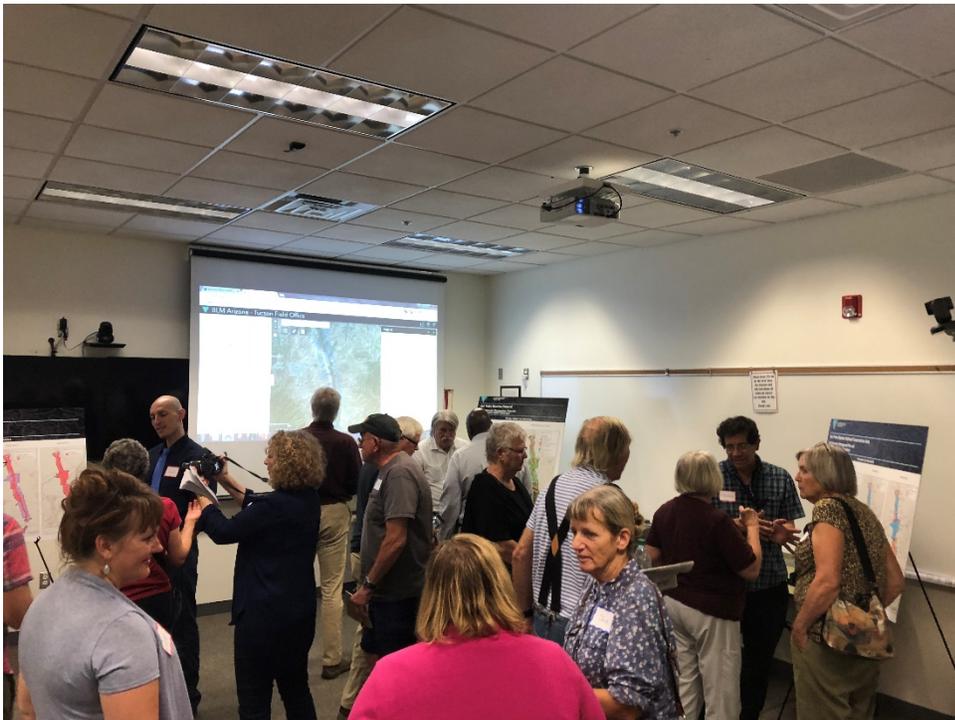


DRAFT SAN PEDRO RIPARIAN NATIONAL CONSERVATION AREA RESOURCE MANAGEMENT PLAN

Public Meeting, August 8, 2018—Benson, Arizona



BLM Planning Team

Scott Feldhausen, District Manager
Amy Markstein, Planning and Environmental Specialist
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Elroy Masters, Wildlife Biologist
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Meeting Minutes

1. Opening Remarks (Scott Feldhausen)

General philosophy

- We are the listening phase. A decision has not made.
- We have a preferred alternative, which the BLM views as best balancing use and protection in the SPRNCA within the constraints of the enabling legislation. But that is open to changing.

What is the current management direction of SPRNCA?

- Current management is based on 25- to 30-year-old plans
 - 1989 San Pedro River Riparian Management Plan—This is largely an implementation-level plan. It tells us what needs to be done where but doesn't have goals and objectives.
 - 1994 Safford Resource Management Plan—This is a planning-level document but doesn't set out clear goals and objectives for the SPRNCA.
- New issues exist today that were not addressed historically, notably population growth and development and increased water draws from wells.

What is the need for a plan?

- The BLM's management currently lacks a clear vision of goals and objectives.
- An explicit decision on livestock grazing has not been made.
- There needs to be an understanding of overall management direction.

Why do decisions look like they do in the plan?

We're trying to tell you what it would look like if grazing would be allowed, but we're not saying we're necessarily going to do that. The focus right now is on showing what that means. The same applies to other resource decisions.

2. Outline of Project Overview (Amy Markstein)

Comments due: **September 27**

Next steps, protest procedure, and standing

The plan will be modified based on the comments submitted in this phase, and a proposed RMP/final EIS will be published. After the final EIS is published, there is a 30-day protest period. For a protest to be made, standing must be established—this means a comment must be submitted in this period. New issues cannot be protested after the final EIS is published.

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 in the 90-day public comment period. Its purpose is for you to provide substantive comments on the draft RMP. The 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 draft EIS

- Arizona-Idaho Conservation Act of 1988 (Enabling Legislation)—Places limits on allowable management (withdrawn from mineral entry, motorized vehicles are limited to designated routes, and BLM-administered land in the SPRNCA cannot be disposed of)
- The SPRNCA is currently managed under 25-year-old management plans. The 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 affect SPRNCA.

What is not in the plan

Congress identified constraints on what can be allowed on the SPRNCA. One of these constraints applies to mineral withdrawal, removing the SPRNCA from mineral entry; minerals are thus not part of the plan. Another of these constraints is disposal; none of the SPRNCA can be transferred out of federal ownership.

Travel management decisions

A travel management plan was originally proposed as part of the RMP. The decision has been made to defer this until the RMP is finalized and signed, so there is a framework in place.

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.
 - 3 areas of critical environmental protection (ACECs; all rare plant protection)
 - No management to preserve lands with wilderness characteristics(LWCs)
 - Livestock grazing allowed on 4 allotments
 - Management actions are considered on a case-by-case basis
 - Alternative B—No ACECs, no LWCs; livestock grazing allowed throughout SPRNCA; allows use of intensive management tools

- Alternative C—No ACECs, no LWCs; livestock grazing allowed on existing four allotments and additional 19,000 acres of SPRNCA; allows use of intensive management tools
- Alternative D—Maintain three existing ACECs and two additional ACECs (to manage cultural and historic resources); 23,810 acres (50 percent of SPRNCA) managed to protect LWCs; no livestock grazing; allows limited use of management tools, such as hand tools for vegetation treatments
- 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 in the planning area is the issue or error?
- What are the problems with methods and analysis?
- What is the specific element of the document that you take issue with?

Walkthrough of comment submission options

COMMENTS AND ANSWERS

I. What does “water resource recharge enhancements” refer to? Does it have any relationship to private water wells and private water use?

Scott Feldhausen: No. It doesn't mean shutting off any water wells, except for maybe our own, which we have done a lot of, since some of the original agricultural water wells were shut off. Since that time, groundwater has become a very big issue in the basin, and I often get questions about "What is BLM doing about it?" Water resource recharge enhancement doesn't have anything to do with anyone's private wells. It gives the BLM the ability to do land treatments to enhance groundwater recharge. If the science says a place on the SPRNCA this is the new best place to do groundwater recharge with effluent, then it would give us the ability to do that. Right now, we don't have that ability. And if we have a plan that just focuses on ecological health—which water is a piece of—then we won't have that ability down the road. We don't have anything designed or in mind right now, but we're trying to create the capacity to do that in the future, if such an opportunity arises.

There are all types of dikes and berms, and people are saying, "Is it making it better? Is it putting water in the ground? Or is it slowing water and affecting flushing flows?" And right now, we don't know. But we want to be able to treat that in the future. But this only focuses on BLM lands; nothing in the plan talks about people's private water rights or anybody's private wells.

2. Are the meeting materials posted on the BLM website?

Amy Markstein: Yes, they are. On the SPRNCA Resource Management Plan website (<https://go.usa.gov/xUM3C>) the presentation materials from the July 30 public meeting are posted, which are essentially identical to those presented tonight. I will try to post these materials as well.

3. There is a disconnect between the enabling legislation and the alternatives.

No response; the statement was a comment, not a question to the BLM.

4. Will the species name and location of individual plants be identified as part of the identification of ACECs, or just general areas designated for rare plants?

Amy Markstein: There are maps of the ACECs in the appendices in volume 2 of the RMP. Those maps will tell you the areas where the ACECs are currently designated. I'm not sure if species are identified in the main body of the RMP, but I know that the nomination forms, which are included as an appendix, have species identified for each of the ACECs.

5. Does the plan include any provisions or goals for restoration or enhancement of resources?

Amy Markstein: One of our main management strategies is vegetation treatments, which is described as an allowance in the vegetation section under management actions. The specific objectives for each of the resource areas set the stage for that vegetation management.

6. What is the overall goal for management, considering you have alternatives that appear to lead toward different directions?

Amy Markstein: Right now, that is the BLM's preferred alternative: Alternative C. The goals and objectives for each resource area define the resource condition being managed for, so you would see a clear description of what is being managed for.

(Follow-up) You have four alternatives. Does each one of those have a different management goal?

Amy Markstein: In some cases, and for some resources, they are different. And in some cases, the goal is the same across the three alternatives, and what varies is how we get there. It depends on what resource we're talking about and which alternative we're talking about. Especially Alternative D, which is that "light on the land" approach, the objectives are sometimes different.

7. Does the BLM intend to seek management beyond the boundaries of its land jurisdiction for water and to manage the complete river system?

Scott Feldhausen: No. And not to my knowledge at all. Our focus is on BLM land in the SPRNCA. At such time as the Gila River adjudication is done, and water allocations are made, I would hope that BLM would be at the table with the community and with partners to figure out what that

means for all of us and how we get there. But we're not going to undertake a planning effort outside of the scope of our own authority, unless everybody around the table asks us to do so.

8. Does the BLM have any plan to control the accumulation of wildfire fuel loads in the upland areas outside of the floodplain?

Scott Feldhausen: Yes. Each of the alternatives that Amy talked about addresses the vegetation objectives. We also talked about the impacts of wildfire to those issues. We talk about the tools that we have to address those issues. There may be opportunities to address fuel loading and ecological health, where it's not where it is supposed to be, at the same time. Under each of the alternatives, the tools available to us to address that differ. If we went with Alternative D, it would be either hand tools or something like prescribed fire, but we couldn't use herbicide, we couldn't use mowers. That's going to be an issue that is specific to that particular location. Grasslands are disturbance oriented; around here, that was fire. Some would argue that livestock grazing had a huge part in that. But as a manager, if we set an objective about what we want that to look like, ecologically, and we have a fuel loading issue, the question becomes, "What kind of tool best achieves both of those with the least risk."

My property is landlocked and surrounded by fuels, and I'm concerned about the risk. I would like to see a plan for how you are going to address the interface of public lands and private property.

Scott Feldhausen: I understand that. I would not disagree with that. Our goal is, once we complete this plan, and we know what our future should look like, we start developing implementation-level plans, such as vegetation management plans, including fuel breaks. Under each of the alternatives, there are descriptions of the types of tools that we have at our disposal to get to those needs.

9. Do you have a plan for managing ladder fuels in the floodplain?

Scott Feldhausen: Right now, no, except for the fuel breaks we have been doing along roadways and other rights-of-way.

10. Why isn't there proactive management on the lands with conservation easements? The lands appear unmanaged.

Scott Feldhausen: Most conservation easements in the San Pedro Basin are focused on protecting endangered species, preserving open space related to helping [Fort Huachuca] maintain its mission, or reducing groundwater use. Most of them don't have vegetation treatments or objectives associated with them.

(Follow-up) I don't understand how it conserves water when you have mesquite trees growing that weren't present before the land went under easement?

Scott Feldhausen: I would be happy to give you the contact information for the land trusts that hold conservation easements. The BLM is the holder of very few conservation easements in the San Pedro Basin.

11. Do you think that Alternative C really meets the intent, goals, and protective mandate of the enabling legislation?

Scott Feldhausen: Yes, I do. I have had that conversation with my boss, the State Director. I've had that conversation with the Deputy Secretary of the Interior. Unlike a lot of designations, the SPRNCA did not remove most of multiple uses. It did for mineral entry and everything related to that. It did for travel, limiting travel to designated roads and trails. It did not preclude other uses, and it recognizes FLPMA [Federal Land Policy Management Act] as a valid authority where it does not conflict with it. Our argument, in the analysis, is that this is how it does not conflict with the enabling legislation. If you disagree, I want to hear it. So please tell me.

12. The management prescriptions north of Highway 82 are too general and overly simplistic for the resources in that area. There are both resources that need protection and urban-interfaces that need to be managed, which are not reflected in the broad areas demarcated with uniform management. There needs to be more attention to the complexity in that area and more detail in the management prescriptions of that area.

Scott Feldhausen: Thank you for that. That is really good input, and that is the stuff we're looking for. I have been told that in the past we failed to do what we were supposed to do from about everybody's perspective—including our own. So, yeah, I think we have missed the mark in the past. I think you are right, there. I think we know what that mark is. And it is a very complex and challenging piece of ground to manage. Having a very narrow strip surrounded by everybody else, with tight regulations on what that should look like, and almost no ability to influence what happens around the SPRNCA, makes it a very challenging landscape to manage. I am going to try to do a detailed analysis of the vegetation treatments to see how we can manage things. We are going to work with the Natural Resource Conservation Service to look at soil and vegetation types, and slope, and precipitation patterns, and break out the vegetation into multiple components, and set objectives for each one of those. So for these landforms that are very complex we are going to try to be as specific as possible. In the breakout sessions you can talk to Elroy Masters about what we've done and why, and what we can do better. We can hopefully get to what you're looking for.

13. Would you consider converting irrigation wells that have been shut off into refill stations for firefighting?

Scott Feldhausen: We work very closely with all of the communities in the wildland protection plans to help identify how we're going to fight fire and where we are going to fight fire and all of these kinds of things. To my knowledge, that has not come up as a need, locally. It's something I will talk to our fire folks about.

14. Could flooding on Smith Avenue and the complication of creating and managing drainages be mitigated by the creation of a water pond on BLM land that would also provide riparian habitat and would slow flows back to the river?

Scott Feldhausen: When the plan is complete, we can discuss that.

15. Will the plan provide for entrances to the SPRNCA that are safe and usable by equestrian users? Right now, the existing entrances to the SPRNCA that are horse accessible are virtually unusable.

Scott Feldhausen: *I appreciate that. I want to make sure we have different levels of access. Because I keep hearing that we don't have enough, or we don't have it in the right place, or where we have it, it has impacts that we don't want. What we're doing now is setting the philosophy. After that, we'll get to the travel management plan, for motorized and nonmotorized, that sets the "here" and "how." Francisco Mendoza will be able to discuss with you the existing conditions. It does me no good to have a recreation area that the public doesn't use or doesn't support. We're trying to come up with something that meets the conservation values and the public use needs.*

16. Is there any movement whatsoever on doing anything with the railroad ROW that goes through the SPRNCA?

Scott Feldhausen: *No. We have no discretion on the railroad ROW. We have had conversations with the ROW holder, and they do not want to get rid of it at this point. We have no authority over it.*

17. Do you think all of the alternatives are consistent with the purpose of the authorizing legislation?

Scott Feldhausen: *Good question. I think, depending on the step-down project-implementation analysis, they could all get there. Some would be more challenging than others. In the No Action Alternative, I'm not sure that it does, but we have to analyze it. The full livestock grazing would be challenging, but as Amy said, the plan says only that the area is available for grazing. We could pick that one, and put one cow out there. We have tried to choose action alternatives that truly fit the purpose and need. The ability to implement to get us there is more the crux.*

18. I have a concern about fire. I think the most understated thing in your plan is wildfire. Wildfire represents the single most devastating threat to the area to native plants, to endangered plants, to wildlife, and other species that are present. If you get a fire, and you can't control it, it's a human illusion that we have the capacity to fight a truly big wildfire.

No response; the statement was a comment, not a question to the BLM.

19. Is livestock only considered a land use, or is it also considered a management tool?

Scott Feldhausen: *We have heard that we did not analyze it adequately in that way, and we have already had discussions about the changes we would have to make.*

20. What are the biggest objectives or concerns you see right now in moving forward and finalizing the draft management plan and EIS?

Scott Feldhausen: For me, it really comes down to that I can't make everyone happy. The demands, expectations, and desires of the public differ. Providing for recreation, for instance, has an effect on other values. That's where the balancing comes in between use and conservation. We've decided to analyze livestock grazing, and that has upset a lot of people. How conservation values are established affects groundwater, and that's in court right now, and so that's an additional challenge.