

DRAFT SAN PEDRO RIPARIAN NATIONAL CONSERVATION AREA RESOURCE MANAGEMENT PLAN

Public Meeting, JULY 30, 2018—Sierra Vista, Arizona

BLM Planning Team

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Meeting Minutes Begin on Next Page

Meeting Minutes

1. Opening Remarks (Scott Feldhausen)

As it stands today, we don't have a planning document to give direction for what the San Pedro Riparian National Conservation Area (SPRNCA) should look like. There aren't goals and objectives defined for managing the SPRNCA. What we're here to do tonight is to try to provide a set of objectives that we can all understand (whether or not you agree with them) for how we are going to manage the SPRNCA.

The Draft Resource Management Plan (RMP) and Draft Environmental Impact Statement (DEIS) for the SPRNCA have the support of the BLM State Director and the Deputy Secretary of the Interior, but the decision-space remains open. The final decision could change from what is currently the preferred alternative and could potentially change in a big way.

Today we are here to listen. This is a draft document. This is why there is a draft. The question today is, "Did we analyze it adequately?" The answer to this question will allow a better decision to be made.

Tonight is aimed at providing some answers, but written comments are what count, and are what will ultimately shape the analysis.

2. Outline of Project Overview (Amy)

What is an RMP?

- Similar to city or country management plans—a high-level framework
- Establishes goals and objectives of resource conditions
- Doesn't authorize on-the-ground decisions

Where are we in the process?

- Stages—Scoping, Alternatives Development, Draft*RMP/Draft EIS, Proposed RMP/Final EIS

* We are here

- We are currently in the 90-day public comment period. The purpose of the 90-day public comment period is for you to provide substantive comments on the Draft RMP. BLM will provide comment responses in the Proposed RMP/Final EIS.
- The next stage in the process is the release of the Proposed RMP/Final EIS and 30-day protest period
(In the protest period, you can't bring up new issues; you must have previously established standing by submitting comments either during scoping or the comment period on the Draft RMP.)

Estimated completion date: April 2019

Overview of the DEIS

- Arizona-Idaho Conservation Act of 1988 (Enabling Legislation)—Places limits on allowable management
- The SPRNCA is currently managed under 25-year-old management plans. Safford District RMP and San Pedro River Riparian Management Plan don't provide clear goals and objectives for SPRNCA and don't address population growth and other changes that effect SPRNCA

Overview of Plan Components

- Goals and objectives and relationship to management actions and allocations
- Alternatives—goal to explore broad range of potential uses of the SPRNCA
 - *The “no action” does not set desired outcomes*
 - Three Areas of Critical Environmental Concern (ACECs) would remain designated
 - Alt B—high management involvement; ACECs undesignated, no land with wilderness characteristics (LWCs)
 - Alt C—allocations limiting livestock and recreation access; no ACECs, no LWCs
 - Alt D—50% of area managed to protect LWCs; +2 ACECs; no livestock grazing
- Chapter 3—Effects analysis. The focus of the most constructive comments
 - Reasonably Foreseeable Development Scenario (RFDS) summary
 - Difference between RFDS and implementation-level decisions

How to make constructive comments:

The strongest comments respond to the following questions:

- Where did we miss the mark on our environmental analysis?
- What else do we need to consider?
- What is the issue or error?
- Where is the issue or error located?
- What are the problems with methods and analysis?
- What is the specific element of the document you take issue with?

Walkthrough of comments submission options.

COMMENTS AND ANSWERS

- I. The enabling legislation for the SPRNCA is based in the protection of particular resources, such as plants, wildlife, and archaeological resources. Livestock is not one of the protected resources or part of the legislation. So why is livestock part of the proposed management of this area?**

Scott Feldhausen: The enabling legislation for the SPRNCA directs the BLM to protect, conserve, and enhance certain resources. In the absence of other direction, lands will be managed in accordance with the Federal Land Policy Management Act (FLPMA), managing for multiple use and sustained yield. Nothing in the enabling legislation forbids livestock grazing, and so decisions about grazing are being analyzed as part of the planning process.

Livestock grazing was placed on moratorium after acquisition of the lands for what was supposed to be 15 years. During that time, the BLM was supposed to have reevaluated grazing decisions; 30 years later, we're all pretty much assuming that there is no livestock grazing in the SPRNCA and that there shouldn't be. But the BLM is required—and it is the direction of the BLM's State Director—that as part of the planning process, the BLM will evaluate livestock grazing and make a decision on its allowance or disallowance. The decision has not been made. A decision will be made through this planning process.

There is another part of the question, which is "What would that look like?" I spent half of my career as a fisheries biologist in Idaho trying to improve streams with endangered species that had been heavily impacted by livestock grazing for 100 years. So I know the impacts of livestock on streams when it is not properly managed. I also know that you can improve streams in poor condition with good management and still graze. I also know that it is very difficult to graze an area that is in good condition and not have an impact. On normal BLM lands, in the public domain, on lands that are not specially designated like an NCA, it's a whole lot easier. So what I asked staff to do in this case was to take out some of these areas where I can't defend livestock grazing. I can't defend putting livestock grazing on the San Pedro River and put additional cows out there today. I would be a fool to ask them to put livestock grazing in our high use recreational areas, because that's an automatic conflict. Same with our cultural sites. What's left? That's the question.

We are taking a look at the vegetative conditions, using science, to figure out how much forage is available. We are looking at areas where you can feasibly graze livestock because of their adjacency to other allotments or to a ranch, or has topography that would allow us to put in fences, to see what is remotely realistic. When all of these filters are put in place, you see what is reflected in our current preferred alternative. That's what we can say is the most likely available. Do I think that's going to change? Quite likely. I think we did our best to try to analyze the impacts of livestock grazing on the resource, as Amy has said, but I also expect many of you to tell us differently or otherwise.

I also want you to know that if we do end up with a decision that continues or increases livestock grazing, my goal is to do it in a collaborative manner, similar to the Las Cienegas National Conservation Area, where we have folks that help us figure out best management methods. It will not be just like public domain grazing out there. It can't be. It must be adaptive management. It has to be a thoughtful process. It has to be everybody at the table looking at what we did today, what it is, and what we can do tomorrow, and whether we should even continue it.

2. There is a preponderance of academic studies on the SPRNCA that point to clear adverse effects of grazing. Are those being taken into account in the analysis?

Amy Markstein: This gets back to where you can be most helpful to us. We looked at a lot of studies, and a lot of studies are referenced in Chapter 3. We want to know where we missed the mark. If you have studies that we didn't consider that you think are pertinent, please include that with your comment. Send us PDFs of those studies. You all have my email address. If you have more questions, and want to get into the details of the grasses and invasive species, you should go see Eric at the livestock grazing table in the breakout session.

3. Could you clarify the statement that the aggregate of comments, or total number of a particular comment, isn't taken into account in your decision-making?

Amy Markstein: *It is correct that the process is not a vote. If your comments are all the same, we look at that as one comment.*

(Follow-up) Is that just for form letters, or for similar comments as well?

Amy Markstein: *There are nuances. If they are similar, but not the same, then we will look at those comments individually. But a form letter is the best example. If we receive 500 form letters that all say the same thing, we look at that as one comment.*

4. Could you expand on the quantity and method of groundwater recharge that is mentioned in the RMP?

Scott Feldhausen: *That's a really good question, and I don't have an answer. What I know is that we have the San Pedro Riparian NCA, which is a sliver of land surrounded by other land entities. And we as an agency are charged with improving aquatic habitat and riparian resources, but there has not been a lot of opportunity identified on our lands. The question for me is, "Is there anything that could be done on the SPRNCA itself to improve groundwater or groundwater recharge?" Maybe that's taking out upland mesquite or other things we can do. That's a great question, and we'll decide that later. Unless we allow for it in the RMP, we won't be able to implement this activity later. I know there is a lot of work being done in the San Pedro Basin to reduce impacts to groundwater, and I want to be part of that if we can. It makes no sense for the BLM to be the ones who all of the water needs to flow to but not participate in doing anything about water management opportunities. I don't know of any opportunities today, but I want to make sure that the manager ten years down the line can do something. That's the thing about these plans: They set the management philosophy for the next 5, 10, 30 years. We've tried to cast something that is broad and flexible as possible, so that we can manage for changing needs. Today, we don't have a lot of flexibility in our management.*

5. How can we be most helpful in making comments on alternatives? Are specific features most helpful to comment on? Are new alternative suggestions helpful?

Amy Markstein: *Absolutely. A new alternative is definitely a constructive comment. Presenting reasonable alternatives is helpful. Comments are most helpful when they identify the deficit in the alternative, rather than making a blanket statement to the effect of "I like Alternative A" or "I hate Alternative D." Constructive comments typically relate to something we missed in Chapter 3—the analysis. What didn't we analyze, or what did we not analyze correctly? That is helpful. If there is something that we didn't include in our range of alternatives, then absolutely, that's a very helpful comment. It is possible that the final Preferred Alternative is a combination of different parts of Alternatives A, B, C, and D.*

(Follow-up) Does a suggested alternative need to be reasonable to be considered?

Amy Markstein: *Yes.*

6. As part of the groundwater recharge vision, are you taking into account private water resources?

Scott Feldhausen: *No. Not unless somebody wants to donate water to river flows from their privately held water right. It is not part of what we're envisioning. I have no authority to take somebody's water right. Right now we're in litigation. You all know that. And whatever comes out of that Gila River adjudication process is what we as an agency have to live with. What we're trying to do is set objectives for the vegetation and resources on the SPRNCA so that whatever water right we have we'll be able to manage for, but also provide the flexibility for us to be able to be proactive where we can on our lands.*

(Follow-up) But you're not imagining reaching out to the private sector?

Scott Feldhausen: *That's a really good question. The SPRNCA is surrounded by all of you, and I can't serve all of you without having some conversation, which is why we're here today. We can't also solve the problems on BLM lands without having some conversations. If it's determined that we can do something cooperatively within this community to meet all of our needs, including the enabling legislation, then yeah, I want to be at that table. But that doesn't mean I'm going to go looking to take somebody's water. I can't do that.*

7. What is the effect of different water levels in the San Pedro River under different alternatives, particularly concerning water?

Scott Feldhausen: *I think you are talking about two different things. There is the water rights litigation, which is based on the water rights that Congress gave to the SPRNCA—that's what we're in litigation on today. The RMP alternatives do not talk about that at all. The Arizona courts are making that decision. We're talking about how we manage that water, whatever that is. We're talking about the vegetation that is associated with that. We're not talking about water rights at all. We don't make any analysis of that.*

8. How can the number of ACECs vary across alternatives from none to several?

Scott Feldhausen: *Great question. I asked the staff why they were necessary. Our guidance is that Areas of Environmental Concerns (ACECs), like a lot of protective designations, are put in place where they are required to protect and conserve beyond normal FLPMA requirements—multiple use and sustained yield. So looking at BLM lands more generally across the Gila District, we make decisions on allowable use: We'll focus livestock grazing in one place and reduce it in another in order to protect a rare plant. But we might exclude all uses to protect the plant through an ACEC, because that is the priority of that area. And we might have a wilderness designation.*

When I saw the first slide, with the SPRNCA and started overlaying the various special designations—ACECs, lands with wilderness characteristics, Wild and Scenic Rivers—every time you took a step, you were in some different land use designation. My question is, as a public land user, how is the public going to know what they can do without a sign every fifty feet? And how is a public land manager going to know what to do out there? What we've tried to do, because we have enabling legislation, and which is strict—stricter than most BLM lands—restricts what we can

do out there, I've tried to reduce the number of times that we tell the public, "We've got to do less here in our preferred alternative."

As a public land user, I like having one set of rules to follow and not have to change rules every time I cross an imaginary line. And as a public land manager I like flexibility to find a solution. While the rule-set can be a good idea, it changes sometimes. That's why we've taken them out in the preferred. It doesn't mean they won't go back in the final, if we hear we really missed the mark, and "this is why you should..." This was our attempt to streamline and simplify.

9. Could the BLM get sued into asserting water rights that would limit water use of private wells?

Scott Feldhausen: I will be happy to talk to folks about water rights after this Q&A, but it is not part of the RMP. There is that risk; litigation happens, and I can't control that. I know that Congress said in the enabling legislation that "you shall have the water necessary to implement all these other things;" but there is no number (cfs). And water is managed by a number. So we asked the state to identify what that number is. That process has been going on 40 years. I'm not sure we'll ever know that number. But at the end of the day, we will get that number. At that point, it will be up to us or somebody else to determine how the condition of the river is being impacted by those wells and prove that in court.

10. What is the ultimate vision of SPRNCA? What is the desired future condition?

Amy Markstein: There are two places in the RMP where you could find that. The first is Chapter 2, under "Goals and Objectives." That's where we describe what we're managing for. That's what we want the resource to look like if we fully implement each of these alternatives. The second place is Chapter 3, which is the Effects Analysis. Again, if we were to fully implement the actions, this is what the effects of the actions would be to different resources.

11. How will the BLM ensure that Mexico allows water to continue flowing into the United States down the San Pedro River?

Scott Feldhausen: The amount of water that comes down the river out of Mexico is not in my jurisdiction. We manage for what we can do on the San Pedro River today. If Mexico decides to put a reservoir on the wall, then I guess we'll all be talking about the future of the San Pedro. We would need a new plan. Until then, we're managing what we have. Again, I am happy to talk about water rights later, but it's not part of this plan.

12. (a) Was the 2013 National Climate Assessment volume for the southwest contemplated in the analysis?

Amy Markstein: No. But please include it as a comment.

(b) Did Secretary Zinke direct you to not consider climate change impacts in the development of this plan?

Amy Markstein: Not specifically.

Scott Feldhausen: *No, we were not specifically directed by the Secretary. An early draft I looked at in February just had very generic information and didn't say anything about the impacts of what we were doing. I had a recent conversation with Representative Grijalva's staff, and they will be working with the University of Arizona to look at the RMP, to look at that question specifically, and see if they can provide information to add to the analysis, and I am happy to take a look at that.*

13. Is it helpful to separate comments out by topic and submit them as independent comments, or is it just as helpful to submit several comments in a single comment letter?

Amy Markstein: *I don't think it matters. What is helpful is if you have several topics, to have them well defined in paragraphs. More generally, it is most helpful to have specificity in your comments.*

14. Is it the BLM's intent to retain ownership of the water that is recharged through the water recharge system?

Scott Feldhausen: *No, my intent is simply that, if the scientists tell me—and there are some really good scientists in this basin—that something can be done on the SPRNCA that can improve flows in the river, I want to have the flexibility to do that work.*

15. Are there decisions in the RMP about rifle use?

Amy Markstein: *Yes, there are decisions under each of the alternatives about the discharge of firearms for hunting specifically. Under Alternative A, about half of SPRNCA is available to the discharge of firearms for hunting. Under Alternative B and C, the whole SPRNCA is available for the discharge of firearms for hunting, except where restricted by state law—about a quarter-mile from structures. Alternative D is the same as Alternative A, about half of the SPRNCA available.*

(Follow-up) Does it say where?

Amy Markstein: *In volume two there are maps that show the areas that are open and closed to hunting specifically.*

Scott Feldhausen: *In addition to the legislation and FLPMA, we also have recent secretarial orders that direct the BLM to consider increasing hunting and recreational access and opportunities across the board. We're required in every plan we do to evaluate that. And like special designations, I want to know if restrictions are necessary. We're trying to align as much as possible with state regulation so that the public has one rule to follow.*

(Follow-up) Is the secretarial order referenced in the RMP?

Scott Feldhausen: *Yes it is.*

16. In view of the protection and enhancement mandate of the enabling legislation, is there data or information in the RMP that demonstrates that grazing, grazing enhancements, hunting, and trapping are good for those primary resources?

Amy Markstein: *You would find that in Chapter 3—the effects analysis. That will show both the positive and negative effects of a use. If you find that we missed something, if you have additional resources, or you disagree with our analysis, that would be great to submit in a comment.*

17. Is the economic cost of implementation analyzed in the RMP?

[Facilitator Teresa Makinen]: *I would submit that as a large-scale plan; it doesn't get into those details.*

Amy Markstein: *That is correct; the short answer is no.*

18. How do I get questions answered in advance of submitting comments?

Amy Markstein: *You can email me [amarkstein@blm.gov].*

19. How did you arrive at the use numbers in Table 4-2?

Amy Markstein: *We looked at reasonably foreseeable development scenarios (RFDS) and considered how much water we would need for administrative uses (such as water for our recreation sites [San Pedro House] and livestock grazing). We looked at how much water would need to be pumped from wells in the SPRNCA for BLM's administrative uses (as described above). We would do this for each of the uses described for each of the alternatives, and that's what those numbers reflect.*

(Follow-up) And did you look at the source of the water?

Amy Markstein: *We did.*

(Follow-up) And the sources all came out of the SPRNCA?

Amy Markstein: *Yes.*

(Follow-up) If all of this water is coming from the SPRNCA, then why are we in court?

Dave Murray: *This table reflects administrative use of water. That's why calculations are in the tens of acre-feet—that's not a typo. This isn't talking about stream flow or riparian water; this is just administrative use of water from wells for recreation sites and livestock.*

(Follow-up) If this is the water that's needed, then why is BLM asking for 44,000 acre-feet of water?

Dave Murray: *The difference is that what is described in Table 4-2 is just an estimate of water pumping for BLM's administrative use that could change, based on alternatives for recreation and*

livestock use. The 44,000 acre-feet is what we claimed we needed for the riparian area, for surface flows, and for flood flows, and that is not part of this table. This table is only for administrative use.

20. Have you analyzed socioeconomic impacts of tourism in the analysis (e.g., whether cattle grazing could affect visitation)?

Amy Markstein: Yes. In Chapter 3, there is a socioeconomic section that analyzes the effects of each of the alternatives. This looks at recreational revenue that is brought into the economy under each of the alternatives.

21. (a) There needs to be a clearer explanation of the legal grounding of the plan.

Amy Markstein: Alternatives are grounded in the purpose and need for the plan and the intent of the enabling legislation. All alternatives must satisfy both. The different alternatives were shaped substantially by public comments from scoping. We also engaged the public with a high level look at the alternatives in 2015. That forms the basis of our alternatives; that grounds the plan.

(b) Does the plan manage recreational shooting distinctly from hunting?

Amy Markstein: Yes. The plan manages recreation target shooting differently than the discharge of firearms for hunting. The recreational target shooting management prescription would be carried forward under all alternatives—continuing to keep the entire SPRNCA closed to recreational target shooting. As mentioned before, discharge of firearms for hunting would be allowed to different degrees under the alternatives.

22. Do you specify allowable types of ammunition on the SPRNCA in the plan?

Amy Markstein: No. We plan for areas where hunting may be allowed, but we do not specify what ammunition hunters can use.

23. What methods do you use to estimate socioeconomic losses related to ecotourism as a result of authorizing cattle grazing or other land use decisions?

Amy Markstein: I suggest you submit comments related to that. Look at what we have written now in the socioeconomics section. We have trained socioeconomists that have looked at models and used them to predict impacts. We also consider ecosystem services—indirect benefits obtained from ecosystems.

(Follow-up) Do comments on what is “aesthetically pleasing” risk being dismissed as insubstantive?

Amy Markstein: No, what you are describing to me doesn't sound like the kind of opinion that is characteristic to insubstantive comments. Those are more “I like this” or “I don't like this.” What you are describing sounds more like an ecosystem service.

24. (a) Would the SPRNCA ever expand?

Amy Markstein: The SPRNCA was created by Congress through legislation in 1988. The BLM acquired the land through a land exchange. It would require a new act of Congress to expand the SPRNCA.

(b) How would the safety of nearby homeowners be ensured if hunting is permitted on the SPRNCA?

Amy Markstein: The BLM only has jurisdiction over BLM-administered lands in the SPRNCA. Firearm safety is regulated by the state—Brad Fulk from Arizona Game and Fish Department is in the back, who can answer this question. State law prohibits the discharge of firearms within a quarter-mile of any occupied structure.

Brad Fulk: Another measure is under review that would limit bow-and-arrow use within that same boundary.

Full Text of Comments

1. Without asserting any values and having lived in Arizona most of my life, when I read the establishment language for this area, it says, “In order to protect the riparian area and the aquatic, wildlife, archaeological, paleontological, scientific, cultural, educational, and recreational resources surrounding this area of the San Pedro River in Cochise County,” and then establishes the area. My question—and again, recognizing the rich heritage of our area, and the fact that the BLM manages 2.5 million acres of our state—it doesn’t say anything about livestock grazing in here. What is the basis of including livestock in the RMP?
2. The University of Arizona has done hundreds of studies on the SPRNCA, and based on the suggested alternative, it appears as though you have not read any of them. Because in every instance, there is scientific evidence that if you graze cattle, *E. coli* levels are going to jump in the river, even if they are ten miles away from you. There are studies on the water table. There are studies on erosion. There are studies on things you can actually look at: If you go up to Motion Road, which is three miles from the San Pedro House and drive along the road, you will find forests of mesquite. Those mesquite are native to the floodplain, not that area. They are a result of grazing. Plants, animals, seeds, invasive grasses...have all taken over. There is so much proof that grazing harms the environment of SPRNCA. Did you look at any of those studies?
3. I just wanted you to clarify, if you could, when you said the aggregate of comments will have no effect. That didn’t seem correct to me, so I must have misunderstood. In other words, if everybody in this room decides we like a certain thing, is that not going to count when you make your final decision?
4. You spoke about groundwater recharge. If there are not water consumption differences among the three alternatives, so I was wondering if you could expound about the methodology or quantity of groundwater recharge.

5. If you wish to comment on alternatives, but do it in a helpful way, do you want to hear certain features that should be in specific alternatives, or even a new plan alternative? How can we be helpful there?
6. Do you envision, in your enabling process—which I believe you are working on now for the future—private wells or private water resources.
7. Could you explain what effects each of these alternatives you are proposing have on surrounding areas in usage? What do you envision with these different proposals? What about impacts on housing and related matters? Based on proposals that you have right now, going from 41,000 acre-feet down to the smaller amount, 15,000 or so, what effect do you see having on the area. Obviously there's a huge difference in the amount of acre-feet of water that you're asking for. What do you see as the effect on all of us, which I think is what a lot of us want to know. What are the differences of these proposed alternatives going to mean for us?
8. You say that there are three critical designated areas under Alternative A. And there wouldn't be any under Alternatives B and C, and then there would be additional ones under Alternative D. How do you get to there being no critical designated areas under your preferred alternative?
9. My issue is water. I have a well, and I don't want somebody telling me I can't use my private well. You made this statement that you don't have any authority with regard to this, but with a pending lawsuit, isn't BLM asking for the authority? And if you got the authority, even if you didn't want to exercise it, isn't it also possible that one of these environmental groups could sue you and make you take action to take the water.
10. There are four alternatives that we can't vote on, but somebody has to make that decision. But maybe I missed it, I haven't read the whole RMP, what is the end-state? What does it look like? For the community to support keeping the house in order, we need to define what that house looks like when it is in order.
11. I want to understand it better, and I don't quite understand how you are going to figure this out, but are you in discussions with Mexico to ensure that water continues to flow down the river? From Google Earth, I've looked, and there are a lot of reservoirs or large lakes. How are you going to ensure that BLM gets the water it needs, and also get us the water we need, because the water comes out of Mexico. That part of your resource evaluation, right? That water flows out of Mexico. How can we rely on your ideas here, if we're not sure you have all of the facts about water coming out of Mexico?
12. In 2013, the National Climate Assessment released a volume specific to the southwest, and it outlined and highlighted a lot of the impacts of climate change that the best scientists in the United States were coming together on. The fourth Climate Assessment is due later this year. My question is two-fold: (1) Was the 2013 National Climate Assessment for the southwest used, and its forecasted trends as one of the resources, when you were developing these alternatives; (2) Were you directed by Secretary Zinke to not consider climate change impacts in the development of this plan.

13. In comments, is it more useful to separate out comments by topic and submit separate comments, or is it okay to send a single comment that includes many sub-topics.
14. For enhanced water recharge—and I know it's just a bullet point right now—was it BLM's intent to retain ownership of that recharge and wheel it elsewhere?
15. Can someone speak to the potential for rifle hunting under each of the alternatives? I'm assuming that falls under recreation. Is that right? Is rifle hunting analyzed under that category?
16. The enabling legislation of the SPRNCA was written 12 years after FLPMA. They were well aware when they wrote the enabling legislation what the requirements of FLPMA were. And yet, the enabling legislation makes the primary function of the SPRNCA the protection and restoration of what is called the primary resource. It does not talk about grazing or enhancing grazing or hunting or trapping, which is now in the RMP. Is there a place in the RMP that gives data or decisions in the RMP that show how grazing and trapping are good for the primary resources?
17. I apologize for not having read every word of the draft, but is there a requirement that you analyze the financial feasibility of implementing these alternatives? Funding and staffing for the SPRNCA has been pretty minimal over the recent past, and to execute any of these alternatives well will require a lot of money and a lot of staff. Does that go into the final analysis?
18. This is a process question. Obviously, we have a lot of questions; I have a lot of questions. And I am able to give Amy my comments? I need to have these questions answered. How do we get these questions answered before I submit my comments?
19. I have a question regarding Table 2-1 (page 2-62). This has to do with water. I think there is a typo, because, for example, you're talking about 17 acre-feet of water. I suspect that's 17,000 acre-feet. I think you're talking about thousands of acre-feet and not just acre-feet. And in coming to those numbers, did you consider where that water is coming from? How did you arrive at those use numbers? It's not clear in the report, and it sounds like a big number. Please correct me if I'm wrong.
20. Did you take into consideration, in your planning, the financial conditions that you are responsible for in the community. For example, how much money and taxes come in from people coming to visit the SPRNCA. I have figures that show millions of dollars coming into the county from tourism. When you look at the statistics, most of the people coming to the area, they are coming for the SPRNCA. If you do something in the SPRNCA that effects visitation, you are affecting the whole economy of Sierra Vista and Benson.
21. (a) What I think is missing is a solid understanding of what the alternatives are based on, as prescribed by the designation and laws, as Scott has pointed out. All of this other stuff is fabrication if it is not thoroughly grounded in the legal authorities. (b) Is there a distinction between recreational shooting and licensed hunting by game and fish? And is there an additional provision for recreational shooting?
22. Do you control the type of ammunition allowed on the SPRNCA?

23. This goes back to the socioeconomics question, related to ecotourism. How can we predict the economic losses to ecotourism when you implement something like cattle grazing on a place that people like to visit. Personally, I know that when I go to places that cattle graze, it's not nearly as aesthetically pleasing as places that aren't grazed. How do you logistically approach that?
24. (a) I'm wondering how the borders of BLM lands were established and how do these private land owners north of Highway 92 know that BLM won't expand into those areas? What is to keep BLM from expanding its boundary? (b) How will the alternatives prevent the use firearms near houses with children in that area?