Watersheds Project, Greta Anderson	100136-18	In another inexplicable obfuscation of rangeland health condition, the BLM did not include multiple years of rangeland health data in the DRMP/DEIS even on key areas where these data exist. For example, on the Big Horn allotment, the DRMP/DEIS only includes the key area data from 2009. DRMP/DEIS at 1154-1158. The agency actually has data from previous years. Exhibit B (19) Appendices to Draft LHE. The failure to include it suggests intentional obfuscation. ¶ On transect BH-1, the BLM failed to acknowledge that annual grasses have declined from 10 percent cover in 1980 and 2004, to just 5 percent cover in 2009. Id. at 3. Ironwood declined from 44 percent in 1980, to 31 percent in 2004, to just 8 percent in 2009. Ibid.	<p>Comparison of transect data collected over several years in the key areas by BLM was not appropriate, in this case, for assessments of long-term trend analysis. The 2009 data were the most recent data for the area. The 2004 and 1980 transects used different study designs, and therefore, were not comparable to 2009 transects and could not be used to measure trend in the LHE.</p> <p>Annuals are not appropriate species for long-term monitoring for the following reasons: a) annuals complete their life cycle in one year and production fluctuates year to year based on precipitation level; b) cover data collection is often complicated by the presence of annuals that are live plants early in the season, only to become litter later in the season. Cover data from perennial plants is more reliable for measuring changes in cover over time. Average annual production, based on Ecological Site Descriptions are used to calculate total production and cover.</p>
Western Watersheds Project, Greta Anderson	100136-21	A perennial grazing allotment is one which "Consistently produces perennial forage to support a year round livestock operation." DRMP/DEIS at 1095. It is clear that the levels of livestock use proposed in the preferred alternative are based on the production of annual forage, and there are very few palatable perennial species even identified in the field data. BLM has not established that there is sufficient	<p>As part of the design features for the preferred alternative, the proposed livestock use is based on several considerations including the level of use established in the Resource Protection Alternative in Lower Gila South RMP (1988).</p> <p>Recent monitoring data supports the level of use suggested in the Resource Protection Alternative in Lower Gila South</p>

Commenter	Comment Number	Comment Text	Response
		perennial forage on any of the SDNM allotments to make this the preferred alternative.	RMP. See Section F.16, Table F.15. for the rationale for preferred alternative.
Western Watersheds Project, Greta Anderson	100136-39	The LHE process did incorporate a data set collected in a more scientific way by Pacific Biodiversity Institute, but did so in a biased fashion. (6) One PBI study was designed to explicitly address the impact of livestock watering sources, by collecting data along linear transects around a number of water sources. For each water source, PBI sampled four or more plots, including a plot within the disturbance area, the second at 50 meters from the disturbance, the third at 100 meters, a fourth at 500 meters, and in some cases additional plots at additional 500 meter intervals. The LHE process used only data from plots that were 1,000 meters or farther from disturbance sites. DRMP/DEIS at 1107. BLM used data from 48 plots measured by PBI, out of 320 plots for which PBI gathered a full set of quantitative data. This eliminated data from 272 plots that could have better characterized the landscape condition. It eliminates a large portion of the SDNM from evaluation. PBI estimated that more than 4,700 acres of the SDNM were within "high-density cow trail areas." Morrison, et al. 2003. More importantly, BLM specifically excluded data that specifically addressed the question of livestock compatibility with a functioning desert ecosystem.	BLM contracted The Nature Conservancy (who in turn contracted PBI) to collect data within the SDNM for the purposes of providing BLM data to determine ecological conditions within the Monument. BLM used PBI plots to increase the number of key areas, where appropriate. See Section F.6.3 of Appendix F. While PBI's method for collecting the vegetation attributes was acceptable, many of the plot locations did not fit BLM's criteria for selection of key areas. Several of the plots overlapped multiple ecological sites and soil survey mapping units and some plots were located too close to livestock waters, which are not representative of the overall landscape level conditions within the Monument. For these reasons BLM was unable to use some of the analysis that was provided. In addition, the majority of the plots were located south of I-8 on the allotments that were closed to livestock grazing as required under the SDNM proclamation and within BMGR on ecological sites that do not occur north of I-8. PBI's study was of limited use because it did not address the intensity, frequency, timing, class of livestock, season of use, ecological sites, precipitation patterns and other variables the BLM needs to address the effects of current livestock grazing practices on the objects of the Monument. However, BLM did use some of PBI's plot data (where applicable) to address vegetation attributes when defining Ecological Site and Key

Commenter	Comment Number	Comment Text	Response
Western Watersheds Project, Greta Anderson	100136-55	The above-enumerated differences between previous monitoring data and the currently-reported monitoring data are significant. They are not the only differences in the data; there are also many instances of increased cover by wolfberry and creosote, some occurrence by new species, and other changes that aren't described here. The issue is this: BLM apparently chose to only include a single year of monitoring data in the Compatibility Determination, Land Health Assessment and DRMP/DEIS in order to avoid discussing the downward trend of cover on key conservation elements in the monitoring data. This is unacceptable. Management decisions should be based on all available data, not just the politically expedient subset.	Area DPC objectives. The 2009 data were the most recent data for the area. The 2004 and 1980 transects used different study designs, therefore, were not comparable to 2009 transects and could not be used to measure long-term trend in the LHE. (see F.6).
Western Watersheds Project, Greta Anderson	100136-69	The BLM used a year with above-average precipitation (2008) in which to measure utilization. DRMP/DEIS at I 109, 1008. The BLM does not disclose allotment-specific stocking rates were in 2008, and only provides a ten-year average stocking rate. Id. at I 107, 322. BLM also conducted use-pattern mapping following two below-average use years where no ephemeral use had been authorized. Ibid. The BLM also apparently only has utilization data for two allotments, the Big Horn and the Conley. Id. at I 109. The DRMP/DEIS does not identify, analyze, or disclose, how this level of utilization relates to livestock use, where utilization was measured relative to livestock water sources, or how it relates to the utilization guidelines described on page I 104 of the plan. Ibid. Given the statement in the plan that utilization guidelines are intended to, "be met over the long-term and not on a year-to-year basis," (DRMP/DEIS at I 104) it's problematic that the agency uses a single year's	In 2008, precipitation at Gila Bend was slightly above average and Maricopa was slightly below average, resulting in an average production year, as stated in F.7.4. The 2008 billings (indicative of 2008 use) are available for review at PDO. BLM has clarified the text and Map 5 to state that use pattern mapping was conducted on all the allotments in the SDNM (north of Interstate-8) in 2009. Utilization measurements were conducted at key areas and other utilization plots on the Big Horn and Conley in 2008 and Big Horn, Conley and Lower Vekol allotments in 2009. The design features address recommended levels of use by allotment. Conclusions do not depend solely on utilization

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		<p>monitoring on just two allotments to justify continued livestock use. Id. at 1109. In other words, where the agency won't use a single year's overutilization to limit livestock use, it is using the single year's lower utilization to justify ongoing livestock grazing. It is contradictory and belies an unscientific agenda</p>	<p>data but on multiple data sets and analysis for the development of management recommendations and alternatives. Supporting data can be found in Appendices E and F.</p>
<p>Western Watersheds Project, Greta Anderson</p>	<p>100136-71</p>	<p>WWP has obtained, through a Freedom of Information Act (FOIA) request in 2008, records of utilization monitoring on the Big Horn and Conley allotments from 2008. Exhibit C, utilization records. We requested any and all monitoring records from the SDNM in the winter of 2008; the records we received differ significantly from the results the DRMP/DEIS reports, including in the key areas monitored. See Exhibit C and DRMP/DEIS at 1109. If the BLM conducted subsequent utilization monitoring in the months following our May 2008 FOIA request, we are unaware of it, but it suggests that BLM was not monitoring livestock use during the winter/spring season that it reports was the period of the majority of livestock use. DRMP/DEIS at 1109. If the DRMP/DEIS is referencing the same data that we were provided, the summary is inconsistent with the actual data and we were not provided a complete response to our FOIA request.²⁴</p>	<p>BLM has reviewed and clarified the information in Table F.7.</p> <p>Information provided in commenter's exhibit C reflects use compliance checks for ephemeral authorization. This type of monitoring data did not measure current year's growth utilization and was therefore not used in the RMP.</p>
<p>Western Watersheds Project, Greta Anderson</p>	<p>100136-72</p>	<p>In any case, having data from only two allotments fails to support the conclusions that grazing isn't the cause of degradation on the others. It appears that the agency is conflating absence of evidence with evidence of absence. If the BLM only has utilization data for two allotments, it cannot support its conclusions that depend on utilization data for the other allotments.</p>	<p>BLM has clarified the text and Map 5 to state that use pattern mapping was conducted on all the allotments in the SDNM (north of Interstate-8) in 2009.</p> <p>Utilization measurements were conducted at key areas and other utilization plots on the Big Horn and Conley in 2008 and Big Horn, Conley and Lower Vekol allotments in 2009.</p>

Commenter	Comment Number	Comment Text	Response
Western Watersheds Project, Greta Anderson	100136-74	The DRMP/DEIS also ignores the findings of the xeroriparian grass report that quantified the impacts of grazing on this protected vegetation community at intervals from water developments. Smith and Morrison 2006. These plots were located on the Beloat, Big Horn, Hazen, and Conley allotments. Id. at 16. The analysis was performed using standard statistical methods, methods not employed in the qualitative studies conducted by BLM. However, the results of this study were likely skewed by inaccurate information provided by BLM about the water sources. Still, the report concluded with an acknowledgement that the most significant finding in the study was that on the parts of the SDNM north of interstate 8, abundance of exotic grasses is very high and abundance of native grasses is very low. This is not characteristic of Sonoran Desert xeroriparian areas at large and the report referenced earlier studies indicating that ungrazed areas have higher abundance of native grass species.	Impacts of grazing on xeroriparian areas were discussed in detail in the compatibility study (Appendix E) and Land Health Evaluation (Appendix F) when analyzing Sandy Wash ecological sites. BLM considered the Smith and Morrison report, but found it was of limited use because it did not address the intensity, frequency, timing, class of livestock, season of use, ecological sites, precipitation patterns and other variables the BLM needs to address the effects of current livestock grazing practices on the objects of the Monument.
Western Watersheds Project, Greta Anderson	100136-86	The DRMP/DEIS does not provide enough information about actual use, seasonal vegetation pulses, allotment conditions, ecosystem conditions, or other relevant parameters of the FO grazing system to determine whether the preferred alt (to continue status quo grazing) is appropriate.	The Lower Sonoran Decision Area does not include implementation level analysis for grazing. It provides program guidance for future implementation decisions.
Western Watersheds Project, Greta Anderson	100136-97	Other key issues with the utilization data (Exhibit C): $\hat{\text{a}}\text{€}z$ Bighorn Site # 1 is over one mile to water, 25 and yet utilization on some plants averaged 90 percent on both K. grayi and A. dumosa. BLM averaged this use to 41 and 35 percent, respectively, but failed to include this key area in the summary it provided to the public with the DRMP/DEIS. $\hat{\text{a}}\text{€}z$ Bighorn Site #2 is also approximately one mile to water,	Utilization patterns are affected by slope, terrain, seasonal temperature, and distance to or from water. All of these factors were considered during use pattern mapping. The BLM followed utilization guidelines in Technical Recommendation 1734-3 (RMP at F.6.2 and F.17).

Commenter	Comment Number	Comment Text	Response
		<p>adjacent to Interstate 8. ¶ Bighorn Site #3 (unreported location) includes a measure of burro bush (<i>A. dumosa</i>), but the DRMP/DEIS reports 13 percent, or slight use, on this species. Data sheets show that 90 percent of the plants receive slight use, but this is considered a "low" palatability plant. ¶ Conley Site # 1 reports that the utilization was measured in a small wash running north/south, but UTM was not provided. Again, this is a low palatability shrub, and BLM apparently did not measure utilization on more preferable species (such as native grasses or other herbaceous shrubs). ¶ Conley, Site #unspecified, is also over a mile to water, and yet, use on <i>Krameria</i> and <i>Ambrosia</i> reached 50 percent use at least once on each species. ¶ Conley, Site #8, isn't included in the DRMP/DEIS. These are the only data we were provided by BLM, and given the irreconcilability with the data in the DRMP/DEIS, we hope for a more complete accounting of what the BLM actually has in terms of monitoring results and how they relate to xeroriparian areas and the protection of Monument objects. A</p>	
Pacific Biodiversity Institute, Peter Morrison	100161-5	<p>I also strenuously disapprove of BLM's use of a subset of PBI's data to support its conclusions about rangeland health. Our study was designed to explicitly address the impact of livestock watering sources on the ecological health of the SDNM. We did this by collecting data along linear transects around a number of water sources. At each water source, we sampled four or more plots, including a plot within the central disturbance area, the second at 50 meters from the disturbance, the third at 100 meters, a fourth at 500 meters, and additional plots at 500 meter intervals out to 5-km. The LHE process used only data from plots that were 1,000</p>	<p>BLM contracted The Nature Conservancy (who in turn contracted PBI) to collect data within the SDNM for the purposes of providing BLM data to determine ecological conditions within the Monument. BLM used PBI plots to increase the number of key areas, where appropriate. See Section F.6.3 of Appendix F.</p> <p>While PBI's method for collecting the vegetation attributes was acceptable, many of the plot locations did not fit BLM's criteria for selection of key areas. Several of the plots overlapped multiple ecological sites and soil survey mapping</p>

Commenter	Comment Number	Comment Text	Response
		<p>meters or farther from disturbance sites (F.6.3). This neglects the range conditions most directly attributable to livestock grazing within the 1 km distance</p>	<p>units and some plots were located too close to livestock waters, which are not representative of the overall landscape level conditions within the Monument. For these reasons BLM was unable to use some of the analysis that was provided. In addition, the majority of the plots were located south of I-8 on the allotments that were closed to livestock grazing as required under the SDNM proclamation and within BMGR on ecological sites that do not occur north of I-8.</p> <p>PBI's study was of limited use because it did not address the intensity, frequency, timing, class of livestock, season of use, ecological sites, precipitation patterns and other variables the BLM needs to address the effects of current livestock grazing practices on the objects of the Monument. However, BLM did use some of PBI's plot data (where applicable) to address vegetation attributes when defining Ecological Site and Key Area DPC objectives.</p>
<p>Pacific Biodiversity Institute, Peter Morrison</p>	<p>100161-6</p>	<p>BLM used data from only 48 of 320 plots for which PBI gathered a full set of quantitative data. This eliminated data from 272 plots that could have better characterized the landscape condition. It eliminated the plots that often dramatically documented the impacts of livestock grazing and the potential for harm to Monument objects from livestock grazing. This highly selective use of our data is indefensible.</p>	<p>BLM contracted The Nature Conservancy (who in turn contracted PBI) to collect data within the SDNM for the purposes of providing BLM data to determine ecological conditions within the Monument. BLM used PBI plots to increase the number of key areas, where appropriate. See Section F.6.3 of Appendix F.</p> <p>While PBI's method for collecting the vegetation attributes was acceptable, many of the plot locations did not fit BLM's criteria for selection of key areas. Several of the plots overlapped multiple ecological sites and soil survey mapping units and some plots were located too close to livestock waters, which are not representative of the overall landscape level conditions within the Monument. For these reasons BLM</p>

Commenter	Comment Number	Comment Text	Response
			<p>was unable to use some of the analysis that was provided. In addition, the majority of the plots were located south of I-8 on the allotments that were closed to livestock grazing as required under the SDNM proclamation and within BMGR on ecological sites that do not occur north of I-8.</p> <p>PBI's study was of limited use because it did not address the intensity, frequency, timing, class of livestock, season of use, ecological sites, precipitation patterns and other variables the BLM needs to address the effects of current livestock grazing practices on the objects of the Monument. However, BLM did use some of PBI's plot data (where applicable) to address vegetation attributes when defining Ecological Site and Key Area DPC objectives.</p>

6.3.4 SDNM RMP – LAND HEALTH EVALUATION EDITS

Commenter	Comment Number	Comment Text	Response
Western Watersheds Project, Greta Anderson	100136-20	The preferred alternative, Alternative E, allows livestock grazing to continue on 157,210 acres on the Big Horn, Beloat, Hazen, Lower Vekol, and Arnold allotments. It completely closes the Conley allotment within the SDNM to grazing, but the total unavailable acreage under the preferred alternative is wholly unclear: in Table 2.12, the unavailable acres total 95,290 (DRMP/DEIS at 143), in Table 2.14, unavailable acres equal 44,798 (Id. at 144), and in the Management Actions and Allowable Uses section, unavailable acres totals 95,290 again (Id. at 148).	In Table 2.12, the numbers indicate all acreage both north and south of I-8. Table 2.14. shows acres North of Interstate 8 only as indicated in the Table title. Footnotes corresponding with certain figures help to explain the differences between alternatives. Table 2-12 has been updated for clarification.
Western Watersheds Project, Greta Anderson	100136-45	It is also unclear, since the DRMP/DEIS doesn't specify, how ongoing use will be altered to ensure against future failures. Given the extent to which management decisions regarding harms to Monument objects hinge on meeting the land health standards, this section needs further clarification and elaboration.	Monitoring is not an RMP decision, but an administrative action related to day-to-day operations. BLM has added an admin action to the RMP [section?] addressing BLM's intent to design and implement a monitoring program for protection of Monument objects, regardless of the cause.
Western Watersheds Project, Greta Anderson	100136-48	The DRMP/DEIS's reference to "Key Management Species List" is without a page number. It is not clear how this list was derived, or whether BLM created it from the extant data set. Without supporting references, it is impossible for the decision-maker or reader to evaluate whether these objectives make sense	The Key Management Species list is described in the Land Health Evaluation in F.24, Attachment 7.
Western Watersheds Project, Greta Anderson	100136-65	Additionally, the description of alternatives included in the DRMP/DEIS is confusing. For example, under the preferred alternative, portions of the Santa Rosa and Big Horn allotments outside of the SDNM would need to be fenced in order to facilitate future use. DRMP/DEIS at 145. It is unclear why the BLM is encouraging additional range infrastructure	The RMP at GR 1.1.7 is correct. A portion of the Santa Rosa allotment and the Big Horn allotment within SDNM and south of Interstate-8 were closed in accordance with the Proclamation. Portions of the allotments outside of the SDNM (in the LS Decision Area) may be grazed once a fence is built to exclude cattle from the closed areas.

Commenter	Comment Number	Comment Text	Response
		<p>given its plans to continue grazing use on these allotments inside the SDNM. This should be explained in the final RMP/EIS and an analysis of the impacts of this kind of infrastructure should be provided.</p>	

6.3.5 DATA ISSUES – GENERAL

Commenter	Comment Number	Comment Text	Response
Donald Johnson	100108-1	<p>BLM appears to be using portions of the data reported by PBI to support conclusions opposite those reached and reported after analysis of ALL the data by PBI staff. BLM has stated instead that grazing is not having an adverse effect on small saguaros. There is no SDNM data to support that conclusion and it goes against other scientific reports that have studied effects of cattle grazing on cactus recruitment. I have observed and photographed cactus recruitment within a sanctuary near La Paz, BCS, Mexico. Within that sanctuary ground cover was complete and cactus recruitment abundant; fence line photos show bare ground and the scarcity of cactus where cattle were present.</p>	<p>BLM contracted The Nature Conservancy (who in turn contracted PBI) to collect data within the SDNM for the purposes of providing BLM data to determine ecological conditions within the Monument. BLM used PBI plots to increase the number of key areas, where appropriate. See Section F.6.3 of Appendix F.</p> <p>While PBI’s method for collecting the vegetation attributes was acceptable, many of the plot locations did not fit BLM’s criteria for selection of key areas. Several of the plots overlapped multiple ecological sites and soil survey mapping units and some plots were located too close to livestock waters, which are not representative of the overall landscape level conditions within the Monument. For these reasons BLM was unable to use some of the analysis that was provided. In addition, the majority of the plots were located south of I-8 on the allotments that were closed to livestock grazing as required under the SDNM proclamation and within BMGR on ecological sites that do not occur north of I-8.</p> <p>PBI’s study was of limited use because it did not address the intensity, frequency, timing, class of livestock, season of use, ecological sites, precipitation patterns and other variables the BLM needs to address the effects of current livestock grazing practices on the objects of the Monument. However, BLM did use some of PBI’s plot data (where applicable) to address vegetation attributes when defining Ecological Site and Key Area DPC objectives.</p>

Commenter	Comment Number	Comment Text	Response
			<p>BLM looked at multiple indicators for saguaros. The BLM addressed saguaro cacti in Sections F.5.3.4.6 and F.5.3.4.7 and Table F.22. This issue has also been addressed in Table F.2. BLM used recruitment data to determine if saguaro standards are being met.</p> <p>The Methodology for the LHE is provided in Section F.6 of Appendix F. In accordance with BLM Manual Handbook 4400-1, the BLM incorporated a “Key Area” concept when establishing study sites. Only PBI plot data that was consistent with the definitions of a BLM “Key Area” was used to enhance the LHE process. Any PBI plot data that did not meet the definition was not applicable in the analysis. For example, PBI plots that fell in transition zones between two ecological sites or were not representative of larger areas were not used. Information was interpreted based on the best professional judgment of the individual evaluators at the field office, state office, and Washington office levels. Additionally, the LHE went through further revisions based on the comments and recommendations by a rigorous peer review of academic experts in the field of range management in Sonoran Desert ecosystems.</p>
Donald Johnson	100108-4	<p>Instead of relying on the best available science, the agency has manipulated PBI's comprehensive data and ignored report conclusions to support its agenda. PBI's raw data has been re-analyzed by someone outside PBI's scientific team and cited in the document as the work of PBI. These citations are inappropriate and need to be removed, with the source of the data analysis identified. References are made to the “Pacific Biodiversity Institute Saguaro Study”, although PBI never conducted such work. The DRMP/DEIS document needs to</p>	<p>BLM contracted The Nature Conservancy (who in turn contracted PBI) to collect data within the SDNM for the purposes of providing BLM data to determine ecological conditions within the Monument. BLM used PBI plots to increase the number of key areas, where appropriate. See Section F.6.3 of Appendix F.</p> <p>While PBI's method for collecting the vegetation attributes was acceptable, many of the plot locations did not fit BLM's</p>

Commenter	Comment Number	Comment Text	Response
		remove all inappropriate references to PBI.	<p>criteria for selection of key areas. Several of the plots overlapped multiple ecological sites and soil survey mapping units and some plots were located too close to livestock waters, which are not representative of the overall landscape level conditions within the Monument. For these reasons BLM was unable to use some of the analysis that was provided. In addition, the majority of the plots were located south of I-8 on the allotments that were closed to livestock grazing as required under the SDNM proclamation and within BMGR on ecological sites that do not occur north of I-8.</p> <p>PBI's study was of limited use because it did not address the intensity, frequency, timing, class of livestock, season of use, ecological sites, precipitation patterns and other variables the BLM needs to address the effects of current livestock grazing practices on the objects of the Monument. However, BLM did use some of PBI's plot data (where applicable) to address vegetation attributes when defining Ecological Site and Key Area DPC objectives.</p> <p>BLM looked at multiple indicators for saguaros. The BLM addressed saguaro cacti in Sections F.5.3.4.6 and F.5.3.4.7 and Table F.22. This issue has also been addressed in Table F.2. BLM used recruitment data to determine if saguaro standards are being met.</p> <p>The Methodology for the LHE is provided in Section F.6 of Appendix F. In accordance with BLM Manual Handbook 4400-1, the BLM incorporated a "Key Area" concept when establishing study sites. Only PBI plot data that was consistent with the definitions of a BLM "Key Area" was used to enhance</p>

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			<p>the LHE process. Any PBI plot data that did not meet the definition was not applicable in the analysis. For example, PBI plots that fell in transition zones between two ecological sites or were not representative of larger areas were not used. Information was interpreted based on the best professional judgment of the individual evaluators at the field office, state office, and Washington office levels. Additionally, the LHE went through further revisions based on the comments and recommendations by a rigorous peer review of academic experts in the field of range management in Sonoran Desert ecosystems.</p>
Donald Johnson	100108-5	<p>The conclusion of the DRMP/DEIS that livestock grazing is compatible with the protection of Monument objectives is contrary to PBI's scientific research findings. Throughout reports published by PBI on the SDNM strong associations of livestock grazing with negative impacts on the natural communities were made.</p>	<p>BLM contracted The Nature Conservancy (who in turn contracted PBI) to collect data within the SDNM for the purposes of providing BLM data to determine ecological conditions within the Monument. BLM used PBI plots to increase the number of key areas, where appropriate. See Section F.6.3 of Appendix F.</p> <p>While PBI's method for collecting the vegetation attributes was acceptable, many of the plot locations did not fit BLM's criteria for selection of key areas. Several of the plots overlapped multiple ecological sites and soil survey mapping units and some plots were located too close to livestock waters, which are not representative of the overall landscape level conditions within the Monument. For these reasons BLM was unable to use some of the analysis that was provided. In addition, the majority of the plots were located south of I-8 on the allotments that were closed to livestock grazing as required under the SDNM proclamation and within BMGR on ecological sites that do not occur north of I-8.</p>

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			<p>PBI's study was of limited use because it did not address the intensity, frequency, timing, class of livestock, season of use, ecological sites, precipitation patterns and other variables the BLM needs to address the effects of current livestock grazing practices on the objects of the Monument. However, BLM did use some of PBI's plot data (where applicable) to address vegetation attributes when defining Ecological Site and Key Area DPC objectives.</p> <p>BLM looked at multiple indicators for saguaros. The BLM addressed saguaro cacti in Sections F.5.3.4.6 and F.5.3.4.7 and Table F.22. This issue has also been addressed in Table F.2. BLM used recruitment data to determine if saguaro standards are being met.</p> <p>The Methodology for the LHE is provided in Section F.6 of Appendix F. In accordance with BLM Manual Handbook 4400-1, the BLM incorporated a "Key Area" concept when establishing study sites. Only PBI plot data that was consistent with the definitions of a BLM "Key Area" was used to enhance the LHE process. Any PBI plot data that did not meet the definition was not applicable in the analysis. For example, PBI plots that fell in transition zones between two ecological sites or were not representative of larger areas were not used. Information was interpreted based on the best professional judgment of the individual evaluators at the field office, state office, and Washington office levels. Additionally, the LHE went through further revisions based on the comments and recommendations by a rigorous peer review of academic experts in the field of range management in Sonoran Desert ecosystems.</p>

Commenter	Comment Number	Comment Text	Response
			<p>The baseline data for the SDNM decision area was developed from monitoring data and best available information (including the 2011 Land Health Evaluation and Compatibility Analysis) and that was relevant to the Monument decision area level of analysis. This best available information was then used to develop management recommendations to meet the requirements of the SDNM proclamation.</p>
Western Watersheds Project, Greta Anderson	100136-1	<p>The LHE was not used objectively and was not scientific. Vegetation data collected by BLM were from subjectively placed plots, explicitly not in areas of high disturbance by livestock. DRMP/DEIS at 1054. A scientific study would have used randomly-placed plots, or would include a study design that explicitly incorporated and reported the variability of the landscape, such as a stratified random design.</p>	<p>The BLM uses the Key Area concept to monitor the effects of livestock grazing as described in RMP Appendix F.6.2 and in accordance with BLM technical Reference 1734-4.</p>
Western Watersheds Project, Greta Anderson	100136-10	<p>The key areas used in the LHE are distributed non-randomly across the landscape, which is problematic from the perspective of bias. Nowhere does the DRMP/DEIS reveal where these key areas are located or how they were picked. We were able to obtain geospatial location information about the key areas through a special request, but again, it is unclear why these areas are selected or how they were determined to be "representative" of livestock impacts on the Monument.</p>	<p>Key areas are displayed on Appendix F, Map 4, in draft LHE. Selection of key areas is described in Section F.6.2.</p>
Pacific Biodiversity Institute, Susan Snetsinger	100138-1	<p>1. PBI was referenced as the source for analyses that we did not conduct. It appears that PBI's raw data was re-analyzed by someone else and cited in the document as the work of PBI. These citations are completely inappropriate and need to be removed, and the actual source of the data analysis identified. For example, references are made to the "Pacific Biodiversity Institute Saguaro Study." This study does not</p>	<p>BLM contracted The Nature Conservancy (who in turn contracted PBI) to collect data within the SDNM for the purposes of providing BLM the data and determining ecological conditions within the Monument. BLM used PBI plots to increase the number of key areas, where appropriate.</p> <p>BLM used PBI raw data to determine if saguaro objectives</p>

Commenter	Comment Number	Comment Text	Response
		<p>exist - we never conducted such work. The DRMP/DEIS document needs to be thoroughly checked and all inappropriate references to PBI removed.</p>	<p>have been met.</p>
<p>Pacific Biodiversity Institute, Susan Snetsinger</p>	<p>100138-3</p>	<p>2. Inappropriate re-analysis of Pacific Biodiversity Institute's data. Despite the comprehensive work that PBI conducted to assess the ecological conditions of communities in the SDNM, the BLM has chosen to re-analyze the data using only a small subset of the information. The subset was chosen specifically to exclude those areas where livestock impacts most affect the natural communities. This is completely inappropriate and leads erroneous conclusions.</p>	<p>BLM contracted The Nature Conservancy (who in turn contracted PBI) to collect data within the SDNM for the purposes of providing BLM data to determine ecological conditions within the Monument. BLM used PBI plots to increase the number of key areas, where appropriate. See Section F.6.3 of Appendix F.</p> <p>While PBI's method for collecting the vegetation attributes was acceptable, many of the plot locations did not fit BLM's criteria for selection of key areas. Several of the plots overlapped multiple ecological sites and soil survey mapping units and some plots were located too close to livestock waters, which are not representative of the overall landscape level conditions within the Monument. For these reasons BLM was unable to use some of the analysis that was provided. In addition, the majority of the plots were located south of I-8 on the allotments that were closed to livestock grazing as required under the SDNM proclamation and within BMGR on ecological sites that do not occur north of I-8.</p> <p>PBI's study was of limited use because it did not address the intensity, frequency, timing, class of livestock, season of use, ecological sites, precipitation patterns and other variables the BLM needs to address the effects of current livestock grazing practices on the objects of the Monument. However, BLM did use some of PBI's plot data (where applicable) to address vegetation attributes when defining Ecological Site and Key Area DPC objectives.</p>

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			<p>BLM looked at multiple indicators for saguaros. The BLM addressed saguaro cacti in Sections F.5.3.4.6 and F.5.3.4.7 and Table F.22. This issue has also been addressed in Table F.2. BLM used recruitment data to determine if saguaro standards are being met.</p> <p>The Methodology for the LHE is provided in Section F.6 of Appendix F. In accordance with BLM Manual Handbook 4400-1, the BLM incorporated a “Key Area” concept when establishing study sites. Only PBI plot data that was consistent with the definitions of a BLM “Key Area” was used to enhance the LHE process. Any PBI plot data that did not meet the definition was not applicable in the analysis. For example, PBI plots that fell in transition zones between two ecological sites or were not representative of larger areas were not used. Information was interpreted based on the best professional judgment of the individual evaluators at the field office, state office, and Washington office levels. Additionally, the LHE went through further revisions based on the comments and recommendations by a rigorous peer review of academic experts in the field of range management in Sonoran Desert ecosystems.</p>
Pacific Biodiversity Institute, Peter Morrison	100161-4	The BLM has also used PBI data in other ways that are inaccurate. For example, BLM characterizes the ecological conditions of allotments north of interstate 8 in comparison to PBI's plots in the areas without authorized livestock grazing south of Interstate 8 on the Barry M. Goldwater Range and "Area A." The lands of BMGR/Area A may not have authorized livestock grazing, but they certainly have trespass livestock grazing, burros, and other types of disturbance. The area south of Interstate 8 experienced a	<p>BLM contracted The Nature Conservancy (who in turn contracted PBI) to collect data within the SDNM for the purposes of providing BLM data to determine ecological conditions within the Monument. BLM used PBI plots to increase the number of key areas, where appropriate. See Section F.6.3 of Appendix F.</p> <p>While PBI’s method for collecting the vegetation attributes was acceptable, many of the plot locations did not fit BLM’s</p>

Commenter	Comment Number	Comment Text	Response
		<p>long history of livestock grazing in the late 1800's through the mid 1900's. Its ecological condition has been influenced by livestock grazing. More importantly, there are simply not enough plots distributed across comparable ecological sites to infer representative baseline conditions or deviation from reference conditions. The comparisons that BLM attempts to make between the plots south of Interstate 8 and those north of I8 reflect do not appear to be valid and represent a misuse of the data that PBI collected and a misunderstanding of valid scientific methods and uses of this data</p>	<p>criteria for selection of key areas. Several of the plots overlapped multiple ecological sites and soil survey mapping units and some plots were located too close to livestock waters, which are not representative of the overall landscape level conditions within the Monument. For these reasons BLM was unable to use some of the analysis that was provided. In addition, the majority of the plots were located south of I-8 on the allotments that were closed to livestock grazing as required under the SDNM proclamation and within BMGR on ecological sites that do not occur north of I-8.</p> <p>PBI's study was of limited use because it did not address the intensity, frequency, timing, class of livestock, season of use, ecological sites, precipitation patterns and other variables the BLM needs to address the effects of current livestock grazing practices on the objects of the Monument. However, BLM did use some of PBI's plot data (where applicable) to address vegetation attributes when defining Ecological Site and Key Area DPC objectives.</p> <p>BLM looked at multiple indicators for saguaros. The BLM addressed saguaro cacti in Sections F.5.3.4.6 and F.5.3.4.7 and Table F.22. This issue has also been addressed in Table F.2. BLM used recruitment data to determine if saguaro standards are being met.</p> <p>The Methodology for the LHE is provided in Section F.6 of Appendix F. In accordance with BLM Manual Handbook 4400-1, the BLM incorporated a "Key Area" concept when establishing study sites. Only PBI plot data that was consistent with the definitions of a BLM "Key Area" was used to enhance</p>

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			<p>the LHE process. Any PBI plot data that did not meet the definition was not applicable in the analysis. For example, PBI plots that fell in transition zones between two ecological sites or were not representative of larger areas were not used. Information was interpreted based on the best professional judgment of the individual evaluators at the field office, state office, and Washington office levels. Additionally, the LHE went through further revisions based on the comments and recommendations by a rigorous peer review of academic experts in the field of range management in Sonoran Desert ecosystems.</p> <p>Proclamation suggested BLM use area A as comparison (see Appendix F.9).</p> <p>BLM used raw data from PBI plots that were representative of the ecological sites found within allotments north of Interstate-8.</p>

6.3.6 SDNM RMP LIVESTOCK GRAZING MANAGEMENT

Commenter	Comment Number	Comment Text	Response
Arizona Public Lands Foundation, Beau McClure	100053-1	We question that it is necessary or appropriate to permit yearlong livestock grazing on the allotments shown as Perennial or Perennial/Ephemeral on Alternative E Livestock Grazing Map 2-8e of the Draft report. Most of the livestock use of these desert lands in the Lower Sonoran area and the Sonoran Desert National Monument occurs in the Spring, after winter rains have produced a lush, short-lived crop of annual vegetation. The Executive Order that established the Sonoran Desert National Monument, provided that livestock grazing would eventually be terminated on public lands south of Interstate-8, and there are continuing court actions over livestock use on Monument lands north of Interstate-8. BLM is managing prime Sonoran desert habitats on public lands adjacent to a major metropolitan area. Why would you want to have a few cows on these lands year-round to stir up the environmental controversies commonly associated with livestock grazing? We strongly recommend that the Perennial Allotments and the Perennial/Ephemeral Allotments shown on Map 2-8e be re-designated as Ephemeral Allotments, and used for livestock grazing only when annual vegetation is present on the lands.	Chapter 2, section 2.5.4 has been revised to explain why an Ephemeral Only alternative was not analyzed within the SDNM.
Western Watersheds Project, Greta Anderson	100136-75	The BLM's plan is to allocate this ephemeral forage to livestock use. Id. at 143. The extent of the ephemeral authorization is not disclosed in the plan. Ibid. The DRMP/DEIS erroneously states that ephemeral grazing will be authorized based on "a prediction of ephemeral forage." DRMP/DEIS at 1137. Ephemeral authorizations may be authorized if, "Ephemeral vegetation is present. .. and has grown to useable levels at the time grazing begins."	The EIS has been revised to clarify the procedures for ephemeral forage authorization in Appendix H, Best Management Practices and Standard Operating Procedures. Inconsistencies between the alternatives in Chapter 2, Appendix F and Appendix L concerning those procedures have been resolved. In addition, appropriate guidance has been cited.

Commenter	Comment Number	Comment Text	Response
		<p>DRMP/DEIS at 1268. This is not a "prediction" of forage availability; it is an actual, observable availability. Moreover, this requires an allotment inspection prior to authorization. See IM-AZ-94-018 Ephemeral Grazing Authorizations. The BLM also states that ephemeral authorizations will be permitted on a case-by-case basis pursuant to the Special Ephemeral Rule. Ibid. However, the Special Ephemeral Rule is for the reclassification of allotments, not the management regime for allotments that are perennial/ephemeral as five of the six SDNM allotments in the planning area. 28 We note this study did not distinguish between areas north and south of 18, but the map distinguishes areas of high livestock impact in the northern portion of the Monument. The Special Ephemeral Rule does not provide management parameters such as production/tum out/utilization limits, or other requirements. However, Instruction Memorandum AZ-94-018 provides the guidance for the authorization of livestock grazing on allotments designated as ephemeral or for authorization of ephemeral grazing use on allotments managed as perennial (perennial/ephemeral). The BLM should have referenced this instruction in the DRMP/DEIS, especially because it establishes conditions of ephemeral authorizations in Sonoran desert tortoise habitat. This failure to establish, analyze, and disclose meaningful management parameters for ephemeral use is a major failure of the plan, given the dependence of wildlife on these same "boom" years. It is problematic also because the BLM does not set or even measure utilization on annual vegetation, despite the significance of this vegetation type to wildlife.</p>	

Commenter	Comment Number	Comment Text	Response
Fennemore Craig P.C, Dawn Meidinger	100137-19	<p>One concern, however, is Management Action GR-I.I.19 which states that BLM will use the guidelines described in the "Not Likely to Adversely Affect" section of "Guidance Criteria for Determinations of Effects of Grazing Permit Issuance and Renewal on T&E Species" (BLM and USFS Arizona and New Mexico, 1999). DRMP/EIS at 146. These guidelines are outdated, inconsistent with the ESA, and to the extent BLM wishes to utilize them for purposes of permit decisions or permit updates, the guidelines must be promulgated as a rule under the Administrative Procedure Act. 5 USC Â§ 553. At a minimum, they should be disclosed for public review and comment. Their guidelines expand the scope of the ESA to areas where members of listed species are not present and critical habitat does not exist. The determination of livestock grazing uses should be on a case by case basis involving the permittee. Prohibitions of use resulting from consultation under Â§ 7 of the ESA should only arise where threatened and endangered species are present or critical habitat has been designated. 16 USC Â§ 1533 (a)(2).</p>	<p>The EIS has been revised to remove Management Action GR-I.I.19. Relevant aspects of the criteria are included in objectives and management actions within the plan.</p>

6.3.7 SDNM RMP MONUMENT AND COMPATIBILITY

Commenter	Comment Number	Comment Text	Response
Bill Broyles	100120-4	Again looking at the 1991 GAO report, grazing in SDNM likely has negligible economic benefit to the region. At that time, under better grazing conditions, “The 33 ranches in the Lower Gila North area of Arizona contributed an estimated 0.32 percent to the total value of livestock and livestock products sold in Yuma, Maricopa, and Yavapai counties” (p. 47). There are reasons that ranches and leases in both Lower Gila North and South have been abandoned. And I’m betting that the economic advantages of retiring grazing tourism, hunting, environment -- far surpass those of grazing in SDNM, though I didn’t see that information in the management report.	This 1991 GAO report and a more recent report (2011 - Economic Benefits of Public Lands) have been included in Section 3.5.3, Socioeconomics.
Friends of the Sonoran Desert National Monument, Thomas Hulen	100123-6	The Bureau of Land Management’s preferred alternative would shift the majority of livestock use on the Monument to the winter and spring months. This is precisely the time when recreational use is at its peak.	The Proclamation states how livestock grazing would be addressed both north and south of Interstate-8. BLM has revised its analysis to clarify the effects of grazing on recreation use. Impacts of grazing to archeological resources are discussed in Section 4.5 ; impacts on wildlife are described in Section 4.7 ; and impacts on vegetation are described in Section 4.9 .
The Wilderness Society, Phil Hanceford	100126-39	What is clear is that the status quo livestock grazing management will not suffice in the future for the Sonoran Desert National Monument. For example, in 2005, The Nature Conservancy entered into a cooperative agreement with the BLM’s Phoenix Field Office to perform a study (TNC Study) of the impacts of livestock grazing within the Sonoran Desert.(11) Among the TNC Study’s pertinent findings was the following statement about current grazing management strategies on Sonoran Desert public lands:	In the case of the SDNM, the LHE analyzed the Monument’s desert ecosystems for proper functioning condition; considered the anticipated diversity of plant species; examined the long-term recruitment and maintenance of saguaro cactus forests; addressed the effect of grazing on wildlife and associated habitat; and evaluated the functioning, health, diversity and sustainability of key vegetation communities. The Compatibility Analysis (Appendix E, Section E.2) addresses the compatibility and determination

Commenter	Comment Number	Comment Text	Response
		<p>"Based on our review of the literature on grazing management strategies, we conclude that no currently described approach, including continuous grazing and each of the specialized grazing systems, is completely applicable to or appropriate for the Sonoran Desert ecosystem within their current formations. Furthermore, in conjunction with our review of stocking rate and drought management considerations, we conclude that continuous grazing in which livestock are maintained within fenced allotments yearlong is not a feasible grazing management strategy on Sonoran Desert public lands.(12)"These conclusions are based on factors that are specific to the Sonoran Desert ecosystem; namely, variable and low precipitation levels, frequent and extended drought, the particularly sensitive resources in the region, and lack of research in general on grazing impacts in the area.(13) In addition, the Monument proclamation itself recognizes the benefit to the biological diversity within the Monument by attributing the "especially striking" conditions of the Sand Tank Mountains area where "no livestock grazing has occurred for nearly 50 years." This should be taken into account when BLM is performing a compatibility analysis.</p>	<p>process. The land health standards, specifically Standard 1 and Standard 3, directly address and measure indicators associated with the biological and ecological objects identified for protection in the Monument's proclamation. These findings led to management recommendations for livestock grazing on the Monument and development of the alternatives in the DEIS. As described in Appendix E, section E.2.3, BLM chose the LHE as an appropriate tool in the compatibility because the LH standards are measurable and attainable goals for the desired condition of biological resources and physical components/characteristics of desert ecosystem found within the Monument.</p>
The Wilderness Society, Phil Hanceford	100126-41	<p>However, although the analysis purports to be looking at the compatibility of grazing with the "paramount purpose" of protecting Monument objects, the analysis conducted is actually a land health evaluation (LHE) that is used "to ascertain whether the Arizona Rangeland Health Standards (land health standards) are met." DRMP/DEIS, p. 1042. In evaluating whether grazing is "compatible" with protecting Monument objects, BLM should look to the existing use of the term in both the Wild and Scenic Rivers Act (16 USC Â§ 1274(d)(1)) and the National Wildlife Refuge Administration</p>	<p>In the case of the SDNM, the LHE analyzed the Monument's desert ecosystems for proper functioning condition; considered the anticipated diversity of plant species; examined the long-term recruitment and maintenance of saguaro cactus forests; addressed the effect of grazing on wildlife and associated habitat; and evaluated the functioning, health, diversity and sustainability of key vegetation communities. The Compatibility Analysis (Appendix E, Section E.2) addresses the compatibility and determination process. The land health standards, specifically Standard 1</p>

Commenter	Comment Number	Comment Text	Response
		Act, 16 USC Â§ 668ee.	and Standard 3, directly address and measure indicators associated with the biological and ecological objects identified for protection in the Monument’s proclamation. These findings led to management recommendations for livestock grazing on the Monument and development of the alternatives in the DEIS. As described in Appendix E, section E.2.3 , BLM chose the LHE as an appropriate tool in the compatibility because the LH standards are measurable and attainable goals for the desired condition of biological resources and physical components/characteristics of desert ecosystem found within the Monument.
The Wilderness Society, Phil Hanceford	100126-94	Using the correct standard will affect the determination of compatibility, as well as the development and selection of alternatives. See, DRMP/DEIS, p. 139 (For the SDNM Decision Area, implementation level allocations reflect the findings of the compatibility analysis. Since the “LHE and the Compatibility Analysis will not be final until the RMP’s Record of Decision is approved (Id), the BLM can correct these flaws and update the compatibility analysis in accordance with the standards discussed above, including current science regarding livestock grazing in the Sonoran Desert	In the case of the SDNM, the LHE analyzed the Monument’s desert ecosystems for proper functioning condition; considered the anticipated diversity of plant species; examined the long-term recruitment and maintenance of saguaro cactus forests; addressed the effect of grazing on wildlife and associated habitat; and evaluated the functioning, health, diversity and sustainability of key vegetation communities. The Compatibility Analysis (Appendix E, Section E.2) addresses the compatibility and determination process. The land health standards, specifically Standard 1 and Standard 3, directly address and measure indicators associated with the biological and ecological objects identified for protection in the Monument’s proclamation. These findings led to management recommendations for livestock grazing on the Monument and development of the alternatives in the DEIS. As described in Appendix E, Section E.2.3 , BLM chose the LHE as an appropriate tool in the compatibility because the LH standards are measurable and attainable goals for the desired condition of biological resources and physical components /

Commenter	Comment Number	Comment Text	Response
			characteristics of desert ecosystem found within the Monument.
Western Watersheds Project, Greta Anderson	100136-100	It is also not clear how BLM's young saguaro recruitment rate corresponds with the objective set elsewhere in the plan to have medium to high density columnar cactus habitat (greater than 30 saguaros per acre) within 40 miles of roost sites of lesser long-nosed bats and/or whether this was even measured on the SDNM. DRMP/DEIS at 73. It appears BLM did not evaluate whether or not relevant SDNM plots met this objective, another failure of the plan to protect Monument objects	The BLM addressed saguaro cacti in Sections F.5.3.4.6 and F.5.3.4.7 and Table F.22 . This issue has also been addressed in Table F.2 . PS-2.1.3 has been revised to more clearly reflect the intent to maintain foraging habitat for lesser log-nosed bat. "Maintain existing medium to high density stands of columnar cacti (\geq plants/acre) within 40 miles of known roost sites where potential exists on the ecological site."
Western Watersheds Project, Greta Anderson	100136-36	The BLM determination of compatibility for grazing on the SDNM is fundamentally flawed on three levels. First, it contradicts the preponderance of scientific evidence that shows incompatibility. http://www.blm.gov/pgdata/etc/medialib/blm/lwo/Communications_Directorate/public_affairs/news_release_attachments.Par.16615.File.tmp/NLCS_Strategy.pdf Second, instead of accepting the evidence, it relies on an inappropriate tool, the Land Health Evaluation to override scientific conclusions. And finally, it then misuses the Land Health Evaluation process by relaxing established standards and selectively omitting data.	In the case of the SDNM, the LHE analyzed the Monument's desert ecosystems for proper functioning condition; considered the anticipated diversity of plant species; examined the long-term recruitment and maintenance of saguaro cactus forests; addressed the effect of grazing on wildlife and associated habitat; and evaluated the functioning, health, diversity and sustainability of key vegetation communities. The Compatibility Analysis (Appendix E, Section E.2) addresses the compatibility and determination process. The land health standards, specifically Standard 1 and Standard 3, directly address and measure indicators associated with the biological and ecological objects identified for protection in the Monument's proclamation. These findings led to management recommendations for livestock grazing on the Monument and development of the alternatives in the DEIS. As described in Appendix E, section E.2.3 , BLM chose the LHE as an appropriate tool in the compatibility because the LH standards are measurable and attainable goals for the desired condition of biological resources and physical components/characteristics

Commenter	Comment Number	Comment Text	Response
			<p>of desert ecosystem found within the Monument.</p> <p>The PDF referenced in your comment is the BLM's NLCS Strategy document that recognizes grazing as a use in NLCS units on pages 2 and 4.</p>
Western Watersheds Project, Greta Anderson	100136-38	<p>The next stage of BLM's Compatibility Determination was based on a Land Health Evaluation (LHE). BLM did not conduct focused scientific studies designed to address every aspect of known incompatibility. Rather, the BLM chose to evaluate the protection of these Monument objects in context of a functioning ecosystem was considered in the development of "indicators." These indicators functioned as proxies in order to use data and methods BLM already had rather than develop new ways of measuring object-specific impacts of livestock grazing as enumerated by the literature review. BLM's indicators wholly rely on the Arizona Standards for Rangeland Health and Guidelines for Grazing Administration. DRMP/DEIS at 1060-1066. Instead, BLM relied upon its Land Health Evaluation process, "to gauge whether the Arizona Standards for Rangeland Health are being met on the Monument." DRMP/DEIS at 1052, et seq .. Those standards are intended to determine levels of soil erosion and the provision of food and cover for wildlife and livestock, along with a riparian-wetland standard that does not apply to the SDNM. Those standards do not address grazing compatibility with the identified objects on the Monument, and do not address the aspects of incompatibility that are known from the scientific literature. It is therefore incomprehensible that the results of a Land Health Evaluation could serve to override the preponderance of scientific evidence that shows incompatibility.</p>	<p>The Proclamation for the SDNM (Appendix A) tells BLM that "...grazing on Federal lands north of Interstate 8 shall be allowed to continue only to the extent that the Bureau of Land Management determines that grazing is compatible with the paramount purpose of protecting the objects identified in this proclamation...." The BLM is not aware of scientific evidence that shows managed grazing within the Sonoran Desert National Monument is incompatible with protecting the objects of the Monument.</p> <p>The proclamation leaves it to the BLM to design the method to make this determination. The method developed is described in Appendices E and F.</p>

Commenter	Comment Number	Comment Text	Response
Western Watersheds Project, Greta Anderson	100136-43	BLM policy cautions against the improper use of S&G assessments to make grazing and other management decisions. The BLM's "Interpreting Indicators of Rangeland Health" states that the technique should be used in association with quantitative monitoring and inventory information, and "is designed to... provide a preliminary evaluation of soil/site stability, hydrologic function, and integrity of the biotic community... help land managers identify areas that are potentially at risk of degradation," and be used as a communication tool with a wide range of audiences. BLM Technical Reference 1734-6 at 1.(8) The Technical Reference explicitly states, "The approach is NOT to be used to: Identify the cause(s) of resource problems; Make grazing or other management decisions; Monitor land or determine trend; Independently generate national or regional assessments of rangeland health." Ibid., emphasis added. Here, BLM relies on the LHE process to assessing everything from livestock impacts to cultural resources, wildlife, sensitive species habitat, etc. in the Compatibility Determination. Moreover, the BLM relies on compliance with LHE to claim that livestock are not degrading the objects protected by the Monument Proclamation and to maintain status quo livestock grazing under the proposed action. This application, without any quantitative monitoring data to support it, is inappropriate and contrary to the BLM's own guidance.	The "Interpreting Indicators of Rangeland Health" is one of the assessment tools used in the Land Health Evaluation to determine if Rangeland Health Standards are being achieved. Supporting quantitative data included utilization, composition, frequency, dry weight rank, and similarity index. Much of this data is included in Appendix F, and the rest is available at PDO for review. The description of this process is found in Appendix E .
Western Watersheds Project, Greta Anderson	100136-46	It is also unclear why the BLM is seeking to continue livestock grazing on lands that aren't meeting land health standards. Livestock grazing has a cumulative detrimental impact; allowing it to continue on lands that aren't meeting standards for whatever reason will contribute to those lands	BLM's process and conclusions are shown in Appendix E.2.5 of the RMP. The Land Health Evaluation is one step in analyzing grazing compatibility. Lands not meeting Land Health standards, by themselves, don't mean grazing is the cause, or that grazing is incompatible with protection of

Commenter	Comment Number	Comment Text	Response
		ongoing failures. The DRMP/DEIS fails to show how livestock grazing is compatible with resource protection on areas that are degraded for any reason.	Monument objects.
Western Watersheds Project, Greta Anderson	100136-58	The statement, "The functioning desert ecosystem in the SDNM including the saguaro forests, various vegetation communities, and habitat for a wide range of wildlife species is generally unaffected by livestock grazing," (DRMP/DEIS at 1066) can only be justified if one ignores the scientific literature to the contrary, excludes relevant data sets and huge areas of profound livestock impacts, turns a blind eye to the limits of the monitoring methods, and changes the objectives to match the data to "prove" a foreordained outcome. The BLM here has employed all four tactics. The LHE and Compatibility Determination rest on this shaky and illegal foundation; the preferred alternative of the DRMP/DEIS is unsupported and unsupportable, and the BLM must act immediately to remove livestock from the SDNM.	The support for this summary statement is contained in Section E.2.3.3.
Western Watersheds Project, Greta Anderson	100136-68	We note that the statement, "The level of use should be adjusted primarily to fall-winter-spring with reduced use levels during the summer months " (DRMP/DEIS at 1075) comes out of the blue in the Compatibility Determination and is carried forward in the preferred alternative. Where the Technical Recommendations in the LHE provide a rationale for this, the data are not used to support this change. Because the allotment-level analyses did not describe a need for this change, it is unclear why this is necessary and how it might affect Monument objects.	BLM has revised Section F.16 to clarify the procedures and rationale for reductions and seasonal adjustments. The analysis of the impacts of the preferred alternative on the Monument objects is described throughout Chapter 4.
Pacific Biodiversity Institute, Susan Snetsinger	100138-2	The conclusion of the DRMP/DEIS that livestock grazing is compatible with the protection of Monument objects is incomprehensible. This finding is completely contrary to the dominant body of scientific research on the impacts of	BLM reviewed extant applicable literature including reports by PBI, and considered them to the degree they were applicable. See Section E.2.2

Commenter	Comment Number	Comment Text	Response
		<p>livestock grazing in desert environments, as well as to PBI's own findings. Throughout the 4 reports published by PBI on the SDNM (the two others not mentioned earlier "Natural Communities of the Sonoran Desert National Monument and Sand Tank Mountains" and "Native Grass Characteristics within Xeroriparian Communities of the Sonoran Desert National Monument") we repeatedly find strong associations of livestock grazing with negative impacts on the natural communities.</p>	<p>BLM contracted The Nature Conservancy (who in turn contracted PBI) to collect data within the SDNM for the purposes of providing BLM data to determine ecological conditions within the Monument. BLM used PBI plots to increase the number of key areas, where appropriate. See Section F.6.3 of Appendix F.</p> <p>While PBI's method for collecting the vegetation attributes was acceptable, many of the plot locations did not fit BLM's criteria for selection of key areas. Several of the plots overlapped multiple ecological sites and soil survey mapping units and some plots were located too close to livestock waters, which are not representative of the overall landscape level conditions within the Monument. For these reasons BLM was unable to use some of the analysis that was provided. In addition, the majority of the plots were located south of I-8 on the allotments that were closed to livestock grazing as required under the SDNM proclamation and within BMGR on ecological sites that do not occur north of I-8.</p> <p>PBI's study was of limited use because it did not address the intensity, frequency, timing, class of livestock, season of use, ecological sites, precipitation patterns and other variables the BLM needs to address the effects of current livestock grazing practices on the objects of the Monument. However, BLM did use some of PBI's plot data (where applicable) to address vegetation attributes when defining Ecological Site and Key Area DPC objectives.</p>

6.3.8 SDNM RMP RANGE IMPROVEMENTS

Commenter	Comment Number	Comment Text	Response
Grand Canyon Chapter of The Sierra Club, Jim Vaaler	100001-1	If you are going to use "Key areas" to evaluate the effects of grazing on Sonoran Desert eco-systems, then these "Key areas" need to be fenced off from the effects of grazing. The Forest Service has numerous "grazing exclosures" that are ungrazed areas that may be used as baseline comparisons to areas that are grazed.	The Key Area concept is briefly described in Appendix F, Section F.6.2 and a definition is provided in Chapter 7 , Glossary. As stated, key areas are selected to "represent where livestock grazing pressure is occurring" and is used as "a long-term monitoring point" to evaluate the effects of grazing pressure. Key areas are not exclosures. Exclosures are used to compare grazed areas with ungrazed areas and provide a baseline for changes that might be detected at key areas. Area A serves as an exclosure because it has not had livestock grazing since the 1940's. Study plots within Area A allowed BLM to compare the condition and composition of some Ecological Sites that had not been grazed for approximately 70 years with the same ecological sites at key areas north of Interstate 8 where grazing has continued. (See Appendix F, Section F.5.3.)
Sierra Club, Jim Vaaler	100121-37	The BLM needs to institute a network of grazing exclosures similar to what the Forest Service has done on their lands. While the concept of Key Areas may be a good start, these Key Areas need to be upgraded into grazing exclosures. Simply calling Area A one huge grazing exclosure does not get the job done. Features such as soil type, plant community variations, percentage of rocky outcrops, exposure, and elevation, as well as past grazing history, call for an area-wide system of "grazing exclosures."	The Key Area concept is briefly described in Appendix F, Section F.6.2 and a definition is provided in Chapter 7 , Glossary. As stated, key areas are selected to "represent where livestock grazing pressure is occurring" and is used as "a long-term monitoring point" to evaluate the effects of grazing pressure. Key areas are not exclosures. Exclosures are used to compare grazed areas with ungrazed areas and provide a baseline for changes that might be detected at key areas. Area A serves as an exclosure because it has not had livestock grazing since the 1940's. Study plots within Area A allowed BLM to compare the condition and composition of some Ecological Sites that had not been grazed for approximately 70 years with the same ecological sites at key

6. Response to Comments on the DRMP/EIS, Responses for Specific Comments, SDNM RMP Range Improvements

Commenter	Comment Number	Comment Text	Response
			<p>areas north of Interstate 8 where grazing has continued. (See Appendix F, Section F.5.3.)</p> <p>Developing exclosures is not an RMP decision. BLM may select appropriate areas for exclosure as needed to facilitate monitoring without an RMP decision to do so.</p>
Western Watersheds Project, Greta Anderson	100136-25	The DRMP/DEIS admits that livestock developments have an impact on the ecological resources of the Monument. It estimates that water developments have an impact of 6 acres (on average), with larger developments up to 125 acres of impacts. DRMP/DEIS at 502. The DRMP/DEIS does not analyze or disclose the methods it used to derive this acreage or the number of water developments that occur on the SDNM, making it impossible to evaluate the overall scope of impacts livestock infrastructure contributes.	<p>Section E.1.4. lists the number of water developments in SDNM north of Interstate-8.</p> <p>The impact area around water developments were estimated by BLM range specialists. The total acreage was derived using GIS analysis.</p>
Western Watersheds Project, Greta Anderson	100136-66	Similarly, the DRMP/DEIS fails to analyze or disclose the extent of infrastructure extant on the SDNM and the potential benefit of the "No Grazing" alternative on restoring these grossly impacted areas.	BLM has reviewed the impact analysis for removal of infrastructure and rehabilitation of areas impacted in Chapter 4, Section 4.8.6 in regards to water development sites.
Arizona Game and Fish Department, Josh Avey	100142-17	Section - 2.7.5.2Page - 82Line - 14.1.2Commnet/Suggestion - Add provision that facilitates maintenance of livestock waters through cooperation with AGFD and/or a third party. BLM will consult with AGFD on viability of waters for removal. Bullet 3 - Add provision to remove fencing when fencing is no longer needed or other options meet need	Coordination and collaboration with other agencies is not an RMP decision, but an administrative action. BLM would coordinate with AGFD on disposition and maintenance of developed waters when they are no longer need for livestock use.

6.3.9 SDNM RMP TRAVEL MANAGEMENT – IMPLEMENTATION LEVEL COMMENTS

Commenter	Comment Number	Comment Text	Response
Colby Turner, Town of Gila Bend	100051-3 and 100051-4	Some of the apparent reasoning behind certain closings are scientifically inaccurate. The closing of washes during the summer because wildlife use these areas to escape the heat is only partially correct. During the summer, desert animals either estivate or become nocturnal. During estivation these animals sleep for long periods of time, away from naturally disturbed areas. Washes during the summer are naturally disturbed by our monsoons and spring rains. Which brings us to the nocturnal wildlife. These animals do indeed seek cooler areas (vegetation, washes, mountains) to rest during the day, but are active at night.	<p>The issue of vehicular disturbance of resting wildlife along washes during hot weather (May through September) has not been studied sufficiently within the Sonoran Desert or the SDNM. The point about wildlife being nocturnal during summer months may be true for species that prefer it, such as javelina. However, other species are likely to remain in the wash area. Without peer-reviewed studies or other sound evidence, BLM is neither prepared nor comfortable with implementing night use hours in the Monument’s washes without further analysis. BLM and the AGFD have started vehicular and wildlife disturbance wash studies in the past, but they have not been aggressively pursued.</p> <p>BLM would explore re-starting the study of this issue, preferably in the SDNM, and learn from the results. The findings would inform future decisions to: (1) amend the SDNM Travel Management Plan to allow night use hours or both day and night use of designated washes; (2) support maintenance of the decisions presented in this FEIS; and, (3) inform future travel management planning in the LSDA.</p>
Colby Turner, Town of Gila Bend	100051-4	<p>I have included the following trails by number, a brief notation to support keeping them open</p> <ul style="list-style-type: none"> (1) SDNM Route 8008H and “Historic” Sand Tank Well (2) 8008I, 8009E- “Interconnectivity” “Accessibility” Game Catchment (3) 8013A ,8019A Resident Interconnectivity (4) Routes 8013, 8017, 8018, 8019 - Resident interconnectivity, Local Residents Use These To 	<p>(1) Access to view historic objects in SDNM is popular. BLM must balance the need for access with protecting remote areas from vandalism and over use where vehicle use may adversely affect Monument objects. The route being closed, 8008H, is 0.25 mile in length. It is reasonable that the historic well can be explored on foot. For these reasons, route 8008H would be closed.</p> <p>(2) Protection of saguaro cactus forests, a key Monument object, would be realized by eliminating vehicle traffic near</p>

Commenter	Comment Number	Comment Text	Response
		<p>Access Points Of Interest</p> <p>(5) 8016A, 8016B - Sand Tank Wash tributaries</p> <p>(6) 8016C- "Interconnectivity" "Cultural Sensitivity" "Historic" Farley's Pass</p>	<p>the south end of 8009E. In this area, saguaro cactus may be hit by passing vehicles. The southern portion of the 8009E primitive road enters a network of interconnected washes (8008i, 8009F) where the travel path is indistinct. Route closures here would best protect the saguaro forests and wash habitat in this area. Camping is being accommodated by adjusting the open length of 8009E to the second campsite 0.25 mile south of the wildlife water. Access to the south near Johnson Well would remain available by driving a slightly longer distance, using route 8009.</p> <p>(3) The desire of Gila Bend residents to have interconnectivity of routes is recognized. Routes 8013A and 8019A occur in wash drainages where vegetation density is higher than the surrounding area, making it valuable for bird nesting and wildlife use/movement. Maintaining the closure of 8013A and 8019A and directing traffic to 8018C and 8008 would maintain access to this area.</p> <p>(4) The desire of local motorists for the interconnectivity of routes is acknowledged. Most of these routes are desert washes, an important Monument object. Vehicle use in washes with large trees can cause conflicts with providing undisturbed thermal cover for wildlife resting and nest sites for birds, both of which are required for a functioning desert ecosystem, a Monument object.</p> <p>The seasonal closure period has been adjusted in Alternative E to end August 31 in order to provide motorized visitor access and seasonal dove and archery hunting in these sand wash areas, while fully protecting</p>

Commenter	Comment Number	Comment Text	Response
			<p>Monument objects. Furthermore, to offset concerns about successful nesting by birds in washes, thermal cover areas, and wildlife movement, route 8017 has been closed year round to provide additional high-quality wash habitat.</p> <p>(5) The desire for OHV travel in washes on primitive roads 8016A and 8016B for interconnectivity is understood. The indistinctness and difficult intersections with route 8016 is of concern to BLM. The absence of a good intersection with 8016 indicates that these routes were created by route proliferation. Factors BLM considered in opening and closing these two routes included: (1) the vagueness in finding the entrance to 8016A and B along the elevated 8016 primitive road; (2) the good stands of trees along these washes providing nesting habitat and wildlife forage, shade and cover; and, (3) the availability of route 8013 to provide similar opportunities and access.</p> <p>(6) The request for route 8016C to remain open for interconnectivity is recognized. Alternative E has been modified to open this route. Some public respondents supported opening route 8016C because it was a “technical” or challenging primitive road and important for connectivity and recreation access. Route 8016C saves seven miles of driving to reach the same location on route 8016, facilitating hunting, sightseeing and motor touring. BLM has concerns with an off-camber section of 8016C and its intersection visibility with 8016; appropriate visitor information and signing would be exercised.</p>

6. Response to Comments on the DRMP/EIS, Responses for Specific Comments, SDNM RMP Travel Management – Implementation Level Comments

Commenter	Comment Number	Comment Text	Response
Justine White, ADOT	100112-6	ADOT has four existing material source sites (see attached map) within the LSDA, two of which are in the boundaries of the SDNM. Continued use of these sources, including their designated access routes from the interstate highway system, should remain valid.	ADOT authorizations were reviewed, and the necessary changes have been made to allow for administrative access.
Douglas Thomas	100117-15, 100117-16	<p>Travel in washes offers a unique recreational experience with opportunities to view wildlife and xeroriparian vegetation that does not occur within the upland valley and bajada areas dissected by these washes. Driving in washes is a practice used by some hunters, and other visitors, to gain access to locations where game species are more likely to occur.</p> <p>Washes are a traditional travel route and have been used extensively throughout time. Motorized travel in washes should actually be encouraged in certain circumstances as evidence of travel in washes gets 'erased' after even a small flood event.</p> <p>The surface of wash beds is of gravely and rocky material that is resistant to erosion, so there are generally no measurable impacts to soils that occur from driving in wash beds.</p>	<p>BLM is working to designate a route system that protects the Monument's objects first and foremost, followed by a route system offering suitable and sustainable levels of visitor access and recreation opportunity. The use of washes as traditional routes of travel is not debated, nor their value in viewing wildlife and xeroriparian plants. Your points about washes being self-maintaining in the sense that ruts are smoothed over by flooding and reduced particulates emissions and erosion is acknowledged.</p> <p>BLM's primary concern remain this - large tree lined washes are the biological backbone of the Sonoran Desert. Washes are a Monument object, and are critical to several other Monument objects. These objects include wildlife and a functioning desert ecosystem with diverse plant communities.</p> <p>Washes in the SDNM support a much denser plant community than the surrounding desert, including mesquite, ironwood, palo verde, desert honeysuckle, chuperosa and desert willow. Such vegetation offers the dense plant cover bird species need for successful nesting, foraging, and escape, and birds heavily use desert washes during migration. In fact, most bird species in the Sonoran Desert occur in washes. Washes are equally important for other game and non-game wildlife for forage, cover, escape and movement. Relief from thermal stress by fauna requires washes with larger shade trees.</p>

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Douglas Thomas	100117-18	<p>What volume of travel constitutes a “disturbance” to wildlife habitat by travel through these washes during 6 summer months and what solutions (besides closure) would minimize the level of disturbance on these routes?</p>	<p>The consequences of driving vehicles in washes have been studied in the past with regard to effects on vegetation loss and potential harm to wildlife habitat. Sonoran Desert washes have not been sufficiently studied to determine a threshold or volume of use where impacts to wildlife and habitat is or could be detrimental. Impacts might occur from: (1) the intensity of motorized use; (2) the sights and sounds of motorized and nonmotorized recreation activities; (3) the time of day such motorized recreation use occurs; and, (4) through vegetation damage or loss. For these reasons, BLM is taking a conservative approach in using a seasonal closure in hot weather months to preclude vehicle use from disturbing wildlife and their habitat in washes south of I-8. The end date for the seasonal closure has been adjusted to end August 31 since extreme hot weather is subsiding by that date. At the same time, this allows visitors to access the areas for two early and popular hunting seasons, dove and archery.</p>
Douglas Thomas	100117-20	<p>The “Sand Tank Pass Route” (Route 8013) is the only route through the mountains to the southern area of the range. The Sand Tank Wash (8013), The Bender Wash (8018), and Farley Cabin Route cross-cut route (8017) all connect Monument lands and routes west of the Sand Tank Mountains with Monument lands and routes east of the Sand Tank Mountains without the necessity of round-about travel on Interstate 8.</p>	<p>The use of route 8013 as a cut across or short cut route must not conflict with wildlife requirements and the protection of Monument objects. The large habitat area provided by the Sand Tank Mountains ensures Monument objects would not be harmed by vehicle use in some washes in cool seasons. Ensuring animals have sufficient undisturbed habitat in summer months necessitates the seasonal route closures. It is understood by BLM that use on other or nearby upland routes may increase during times of seasonal closures. This is anticipated and would require additional monitoring and maintenance to ascertain impacts on resources and management objects.</p>

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Douglas Thomas	100117-22, 100117-23, 100117-24	Access to the SDNM will be restricted to the Nine Mile Wash Road (Butterfield), Freeman Road and Vekol Rd where existing freeway interchanges are available. The elimination of direct access gates along both sides of Interstate 8 (in particular MM 124,127.7,133,2 & 136.4) will severely limit public access to the SDNM.	A management action has been added to the plan to address the desire for safe public access along I-8. Access at Big Horn Station would eventually be locked to provide additional protection to this historic site. However, a new access road is proposed. Other gate locations would remain open pending successful work with ADOT and FHWA.
Douglas Thomas	100177-25	The proposed access route to the SDNM from the Nine Mile Wash Road where it intersects Route 8019A just happens to be at the confluence of the Sand Tank Wash, the Bender Wash, and all of their branches. Because of the amount of runoff this confluence experiences and the flat nature of the terrain, this area become impassable for days due to ponding in the Nine Mine Road.	The designation of these routes as Primitive Roads, by definition of the asset, indicates BLM would not maintain nor manage the routes for daily or year round use. If flooding occurs and the routes are temporarily impassable, visitors would need to seek other access points.
Sierra Club, Jim Vaaler	100121-45	In an area just outside of the SDNM (along the gas pipeline road), there are a plethora of short roads that need to be posted as closed and then barricaded. It appears that some, if not all, of these roads are being used as access roads for user-created shooting galleries.	Some of these roads and along the pipeline can be repurposed for camping and day use parking. During the route inventory evaluations, identified attributes for these routes south of the gas pipeline road included good campsites. Some roads have wide turnaround areas suitable for group camping.
Sierra Club, Jim Vaaler	100021-54	The Anza-Butterfield Interpretive Trail in the SDNM should be closed to all motorized entry.	Vehicle access to the Anza/ Butterfield trail would be reduced to only the Butterfield Pass area. Potential future adverse effects on Monument objects in this area would be curtailed through limitations such as: (1) licensed drivers only; (2) licensed vehicles only; (3) designated routes only; (4) the proposed hardening and definition of the Gap Well camping areas; and (5) Butterfield/Anza specific recreation management planning.
Sierra Club, Jim Vaaler	100121-68	Short spur routes and routes located in desert washes need to be closed to vehicle use under all alternatives. Short spur routes most generally lead to user-created camp sites and/or user created shooting galleries, undesirable land use allocations. Short spur routes may	The use of designated spur roads would help visitors to comply with roadside pull-off limitations in this plan. The size or footprint of campsites by those towing camp trailers, ATVs or horses is very similar. The BLM feels that limitations being put in place on vehicle use would limit or curtail improper

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		also be used as informal staging areas for off-road vehicle activities and, over time, these areas get expanded through inappropriate off-road vehicle activity.	use. Personal contacts, signage and continuation of patrol and monitoring of visitor use and related impacts would be an important part of plan implementation.
Friends of the Sonoran Desert National Monument, Thom Hulen & Wilderness Society, Phil Hanceford	100123-7, 100123-8, & 100123-9, & 100126-14, 100126-66 & 100126-67	See pages 170, 171, 172, and 173, Chapter 6, for open route listings.	<p>(1) Comments provided in support of maintaining open routes are noted. BLM agrees with your assessment with exception of the Anza/Butterfield Trail. BLM feels that only one section of the trail, the Butterfield Pass, can remain open to vehicle use. This use would be managed with the plan's new vehicle and driver restrictions.</p> <p>(2) BLM agrees with your route by route comments with exception of routes 8029, 8030, 8030A and 8037Q. Administrative use proposals for wildlife water access were not made during scoping; the AGFD specifically requested routes north of I-8 to remain available for public access. Routes 8029 and 8030 were cherry-stemmed into wilderness; Congress intended for these roads to remain open for use. The use of route 8030A is necessary to access routes 8029 and 8030, thus it remains open.</p> <p>8037Q, although heavily used, allows access into the Mobile Valley. Public access in this area is virtually unavailable and unmanageable, mainly due to the assortment of private land owners and exceedingly silty soils. Consequently route 8037Q remains proposed for closure. Access to this area would be investigated using the power line road east of the SDNM.</p> <p>(3) Many comments were made supporting keeping open certain routes. The routes on your list appear as open in the FEIS.</p>

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<p>Friends of the Sonoran Desert National Monument, Thom Hulen</p> <p>&</p> <p>Wilderness Society, Phil Hanceford</p>	<p>100123-7, 100123-8, & 100123-9,</p> <p>&</p> <p>100126-14, 100126-66 & 100126-67</p>	<p>See pages 170, 171, 172, and 173, Chapter 6, for closed route listings.</p>	<p>(1) Comments supporting closure of certain routes are noted. Routes along the Komatke Gas Pipeline road (8000C, D, E, F, G, L) would no longer be available for target shooting; however, certain roads may be repurposed to offer camping opportunities. 8000A was specifically cherry-stemmed into wilderness by Congress for access to a grazing improvement; it would remain open to all uses. Routes 8001A, B and D would remain open to provide hunting and general access.</p> <p>The preferred alternative is not allocating the Margie’s Peak area to maintain wilderness characteristics; consequently effected routes in this locale would remain open.</p> <p>Several comments cited unnecessary roads, but it was difficult to interpret these comments. So, these comments were viewed as meaning unnecessary for Monument uses. Where closing spur roads was determined to be beneficial to managing the uses and objects of the Monument, routes have been closed. Routes 8006H and 8006I have been closed to reduce the number of access points to the SDNM. Routes 8039C and 8039D, although not in an area BLM is allocating to maintain wilderness characteristics, would be closed to reduce the number of access points and concentrate public and visitor use at more sustainable sites near Gap Well and North Tank.</p> <p>(2) Your route by route comments were reviewed for proposed route closures near the South Maricopa Mountains wilderness. Route 803I is not in an area proposed by BLM to be maintained for wilderness</p>

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			<p>characteristics. Thus, it remains open for access to the west side of the wilderness. Your comments recommend closure of specific roads for redundancy; BLM agrees with most of these recommendations.</p> <p>BLM did not agree with all proposed route closure comments. Route 8033 provides access to an interesting campsite on 8033A as well as a sightseeing loop opportunity in area; hence BLM does not think the road is redundant. Route 8034A is next to route 8034I which is proposed for closure; therefore it's not redundant. Furthermore, route 8034A allows for a sightseeing loop in this area and general Monument access. Route 8037 is not a railroad crossing point. All proposed access to this area goes under the railroad tracks. Route 8037C may appear redundant, however, the route network on the ground is such that depending upon the direction of travel, east or west, this road or route 8037 enhances sustainable access, provides convenience and opportunities for driving choices, and has no impact on Monument objects.</p> <p>(3) Many comments were made indicating certain roads and routes south of I-8 as unnecessary or redundant. Spur roads are important to allow visitors camping access. This is an important concept considering the strict limitations for pulling off roads for parking or camping and the restriction of vehicles visitors to the immediate roadside.</p> <p>Vekol Valley: The following routes are proposed as Open by BLM: Routes 8007B, D, E, K, are spurs along Vekol Road where camping is allowed. Monitoring and adaptive management would ensure proper behavior and</p>

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			<p>restoration if needed. Route 8007F is proposed as an administrative use route going to water. It would remain closed to public use.</p> <p>South Sand Tank Mountains: 8008B and F are proposed as Open by BLM because they provide access off of the main road 8008 for camping, parking for hunting. Route 8009C provides opportunities for hunters and hikers to vehicle camp. 8009D affords visitors an alternate driving opportunity and a direct route for the AGFD to service or haul water to the nearby wildlife catchment. Route 8009E provides access to two campsites with vistas of a saguaro forest.</p> <p>North Sand Tank Mountains: Route 8011A provides access to Javelina Mountain where hunters and hikers have an opportunity for car camping. Route 8014 provides access to a well. Access to the north side of Sand Tank Mountains is also served by this route. Route 8015A is a glassing spot for hunters looking for wildlife. Route 8016 provides a distinctly different driving experience than 8011 due to its location and raised bed construction; thus BLM maintains it is not redundant. Route 8018D is located in the area of an ADOT borrow pit. Route 8009F is proposed for closure by BLM since it occurs in a wash where managing vehicle use would be problematic.</p> <p>Table Top Mountains area: BLM feels that for the following reasons, many roads claimed to be redundant are not, and are proposed to remain Open. Routes</p>

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			<p>8023B and 8025A allow camping away from the power line road, route 8023. 8027A provides access to wildlife water. 8042B provides alternative access to Antelope Peak. BLM can provide legal public access completely on BLM land using route 8042B, although many people use 8043 for access. 8042C allows for camping and wilderness access away from a main road. Route 8043 has several uses such as private property access, law enforcement patrol, and functions as an alternative access to Antelope Peak. 8043A also provides law enforcement access and alternate access route from and to Vekol Valley Road.</p>
Wilderness Society, Phil Hanceford	100126-32	<p>As stated in the Draft RMP, the Anza, Butterfield, and Mormon Battalion NHTs are all named Monument objects. BLM’s transportation planning should prioritize protection of Monument objects. Proclamation 7397 obligates BLM to develop a transportation plan “that addresses the actions, including road closures or travel restrictions, necessary to protect the objects identified in the proclamation.” BLM has already demonstrated that damage to Monument objects has occurred and is likely to continue in the future within the temporary closure in place. Thus, the Draft RMP should not propose opening the routes in the area to motorized use. In addition, in order for BLM to open routes that are currently temporarily closed, the agency must make a showing that “the adverse effects are eliminated and measures implemented to prevent recurrence.” 43 C.F.R. § 8341.2(a). The Draft RMP does not demonstrate BLM has eliminated the adverse effects (i.e. abuse from ORVs) that caused damage and does not propose measures to prevent the recurrence of the</p>	<p>BLM proposes to reopen Butterfield Pass between roads 8002 and 8004 (Gap Well). All other portions of the historic trail would be limited to non-motorized uses. This plan would enact restrictions such as requiring all vehicles to be licensed for street use and operated by licensed drivers. Such actions would reduce the effects of vehicle use by removing unlicensed vehicles and drivers. Such vehicles were associated with the irresponsible uses that necessitated, in the first place, the temporary OHV closure.</p> <p>Additional actions to be explained in detail in the SDNM travel management plan include: (1) the definition of Open Primitive Roads in the Gap Well area through fencing, and/or adding gravel to define the route; (2) other management actions including engineering, education, interpretation and enforcement; and, (3) development and defining of camping areas to further demarcate public use areas and curb cross-country use.</p>

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		damage.	The draft RMP does indicate that adverse effects would end or be greatly reduced upon plan implementation and subsequent development of site-specific recreation activity plans for this Butterfield/Anza area. Upon RMP approval, further activity planning would elaborate the details and specific on-the-ground management actions required to protect the historic trails and Monument objects in the temporary Butterfield/Anza OHV closure area.
Andy Laurenzi, Center for Desert Archaeology	100129-19	Based on existing information in AZSITE, we recommend specific route/road closures to public use as shown on the attached maps. Given the well documented information on motorized access and site impacts for these types of sites and the lack of any documentation on these sites in the plan, it is unclear how these Monument objects are adequately protected by continuing to designate these routes as open to public use. An additional consideration is that two of the three routes “dead end” at the southern Monument boundary which inadvertently facilitates trespass onto the Tohono O’odham Nation and Barry Goldwater Bombing Range.	Archaeological site information was reviewed as part of the route evaluation process. Site information is not disclosed in the plan. BLM Instructional Memo 2007-030 has been thoroughly followed with regard to Area of Potential Affect. Impact to sites was considered using a 1/4mile buffer along routes. Reference to subject sites can be found in the implementation level analysis for cultural objects. With regard to routes extending to the Tohono O’odham Nation boundary, BLM has not received any information from the Nation that they wish these roads to be closed. Smuggling activity is an illegal activity addressed outside of authorized public uses considered by comprehensive travel management planning.
AGFD, Josh Avey	100142-5	The preferred alternative identifies 32.7 miles of primitive roads on the southwest corner of the SDNM as seasonally closed from April 1 to September 15. Through these closures the public loses vehicular access to a substantial portion of the SDNM for 5.5 months of the year. September 1 to 15 is the early dove season and the seasonal closures eliminate a substantial portion of the SDNM from dove hunting. The closures will also impact archery hunts. The AGFD recommends reevaluating the seasonal closures and leaving at least one route open year	BLM reviewed the seasonal closure per this comment. With monsoon rains occurring in July and August, sufficient water and forage should be available to sustain and disperse wildlife. The seasonal closure date for these washes has been revised to April 15-Aug 31. Wildlife objects of the Monument, if disturbed along designated routes such as Sand Tank Wash after August 31, would not be greatly affected. As an assurance of this, BLM has closed route 8017, a northern branch of Sand Tank wash

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		<p>round to provide year round public access to the southwest corner of the SDNM. We also recommend changing the end date to August 31 to accommodate the dove hunt.</p>	<p>to all uses. This proposal sets aside, free from vehicle-based human intrusions, a long stretch of excellent wash habitat year round, assuring thermal cover, forage and movement areas for wildlife, while protecting the Monument’s wildlife and wash objects.</p> <p>In response to comments regarding access to the area between road 8002 and North Tank, BLM maintains protecting the Anza/Butterfield Trail area from vehicle damage is a higher priority than allowing hunter access. Road 8003 remains available by vehicle and goes to a dirt tank where game species may be found. Access to the north side of the South Maricopa Mountains wilderness has been adjusted to provide additional camping opportunities on spur routes. Routes 8037E and 8037F would remain open for vehicle use.</p>

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