

Comment Submissions via ePlanning Web Form

Submission ID	Comment Title	Comment	Attachment(s)
SPRNCA-1-212042	Cannot Download PDF Files	Your draft proposal, and all of the other PDF files, cannot be downloaded from your website, meaning that the only way the public can view them is when they are online and visiting your website. Is this just a technical error, or are you actively trying to restrict information from the public?	
SPRNCA-1-213628	Firmly behind Alternative B	Firmly behind Alternative B. Sad that BLM makes this process so hard. Link is stupid long and they wear you out with relentless meetings. Not my first rodeo with being ignored by BLM envirocrats. Going to Martha McSally this time. Wanna save nature, but not solely for the bird watchers and ones in BLM uniform.	
SPRNCA-1-213884	Flora and Fauna	Stop sprawling developments which would seriously endanger the continued flow of the San Pedro River. The irony is that the San Pedro River , with its diverse flora and fauna, is a major reason for people to live in this area. To destroy what brings people here just does not make sense. Please save the San Pedro River!	
SPRNCA-1-215033	San Pedro River	Please. We must do everything possible to preserve all water resources left in this country. The San Pedro river sits in a vulnerable area and relaxing any restraints will be detrimental. If anything there needs to be more oversight and protection. Help protect our waters don't destroy them. Thank you.	
SPRNCA-1-215034	Keep the San Pedro flowing clean!	Comment for San Pedro Riparian National Conservation Area (SPRNCA): Proposed additional grazing in the highlands surrounding the San Pedro will reverse years of repair to the area. A healthy riparian area is necessary for wildlife and for the human communities of the San Pedro who draw a large measure of financial security from tourism. Keep erosion from destroying progress-- no new grazing!	
SPRNCA-1-215035	No increased grazing	Please do not increase grazing in the San Pedro Riparian National Conservation Area. It's too destructive for such an area.	
SPRNCA-1-215036	Protect!	Riparian land in a finite quantity that must be protected to protect the biodiversity of the area. Arizona is special because of it's biodiversity and any threats to it is fool hardy.	
SPRNCA-1-215053	SPRNCA	I am writing to ask you to please conserve, protect, and enhance the unique river and riparian habitat of the SPRNCA. It is a critical and rare riparian resource for future generations.	
SPRNCA-1-215054	San Pedro Riparian National Conservation Area	The San Pedro Riparian National Conservation Area (SPRNCA) is a natural gem that sits at the heart of the Sky Island Region. Encompassing 40 miles of the San Pedro River, it was designated to protect and enhance this rare perennially flowing desert river and the lush ribbon of green it supports. The BLM idea to revise the Resource Management Plan with proposals to increase livestock grazing in the area is not rational. The SPRNCA has recovered remarkably since it was declared legally off limits to most livestock grazing in 1989. With the new plan calling for increased livestock grazing in upland areas with soils that have a severe susceptibility to erosion caused by grazing is wrong headed. This would have major impacts on water quality within the San Pedro River. A healthy river relies on a healthy watershed! Please DO NOT CHANGE THE SPRNCA to allow more grazing!	
SPRNCA-1-215198	San Pedro river	It is essential that the San Pedro river remain a pristine ecosystem for the health of this region - its tourist value, and therefore economic value, its intact regional ecosystem and wildlife value. Grazing or partial grazing will destroy the native vegetation and resulting wildlife - destroying and compromising a unique ecosystem. I urge the BLM to reconsider their plan to contract out grazing or partially grazing this area. Please protect this area, don't make money off of it.	
SPRNCA-1-215242	Draft Resource Management Plan for the San Pedro Riparian National Conservation Area	The SPRNCA has recovered remarkably since it was declared legally off limits to most livestock grazing in 1989. I am in opposition to the BLM's new plan to increase livestock grazing in upland areas with soils that have a severe susceptibility to erosion caused by grazing. This proposed plan would cause negative impacts on water quality within the San Pedro River. A healthy river relies on a healthy watershed! Please conserve, protect, and enhance the unique river and riparian habitat of the SPRNCA. Water is our planet's most precious natural resource and commands being protected as such!	
SPRNCA-1-216286	San Pedro Grazing	The San Pedro riparian corridor has recovered since grazing was stopped in this area since 1984. Please continue to prevent grazing on this precious riparian corridor that is priceless to the Southern Arizona ecosystem.	

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SPRNCA-I-216368	San Pedro National Conservation Area planning	<p>Dear BLM: People visit the San Pedro Riparian National Conservation Area to birdwatch, enjoy the cool riparian canopy, look for wildlife, and to appreciate the beauty of this national conservation area. This area faces many threats, including drought, development and groundwater pumping, border militarization, climate change, and livestock grazing. In establishing the conservation area, Congress charged the BLM with conserving, protecting, and enhancing this amazing and diverse landscape. Unfortunately, the draft plan proposes actions such as increased livestock grazing, that are in direct conflict with Congress' mandate and will degrade this special place.</p> <p>The San Pedro River supports a rich array of species, including millions of migratory songbirds. It has been legally off limits to most livestock grazing since 1989. According to the new plan, the BLM would increase livestock grazing in upland areas with soils that have a severe susceptibility to erosion caused by grazing, which would then have impacts on water quality within the San Pedro River. To allow decades of conservation to be degraded by allowing cattle to graze the San Pedro's vegetation and to harm wildlife and imperiled plants and animals, is unconscionable. I urge you to leave this area as it has been for nearly 30 years, and to keep the cows out of this fragile and important National Conservation Area. Sincerely, Ann DeBolt</p>	
SPRNCA-I-216900	Remain Balanced	<p>First as a Cochise County resident, I would strongly recommend Alternative C, remaining balanced, opening more land for recreational hunting and use as well as grazing. I would like to assume Alterantive B would be the best choice, releasing the land back to the people, but as a conservation minded hunter I doubt that everyone would take proper care of the land. I would like this land to be available for future generations so limited management and oversight is a must.</p>	
SPRNCA-I-216982	Push forward with B or C	<p>I would love to see the SPRNCA opened for more recreation activities, mainly hunting and mountain biking. I am not able to attend any of the public meetings due to being out of the country for work. Please move forward with option C and open these lands up for more recreational use.</p>	
SPRNCA-I-217283	Grazing	<p>The enabling legislation for SPRNCA states the purpose as:(a) In general In order to protect the riparian area and the aquatic, wildlife, archeological, paleontological, scientific, cultural, educational, and recreational resources of the public lands surrounding the San Pedro River in Cochise County, Arizona, there is hereby established the San Pedro Riparian National Conservation Area (hereafter in this subchapter referred to as the "conservation area").I do not understand why any of the management alternatives include grazing. Grazing is a detriment to all of the purposes of this legislation, especially because grazing would use more of the water resources and would increase the level of polution of the San Pedro River. Grazing also affects the recreational use of walking trails. I have personal experience of grazing interfering with enjoying birding trails at Patagonia Lake and even causing personal danger. What is the rationale for allowing a lessee to benefit economically by negatively affecting the public use of these lands?I would be willing to consider other alternatives that did not include grazing.</p>	
SPRNCA-I-218483	no grazing on San Pedro river	<p>Please no more cows grazing near the San Pedro river. I vote for alternative D, with the least public access, especially no atv's. People should be able to walk and look for birds, butterflies, and wildlife, but no machinery or vehicles. More beavers and other animals and birds. This is a rare habitat and easily damaged by human use.</p>	
SPRNCA-I-218533	I Strongly Oppose BLM's Alternative C	<p>Thirty years ago the San Pedro River was a muddy ditch moving sluggishly through a denuded landscape. Decades of over-grazing had destroyed all remnants of what was once a thriving riparian eco-system.</p> <p>In 1988 Congress passed the Arizona-Idaho Conservation Act of 1988, creating the San Pedro Riparian National Conservation Area and setting aside a stretch of the river from the Mexican border to Benson for conservation of its natural resources. Since then that stretch of river has recovered many of its natural riparian aspects and has become home to thousands of birds, mammals, amphibians, and other creatures. The SPRNCA is now a magnet for bird watchers and nature lovers from around the world who come to marvel at its beauty and wildlife. Local businesses see increased revenue from all those visitors, hundreds of school children now enjoy field trips to the river, and hikers and equestrians use its miles of trails. BLM's preferred alternative in the Draft Resource Management Plan for the SPRNCA, Alternative C, would re-open most of the SPRNCA to grazing as well as hunting. Alternative C, if adopted, would undo everything that nature has accomplished in the last 30 years. Increased grazing would require use of heavy equipment and pesticides to make grazing areas suitable for cattle, roads to access pastures would have to be built, and stock tanks put in place. Hunting, which is now restricted to certain remote areas of the SPRNCA, would now be permitted throughout the area, except within a quarter of a mile of occupied areas such as San Pedro House and the Fairbank Historic Townsite, potentially putting hikers, equestrians, and school kids on field trips within range of hunters. Is the BLM planning to put up signs at trail heads suggesting that those using the trails wear florescent orange vests to keep them safe from hunters who might mistake them for deer? I strongly oppose the BLM's Alternative C. The SPRNCA has been managed successfully for thirty years under the original management plan established under the Arizona-Idaho Conservation Act of 1988. Don't turn back the clock!!</p> <p>Carolyn Santucci </p>	

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SPRNCA-I-218781	SPRNCA_DRMP_VOL!_508	Please do not alter the current management program to allow more cattle access to the river. This area was created to preserve the ecosystem for its wild state, especially for wildlife and birds. People come from all over the world to birdwatch here, putting much money into the local environment. This in itself is more valuable than marginally benefiting a few ranchers.	
SPRNCA-I-218945	Comments on SPRNCA Draft RMP	<p>Thank you for the opportunity to comment on this important document. It is apparent a lot of work was put into this draft plan. As a former NPS planner, I understand the Herculean effort required for such an endeavor and the BLM is to be commended. However, it is dismaying to learn that there was no consideration of climate change trends, current and projected impacts, such as decreased recharge and bank storage; decreased, but more intensive flood-events; increased likelihood of fire and insect infestation; and prolonged drought. I suggest a review of the Southwest Climate Assessment that was part of the 3rd National Climate Assessment (2013) and a preview of the 4th National Climate Assessment that is due to be released by the end of this year (www.globalchange.gov). The 2013 Southwest Assessment should suffice with regard to understanding those trends and impacts, as they likely have not changed since 2013 other than an acceleration of the projected impacts. I also did not see any data or evidence supporting the premise in the plan of increased demand for access to SPRNCA. Since 2010, Cochise County has lost population so the idea that there is increased demand for access does not seem plausible. Sierra Vista's population, the most populous in the county, since the 2010 Census has dropped by an estimated 2.7% (Arizona Office of Economic Opportunity, 2017). Are there visitor records to support the premise of increased demand for access in SPRNCA? Section 2.5 does an excellent job of outlining the resource area goals and objectives of each of the alternatives and provides a better opportunity to understand the nuanced differences between alternatives, which are not nearly as stark as the executive summaries may suggest. The maps are also a good reference to understand the scope and location of each alternative. I believe Alternative C, the Preferred Alternative, can be modified to truly support the conservation of the values for which the SPRNCA was designated in 1988, by incorporating some of the objectives of Alternatives A and D. Specifically, I recommend revising Alternative C as follows:</p> <ol style="list-style-type: none"> 1. Restrict grazing to the current allotment (7,000 acres) with no expansion, as described in Alternative A. Per the plan, Alternative C would open up grazing on 26,450 acres and require 43 miles of new fence. In fiscally challenging times, this seems implausible, especially in keeping livestock out of the riparian area, and would provide no benefit or enhancement to the conservation values. In addition, the area proposed for new grazing would create conflicts with recreational users, cultural resources and residents living adjacent to the NCA, especially in the areas south of 90 and west of the river. Moreover, with an allotment that spans both the east and west sides of the river, keeping cattle out of the riparian area would be problematic as evidenced by the lack of enforcement over the years of trespass cattle in the NCA south of Highway 90. 2. Incorporate the ACECs proposed in Alternative D into Alternative C. These areas provide a management focus on specific resources that might otherwise be neglected or left unprotected. 3. Incorporate the limitations of Discharging Firearms as mapped in Alternative D. Again, as with grazing, there would be the potential for tremendous conflict between the other recreational users of the NCA if hunting were allowed south of Highway 90, especially west of the river. A study of the economic impacts of eco-tourism (mainly birdwatching) in SPRNCA and Ramsey Canyon cited a \$25 million positive impact to the local economy in Bonnie Colby's (UA) study conducted in the early 2000's. Proposing hunting in areas that have been closed to hunting for the last 30 years has the potential to negatively impact the economic impact of eco-tourism activities in these areas. 4. With regard to wildfire, incorporate the objective of Alternative A that proposes "Areas suitable for managing wildland fire to achieve resource benefit (21,600 acres)." It would be useful to look at the track record of this policy over the years as far as resource management and benefits go. A policy of full suppression may be detrimental to the health of the SPRNCA in the long run if fuels can't be reduced through controlled burns. I hope you find these suggestions helpful. Thank you again for the opportunity to participate in this planning process for one of the Southwest's most valuable resources. BLM should do everything possible to live up to PL 100-696 and protect the riparian habitat and uplands of SPRNCA. 	
SPRNCA-I-218992	Hunting in the SPRNCA	<p>As a docent for the Friends of the San Pedro River, I lead both nature walks and history walks. My primary concern (I many other concerns) is that hunting could be allowed in the entire SPRNCA. Big game hunting seasons occur during late summer and fall. These are months of high river visitation. As I group lead it would be difficult to have walk participants on the trails. WOULD I personally, or the FSPR, be responsible if someone on my walk was injured due to an erratic shot by a hunter? Would walks/hikes not be allowed in the fall season, which is the most pleasant season to be on or near the river? Also, I checked the hunting regs for Arizona and rabbit hunting is allowed all year. It would be just as easy for a rabbit hunter to hit a walker or bird watcher as it would for a big game hunter. Please reconsider your hunting alternatives to allow year round access to all the SPRNCA trails.</p>	

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SPRNCA-I-219010	Recommend Alternative D	<p>We must protect our environment at all costs. This report is far too long and detailed for the average person to comment by Chapter and Section reference. I have many comments that I cannot put into that reference.-DO NOT increase grazing acreage-DO NOT remove any ACEC status-DO NOT allow more hunting or firearm discharge, it results in noise pollution, soil contamination from bullets and casings, fire danger and trees being destroyed by bullets (I speak from personal experience)-DO NOT develop more campgrounds-DO protect all cultural and paleontological resources before it's too late and they are gone forever-DO maintain the primitive, solitude, naturalness and roadlessness of the area as much as humanly possible.A, B and C will require more monitoring and patrol. Who will do this?If nothing else, please try come up with a compromise between Alternatives C and D</p>	
SPRNCA-I-219286	Do not allow cattle in the San Pedro Riparian National Conservation Area	<p>The San Pedro Riparian National Conservation Area draws birders and naturalists from literally all over the world at all times of the year. This has important positive economic impact on the area. Because of this and the fact that I think conservation is important for many other reasons, I do not support allowing cattle in the preserve. It has been noted that in the past that just a few 'loose' cattle have quickly degraded the habitat. Please continue to preserve this area for generations. Pat Penn [REDACTED]</p>	
SPRNCA-I-219444	SPRNCA no expanded grazing or hunting.	<p>BLM My name is Mike Foster and I have been a resident of Bisbee for over 30 years. I am a retired visual arts employee of the Sierra Vista Schools. I have been a BLM and Friends of the San Pedro Volunteer since the Conservation Area was opened in the 1980's. I have over 2000 hours of volunteer service producing videos about the area and keeping track of the beaver dams. Needless to say, I am very concerned about the changes proposed in the BLM preferred alternative. In particular, I am concerned about the proposals to expand cattle grazing and hunting. In connection with keeping track of the beaver dams, I have seen many areas of the River that most people never see. And, what I have consistently found is cattle grazing at the River. I have supplied the BLM employee charged with keeping cattle within their grazing allotments with video of the cattle, and descriptions of the locations and ear tag numbers of the cattle to no avail. The cattle were never removed. In addition, I have been told by the aforementioned BLM employee to quit pushing it. And, I did quit reporting the cattle since nothing was ever done to remove them. Additionally, I have run into a rancher with his cattle at the River who told me he grazes them there since the grass is better. The Preferred Alternative would increase the allotments threefold and, in my view, put at least three times as many destructive cattle at the River ruining the banks and stream side vegetation. My view is that the allotments should remain as they are with better enforcement or the current allotments should end. Common sense, if nothing else, mandates that deer hunters with high powered rifles should not be mixing with the thousands of hikers, bikers, birders, dog walkers and others who use the areas near the San Pedro House and the Fairbank School House. Deer season of some kind or other is on at least half the from September through December. My view is that the current hunting areas should not be expanded. Mike Foster [REDACTED] [REDACTED]</p>	

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SPRNCA-1-219493	You have no idea	<p>1. First, the BLM has no idea how much water is available in the river, which is actually no more than a creek because the water is held up in Mexico. It may have more water during the monsoon; however, that is not the time to measure. If you don't know how much water is coming in from Mexico then you cannot advise the Judge in Court as to how much is actually available. 2. There must be an agreement between the United States/State of AZ regarding the water flowing north from Mexico. The BLM should review any documents regarding the flow allowed from Mexico. We do not have the water resources that Idaho has. How can you make any improvements to the SPRNCA where there is not the water available.3. The fact that 10, or 25, or even only 5 send the same sort of comments and they are turned into only 1 does not give the government any idea regarding how many are concerned about the issue. Ideally the BLM would count all comments to get an idea of the amount of individuals who are against their plan(s) and why.4. The only reason most people were at the meeting in Sierra Vista on July 30, 2018 was regarding the water and our wells. The rest of the meeting and the presentation were a waste of your time and ours. You need to address this issue as the rest of the meetings are going to, probably, go the same way. The water issue needs to be addressed now whether the BLM knows the outcome of the Hearing in January or not. 5. Most of the BLM answers to questions were fluff meant to sound like answers. The BLM will have to come up with some definite answers at the next three meetings because there will be more questions on the water rights and the effect this change will affect the housing in the area.6. Has the BLM considered the effect the trash the city of Sierra Vista burns two or three times a month. Evidently they have permission from the EPA to burn plastic and other toxic waste and put that into our air down here. That will not be healthy for the SPRNCA.7. It is not the mesquite that has sucked up all the water. Mesquite are quite hardy and take minimal water to raise. We have bushes and trees on our property that my husband has trimmed and pruned to grow nicely. He has never watered them. The monsoon rains are all they require every year just like a lot of desert plants. It is the cottonwood trees in the SPRNCA along the river that drinks up all the water. We don't want you using herbicide in this area and killing our trees because you have mistaken the mesquite for the water usage and the cottonwoods are the culprits.8. At the last meeting you kept insisting that the water/wells had nothing to do with it; however, that was what most of the people were there for. We wanted to know what is happening with our water and want the BLM to realize that you are not going to be able to do what you think you will be able to do for SPRNCA because the water is coming up from Mexico and the "river" (really only a creek) is never going to be the river it once was. It has never really been a river on this side of the border since most of it went underground around the turn of the 20th century during an earthquake. Trying to reintroduce animals like beaver to the SPRNCA is a big mistake as the area will not support them. They left the area and moved on because the area could no longer support them this is natural selection.</p>	
SPRNCA-1-219542	Protection of a Rare Desert Ecosystem	<p>To whom it may concern: As a writer who reports frequently on the relationship between humans and nature, I urge you most emphatically to chose Alternative D among those outlined in the Draft Resource Management Plan for the San Pedro Riparian National Conservation Area. I have visited and camped in this beautiful and unspoiled desert riparian ecosystem and have appreciated its wildness, silence, opportunity for reflection and discovery. How different is SPRNCA from areas in Utah, for example, where cattle have ruined native plants and ATVs startle wildlife. There are those who argue that nature should be for nature alone, but humans themselves are fortified by the natural world in many profound ways. Their health improves, they relax, they feel spiritually connected to something greater than themselves. Campsites, a lessening of protections of cultural resource sites, increased grazing, more vehicular traffic, and additional recreational facilities would undermine the integrity of the San Pedro Riparian National Conservation Area. It would ensure that it answered more to the needs of human beings with a need to roar through wilderness rather than sit quietly and take it in. It would endanger historic and natural areas. It would promote consumerism and greed. I implore you to choose Alternative D.</p>	
SPRNCA-1-219683	Draft San Pedro Riparian National Conservation Area Resource Management Plan	<p>With respect to the Draft San Pedro Riparian National Conservation Area Resource Management Plan, I am writing in support of Alternative D. The San Pedro River NCA is an outstanding resource and is highly unique in Arizona. It therefore deserves the highest protection. I find several aspects of the draft reports preferred alternative (Alternative C) to be unacceptable, namely the opening up of more lands to grazing, the opening up of more land for the discharge of firearms, and the lack of management of suitable areas being managed as wilderness areas. One thing I do not object to regarding Alternative C is the use of heavy equipment to conduct restoration activities.</p> <p>As a native Arizonan who lives in southern Arizona, I have and continue to visit the San Pedro River NCA frequently. The scenic and natural beauty, the quietness and the biological diversity is what keeps me coming back for more. I know countless others who feel the same way. Please do not increase the amount of disturbance or disturbing activities to the San Pedro River. There are many, many areas in Arizona where OHVs and firearms enthusiasts can do their thing, and I do not begrudge them their space. Likewise, there are hundreds of thousands of acres of federal grazing land in Arizona. But there is only one San Pedro River. It is a true jewel, and it must enjoy the highest level of protection.</p> <p>Regards, Brian and Shannon Jones </p>	

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SPRNCA-I-219732	Citizen in favor of Alternative A or Alternative D	<p>As a multi-use land management agency, I understand that the BLM would review and consider changes to the current grazing and hunting regulations on the SPRNCA. However, in my understanding as a land manager of another federal agency, the designation of Conservation Area does dictate certain responsibilities that the BLM must consider when changing a RMP. Those responsibilities include the protection and preservation of this rare ecosystem. Not only does the San Pedro River provide essential habitat to important biodiversity in the Southwest, provide an integral resource to migratory species, and provide water to the residents of the region with the connected aquifer that is now under threat from developers (Thank you for your legal defense!), but the SPRNCA is also one of the most important economic resources in the valley. The passive tourist dollars generated from cultural and natural resource tourism are substantial. The community has yet to fully capitalize on this resource but its potential to the community as an economic foundation is real and this benefit is directly tied to the original SPRNCA designation. Reinforcing this protection through Alternative D in the document is to secure economic prosperity in the region while protecting this fragile ecosystem for years to come. Alternative D would increase the ecotourism in the area due to its protected resources, resulting in a sustainable source of income in an uncertain economy. Alternative D focuses on conservation (the reason the SPRNCA was established) and benefits the local communities. Should hunting areas be expanded, I would caution that public safety would be an issue and could potentially jeopardize the economic benefits mentioned above. If hunting is expanded on the SPRNCA I hope that it be in areas far away from tourism opportunities and known areas of sensitive species. The current area open to hunting is sufficient in my opinion, but if other areas are opened I strongly suggest bow-hunting only and far away from known birding trails, sensitive species, and archaeological / historical areas that attract tourists. A note on Alternative B & C: respectfully, these do not align with the reason why the SPRNCA was created. Also, these require "active resource management". Given that your staffing at BLM and SPRNCA has been historically low and under what is needed to actually manage the current plan, I don't see how these Alt B & C could be managed. Thank you for your consideration.</p> <p>Respectfully, Christopher Bentley</p>	
SPRNCA-I-219953	Undefined	<p>I am against adding more grazing or hunting in this area. Old broken barbed wire fences should be removed. A thrash rack should be added by the Mexican border on the river. The destroyed cattle excluding structure by Waters Road should be removed or repaired.</p>	
SPRNCA-I-219953	SPRCA	<p>We do not want additional grazing or hunting in this area. Put thrash rack on river by Mexican border. Remove old barbed wire fences in area. Remove or repair cattle excluding structure by Waters Road.</p>	
SPRNCA-I-220009	Adapting to Climate Change/Effects of Cattle	<p>These comments are provided by the Friends of the Sonoran Desert. I am submitting the attached article from the journal, Environmental Management. Adapting to Climate Change on Western Public Lands: Addressing the Ecological Effects of Domestic, Wild and Feral Ungulates; This article is an integral part of my comments and I wish it to be included in the record in its entirety.</p> <p>While the BLM may feel compelled to provide for maintaining or potentially increasing livestock grazing on the SPRNCA as part of its revised management plan; there is virtually no evidence provided by BLM, including background provided by BLM on the management plan development, or it appears in the extensive literature regarding the ecological impacts of cattle grazing on arid and riparian habitats that typify the conservation area. Virtually all of the predictable impacts of cattle grazing on the upland and riparian habitats will result in further degradation of the conservation area, including its purposes, contrary to the Arizona- Idaho Conservation Act. Federal management of these resources can be guided by the Federal Land Policy and Management Act of 1976 where such guidance is not inconsistent with this title. Cattle grazing is not an activity that will further the purposes of the SPRNCA, whether conducted in upland or riparian habitats. Allowing grazing in the SPRNCA is inconsistent with the purposes for its establishment.</p> <p>Please note that attachment is sufficiently referenced to be secured by GLM personnel if it will not fit completely in the form.</p>	Beschta_etal_2012_Ungulates_PublicLands_ClimateChange (3).pdf
SPRNCA-I-220106	NO to increased grazing and hunting in the SPRNCA	<p>The draft RMP opens all but a narrow corridor of land along the river to grazing. I am opposed to this. Grazing seriously degraded the riparian area in the past, and re-opening the area to grazing will return us to that undesirable state. Grazing also benefits a very small number of local ranchers. I do not believe their needs/wishes outweigh those of the public that enjoy recreation in the SPRNCA. It could well be that any potential financial gain to local ranchers will be more than offset by losses from current earnings by those associated with the burgeoning Cochise County eco-tourism industry. So a few ranchers benefit and the county loses? Not a good plan IMHO.</p> <p>The plan opens the entire SPRNCA to hunting. Hunting is now permitted in only part of the area. This plan only restricts the activity from a one-quarter mile radius around a small number of recreational sites. It would allow hunting along the river in the heavily used area at the San Pedro House, the Fairbank Loop Trail, the trail to Terrenate and other areas frequented by bird watchers, hikers, horse-back riders, fishermen, school groups & everyone using the public lands for recreation. This is a serious safety risk! While most hunters are responsible, it only takes one...and do you really want the one to hit a school group? Hunters have other options in the area; again, I do not believe that their needs/wishes outweigh those of the rest of the public that enjoy recreation in the SPRNCA.</p>	

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SPRNCA-I-220154	Undefined	<p>To whom it concerns Regarding the SPRNCA Draft Resource Management Plan The BLM should adopt Alternative D because it best incorporates most of the elements of the SPRNCA's founding legislation which reads: "The Secretary shall manage the conservation area in a manner that conserves, protects, and enhances the riparian area and the aquatic, wildlife, archeological, paleontological, scientific, cultural, educational, and recreational resources of the conservation area. The Secretary shall only allow such uses of the conservation area as he finds will further the primary purposes for which the conservation area is established. Except where needed for administrative or emergency purposes, the use of motorized vehicles in the conservation area shall only be allowed on roads specifically designated for such use as part of the management plan prepared pursuant to section 460xx-2 of this title. The Secretary shall have the power to implement such reasonable limits to visitation and use of the conservation area as he finds appropriate for the protection of the resources of the conservation area, including requiring permits for public use, or closing portions of the conservation area to public use." Alternative D would restrict the use of motorized access, grazing, and would best protect the wilderness characteristics of the area. Motorized access and grazing are not compatible uses and would not conserve, protect, or enhance the riparian area. I own property that abuts the SPRNCA and have own it since 1984. I think the current management plan has been working fine but Alternate D will best continue to manage the area.</p>	
SPRNCA-I-220173	No grazing please	<p>I strongly oppose grazing in the SPRNCA. Not only for economic reasons but because of the beauty of the area. The biodiversity of the SPRNCA is very high. It is one of the few high quality riparian habitats left in Southern Arizona. As such it should be protected from grazing. The impact on the grazing industry would be very low if gazing is not allowed in the SPRNCA. However, the impact on the industries dependent on our biodiversity would be very high since there are only a few locations left of the quality of the SPRNCA. Just one small portion of this industry (birding) is worth in excess of \$1.5 billion dollars and the SPRNCA is a key element to this industry. To trade this very high value for cows worth a few thousands of dollars would be very foolish. We need to protect our most precious locations and the SPRNCA is one of those areas. Thanks, Anthony Mendoza</p>	
SPRNCA-I-220224	Bend Over BLM	<p>I'm embarrassed at my former employer's inability to manage lands. Keeping your job is important, but to what end? We can't keep letting special interests dominate. Do your job.</p>	
SPRNCA-I-220225	Undefined	<p>The BLM's own words regarding the damage done to areas of soil susceptible to erosion by livestock grazing and the soil compaction that accompanies it sort of belies their claim that the hooves are also forming pockets for seeds, water, & helps soil erosion. And quite frankly, the idea that cattle manure & urine contributes to soil organic matter & water-holding capacity is a bit far-fetched considering the damage done to riparian areas with manure & urine run-off! Since Alternative D would "have no impacts on soils susceptible from erosion on grazing & that certainly appears to be a better choice. It also would prevent more wells from pulling water from this aquifer and keep recreational use to a minimum. All these reasons make clear that Alternative D would be the best choice for this RIPARIAN NATURAL CONSERVATION AREA! The idea of allowing grazing in this area is ridiculous. The money that would have to be spent preparing it for grazing - wells, fences, travel throughout? Since the grazing allotment rates are so very low - we, the taxpayers would pay for this - monetarily AND from the destruction & degradation done to this beautiful area..NOT WORTH IT!</p>	
SPRNCA-I-220226	San Pedro Riparian National Conservation Area	<p>Western Watershed Project informs me that BLM is considering allowing grazing in the upper reaches of this river. My first job out of college was with Fish and Wildlife Service and I worked with biologists documenting fishery resources in the Greater Yellowstone Ecosystem. Later I worked with EPA documenting water quality impacts of agriculture to a water body in this same ecological area. This amounted to three years of my life's work. I am now 62 and have spent my entire career as a public servant in one form or another in state and federal agencies. I also eat beef. I eat deer too. I bowhunt and fly fish. I am a bird watcher and naturalist. I am very interested in the diseases that are transmissible from animals to man. I think of cattle as an invasive species to north america since they were not native here. Buffalo were. Cattle like to graze in moist areas and will prefer the riparian areas to more open dry land. Buffalo have a different grazing pattern and will not concentrate upon riparian areas. Why not put buffalo on these lands and enhance thier conservation too? I live in Costa Mesa CA. Think Los Angeles. Yuck. I am from a service family and have lived all over the place and I'd like to someday visit this Conservation Area and see how it has been restored because of the good stewardship of those we have entrusted it with (thats you guys) I'd like to see that local Boy Scout troops go there for camping trips and do not have to camp in the waste of cattle like I did when camping on commons in Europe. I'd like to think that they could even drink directly from these streams without fear of getting an illness because livestock are crapping in it or runoff is bringing in pathogenic bacteria. I'd like to see that these local people learn to love and live in harmony with the environment and don't consider it a resource to be exploited for financial gain.</p>	

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SPRNCA-I-220227	BLM plans for the San Pedro Riparian National Conservation Area	<p>Dear BLM: Please leave the San Pedro alone. As a birder and botanist I have been to the San Pedro Riparian National Conservation Area many times and the last thing the area needs is more cows, more fences, more water drawdowns, and instead the area should be protected to the maximum possible. As you know the river has made a remarkable recovery since it was protected as a conservation area and your plans endanger that recovery. Do NOT harm the area. Thank you John Alcock Retired Professor of Biology</p>	
SPRNCA-I-220228	Multiple use doesn't mean every use in every place	<p>No cows. The uplands are key to the river recharge and riparian function, and the BLM must manage to enhance the San Pedro Riparian NCA, not degrade it. There is already ongoing degradation from trespass livestock in the river corridor, and more cows in the area will likely result in even more unauthorized use. The existing allotments should be closed and the entire area should be given the protections Congress intended. No new fences. The entire area is a haven for wildlife and adding more miles barbed wire will fragment, fracture, and impair this special place. Even "wildlife friendly" options are dangerous to native wildlife and disruptive to recreational users. No new wells. The San Pedro River is already extensively overdrawn and suffering severe declines. Pumping more water out of the system for livestock is an unreasonable and inefficient use of precious resources. No way. Multiple use doesn't mean every use in every place. These lands are set aside for the purposes of conserving, protecting, and enhancing irreplaceable resources, and the BLM cannot allow uses that degrade these important values.</p>	
SPRNCA-I-220229	San Pedro Riparian NCA	<p>Please do not allow more livestock grazing on the San Pedro Riparian NCA. The area's resurgence as a healthy ecosystem was facilitated by a reduction in livestock grazing. Please keep cows out of the watershed entirely.</p>	
SPRNCA-I-220234	Protect the San Pedro Riparian National Conservation Area!	<p>As a former president of Friends of Gold Butte I am sadly all too well aware of the damage trespass cattle can do. Remove the cows, no new roads, no new fences, no new wells. Conserve! Protect! Enhance! No new degradation.</p>	
SPRNCA-I-220235	San Pedro	<p>Dear BLM, I am shocked that you would propose to open up any lands in the San Pedro drainage to new livestock grazing. No cows. No fences. No development. Please protect the entire San Pedro drainage. George Wuerthner [REDACTED] [REDACTED]</p>	
SPRNCA-I-220238	RMP for San Pedro Riparian Area	<p>I am totally opposed to any plans that open up the San Pedro Riparian NCA to cattle grazing. Such actions are a complete violation of the concept of a National Conservation Area. Riparian areas in the arid Southwest are the regions of highest biodiversity. There is a mountain of evidence showing that cattle grazing has a highly negative impact on SW riparian areas. We must protect the few riparian areas left in the Southwest, not destroy them, since they will all be impacted negatively by climate change.</p>	
SPRNCA-I-220239	Leave the San Pedro Riparian NCA alone	<p>Cattle create monocultures. Cattle create a great home for invasives. Cattle suck the dry and drier--no new wells should be drilled. Cattle should not be allowed in the San Pedro Riparian NCA. Fences disturb native species movement and harm their survival. Fences disrupt recreation (which is the idea behind multi-purpose/multiple use. While BLM was originally about helping the land produce for farmers and ranchers, those days are gone. The climate has changed things. I know you want the best for the land and wildlife. Leave nature alone. Thank you, David Monsees, [REDACTED]</p>	
SPRNCA-I-220242	No domestic livestock on my public lands	<p>No cows. The uplands are key to the river recharge and riparian function, and the BLM must manage to enhance the San Pedro Riparian NCA, not degrade it. There is already ongoing degradation from trespass livestock in the river corridor, and more cows in the area will likely result in even more unauthorized use. The existing allotments should be closed and the entire area should be given the protections Congress intended. No new fences. The entire area is a haven for wildlife and adding more miles barbed wire will fragment, fracture, and impair this special place. Even "wildlife friendly" options are dangerous to native wildlife and disruptive to recreational users. No new wells. The San Pedro River is already extensively overdrawn and suffering severe declines. Pumping more water out of the system for livestock is an unreasonable and inefficient use of precious resources. No way. Multiple use doesn't mean every use in every place. These lands are set aside for the purposes of conserving, protecting, and enhancing irreplaceable resources, and the BLM cannot allow uses that degrade these important values.</p>	

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SPRNCA-I-220243	Riparian Areas	<p>I was raised with both horses and cows: Horses drink from streams and then move on. Cows drink from streams, after grazing, and then linger at riparian areas to chew their cuds; an entire herd creating damage by killing riparian grasses and creating mud. Horses have upper and lower incisors that shear off grasses and foliage, allowing them to regrow. Cows have no upper incisors and; therefore, wrap their long tongues around grass and pull on it, often destroying the grass plants. The arrogance and tyranny, of the BLM, can only be exceeded by its helicopter roundups of wild horses.</p>	
SPRNCA-I-220251	San Pedro Riparian NCA	<p>Now, more than ever in the history of the planet, it is important to set aside fragile links in the web of life like the San Pedro Riparian National Conservation Area; no cows, no wells, and no more human traffic/ORV's please; this area needs to, in spite of all the already existing challenges remain a refuge for endangered species amongst other valuable functions which cannot be monetized.</p>	
SPRNCA-I-220304	Resource Management Plan Comments	<p>Please consider the following comments about the San Pedro Riparian NCA: 1) The uplands are key to the river recharge and riparian function, and the BLM must manage to enhance the San Pedro Riparian NCA, not degrade it. There is already ongoing degradation from trespass livestock in the river corridor, and more cows in the area will likely result in even more unauthorized use. The existing allotments should be closed and the entire area should be given the protections Congress intended. 2) The entire area is a haven for wildlife and adding more miles barbed wire will fragment, fracture, and impair this special place. Even "wildlife friendly" options are dangerous to native wildlife and disruptive to recreational users. 3) The San Pedro River is already extensively overdrawn and suffering severe declines. Pumping more water out of the system for livestock is an unreasonable and inefficient use of precious resources. 4) Multiple use doesn't mean every use in every place. These lands are set aside for the purposes of conserving, protecting, and enhancing irreplaceable resources, and the BLM cannot allow uses that degrade these important values. Thank you for your consideration of these comments. Paul Moss </p>	
SPRNCA-I-220307	San Pedro Riparian National Conservation Area	<p>PLEASE do not let livestock in this pristine area, as the water, the wildlife, would be desimated, destroyed. This would be so against the preservation of OUR, the taxpayers, public BLM lands!! PLEASE, do not let cattle lobbyists and politics enter into this important decision to protect this area.</p>	
SPRNCA-I-220322	San Pedro Riparian NCA	<p>Re: San Pedro Riparian NCA:No cows. The uplands are key to the river recharge and riparian function, and the BLM must manage to enhance the San Pedro Riparian NCA, not degrade it. There is already ongoing degradation from trespass livestock in the river corridor, and more cows in the area will likely result in even more unauthorized use. The existing allotments should be closed and the entire area should be given the protections Congress intended. No new fences. The entire area is a haven for wildlife and adding more miles barbed wire will fragment, fracture, and impair this special place. Even "wildlife friendly" options are dangerous to native wildlife and disruptive to recreational users. No new wells. The San Pedro River is already extensively overdrawn and suffering severe declines. Pumping more water out of the system for livestock is an unreasonable and inefficient use of precious resources.No way. Multiple use doesn't mean every use in every place. These lands are set aside for the purposes of conserving, protecting, and enhancing irreplaceable resources, and the BLM cannot allow uses that degrade these important values.</p>	
SPRNCA-I-220325	comments - San Pedro Riparian National Conservation Area	<p>"Conserve, Protect, and Enhance" are the congressional mandates for this area. Re-introducing livestock is anathemic to the goals stated and would therefore be illegal. Since it costs us taxpayers multiple times more to manage grazing than what we get back in grazing fees it would be twice as harmful to us who pay your salaries.</p>	

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SPRNCA-I-220329	San Pedro Riparian Area	<p>Dear Sirs,</p> <p>As a botanist with experience in collecting in many areas in the West, it is my privilege and my responsibility to speak out against the destruction that cattle inflict on the land.</p> <p>Most of us eat beef, but some balance must be found that at the same time allows plants to continue to exist and support the web of life in some higher value areas while cattle is raised elsewhere. It is heart breaking to continuously see the damage that most plants (other than some trees) suffer when cattle is allowed to forage free. Some areas must be completely kept off limits from cattle no matter what. I have seen rare plants reduced to nothing and after some years completely eliminated. The seriousness of this activity has to be acknowledged before we continue to lose most pieces of the intricate web of life.</p> <p>The San Pedro has finally started to recover. It will not withstand another cattle assault before it is degraded forever.</p> <p>It is unfortunate that cattlemen are blind to everything except their profit per head. Our authorities must educate them about what they are destroying and offer them some areas for them to operate and completely forbid them to operate in others that have a higher ecological value like the San Pedro Riparian Area.</p> <p>As citizens we have a right to demand that our biodiversity be protected and not abused by private businessmen.</p> <p>Please I urge to refuse to open these areas to cattle again, not to allow the extraction of more water from an area already severely depleted and to leave the land open for wildlife and plants so they can continue to exist and to enrich our natural resources on which we all depend for the rest of times. Please take seriously the threats to permitting cattle to destroy these rich lands. We will need them for our future.</p> <p>Thank you</p>	
SPRNCA-I-220331	Preservation not degradation	<p>Areas like this deserve utmost efforts to protect and preserve riparian habitat. There can never be enough room in the entire western US for cattle; demand for grazing will ALWAYS be aggressive. We have sparse opportunities to save relatively natural areas for future generations. At this point in time, preservation and protection from threats like development or grazing should be the top priority. BLM often appears to be a slave to cattle interests. That is a shameful reputation.</p>	
SPRNCA-I-220346	Please preserve the San Pedro riparian zone	<p>The 30 year restoration of the San Pedro riparian zone, by excluding cattle grazing, is a national success story. Please, don't go through with your misguided proposal to allow cattle & fencing in the upland areas of the San Pedro zone.</p> <p>I especially urge you to not allow more wells in the area. This will further deplete the water table, which is critically low. Diverting San Pedro water for more cows is unreasonable and shortsighted considering the pervasive drought throughout Arizona and the Southwest.</p> <p>There are plenty of other places to raise cattle. There is only one San Pedro, the last free flowing river in the Southwest. The zone and restored streambanks are important habitat for native wildlife and bird species, including the rare yellow-billed cuckoo and the Sonora tiger salamander.</p> <p>Please, preserve the decades of work to return the San Pedro to its natural state so my children and grandchildren can visit and enjoy this desert oasis.</p> <p>Nancy Orr</p>	
SPRNCA-I-220348	San Pedro River	<p>Greetings, I, personally am opposed to any livestock use within the San Pedro River NCA. My wife and I are Idaho residents but spend winters in SouthEast Arizona, much of the time at Saint David, next to the subject property. Yesterday on my 71st birthday I fished an old haunt in Eastern Idaho for Cutthroat Trout. On arrival I could see the riparian zone looked like a cattle feed lot. Needless to say I did not find any fish. I am very tired of the continued abuse of public lands in the west by livestock over use. Elmore and Owyhee counties in my area of Idaho are becoming biological deserts due mainly to over a hundred years of livestock abuse. Is it really necessary to go into a globally important ecosystem such as the San Pedro, for the benefit of a very few? I don't think so. Respectfully, Keith Kiler, [REDACTED]</p>	
SPRNCA-I-220349	San Pedro NCA needs protection	<p>The San Pedro NCA matters to me. I have homes in both Bisbee and Tucson, and have enjoyed hiking and bird watch in the San Pedro watershed for many years. We moved to the area in the early 1970's. Since then, urban growth and extensive ranching have threatened precious natural resources of water and wildlife. No cows. The uplands are key to the river recharge and riparian function, and the BLM must manage to enhance the San Pedro Riparian NCA, not degrade it. There is already ongoing degradation from trespass livestock in the river corridor, and more cows in the area will likely result in even more unauthorized use. The existing allotments should be closed and the entire area should be given the protections Congress intended. No more cows.</p> <p>The entire area is a haven for wildlife and adding more miles of barbed wire will fragment, fracture, and impair this special place. Even "wildlife friendly" options are dangerous to native wildlife and disruptive to recreational users. No more fences.</p> <p>No new wells. The San Pedro River is already extensively overdrawn and suffering severe declines. Pumping more water out of the system for livestock is an unreasonable and inefficient use of precious resources. I have a long record as a water resources expert, and the overdraft of water is significant.</p>	

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SPRNCA-I-220349	Undefined	<p>The San Pedro NCA matters to me. I have homes in both Bisbee and Tucson, and have enjoyed hiking and bird watch in the san pedro watershed for many years. We moved to the area in the early 1970's. Since then, urban growth adn extensive ranching have treated precious natural resources of water and wildlife. No cows. The uplands are key to the river recharge and riparian function, and the BLM must manage to enhance the San Pedro Riparian NCA, not degrade it. There is already ongoing degredation from trespass livestock in the river corridor, and more cows in the area will likely result in even more unauthorized use. The existing allotments should be closed and the entire area should be given the protections Congress intended. No more cows.</p> <p>The entire area is a haven for wildlife and adding more miles barbed wire will fragment, fracture, and impair this special place. Even "wildlife friendly" options are dangerous to native wildlife and disruptive to recreational users. No more fences</p> <p>No new wells. The San Pedro River is already extensively overdrawn and suffering severe declines. Pumping more water out of the system for livestock is an unreasonable and inefficient use of precious resources. I have a long record as a water resources expert, and the overdraft of water is significant.</p>	
SPRNCA-I-220434	San Pedro Riparian NCA	<p>Do not return livestock to any part of the San Pedro Riparian NCA. Do not install fences or any other "improvement" for livestock. There are very few places in the West that are not grazed by livestock; this NCA is an invaluable resource, an example of what our native plants and animals look like and how a hydrological system functions without livestock impacts. Livestock is not a compatible use with resource protection.</p>	
SPRNCA-I-220438	Expressing my support for management strategy D	<p>Greetings,</p> <p>I am writing to express my strong concern about the negative impacts to the SPRNCA and the San Pedro River that opening the Conservation area to grazing, ORVs, and hunting and shooting will have. I frequently visit the San Pedro to hike and recreate, and cattle, ORVs and shooting ruin this experience for wildlife and those wishing to enjoy the natural beauty of the river. There are plenty of areas in Southern AZ that are open to grazing, hunting, shooting, and ORVs, and the sensitive riparian corridor of the San Pedro should not be one of them.</p> <p>Sincerely, Joe Silins</p>	
SPRNCA-I-220442	Support Alternative D	<p>Thank you for this opportunity to express my strong support for Alternative D.San Pedro River National Conservation Area is a special place, with incredible habitat for birds and other wildlife. Bureau of Land Management has the worthy task of stewarding it so that its natural and cultural resources are protected and maintained.Alternative D, with its low impact approach, is the best way for BLM to achieve this mission.Specifically grazing is not appropriate in this riparian area, or even near it because fences do not always keep cattle from the tempting vegetation and water along the river. Grazing is appropriate on many BLM lands, but not in this Conservation Area.Target shooting is a legitimate activity on most of BLM and many other federal and state lands -- but again, not in an area designed by presidential authority to be maintained for its conservation values.Off-Highway Vehicle use can be very destructive, causing erosion and scaring wildlife that seek a natural area for hiding from predators and raising a family. OHV use should be prohibited in the San Pedro River NCA.Thank you for going through this process to achieve the best possible management of this wonderful area.</p>	
SPRNCA-I-220628	Alternaitve A for et SPRNCA	<p>I strongly support Alternative A, sustaining teh status quo of the management of the SPRNCA. Over 30 years, this has served the public, the ranchers, the hunters, and the general population wanting to enjoy our natural lands. I am a rancher and I know that cattle are not discriminatory about where they walk, or what they eat. Their droppings will bring in foriegn vegetation, their movement will disrupt natural patterns of wild life which can be hunted outside the area. Inntroduction of a non native species always has an impact , and often he second and third order effects are unknown. Once the SPRNCA is opened, we in the US rarely have the opporuntity to retrace our steps if we made a mitake.</p> <p>I feel the SPRNCA is unique. I have traveled a lot in the US, and the San Pedor is not just another stream. It sustains a quantify and QUALITY of life, for animals plants and people. We must not manage it to death by opening it to increased pressures.</p> <p>I am not sure why this has suddenly become an iissue to be re-visited. I would truly like to understand why the SPRNCA use is now suddenly on the radar to be changed... if there is something driving this, I feel the public needs to have that as part of any disucssion of making changes.</p> <p>I respectfully and iurgently request we hold on to what we have, for now and for the next generation. As a rancher, of 10,000 acres, I know there is enough land for ranching and hunting without adding the San Pedro to the total. Opening te h river to any additional footprints, potentially opens it to all, unfettered and uncontrolled.</p> <p>Thank you Sincerely Cheryl Morgan USA retired</p>	

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SPRNCA-I-220645	Highest Protection of the San Pedro Needed	Dear Agency - We ask that the highest most environmental protection status be allotted to the San Pedro River system. This fragile and imperiled desert river hangs in the balance between inevitable development, traditional ranching expectations, water depletion from underground pumping, observable climate change, and a predicted desertification increase for the future from climatologists. How many more negative factors can one desert river system do battle with. We need stewards of the land who have a long term vision and a firm if not heroic desire to protect this strip of desert land for future generations. The overall fragility of the entire river system is the issue. All one has to do is to look at it, to see and understand this. The San Pedro river is environmentally fragile. Fragile, fragile, fragile - easily broken, altered, damaged, ruined. We count on you to help protect it.	
SPRNCA-I-220647	Opposed to additional grazing in SPRNCA RMP	I'm writing to register my opposition to any changes to the San Pedro Riparian NCA Resource Management Plan that would lead to additional livestock grazing access or "improvements" aimed at enabling grazing. I have visited the San Pedro Riparian area numerous times for bird and wildlife viewing in the past 20 years and expect to make additional visits in the future. The SPRNCA is a rare and immensely valuable gem, a critical source of water and habitat for wildlife in a desert region and a major center for passive human recreation and tourism. Without a fully-functioning watershed, beginning with the uplands covered by the NCA, this whole ecosystem would be imperiled. Thus, adding new grazing allotments and wells to serve livestock anywhere in the NCA would undoubtedly harm streamflows and be a major step backwards in the protection of the San Pedro riparian system. In addition, I am opposed to any new fencing as that would likely impede wildlife migration as well as human recreation. Overall, I support further reductions in livestock grazing in the SPRNCA rather than any increases or enhancements to grazing. The grazing exclosures that have been put in place in the San Pedro ecosystem in the past have led to significant and well-documented habitat improvements. Please continue moving in the direction of additional protections for this irreplaceable oasis rather than allowing any additional livestock impacts. Thank you for taking my comments into consideration. Please keep me updated on further opportunities to provide feedback.	
SPRNCA-I-220648	Alternative D	I am a water sentinel volunteer with the Sierra Club. We take water samples from the San Pedro when water is running and also check the water depth in wells. Although new to Arizona, this volunteer work and the people with whom I share this effort have taught me a love and respect for the SPRNCA. I strongly recommend Alternative D because it offers a "light on the land" option to care of the SPRNCA and disallows cattle grazing.	
SPRNCA-I-220666	SPRNCA DRMP Vol I 508	I have had the good fortune to have lived in the Upper San Pedro River Basin for 22 years. The natural beauty of the area, the clean air, clean water, and open spaces make it my ideal place to live. What a dream it is to live between the gorgeous and diverse Huachuca Mountains and the equally beautiful San Pedro River. During my time here, I have been impressed by the BLM's management of the SPRNCA for its wildlife, cultural, and recreational values. For hikers, equestrians, picnicing families, birdwatchers, student groups, and out of town visitors, the SPRNCA is a gem of a public resource. The ecological integrity of the SPRNCA plays a huge part in making it such an attractive place to visit. As an undammed, free-flowing river with excellent cottonwood and willow riparian forest, there is nothing like it in the American Southwest. I am strongly in favor of Alternative D in the Draft Resource Management Plan. There is no shortage of land in Arizona for grazing, hunting, and off-road vehicle use. Allowing these habitat-disturbing, noisy, and potentially dangerous activities in the SPRNCA will detract greatly from the enjoyment that all visitors currently experience. The Upper San Pedro River has been seriously altered in the past due to overgrazing. Cattle ranching contributes insignificantly at best to the state's economy, and in my opinion is no longer a viable enterprise in the arid Southwest.....at least not without large government (i.e. taxpayer) subsidies. Please opt for Alternative D. Thank you.	

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SPRNCA-I-220667	Comments on SPRNCA Plan	<p>Thank you for the opportunity to comment on the draft San Pedro River National Conservation Area Management Plan revisions. I am an Arizona birder, familiar with several stretches of the San Pedro River open to the public, and familiar with other birding sites that have been subjected to cattle grazing-planned and unplanned. Key to my comments is the observation in the Plan that: The SPRNCA contains four of the rarest habitat types in the southwest, namely willow forests, marshlands (ci&eacute;negas), grasslands, and mesquite bosques. The SPRNCA's riparian area provides habitat for over 400 species of local and migrating birds. In addition, it is home to one of the richest assemblages of land mammals in the world, with more than 80 species. Emphasis added. The reasons to consider a new management plan are also stated: The purpose of the RMP is to address changing circumstances, including increased population growth surrounding the SPRNCA, increased demand for access and public use of the SPRNCA, and increased demand for water, which could affect the riparian values of the SPRNCA. To me, these reasons support more protection of the SPRNCA, rather than more access-for either people or cattle. SPRNCA contains four of the rarest habitat types in the southwest; this should emphasize the need for their protection. I recognize that changes have occurred since the original management plan, and we should take advantage of changes in technology and management strategies. Changes have also occurred in the American diet; Americans eat less beef. I applaud the Plan's efforts to: Address restoration, and Alternative D's emphasis on "light on the land methods." Manage at least some of the land with wilderness characteristics, although the options seem extreme. Surely there are options between 0 wilderness and 28,000+ acres of wilderness. Prohibit livestock crossing permits through the riparian area on the SPRNCA, as part of Alternative C. Prohibit livestock from grazing in designated critical habitat during the breeding season (April 1-September 1) for listed species, as part of Alternative C. Exclude livestock from the developed public use areas and sites to avoid conflicts. I am concerned about: Significantly increased cattle grazing. The options seem extreme and there must be less damaging options to increasing grazing at least 3 fold. My personal experience with cattle is that they often stray far from where they are supposed to be, even under good management and efforts to keep them where they are allowed. They interfere with several recreational uses by their presence and their damage to the habitat. I agree with commenters who suggested limiting grazing during migratory breeding seasons, modifying rotations and stocking rates, frequently and regularly monitoring grazing practices, and monitoring the available forage to ensure that preferred species are not declining. Significantly increasing firearms use. More firearms are inconsistent with most other recreation. While hunting is appropriate in other areas, I agree with the commenters who suggested that hunting should not be allowed in the SPRNCA, due to conflicts with other uses, public safety issues, and protection of special status species. BLM's limited commitment to maximize water in the river. As stated in the proposed plan, flows in the San Pedro River have been declining. But the plan only states that BLM's actions may include efforts to maximize water availability for the BLM's goals to conserve, protect, and enhance the conservation values. Any additional motorized access to backcountry settings. Again, SPRNCA contains four of the rarest habitat types in the southwest, and most access should be limited, especially motorized access. My experience with motorized access is that, even the most conscientious drivers cause significant degradation to the habitat of wilder areas, and certainly to the increasingly rare experience in wilder areas, with noise, pollution and destruction. There are also drivers who intentionally flout the rules wherever access is available. While the plan is comprehensive, the values of the San Pedro River as (1) a major migratory birding corridor-one of the few left in Arizona and the Southwest-and (2) tourist attraction based on birding, seem understated. More attention is paid to fish, reptiles, mammals and plants than birds in the plan. I hope BLM has actively sought and will continue to seek the input of major environmental organizations, such as the Audubon Society, Sierra Club, Nature Conservancy, American Birding Association, Peregrine Fund and American Birding Conservancy. While the impacts of more cattle grazing, hunting and public access are largely local, the impacts on the migratory corridor are international and should not be overlooked.</p>	
SPRNCA-I-220706	Undefined	<p>The San Pedro Riparian NCA is a conservation success story and a rare riparian habitat in Arizona. As you update the Resource Management Plan, please dismiss all Alternatives that include cows.</p> <p>The original RMP, Alternative A is working well. Please continue to implement Alternative A.</p> <p>Alternatives B and C are wrong. Alternatives B and C add cows, fences, well drilling, heavy equipment and herbicide use, all of which go directly against the Congressional mandate for the SPRNCA which is "conserve, protect, and enhance" the resource.</p> <p>We all know that the funding for conservation management is constantly under pressure. I do not want my taxes spent putting the San Pedro Riparian NCA at greater risk by industrial cow ranching in a desert. BLM, please stop entertaining horrid ideas simply because they are proposed.</p>	

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SPRNCA-I-220708	SPRNCA DRMP Vol I	<p>The SPRNCA was established to protect the largest stretch of intact desert riparian forest in Arizona. And for 3 decades, the BLM has done an excellent job of rehabilitation and protection, in often challenging circumstances. Now is not the time to change course. While it may be appealing to expand grazing and open more of the NCA to hunting, to do so will be in direct conflict with the guidelines for the establishment of the SPRNCA. This is also enough evidence from the previous history of this landscape as well as elsewhere in the west to indicate that taking these steps is not prudent.</p> <p>As a long time member and past president of the FSPR, I am familiar with what this landscape looked like before cattle were removed as the creation of the SPRNCA. I am also familiar with how difficult it has been to keep cattle in the limited upland areas where they are currently allowed to graze. Increasing the upland grazing will only compound that challenge. As for hunting, public safety needs to remain the number one priority. Given the level of visting we have in the SPRNCA, hunting should be kept away from all trails and roadways used by our visitors. I suggest limiting hunting to Primitive and Backcountry RMZs and ensuring signage to warn visitors that these areas are used for hunting.</p> <p>Thank you again for you great work over the years and to your continued focus on protection of the riparian landscape and to public safety.</p>	
SPRNCA-I-220713	Road Use	<p>Since one of the purposes of the legislation setting up SPNCA was for recreational use I would like to see the opening of EXISTING roads to recreational vehicular traffic. Depending on the road conditiions, individuals or groups such as jeeping groups could be issued permits to drive on existing roads--no off roading. The roads would not have to be opened during sensitive times and permits could be issued by lottery if there was too much traffic. I think that this would be a balance between conservation and recreation since it would open new areas for passive enjoyment without hurting the fauna, land, and wildlife since it would use existing roads.</p>	
SPRNCA-I-220714	Fencing	<p>Adding fencing to SPRNCA to accomodate grazing is a waste of resources. Fencing impedes the movement of wildlife, which impedes their health and the health of the land. Volunteers are removing fencing from other government lands in Cochise County to benefit wildlife, why would we be adding fences here or allow them to be added. Fencing would also impede hiking, birding, and back woods camping. The legislative intent is to preserve recreation and conservation, why would grazing and it's requisite fences be allowed to impede this?</p>	
SPRNCA-I-220715	Water	<p>One of the water management goals (pg 2-10) is to reduce or prevent contamination. The main source of contamination is run-off. Allowing grazing on any part of SPRNCA will further contaminate the river with out furthering the legislave intent of benefitting recreation or conservation.</p>	
SPRNCA-I-220717	Water sufficiency	<p>In serveral places of the document (2-11.3 and 4, 2-36) the plan is to increase water pumping. Yet on page 3-15 the document states "changes in near-stream pumping can affect river conditions on much faster timescales than pumping at greater differences". There is no good reason to increase water pumping on SPRNCA. The community is investing a lot of energy and money for recharge and other water saving projects to benefit the river for everyone, not just for a few businesses to use more water, further pollute the river by grazing their livestock. There is plenty of other land, further away, where pumping would have less effect and our endangered river. Grazing would be much more appropriate in an area such as Brown Canyon Ranch. There would still be an effect on the water table, but not such a severe and immediated effect on t he river.</p>	
SPRNCA-I-220718	Cultural sites	<p>The San Pedro has been a settlement area for people at least since the people who used the mammoth kill site. Unfortunately there are many sites, especially the villages of the Soapuri (sp) people, that have not been fully documented. This document has little information on how these sites would be protected from the damage from grazing and heavy equipment use.</p>	
SPRNCA-I-220719	Hunting and Birding	<p>I bird often on SPRNCA and our local economy is benefitted by birders. We do not bird only within a quarter mile of developed sites. How will our safety be secured if SPRNCA is opened to hunting? We can not successfully bird wearing reflective or neon clothing.</p>	
SPRNCA-I-220720	Grazing--you have got to be kidding	<p>A section on the effects of recreation on grazing? You have to be kidding. Grazing is in no way one of the purposes of establishing the SPRNCA and recreation is. Why are private businesses allowed to participate in developing this document. 3-105 mentions increased costs to the businesses. Why should public lands be used to subsidize their costs? If they can't make a profit without raping our public lands, then they go out of business. That is called the free market. There are other grazing lands available in Cochise county. Lands on the west side of my property are used for grazing, but no one has offered market rates to the land owner to the east. There is no shortage of grazing land. The whole establishment and land swap were put in place to eliminate grazing on the sensitive SPRNCA lands. It is a supreme waste of all our conservation efforts since 1998 to revert to grazing on any of these lands. As soon as current leases run out, there should be no more grazing.</p> <p>Analyzing the effects of recreation on grazing is totally backwards and makes me wonder who has undue influence on the process of developing these plans. There is no section of the effects of grazing on recreation, which is a LEGITIMATE use of SPRNCA. I've birded at Patagonia Lake, where grazing is allowed. The trails our disgusting and the cattle can be dangerous and territorial.</p>	

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SPRNCA-I-220760	Select Alternative D	<p>I have a number of concerns about Alternatives A, B, and C, and much prefer Alternative D. I hope BLM will see the wisdom of protecting this precious and rare watershed as fully as possible.</p> <p>BLM's preferred alternative C poses significant safety risks from hunting, limits the natural movement of wildlife through the corridor, and poses the risk of degraded water quality.</p> <p>I live in the San Pedro watershed and use the riparian area heavily. Please preserve this resource for the native animals and local people who depend upon it.</p>	
SPRNCA-I-220761	Preserve and Protect the SPRNCA	<p>Preserve and Protect the SPRNCA Comment: The San Pedro Riparian area is unique in North America. It must be fully protected and preserved. Grazing is known to be very destructive which has disastrous repercussions on all the flora and fauna. We have been there before. This is a complex eco system. Large numbers of bird species rely upon it as safe haven for food and water during their annual migrations. Beavers thrive there now. All of us (humans, animals, plants) depend on the aquifer. This is a spectacularly beautiful area that is deeply loved by those of us who are lucky enough to live nearby. When grazing ended, bird populations flourished. The relationship is obvious. No to increased land use. No to livestock grazing. No to increased recreational use. This is a place where families go to relax and enjoy the natural world. Who wants that peace destroyed by the sound of hunting rifles killing the local fauna? or the sound of recreational vehicles? Not me. The water polluted by cattle feces, plants trampled under hooves? Not me. Fencing interrupting wildlife corridors? Not me. Grazing allotments are often treated with herbicides and pesticides-do we really want that in the water, not only filtering down to the aquifer, but that is water depended on by all the wildlife in the area. There are many sites of archeological significance along the San Pedro. Disrupting them will mean the loss of information we can never replace. Such places are also sacred to the native peoples of our state. Desert areas are like tundra in their fragility. Heavy equipment and recreational vehicles leave behind scars that take a very long time to heal and refoliate. Yes to: no grazing, resource protection and light restoration. You have done a good job, BLM, for three decades. Please don't make changes that would cause irreversible damage to this special area and all the lives that depend on it.</p>	
SPRNCA-I-220763	Alternate D to conserve and protect !	<p>Your preferred Alt C does NOT emphasize the original intent of the 1988 legislation to preserve and protect this rare riparian habitat and corridor for many species of birds and wildlife. It also does not sufficiently protect the sensitive cultural heritage sites. Once this land has been scarred by grazing, herbicide/pesticide use, bulldozers and motorized vehicles it will be lost forever.</p> <p>Science repeatedly demonstrates that livestock grazing in the arid desert Southwest has adverse impacts on natural landscapes (soil erosion, soil compaction, conversion of healthy grasslands to woody scrub, and reduction of food and cover for wildlife). Removal of cattle from the SPRNCA will help restore these lands.</p> <p>Another serious concern is the safety risk of opening up high visitation areas near the San Pedro House and Fairbank Townsite to hunting with firearms or bows. Close the RMZ to hunting. Avoid the harming of threatened and endangered wildlife. I spent many years living next to a national forest where shooting was allowed. The discharge of firearms disturbs visitors and discourages multiple other uses. Safety first! I AM A VOLUNTEER at the SPRNCA and value the area for birdwatching, hiking, and knowing it is a protected area for many birds and wildlife. So many depend on that corridor for their yearly migration. The SPRNCA is a treasure in the area. Please don't harm the land.</p>	
SPRNCA-I-220764	Elements for my proposal	<p>No GRAZING</p> <p>Restoration of habitat on case by case basis</p> <p>Management to be "Light on the Land"</p> <p>Protect wilderness characteristics</p> <p>Expand three existing Critical Environmental areas.</p> <p>Add two Critical Environmental areas.</p> <p>Take into careful consideration the impact of continued drought, climate change and development on the water flow in the San Pedro and the surrounding watershed.</p> <p>Recharge whenever possible.</p> <p>Allow for additional recreation and access that is sustainable and consistent with my previous comments</p>	
SPRNCA-I-220768	SPRNCA	<p>I support Alt D for the SPRNCA. Please eliminate all livestock grazing, designate 23,000 acres as wilderness under the Wilderness Act, as well as Wild and Scenic River status. I support the goal of protecting and enhancing resources, and use of "light on the land" management.</p>	

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SPRNCA-I-220784	Look first to the Enabling Legislation	<p>Why are we considering a wholesale change to the BLM Management Plan at this time? It has been a successful plan that has guided the BLM and citizens for the last 30 years. These successful strategies, therefore, should not be thrown aside and replaced by a plan (Alternative C) that would seem to ignore many of the original points outlined in the enabling legislation. Namely, we are required to conserve, protect, and enhance the riparian forest along the river and its wildlife. The BLM must live up to the enabling legislation and NOT institute a plan which compromises the well-being of the birds and other animals that live along the San Pedro and its protected areas. Consider that the opportunity for grazing, hunting, and off-road vehicle activity, which are being proposed in Alternative C, are available elsewhere in the county and could cause damage that would be difficult and expensive to mitigate if permitted within the SPRNCA. We know what the grazing did to the San Pedro banks before it was regulated. Please just look at photos from 30 years ago and now to see clearly the difference. Hunting with its noise can disturb animals, both wild and human, that use the river. We cannot imagine, for example, bringing school children as we now do to explore the San Pedro environment if in the future under the Preferred Alternative they would be endangered by gunfire within our riparian area. How would BLM with its few officers and extremely limited budget be able to monitor the safety and regulate the appropriate use of firearms or maintain the fencing for grazing or monitor off-road activity? Who else would be responsible and at what cost? In addition to the loss of school groups mentioned above, has the plan looked at the eventual loss of revenue if area birders and Eco tourists from across the country were to feel unsafe or unwelcome here and decide to go elsewhere? What would be the impact upon migratory birds that use the San Pedro as a vital corridor? How would the potential use of lead shot impact the waterfowl that use our bodies of water? My husband and I are local residents who visit the San Pedro often. We love to walk, bird, and photograph in the SPRNCA. This cottonwood/willow forest is a local, state, and national treasure and its diverse and sensitive habitat is a resource that should never be compromised and degraded. The RMP must reflect the unique existence of this beautiful, tranquil area that has been preserved so well by the previous regulations for the last 30 years. Conservation MUST be the number one consideration of any BLM plan. People, such as ourselves, as well the animals we appreciate, deserve to have a space that is not inundated by off-road vehicles, loud firearms, and cattle. They all have their place, but it is not within the SPRNCA. Diane and Albert Puff [REDACTED]</p>	
SPRNCA-I-220786	Comments on Draft SPRNCA RMP/EIS - REDACTED	Please see attached file for [REDACTED] comments on the SPRNCA drfat RMP and EIS, dated 8-27-18	Comments for BLM Tucson Field Office, draft SPRINCA RMP-EIS, with LK comments 8-27-18.docx
SPRNCA-I-220790	OPTION D	<p>DEAR MS MARKSTEIN, SPRNCA IS A TREASURE THAT BRINGS BIRDERS AND OTHER ECO-TOURISTS TO OUR AREA. I VISIT OFTEN AND WHEN I PARTICIPATE IN A GUIDED BIRD OR NATURE WALK THERE ARE ALWAYS PEOPLE FROM OUT OF STATE AND FREQUENTLY FROM OTHER COUNTRIES. OPTION D MOST CLOSELY MATCHES THE GOALS OF PRESERVATION OF THIS NATURAL RIPARIAN AREA. PLEASE NO CATTLE, FENCES, HUNTING, OR HERBICIDES. THANK YOU</p>	

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<p>SPRNCA-I-220791</p>	<p>Continue with current practices, alternative A</p>	<p>Comments about draft RMPThe proposed management plan C will produce serious deterioration in the wildlife refuge the Congress created along the San Pedro River.</p> <p>INCREASED LIVESTOCK GRAZING Public law 100-696-Nov. 18, 1988 states that management of the wildlife preserve should be done in a manner that "conserves, protects, and enhances the riparian area and the aquatic, wildlife etc." The proposal to increase grazing directly contradicts that statement. The former BLM scientist David Krueper, Jonathan Bart (Forest and Rangeland Ecosystem Science Center, USGS) and Terrell D. Rich (U. S. Fish and Wildlife Service) published a 2003 peer-reviewed science paper that showed that the removal of cattle in 1987 greatly benefited the wildlife preserve. The density of herbaceous vegetation increased 4-6 fold in riparian and mesquite grassland communities. The numbers of individual birds found along transects increased by an average of 23%.Take a look at the graph of bird detections after the removal of cattle in Brand's 2009 paper (Brand et al., 2009, p. 165. Notice the increased number of birds after the removal of cattle.A brief summary of energy flows within an ecosystem such as SRNCA can clarify the impact of cattle. Plants absorb energy from the sun, grow, and store energy in themselves. Many different species of insects feed on the plants, acquiring energy from them. Many birds feed on insects, acquiring energy from them. Many lizards feed on insects, acquiring energy from them. Many birds feed on small animals such as lizards, acquiring energy from them. Cattle feed on plants, acquiring energy from them. Cattle remove energy that otherwise would have been available for native wildlife. Cattle are not native wildlife!Cattle facilitate the spread of mesquite beyond where it would naturally spread.Surely BLM staff are aware of the bacterial problems that occur in the river, promoted to a significant degree by the current presence of cattle. Adding more cattle will just degrade the river. I doubt the BLM staff are going to follow after cattle and pick up the droppings to prevent the material in the droppings ending up in the river.Additional fencing will interfere with the normal movement of wildlife.I moved to the Sierra Vista area in 2005 and used to be very active in the Friends of the San Pedro River, including serving on its board. In recent years BLM staff for managing the nature preserve have been reduced and reduced. Before these reductions BLM was already challenged with the task of getting out of the preserve cattle that had gotten in from the limited grazing areas. Increase grazing areas will result in even more cattle getting down to the river. How will BLM deal with the increased number of cattle getting through fences and down to the river given the reduced size of BLM staff?</p> <p>USE OF HEAVY EQUIPMENT WITHIN SPRNCA The use of heavy equipment within the nature preserve will disturb wildlife such as birds. Heavy equipment is not part of nature! Presumably the proposed use of such equipment is to remove mesquite that will be spread by livestock grazing. The use of heavy equipment assumes that people know what is best in nature.</p> <p>HUNTING Our children today unfortunately are subject to being shot at school. Do we have to wait for a child or adult to be accidentally shot by a hunter to realize that increased hunting is dangerous to our children and to our adults? Birdwatchers and other nature lovers and people who just like to hike wander throughout the preserve and will be in danger of being shot due to increased hunting. (When I was a small child, my mother told me about a cousin who was killed by a spent bullet from a hunter's firearm.) Hunting activities by their very nature disturb wildlife.</p> <p>INCREASED ROADS Roads are not a normal part of nature. Increased roads will disrupt wildlife and pose potential dangers to birdwatchers who wander throughout SPRNCA.</p> <p>CONCLUSION The best strategy is to continue current management practices that have protected wildlife and habitats while allowing people to enjoy proper recreational use in the preserve.References citedBrand, L. A. 2004. Breeding and Migratory Birds, p. 153-174. In, Stromberg, J. C. and Tellman, B. (eds.). 2009. Ecology and Conservation of the San Pedro River. The University of Arizona Press, Tucson. xiv + 529.Krueper, D., Bart, J. and Rich, T. D. 2003. Response of Vegetation and Breeding Birds To the Removal of Cattle on the San Pedro River, Arizona (U. S. A.). Conservation Biology, 17:607-615.Gerald R Noonan PhD</p>	
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SPRNCA-I-221642	I strongly oppose BLM's preferred alternative because it won't protect riparian resources	I am writing to express my strong opposition to BLM's Preferred Alternative, which is not adequate to ensure the protection of riparian resources nor to fulfill the SPRNCA's statutory purposes. Indeed, this deficient alternative sadly demonstrates BLM's true colors as the "Bureau of Livestock and Mining."As you know, the SPRNCA is an impressive example of riparian recovery following the removal of livestock grazing. After the river and associated wetland corridor were formally designated as a Riparian National Conservation Area in 1989, numerous studies documented the return of riparian vegetation, improved streambank structure, and important habitat for native wildlife and bird species, including rare and imperiled species like the secretive yellow-billed cuckoo and the Sonora tiger salamander. It's one of the last free-flowing, undammed rivers in the Southwest and, despite the many threats to its water supply from the fast-growing suburbs surrounding it, it's a true oasis in the high desert landscape of southern Arizona. BLM manages 40 precious miles of the San Pedro River within the SPRNCA. For the first time in the nearly 30 years since the lands were protected, BLM is updating the Resource Management Plan to determine land use allocations that are compatible with the congressional mandate to "conserve, protect, and enhance" the resources of the SPRNCA. With this background in mind, it is appalling and outrageous that BLM's preferred alternative would open 19,000 new acres of livestock grazing in the uplands of the SPRNCA, adding 43+ miles of new livestock fencing, an untold number of livestock wells, and an unknown but certainly greatly negative impact on the watershed function. The preferred alternative is in stark contrast to all the known benefits of livestock exclusion that have been achieved in the last three decades. In short, the preferred alternative is contrary to both the relevant law and science. It shows that BLM is politically driven and puts the interests of ranchers and livestock grazing above all other interests. This is neither true multiple use nor sustained yield management of lands and resources that belong to all Americans. The BLM managers and employees that prepared this preferred alternative should be ashamed of themselves. To meet the relevant law and science, and keep faith with the public interest, no alternative should be considered for approval and implementation unless it contains each of the following requirements: No cows. The uplands are key to the river recharge and riparian function, and the BLM must manage to enhance the San Pedro Riparian NCA, not degrade it. There is already ongoing degradation from trespass livestock in the river corridor, and more cows in the area will likely result in even more unauthorized use. The existing allotments should be closed and the entire area should be given the protections Congress intended. Trespass livestock should be promptly removed. No new fences. The entire area is a haven for wildlife and adding more miles barbed wire will fragment, fracture, and impair this special place. Even "wildlife friendly" options are dangerous to native wildlife and disruptive to recreational users. No new wells. The San Pedro River is already extensively overdrawn and suffering severe declines. Pumping more water out of the system for livestock is an unreasonable and inefficient use of precious resources. In summary, these SPRNCA lands were and are set aside for the purposes of conserving, protecting, and enhancing irreplaceable riparian and upland resources, and the BLM cannot allow uses that degrade these important resources. Thank you very much for considering my comments. Richard Spotts [REDACTED]	
SPRNCA-I-222165	Management of the SPRNCA	I urge the BLM to not allow any livestock grazing on this important national conservation area. It is too important as a protected riparian area for the benefit of watershed, wildlife and fish values, as well as a very attractive natural area for the public to enjoy. This area needs to be managed for the owners of these federal lands, and not for the financial gain of a few privileged ranchers at the expense of the land and water. I also am against the construction of any additional fences or wells.	
SPRNCA-I-222885	Conserve it!!	I did not read your lengthy report but I did attend the Sierra Vista presentation and have, I believe, valid concerns regarding your Alternative C. I propose that Alternative D be enacted and if not possible, keep the current situation. I oppose your Alt C for the following reasons: 1. The lack of detail regarding the use of motorized vehicles, the amount of hunting, the amount and type of chemicals and the vast increase (almost 1/2 the area allotted to grazing). 2. I am concerned that under the present administration that proper funding for the activities you propose to allow would leave BLM without resources to control such activities and lead to decimation instead of conservation. 3. Not a whit seems to be given to the possible destruction of archeological sites. 4. Climate change: why can we not keep an area pristine? Motorization and chemical clearance lead to devastation - NOT CONSERVATION and contribute to negative climate change. 5. No real explanation of the amount or type of recreational use. My final comment: IF IT AIN'T BROKE - DON'T FIX IT! While I am not quoting chapter and verse of your study I believe I have valid concerns and the call to study and reference to make a comment is just a means of defeating public input. Attention should be paid to citizen input.	
SPRNCA-I-224201	draft RMP	Sir, Alternative C is the wrong choice for the SPRNCA and for Cochise County. Either choose Alternative D or leave things the way they are.	

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SPRNCA-I-225334	No cattle in SPRNCA	<p>I object the the preferred alternative's proposal to expand cattle use of the upper portion of the SPRNCA. The SPRNCA is already experiencing stress due to climate change, dewatering wells which lower water tables. Riparian proper functioning condition should be maximized to ensure the objectives of this special area will be maintained or enhanced. Cattle use likely would compact soils, increase rates of runoff, increase sedimentation, increase channel erosion and deteriorate channel stability. My perspective as a career aquatic biologist and 10 years as a federal land manager is that public land cattle grazing is a high cost to the taxpayer, increases demands for administration oversight, requires substantial infrastructure and has a high probability of failure to meet grazing standards. This is in addition to the impact to the function of the area biologically, including listed species of both plants and wildiife/fish. Although my permanent address is Montana, I have spent the last 20 years for 3 months in the SPRNCA and surrounding lands. Greg Munther [REDACTED]</p>	
SPRNCA-I-225898	Grazing on the San Pedro	<p>When SPRNCA was formed, livestock grazing was never totally excluded, yet in management it has been. Several of the questions at your Benson and Sierra Vista meetings refer to wildlife and wildfire management. I would encourage the implementation of Alternative A, to use livestock grazing as a management tool, not only on the uplands but also in the river itself. The effects of properly managed grazing for riparian streambed health and wildfire management have been well documented. Allowing grazing only on the uplands, as in your preferred alternative C, has no direct effect on reducing the water used by non-native species or by overgrowth of cottonwoods. There is also no direct effect on reducing fuel loads to a manageable level, as evidenced by the past 20+ years of exclusion.</p> <p>Continuing grazing on the uplands, as outlined in Alternative C, is certainly preferable to total exclusion. Ranching contributes to the \$23 billion dollars agriculture provides to the states economy. It also provides support to a myriad of directly and indirectly related businesses in the small towns across the county, not to mention the effect on families who work the land. As the number of those directly involved in production of food shrinks and the demand for food grows, we cannot afford to lose any farmers or ranchers on a local, national, or global scale.</p> <p>None of the alternatives specifically mention removal of encroaching brush species to improve habitat, decrease erosion, and increase forage to both wildlife and livestock. While the spread of mesquite and other species may have been due in part to poor grazing management long ago, current management reflects conservation efforts. Because of our desert environment, much of what we see now happened many years ago, often a hundred or more, and cannot be changed without direct intervention. The BLM has cooperated and provided funding for the Conservation Partnership Initiative and is currently a partner in the Arizona Conservation Partnership Program, both of which focus on removal of invasive brush species. Please consult with the appropriate field staff and include these programs in your considerations for upland management.</p>	

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SPRNCA-I-225899	SPR NCA revision	<p>Thank you for the opportunity to comment on the draft San Pedro River National Conservation Area Management Plan revisions. I am an Arizona birder, familiar with several stretches of the San Pedro River open to the public, and familiar with other birding sites that have been subjected to cattle grazing-planned and unplanned. Key to my comments is the observation in the Plan that: The SPRNCA contains four of the rarest habitat types in the southwest, namely willow forests, marshlands (ci&eacute;negas), grasslands, and mesquite bosques. The SPRNCA's riparian area provides habitat for over 400 species of local and migrating birds. In addition, it is home to one of the richest assemblages of land mammals in the world, with more than 80 species. Emphasis added. The reasons to consider a new management plan are also stated: The purpose of the RMP is to address changing circumstances, including increased population growth surrounding the SPRNCA, increased demand for access and public use of the SPRNCA, and increased demand for water, which could affect the riparian values of the SPRNCA. To me, these reasons support more protection of the SPRNCA, rather than more access-for either people or cattle. SPRNCA contains four of the rarest habitat types in the southwest; this should emphasize the need for their protection. I recognize that changes have occurred since the original management plan, and we should take advantage of changes in technology and management strategies. Changes have also occurred in the American diet; Americans eat less beef. I applaud the Plan's efforts to:- Address restoration, and Alternative D's emphasis on "light on the land methods."- Manage at least some of the land with wilderness characteristics, although the options seem extreme. Surely there are options between 0 wilderness and 28,000+ acres of wilderness.- Prohibit livestock crossing permits through the riparian area on the SPRNCA, as part of Alternative C.- Prohibit livestock from grazing in designated critical habitat during the breeding season (April 1-September 1) for listed species, as part of Alternative C.- Exclude livestock from the developed public use areas and sites to avoid conflicts. I am concerned about:- Significantly increased cattle grazing. The options seem extreme and there must be less damaging options to increasing grazing at least 3 fold. My personal experience with cattle is that they often stray far from where they are supposed to be, even under good management and efforts to keep them where they are allowed. They interfere with several recreational uses by their presence and their damage to the habitat. I agree with commenters who suggested limiting grazing during migratory breeding seasons, modifying rotations and stocking rates, frequently and regularly monitoring grazing practices, and monitoring the available forage to ensure that preferred species are not declining.- Significantly increasing firearms use. More firearms are inconsistent with most other recreation. While hunting is appropriate in other areas, I agree with the commenters who suggested that hunting should not be allowed in the SPRNCA, due to conflicts with other uses, public safety issues, and protection of special status species.- BLM's limited commitment to maximize water in the river. As stated in the proposed plan, flows in the San Pedro River have been declining. But the plan only states that BLM's actions may include efforts to maximize water availability for the BLM's goals to conserve, protect, and enhance the conservation values.- Any additional motorized access to backcountry settings. Again, SPRNCA contains four of the rarest habitat types in the southwest, and most access should be limited, especially motorized access. My experience with motorized access is that, even the most conscientious drivers cause significant degradation to the habitat of wilder areas, and certainly to the increasingly rare experience in wilder areas, with noise, pollution and destruction. There are also drivers who intentionally flout the rules wherever access is available. While the plan is comprehensive, the values of the San Pedro River as a (1) major migratory birding corridor-one of the few left in Arizona and the Southwest-and (2) tourist attraction based on birding, seem understated. More attention is paid to fish, reptiles, mammals and plants than birds in the plan. I hope BLM has actively sought and will continue to seek the input of major environmental organizations, such as the Audubon Society, Sierra Club, Nature Conservancy, American Birding Association, Peregrine Fund and American Birding Conservancy. While the impacts of more cattle grazing, hunting and public access are largely local, the impacts on the migratory corridor are international and should not be overlooked.</p>	
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SPRNCA-I-225918	San Pedro River National Conservation Area Management Plan	<p>My comments on the San Pedro River National Conservation Area Management Plan follow: Thank you for the opportunity to comment on the draft San Pedro River National Conservation Area Management Plan revisions. I am an Arizona birder, familiar with several stretches of the San Pedro River open to the public, and familiar with other birding sites that have been subjected to cattle grazing-planned and unplanned. Key to my comments is the observation in the Plan that: The SPRNCA contains four of the rarest habitat types in the southwest, namely willow forests, marshlands (cibola), grasslands, and mesquite bosques. The SPRNCA's riparian area provides habitat for over 400 species of local and migrating birds. In addition, it is home to one of the richest assemblages of land mammals in the world, with more than 80 species. Emphasis added. The reasons to consider a new management plan are also stated: The purpose of the RMP is to address changing circumstances, including increased population growth surrounding the SPRNCA, increased demand for access and public use of the SPRNCA, and increased demand for water, which could affect the riparian values of the SPRNCA. To me, these reasons support more protection of the SPRNCA, rather than more access-for either people or cattle. SPRNCA contains four of the rarest habitat types in the southwest; this should emphasize the need for their protection. I applaud the Plan's efforts to:- Address restoration, and Alternative D's emphasis on "light on the land methods."- Manage at least some of the land with wilderness characteristics, although the options seem extreme. Surely there are options between 0 wilderness and 28,000+ acres of wilderness.- Prohibit livestock crossing permits through the riparian area on the SPRNCA, as part of Alternative C.- Prohibit livestock from grazing in designated critical habitat during the breeding season (April 1-September 1) for listed species, as part of Alternative C.- Exclude livestock from the developed public use areas and sites to avoid conflicts. I am concerned about:- Significantly increased cattle grazing. The options seem extreme and there must be less damaging options to increasing grazing at least 3 fold. My personal experience with cattle is that they often stray far from where they are supposed to be, even under good management and efforts to keep them where they are allowed. They interfere with several recreational uses by their presence and their damage to the habitat. I agree with commenters who suggested limiting grazing during migratory breeding seasons, modifying rotations and stocking rates, frequently and regularly monitoring grazing practices, and monitoring the available forage to ensure that preferred species are not declining.- Significantly increasing firearms use. More firearms are inconsistent with most other recreation. While hunting is appropriate in other areas, I agree with the commenters who suggested that hunting should not be allowed in the SPRNCA, due to conflicts with other uses, public safety issues, and protection of special status species.- BLM's limited commitment to maximize water in the river. As stated in the proposed plan, flows in the San Pedro River have been declining. But the plan only states that BLM's actions may include efforts to maximize water availability for the BLM's goals to conserve, protect, and enhance the conservation values.- Any additional motorized access to backcountry settings. Again, SPRNCA contains four of the rarest habitat types in the southwest, and most access should be limited, especially motorized access. My experience with motorized access is that, even the most conscientious drivers cause significant degradation to the habitat of wilder areas, and certainly to the increasingly rare experience in wilder areas, with noise, pollution and destruction. There are also drivers who intentionally flout the rules wherever access is available. While the plan is comprehensive, the values of the San Pedro River as a (1) major migratory birding corridor-one of the few left in Arizona and the Southwest-and (2) tourist attraction based on birding, seem understated. More attention is paid to fish, reptiles, mammals and plants than birds in the plan. I hope BLM has actively sought and will continue to seek the input of major environmental organizations, such as the Audubon Society, Sierra Club, Nature Conservancy, American Birding Association, Peregrine Fund and American Birding Conservancy. While the impacts of more cattle grazing, hunting and public access are largely local, the impacts on the migratory corridor are international and should not be overlooked.</p>	
SPRNCA-I-226037	Choose Alternative D	<p>The BLM's OWN ANALYSIS substantiates Alternative D, rather than the (Preferred) Alternative C. I commend you for such a thorough analysis, yet I cannot support Alternative C due to the proposed use of herbicides, increased grazing, increased fence and road construction. This is a vital riparian natural environment that is overwhelmingly used for light recreation (birding, hiking, touring). Those uses are sustainable and preserve the "wild" quality of the land and environment. Alternative C will cause immense destruction to the environment and so must be rejected. I urge you to reject Alternative C and to select Alternative D.</p>	
SPRNCA-I-226038	Make the Right Choice for Everyone	<p>Your multiple-use mission is to sustain the health and productivity of the public lands for the use and enjoyment of present and future generations. You manage activities and conserve resources on public lands. How can this mission be accomplished other than by protecting the land and the river? The ONLY plan that can possibly accomplish these goals is Alternative D. It allows limited use for grazing, recreation and water extraction yet emphasizes protection and conservation of resources. Please make this choice for our children and our future, not another choice for the benefit of developers. Thank you!</p>	

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SPRNCA-I-226041	No grazing, no hunting	<p>Alternatives B and C are in direct conflict with the enabling legislation "conserves, protects, and enhances the riparian area and the aquatic, wildlife, archeological, paleontological, scientific, cultural, educational, and recreational resources of the conservation area";. At both Sierra Vista Draft Plan meetings, audience members asked Mr. Feldhausen about this discrepancy, and how grazing and hunting aligned with management goals to conserve and protect. His response was that the BLM had to honor a prior commitment to reexamine grazing after a period of time, as grazing had been suspended. I do not represent a special interest group. I am a private citizen who enjoys the solitude, surroundings, hiking opportunities and wildlife in the SPRNCA. The introduction of cattle and firearms into this area would severely impinge on enjoyment of these quiet activities. At Patagonia Lake State Park, not far from Sierra Vista, a birding trail winds through acres of cow pasture. The grasses have been chewed to dust, cattle wander freely on the grounds and in Sonoita Creek, which feeds into Patagonia Lake, and it's important to watch where you step lest you wander into cow patties. It is not a pleasant experience. I do not wish to dodge cow pies or worry about wearing reflective orange to warn hunters on my frequent visits to the San Pedro River. The water needed to support the introduction of cattle could be better put to use in maintaining the flow of the river and resupplying the aquifer. Cattle grazing offers benefits to ranchers - but not to the general public - and should not have a place in a conservation area. While I understand that Mr. Feldhausen is under directive to consider the impacts of grazing in developing alternatives for management, I hope that this reexamination leads him to recommend NO GRAZING. Grazing offers ZERO benefit to the SPRNCA, is in direct conflict with the enabling legislation, and risks polluting the river and creating a non-visitor friendly environment. At the two Sierra Vista meetings, it was clear that the topics of grazing and hunting were extremely unpopular. Although we were cautioned at both meetings that the purpose was not to vote on a particular alternative, I'm asking that the project team strongly consider the desires of stakeholders from the general public when formulating a final plan. No grazing; no hunting.</p>	
SPRNCA-I-226591	BLM's Already Poor Level of Management with Current Level of Responsibilities	<p>There is no mention anywhere in this document regarding a plan to enhance the level of law enforcement around the SPRNCA. The consideration to increase public usage of this area will only inherently bring more violations. I always point out a BLM Ranger when I see one to whoever I'm around because they are such a rare sighting in Cochise County, especially around the SPRNCA. There is already a blatant disregard for the current land use restriction by the public with motor vehicles as UTVs / ATVs "side-by-sides" are increasingly popular. As someone who frequents the SPRNCA many times a week, I see violations by the public on a regular basis. I can tell you that right now, the fencing at the new Hwy 92 Bridge site is down on the NW bank and there are tracks where the public is using it as an access point to drive UTVs and motorbikes down into the river bottom. Phone calls to the BLM Office in Tucson throughout business hours on Tuesday Sept. 4th are met with an automated "We cannot take your call at this time" message. A phone call to the Sierra Vista Ranger District office left me informed that BLM has not had a presence in that office for around 5 months. All around the SPRNCA, signs posting the use regulations are faded, sun blasted, shot with holes, bent, blocked by overgrown vegetation or otherwise rendered invisible / easily ignored by violators. How the BLM can consider letting more traffic in to trample the wildlife is beyond me when they can't even monitor and manage conditions as they are now.</p>	
SPRNCA-I-226734	APRNCA	<p>I am in support of plan D of this report. This area needs to be protected and overseen by dedicated environmentalist!</p>	
SPRNCA-I-226988	SPRNCA DRMP	<p>"Of the four alternatives proposed in the SPRNCA draft RMP, only alternative "D" comes closest to satisfying the law that created and governs the riparian area. In addition to my favoring alternative D, I am strongly opposed to hunting, trapping and grazing within the NCA, because these activities are destructive to the values for which this particular conversation area was established. Please protect the SPRNCA as it is mandated both in the enabling law, and under the mandates of the National Conservation Lands. Thank you."</p>	
SPRNCA-I-227049	San Pedro River Nat Conserv Area	<p>I grew up in Douglas, AZ in the 1950s and now live in Chandler. On a recent Saturday in August, I hiked the San Pedro River trails in the SPRNCA just after a good rain. For years I've driven by the San Pedro House and wanted to stop. Finally, I got up at 4A, drove from the Phoenix Metro area and was on the trail by 8:30A. The entire hike, my companion and I, who are both Master Gardeners, marveled at the many different types of grasses, the gourd vines, the golden caterpillars with black toes and red end markings clinging to grasses moving in the breeze, the sound of running water, the smell of the earth. We never ran into another soul the entire hike. It was quiet, peaceful and enchanting. The Sonoran desert, so green from the rain, was at her best. PLEASE, PLEASE, PLEASE do NOT destroy this truly beautiful and historic area by allowing cattle to graze in its boundaries. Surely there are other areas in Cochise County that can be grazed if there is really an actual need for grazing. NOT at this treasure. I have 3 grand-daughters, ages 10, 8 and 8, who I have taught to "hunt for treasures" when we go out on a trail. If you allow grazing on this precious site, I will never be able to bring them along and let them experience one of the LAST GREAT BEST PLACES ON EARTH (with apologies to Montana). PLEASE do not allow grazing or hunting inside the SPRNCA. It MUST be preserved for our children and grandchildren to enjoy.</p>	

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SPRNCA-I-227273	Protect the river	I've lived in Bisbee for 18 years and have appreciated the San Pedro river area. Water in the desert is very special for both people and wildlife. The area should remain protected from development and land use like cattle and hunting. Those changes would destroy a resource that attracts birding & visitors. I'm part of a hiking group in Bisbee, the Muleteam, and we do hikes along the San Pedro every year. Those hikes would likely be cancelled if there were hunting in the area. That would be awful. Please continue the existing management (A) or go lighter on the land (D). Alternative (C) is the worse choice, and I urge you not to consider it.	
SPRNCA-I-227344	Alternative A is the better choice	I am in favor of Alternative A in the draft RMP. Alternative A is a fair and reasonable mix of uses for SPRNCA. I am opposed to Alternatives B and C. Alternative B opens the entire SPRNCA to cattle grazing. I am happy NOT to hike through cow patties and their resultant flies. Nor do I want to see the inevitable degradation of the land caused by cattle hooves. Alternative C opens the area to hunting and, for safety reasons, I would be much less apt to go to the SPRNCA for hiking or birding if hunters are there.	
SPRNCA-I-227620	SAN PEDRO RIVER IS MY HOME	I have lived by the San Pedro River since 1980. Actually, I ended up moving here because of the river and its birding opportunities. I understand that not everyone is a birder! However, there are a lot more birders than hunters or trappers. We must recognize that western beef only supplies about 5% of US beef. The point being that the fabled cowboy theme around here is mainly myth. All these sides and perspectives and POVs! The issue is about our present...not our future. Everyone knows AZ has water issues. Everyone knows it is pretty tough having a tourist based economy. We know mining is about to take off in some areas of the state. So we are at a crossroads, that I suspect we have always been at: hell bent for growth at any cost, or taking responsibility to where we've been and where we are now. The San Pedro is a delicate body of water. I guess we all know how fragile it is. The current practices, 30 years of designation, may not be perfect but it has gotten us here to this point. Let us keep it that way!	
SPRNCA-I-227672	Please make hunting available	Please open this area to hunting. The BLM remains the last bastion of management that actually allows multiple users to access land. Please take into account that hunters provide the majority of resources for continued management and our access to hunting areas in AZ are already significantly limited due to reservation land.	
SPRNCA-I-227675	Support for Alternative D	As a land owner in Cochise County since 2009, I wanted to reach out to the BLM with my strong support for alternative D in the plan, being foursquare against grazing on this sensitive and precious wildlife area. I would also include a special caveat that these protected lands not be converted to palatable grasses with herbicides and/or heavy equipment. Because the BLM has opened 11.5 million "publically-owned" acres for grazing, I am a bit befuddled why the BLM would even consider opening this small, sensitive riparian area to grazing or exposure to pesticides. Thank you for your consideration. Alyson Peel	
SPRNCA-I-227677	Livestock on the SPRINKA	Alternative C would be my choice for the management of the SPRINKA, however I don't want to open the SPRINKA to grazing, heavy equipment and herbicides. (The purpose of the SPRINKA is not to enable Cochise County ranchers to use the San Pedro riparian areas for grazing. Infact the agricultural use that dominated the conversation in 1988 was farmers who wanted to grow cotton.) Our conservation area has become a model of recovery both to scientist around the country and especially to the wildlife who make their homes or migration paths here. Please choose C with the maximum consideration to wild animals and birds and land-use scientist who need the SPRINKA to compare their riparian areas our treasure.	
SPRNCA-I-227708	SPRNCA Resource Management Plan	I support the current draft.	
SPRNCA-I-227959	Adopt Alternative D	My comments are in the enclosed document.	sprnca comments.rtf

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SPRNCA-I-227991	SPRNCA comments	<p>My current comments for SPRNCA DRMP Christie S Brown I am a resident of Sierra Vista since 1984, moving here from Tucson, AZ and raised in the mid-west, Ohio, Michigan and Missouri. I have made numerous visits to the San Pedro Riparian Conservation Area over these many years. Mostly to hike/walk along the river at the San Pedro house, Charleston Road and Hereford Road trails. I have visited the Murray Springs Clovis Site and the Spanish Presidio Santa Cruz de Terrenate. I bring my guests from nearby and faraway places to enjoy the natural conservation setting, a flowing river, a quiet walk in nature, glimpses of deer, ducks, birds galore and shade from the beautiful cottonwood trees. I have picnicked and enjoyed programs at the San Pedro House. I am so glad this area was placed into the SPRNCA to preserve, protect and enhance the San Pedro River. This year I became involved with the Water Sentinels and have been on their latest collection visits for water quality tests. This is a well-studied river and is vulnerable to Climate Change, a fact to consider in our future. Less rain each summer, almost no rain in our winters for the last 10 years. The last 2 years I have been to the San Pedro River in June when it was dry. It is a shocking view of what could be in the San Pedro River's future without ongoing care and concern for future planning with the SPRNCA. I am saddened by the thought of opening up this SPRNCA land to cattle grazing and hunting. I am strongly opposed to both but cattle grazing first. Historically, cattle have wreaked havoc on the river, eroded its banks and left behind their waste and destruction. Not a conservation effort at all! I know that children from the schools in the area often enjoy a day visit to the San Pedro house and love to enjoy the area and learn how important it is to protect and conserve the river for future generations. Both of my sons were raised here and loved their school trips to the river with Coronado Elementary, I hope that these special times can be saved for their children's future also. So would it be a safe place for birders, hikers and school children with Hunters in the SPRNCA? I think not and I enjoy walking our dogs on a leash and watching for deer that are often near the water. There are also coyotes and javelina tracks but we have never been bothered by them. Hunters would bother me plenty. Lead in ammunition is still prevalent in Arizona and can be passed to all the animals in this area as the poison it is! There is state land near our property and when Hunters are in the area shooting, the dogs are nervous and need to be inside. They make me nervous when they get too close to homes and I will call the Sheriff if I find it necessary for our safety. Recreation areas need to be considered carefully. There are picnic tables at the San Pedro House and I have never felt unwelcome there for a family picnic. Charleston Bridge has poor access to the river for many people as the trail is steep and yet young folks seem to find a way to go party at that site and leave all their trash, beer cans, bottles, waste and containers behind. Trail access is limited in some areas and few areas are handicap accessible but the purpose of the SPRNCA is the protection of the river and its historical sites. Not to let the public around to party and leave their mess for others to clean up. For all of these reasons I am joining my Friends of the San Pedro River and asking for the least possible change to the existing SPRNCA practices, which is closest to your future proposal of Plan D. I would prefer No Hunting or Grazing on any part of this important and special place.</p>	SPRNCA comments.docx
SPRNCA-I-228376	Undefined	No on plan c	
SPRNCA-I-228451	Alternative Preference	<p>Personally, I believe that Alternative D would be the best draft management alternative, as it would provide the most opportunities for resource growth, which is something we desperately need right now. Livestock grazing being kept at zero would allow other animals to use the same resources while, hopefully, not worrying about overgrazing and resource overuse.</p> <p>With the Bureau's preferred alternative, the SPRNCA could very easily be over-hunted and we could see the critical endangerment of certain species currently protected, such as the beaver. It would also continue to allow wildlife trapping which can kill off a lot of important organisms, even though these animals are considered pests by farmers who believe they should be exterminated to protect their livestock. Many pesticides could also be used, degrading the quality of the water in the river, thus directly affecting the entire county.</p> <p>Roads and fencing would also be a problem, as they both would block wildlife corridors, disrupting their natural cycles and killing many. Heavy equipment and machinery would also be allowed to be put to use there, and that would have devastating consequences for both the landscape and the wildlife. Some animal homes would be destroyed, driving away or endangering hundreds of species.</p> <p>The natural landscape is important to Cochise County, as it keeps the entire ecosystem in balance, especially near the San Pedro. The river is such an important part of our lives now and allowing many to do with the land what they want would crash the ecosystem.</p>	
SPRNCA-I-228528	Save this beautiful sanctuary	<p>The San Pedro Riparian Area is a sanctuary for so many of us who live in the Sierra Vista - Bisbee - Palominas - Hereford area. It's a nearby place where we can walk along a free-flowing river, see the incredible variety of bird species who will be threatened by development, and enjoy the peace of this natural wonder. To develop this area and deplete this aquifer is to steal from our children. Please protect this incredible spot.</p>	

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SPRNCA-I-228597	Undefined	<p>My wife and I have traveled to southeast Arizona twice now for birding. We live in Colorado, but there are opportunities for world-class nature viewing in southern Arizona. This July we visited the region, stayed in cabins and lodges, ate in restaurants, visited businesses, and generally had a wonderful time on our vacation. The highlight of the entire trip was our visit to the San Pedro NCA. The birding was great, the volunteers were friendly and helpful, and the weather was fine. I had such a great time that we immediately began making plans to return to the area. I was saddened immensely, however to learn that the BLM is contemplating significant changes to its RMP for the San Pedro River NCA. My understanding is that these changes will compromise wildlife habitat, quiet recreation, and other factors that draw me, my wife, and so many others to seek out wild places like the NCA. I grew up on the West Slope of Colorado, and there is no shortage of public lands there and throughout the west where cattle can graze, people can ride OHVs, guns can be fired, and other activities can be pursued. But I fell in love with the San Pedro NCA because it provided another use: quiet recreation built on wildlife habitat. Myself, and many others, seek out wild and quiet refuges where nature can still be enjoyed. The birding at the San Pedro NCA is incredible. It draws people from around the world. Should the BLM overhaul its management of the NCA as contemplated it would destroy and devalue the other uses that make this area so special. Do not compromise the NCA's current, unique, world-class values by choosing the agency's preferred alternative (Alternative C). Alternative C dilutes the legislative intent behind this NCA, and threatens the special riparian ecosystem that attracts wildlife and humans who enjoy watching wildlife. In an increasingly crowded west, we need refuges from the proliferation of uses, people, and activities that are taking over public lands everywhere I turn. "Multiple use" does not mean that every use has to be accommodated everywhere all the time. Rather, special places like San Pedro NCA should emphasize wildlife habitat and quiet recreation, and in doing so provide a balance to other public lands in southern Arizona that emphasize different experiences. As an out of state visitor who sought out the San Pedro NCA specifically for its birding and wildlife habitat, it fills me with sorrow to think that unsustainable uses could be prioritized by the BLM in its revised RMP that compromise those values. Cattle grazing along the riverbank, shooting guns, and allowing OHV use are all things that I see across most public lands in the west. Why promote it at this special place? You have a treasure in San Pedro NCA. Why jeopardize that? Sincerely, Matt Reed</p>	
SPRNCA-I-228625	Review of DRMP 1610(AZG000)	<p>I strongly support Alternative D in the draft management plan. I have worked with farmers and ranchers, since 1984, throughout Arizona and Colorado in my work for Cooperative Extension at the University of Arizona and Colorado State University. In my professional opinion, the San Pedro River's unique habitat is not suited to livestock grazing nor is it appropriate for increased recreational uses.</p>	
SPRNCA-I-228628	Comments on SPRNCA Draft RMP	<p>Please see our attached comments on the Draft RMP.</p>	Comments Draft RMP_20180914.pdf
SPRNCA-I-228655	Proposed alternatives are inadequate to protect SPRNCA	<p>My comments are submitted here as an attachment.</p>	Comments on SPRNCA Resource Management Plan 2018.docx
SPRNCA-I-228721	NO to Grazing!	<p>Grazing in the area of the San Pedro riparian area is NOT the path to the vision of conservation and preservation of this unique and fragile area in Southern Arizona. Tourism is one of the main revenue generators for private citizens in this area; nature left to be nature is what brings people here to enjoy this rare area. Grazing is destructive and can be done elsewhere - this river and the wildlife that depend upon it cannot be moved elsewhere! Please reconsider this plan and allow this area to remain as it is, a vital resource for more than the ranchers that are just looking for a short-term dollar.</p> <p>Thank you, Phyllis Weber</p>	
SPRNCA-I-228781	Please do not allow grazing.	<p>As a resident of Cochise county living at the junction of E side Middle March Pass and the Dragoon Foothills, I am surrounded by open grazing lands and leases. The cattle have destroyed the native vegetation, much up the waterways and wreak havoc on personal property. They have killed off the desert willows and other trees growing in washes. They eat every herbaceous plant so we see few wildflowers. They eat down the mesquite preventing tree formations. The yucca are eaten to nubs...so no flowering stalks, they trample the fragile ground during monsoon season. Cattle permanently alter the native habitat. Any standing water is so foul you can smell it a quarter mile away. Cattle that are not properly managed...i.e. not enough minerals ...tear down fences and eat any man made objects they find. Plastic and wiring on autos, metal, rope, string, glass and get into sealed garbage cans. They are also aggressive. This has been my experience. If you allow grazing you will destroy the native plant life and habitats. The river and any other waters will be horribly polluted. People, pets and possessions will get damaged. This has been my experience in the area...unpleasant and unsafe.</p>	

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SPRNCA-I-228886	Alternative D	<p>Alternative D is the preferred alternative by far. Reasons below. Grazing. Alternative D is preferable due to lack of grazing. Grazing is destructive and requires further manipulation of land and vegetation that is inimical to the conservation objective. It would require clearing of mesquite, use of herbicides and heavy equipment, erection of fences, drilling of wells, etc. in addition cattle introduce ecoli into the ecosystem. Furthermore cattle destroy habitat and any introduction risks them getting acces to the river itself through broken or cut fencing. Grazing is available in many areas throughout the area without introducing it into the SPRNCA. Hunting. Alternative D is preferable with respect to hunting. Hunting is intrusive. The noise from guns destroys the experience of hikers, birders, and families enjoying the area. It's dangerous and introduces lead from bullets into the environment. In addition, even bow hunting is dangerous and disruptive. Introduction hunting is inimical to the experience of others and disrupts the ecosystem. There is ample land within the National Forests and BLM areas in nearby mountains, open areas and reserves so there is no need to introduce additional hunting areas. The primary purpose of the SPRNCA is conservation and preservation, not recreation. Economics. The SPRNCA is an international bird migratory route and attracts birders from all over the world to enjoy its wildlife and beauty. These visitors bring millions into local economies for lodging, food, and other tourist support industries. Coupled with other area attractions the economic impact is significant. Destructive activities that endanger its environment such an introduction of grazing, any increased motorized use, any use of destructive measures such as herbicides, heavy equipment etc endanger its value as an international flyway. Cochise County provides ample area for off off roading, hunting, grazing, etc without introducing such activities into the SPRNCA. The minimal amount of money that grazing and hunting will bring into the economy pales with comparison to dollars brought in by birding and tourism. Water. Water is a critical resource in the area. Introducing wells to support grazing would further imperil our limited water resources. Cultural and archeological resources. There are numerous examples of known fossil, archeological and historical resources in the SPRNCA. There are most certainly additional such resources that are as yet unknown. Grazing, equipment use, drilling, etc could well endanger these resources. Conservation and preservation. The primary reason for creating the SPRNCA was conservation and preservation. Alternative D is the only option that optimizes that objective. Please consider selecting that alternative. I saw the condition of the river and surrounding area before the SPRNCA was established. The critical and endangered environments have been enhanced immeasurably. There is no comparison of the previous eroded and damaged environment with what we see today. To introduce grazing and hunting and other destructive activities that benefit only a few at the expense of so many makes little sense environmentally, recreationally, culturally or economically.</p>	
SPRNCA-I-228892	Alternatives A or D only!	<p>The only Alternatives within this proposal which are compatible with the establishment of the SPRNCA are Alternatives A and D. BLM should not violate the intent of Congress by adopting B or C. Neither should BLM disappoint or anger the Americans who live near the SPRNCA or those whose travel to the area specifically to visit the SPRNCA. Neither grazing nor motorized recreation should be allowed in the SPRNCA.</p>	
SPRNCA-I-228895	Draft SPRNCA RMP/EIS	<p>Hello,I am sending you my comments on the RMP for the SPRNCA. I have been visiting and appreciating the beauty of the San Pedro River since 1976. I was very glad when it was designated as a National Conservation Area in 1988, because I believed that it would then be protected from hunting, trapping, roads and development, and excessive cattle grazing. It is a special, beautiful, lush, shady environment in the midst of a hot and arid land. A safe harbor for many wild creatures,(some endangered). So I am absolutely opposed to the BLM Alternative C. The river is struggling to survive. I took part in the Wet/Dry mapping of the river for several years - so I know that in June, many miles of the river bed are completely dry. Putting in 23 new wells for livestock grazing is completely irresponsible! I am very much opposed to hunting and trapping. Can't we give wildlife one place to be free from this? Hunting is dangerous to people and equestrians (like me - I am usually riding somewhere along the river at least once a month) using the San Pedro River Trail, and firearms and vehicles are also dangerous for starting a wild fire. I am opposed to opening up roads to vehicles and ATVs. The mesquite forest, especially along the trail from Fairbank is charming. One of the few places with shade where people can go for a walk in the summer, and I'm sure there is abundant wildlife that rely on the mesquites for shelter and sustenance from the protein-rich beans. I am opposed to mesquite tree removal.I prefer Alternative D because the focus is onconservation and protecting a fragile environment. Alternative D most closely follows the founding directive to conserve, protect, and enhance the wild lands environment that is SPRNCA.And now a question: Why did the BLM spend so much money on parking areas off of Hereford Road and Hwy 92, with vault toilets and picnic areas, when they are not maintaining the trail in those areas? Who would use the equestian staging area on 92 when there are no trails? As far as recreation goes, I would like to see more trail maintenance. The trail that goes uner Highway 90 and along the river is no longer maintained, and the Del Valle Road gate on the highway is blocked to equestrians. The trail that once crossed the old agriculture fields south of the San Pedro house is no longer maintained, even though it was shown on maps and signed with metal SPR signs. Instead of spending money on fencing for cattle that no one wants, please consider hiring someone for trail maintenance.Thank you,Karen Tighe</p>	

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SPRNCA-I-228901	SPRNCA_DRMP	<p>Over the last 40 years, my husband and I have made special trips from Maryland to Arizona just to visit the San Pedro River riparian areas for the purpose of watching birds and other wildlife. We have pumped tens of thousands of dollars into the local economy. On each trip we saw new species of birds, butterflies and other important pollinators, lizards, turtles, and snakes-- all because of the amazing diversity of the riparian area. It is unique. Two years ago we retired to Arizona, and now visit Sierra Vista and Hereford more frequently. The San Pedro is definitely an Arizona gem. Please do not allow cattle to graze on this unique area. It would destroy the habitats and displace all the unique wildlife. Your (BLM) directive is to "conserve, protect and enhance the riparian area and the aquatic, wildlife, archaeological, paleontological, scientific, cultural, educational, and recreational resources of the conservation area." Allowing grazing in the SPRNCA would be counter to this purpose. Anything which degrades the riparian health would be counter this purpose.</p>	
SPRNCA-I-229631	Grazing incompatible with habitat protection	<p>I have seen personally what grazing does to the ecosystem of riparian areas and it is, in a word, devastating. Invasive plant species replace native ones, ground is compacted and riparian areas along with the open areas surrounding them become inhospitable to wildlife, particularly endemic species. Grazing benefits only a few people whereas preservation of riparian and other areas for recreation, birding and other passive pursuits benefits many. I am a birder and appreciate observing all wildlife. I visit the San Pedro area four or five times a year, spending approximately 10 days in hotels while buying meals, gasoline and other things and putting money into the local economy by means of taking tours which employ tour guides, visiting museums and gift shops and local points of interest. The San Pedro Riparian Area is key to bringing people to this famous area and it must be preserved in its entirety. If grazing is not allowed in the management area, then, with intelligent management, the San Pedro corridor can be restored to an approximation of its historic condition and provide habitat for the many breeding species of birds which utilize the area as well as migrant birds. It is wrong to let the narrow interests of one group dictate to many what should be done with a vital resourced that belongs to all the people, especially since it is so unique. Do not let grazing be part of the management plan.</p>	
SPRNCA-I-229715	Scientists oppose the preferred alternative	<p>SPRNCA RMP Comments Bureau of Land Management Tucson Field Office 3201 East Universal Way Tucson, Arizona 85756 September 19, 2018 Sent hard copy and submitted online to: https://go.usa.gov/xnTuM Dear Mr. Feldhausen and Ms. Markstein, We, the undersigned individuals, urge you to retain the ecological integrity and scientific value of the San Pedro Riparian National Conservation Area (SPRNCA) through continued livestock exclusion. In advance of the summer release of the Resource Management Plan/Draft Environmental Impact Study (RMP/DEIS), we wrote to State Director Suazo to share what we - as scientists with experience and knowledge of the San Pedro River ecosystem - believe is at stake in the Bureau of Land Management's planning process: if livestock grazing in the SPRNCA is reauthorized, not only will many aquatic and riparian species and ecosystem functions be jeopardized but the critically important role of this Conservation Area as an ecological reference site will be lost. We are deeply concerned that the preferred alternative for the RMP indicates that you have a clear preference for allowing livestock grazing in large areas of the SPRNCA. Even more shocking is Alternative B which would open the entire SPRNCA to the devastating and well documented impacts of livestock grazing. We are writing you again to ensure that our concerns are made part of the project record and we are asking you to reconsider identifying Alternative C as the "Preferred Alternative." It is clear that Alternative D is the only alternative that will protect the opportunities for continued scientific research on the impacts of livestock grazing exclusion - an increasingly rare opportunity and one which you have the power to protect. As you are aware, the SPRNCA has provided scientists with the regionally unprecedented opportunity to document long-term patterns of riparian ecosystem change (and recovery) following livestock exclusion, patterns which play out on time scales of decades to centuries. Other site-specific scientific research has documented the beneficial impacts to vegetation, avian communities, and regional economy of livestock exclusion. In contrast, although there is evidence that certain species affiliated with open disturbed conditions will increase under livestock grazing, the primary beneficiary of continued or re-instated grazing is the permittees. Because of its large size and status as a conservation area, the San Pedro in the SPRNCA has become the most frequently studied river in the Southwest. The remarkable scientific value of this river accrues from its ungrazed status combined with absence of the large diversion dams that modify so many waterways. The ability to eliminate grazing and impoundment as confounding factors has allowed scientists to utilize the SPRNCA to understand riparian ecosystem dynamics and to examine effects of other regionally important stressors including stream dewatering, drought, and climate change. Studies within the SPRNCA have, to date, yielded valuable information on the environmental flow needs of various taxa and ecosystems, the ecological importance of perennial and intermittent stream flows, and the importance of flooding as an ecosystem disturbance. These and other research opportunities will no longer be available should grazing be reinstated. Furthermore, these opportunities don't exist elsewhere in southern Arizona, making the SPRNCA a unique and incredibly valuable scientific resource. Livestock grazing impacts on the SPRNCA must, of necessity, be considered within the context of increasing aridity and temperatures in the Southwest. As the BLM is aware, climate models predict hotter and drier weather for the project area. Any anthropogenic impacts in the SPRNCA must be addressed as cumulative stressors on its resident plants, animals, and ecosystems. Many scientific studies urge land managers in arid and semi-arid regions to reduce or eliminate livestock grazing as a means of counteracting the adverse effects of increasing climatic aridity. Water is a critical ecological element in drylands, and livestock (in terrestrial uplands and riparian lowlands of the watershed) are well known to influence the hydrologic cycle. If the new Record of Decision for the RMP authorizes</p>	

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		<p>continued or increased levels of livestock grazing, there will be adverse impacts not only to water quantity but to water quality, as well. Not only would water be diverted to stock ponds that would otherwise be available to other organisms, but the actions of the cattle would compact soils (inducing more runoff and less infiltration) and reduce the abundance of the streamside plants which function to improve water quality. We had assumed that science would have been adequately integrated into the draft RMP/DEIS to promote understanding of the impacts of livestock grazing and allow the BLM to fulfill its task of "conserving, protecting, and enhancing" the resources of the SPRNCA. It does not appear that this is the case. The RMP/DEIS has not provided a scientific foundation for the proposed decisions. In our March 20, 2018 letter, we noted that if continued livestock grazing on the SPRNCA was recommended in any alternative, we expected the BLM to make publicly available all range science purporting to show that livestock grazing conserves, protects, and enhances the aquatic, wildlife, archeological, paleontological, scientific, cultural, educational, and recreational resources of the public lands. This information is not available on the project website and we can find no references in the RMP/DEIS to support livestock grazing as a conservation measure. Without this information in the project record and readily available for public review, the BLM cannot consider introducing or continuing to allow livestock grazing in the SPRNCA. Given that three of the four action alternatives would allow or increase livestock grazing in the SPRNCA, there appear to be significant flaws in the NEPA analysis and a dire lack of scientific support for this project. We thank you for taking the time to again review our concerns. Many of us will also be submitting individual comments in addition to these comments. We strongly urge you to either select Alternative D as the proposed action and as the selected alternative in the Record of Decision for this project, or take a step back and revise the alternatives to reflect the scientific research specific to the SPRNCA which makes clear that livestock grazing is not compatible with the purposes of the SPRNCA. Sincerely, Dr. Juliet Stromberg Arizona State University [redacted] Elizabeth Makings Arizona State University Herbarium [redacted] Dr. Nico Franz Arizona State University [redacted] Doug Newton Arizona Native Plant Society [redacted] Dr. John Alcock Emeritus Regents' Professor Arizona State University [redacted] Dr. Frank Bungartz Arizona State University [redacted] Dr. David Brookshire University of New Mexico [redacted] Dr. Walter Fertig Botanist [redacted] Dustin Wolkis National Tropical Botanical Garden [redacted] Janet Grove Botanist, Retired U.S. Forest Service [redacted] Dr. Thomas Meixner Arizona State University [redacted] Shannon Doan Arizona State University [redacted] Dr. Ronald Rutowski Arizona State University [redacted] John Anderson Bureau of Land Management Botanist (retired) Cliffrose Consulting, LLC [redacted] Dr. Leslie R. Landrum Arizona State University [redacted] Frances Coburn Coburn Biological Consulting [redacted] Raymond Suazo, State Director, Arizona BLM; [redacted] Honorable Raul Grijalva, U.S. House of Representatives; [redacted]</p>	
SPRNCA-I-229718	SPRNCA	<p>I prefer Alternative D, light on the land management. William C. Thornton [redacted] [redacted] [redacted] [redacted]</p>	
SPRNCA-I-232740	comments on grazing on the SPRNCA	<p>Hello, my comments concern the preferred alternative that allow livestock grazing to occur in the SPRNCA. Riparian areas in the southwest such as the SPRNCA, sometimes called green threads, are by far the most important ecosystems in the southwest for promoting biodiversity compared to the dry desert uplands. Their high ecological value is far outweighed in relation to their small acreage. The minimal economic value of livestock grazing on the small acreage of the SPRNCA is out of all proportion to the amount of environmental damage it would cause to the riparian values lost. Livestock grazing is more appropriate on the desert uplands which can be made to support livestock by the installation of water features such as windmills or solar powered water pumps. For these reasons I strongly recommend the adoption of Alternative D. Thank you for the opportunity to comment.</p>	
SPRNCA-I-234192	Comment Letter Draft RMP SPRNCA	<p>Please incorporate the attached letter into the public record, and consider them in finalizing the SPRNCA Management Plan</p>	BLM San Pedro River RMP.docx
SPRNCA-I-237717	Hereford NRCDC Comments on the June 2018 San Pedro Riparian National Conservation Area Draft Resource Management Plan & Environmental Impact Statement	<p>Please see attached comment letter. Thank you.</p>	HNRCD Comment Ltr to BLM re SPRNCA EIS 2018 9 20.pdf

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SPRNCA-I-237729	Comments on SPRNCA Draft RMP	<p>Dear Ms. Markstein, Thank you for the opportunity to provide comments on the San Pedro Riparian National Conservation Area (SPRNCA) Draft Resource Management Plan/Environmental Impact Statement. As a docent assisting with bird walks at the San Pedro House and as a frequent recreational visitor to the SPRNCA, I have several concerns with the Bureau of Land Management's (BLM's) Preferred Alternative C, especially with regard to proposed grazing, hunting and recreational activities. Grazing. I understand that there are both pros and cons to grazing on public lands. However, I believe in the case of SPRNCA that the cons far outweigh any potential benefits. It has been well documented that grazing in arid and semi-arid ecosystems will cause a number of negative impacts including removal of soil crust, compaction of soils, increased soil erosion, decrease in water quality, and will ultimately have detrimental effects on native plants and wildlife. The draft Resource Management Plan (RMP) proposes the installation of fences to keep cattle out of the river and minimize impacts to the riparian ecosystem, but there have been a number of instances where cattle have escaped and entered the river near the San Pedro House. It sometimes takes a week or more for the rancher to round them up. In less visited areas of the SPRNCA it could take much longer for someone to report the excursions and even longer for the cattle to be removed. Once a decision has been made to allow additional grazing and grazing-related infrastructure (e.g., fences, gates, roads) has been installed it will be very difficult to reverse course. I respectfully request that the issue of increased grazing be reconsidered and removed entirely from Alternative C or, at a minimum, the areas of proposed grazing be minimized to exclude areas with significant washes that flow into the San Pedro River. Hunting. While not opposed to lawful hunting on public lands, it is very disappointing that Alternative C would open most of SPRNCA to hunting. It greatly detracts from the experience of visiting an area when there are concerns that hunters are in the area. Realizing that the vast majority of hunters are conscientious, it is still unsettling when walking through an area where hunting may actively be taking place. The sound of gunfire while hiking through an area is also disturbing and discourages multiple uses in these areas. This is particularly important in heavily visited areas such as near the San Pedro House, Fairbank, Hereford Bridge, etc. Opening additional areas of SPRNCA to hunting greatly also increases the chances that areas within the SPRNCA may become the sites of recreational target shooting. Just as importantly, the sound of gunfire not only impacts people, but negatively impacts wildlife. I respectfully request that the BLM reconsider and continue to exclude existing areas of SPRNCA from hunting. Recreational Vehicles. Several times each year I hike along the San Pedro Trail (the maintenance road) between Hereford Road and the San Pedro House. Even though off-road vehicles are not allowed in the washes within SPRNCA, I typically find tracks of off-road vehicles in the major washes where they cross the trail. There are fewer and fewer places where people can go to escape the sounds of traffic. Any new roads within the SPRNCA should be limited to the greatest extent possible, vehicle travel within the SPRNCA should be limited to the greatest extent possible, and off-road vehicles should not be allowed anywhere within the SPRNCA. Regards, Richard Bansberg</p>	
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<p>SPRNCA-I-237766</p>	<p>Comment on Draft Resource Management Plan and Environmental Impact Statement</p>	<p>Bureau of Land Management These comments are to express our concern regarding the SPRNCA management plan. My husband and I are avid birders and have been traveling to the area of the San Pedro Riparian National Conservation area for the last 30 years. We have spent many delightful hours birding the areas along the San Pedro River. We have seen life birds here, met many wonderful fellow birders, and forged friendships. In addition, we have spent tens of thousands of dollars over the years for our trips to the area. We are extremely concerned that the BLM's directive to "conserve, protect and enhance the riparian area and the aquatic, wildlife, archeological, paleontological, scientific, cultural, educational and recreational resourses of the conversation area" would be significantly negatively impacted should grazing be allowed in the protected SPRNCA. We also own property near the area and know first-hand what land that has been grazed looks like, as opposed to that left ungrazed and untrammled by livestock. We were forced to 'fence out' our neighbors' cows, calves and horses about 3 years ago, and now we see such a difference between his acreage and ours. We have native grasses, trees, succulents, birds, and other wildlife on our property. His is just cow paddies and horse piles, bare earth, and nibbled-down vegetation (not much of it is even grass anymore). Allowing grazing on the SPRNCA is counter to the BLM's stated purpose for management of this area. Livestock will degrade the river banks, fecal matter will foul the water, and any new plant growth after the monsoon season will be promptly munched down to nubs. We are Westerners who have lived and worked in Colorado and Wyoming for many years. We have seen first-hand how grazing in the high deserts can permanently degrade ephemeral and/or sensitive riparian areas. The riparian areas here in SE Arizona are even more fraglie and would be degraded in short order by livestock, and take a long time to recover, once degraded. We do not need more beef cattle on public lands; a healthy San Pedro River is much more valuable than any grazing lease monies collected. In addition, threatened and endangered species will be adversely, perhaps permanently, affected. Please take our concerns into account when making decisions regarding the future management of this irreplaceable landscape and ecosytem. The SPRNCA is special to us, and to so many others, human and otherwise. It is a place like no where else and needs to be protected forever.</p>	
<p>SPRNCA-I-237858</p>	<p>Concerns for the natural environment and its species.</p>	<p>Some of the strategies and procedures that were being done in the previous draft RMP are being completely altered and pushed aside in the new draft from SPRNCA. Why? I don't agree at all with the Alternative C plan. It is going to allow increase road openings for traffic, heavy equipment use that will modify the natural environment and also allow people to trap wildlife. This along along with the use of pesticides creates a cruel, toxic environment for the species and other natural elements of the San Pedro River. This environment and its resources need to be conserved and protected, not altered to make peoples lives easier. Alternative D is definetly the better option because it is consistent with the Enabling Act. I love that it is going to preserve characteristics of the natural landscape and have fire management planning strategies to help lower the risk of fires, preserving the many natural habitats. There isn't anything much wrong with the old draft RMP but, upgrading it and enhancing its ideas and movements will make it much more appealing. If we must change anything about it make sure it is all for the preservation of the environment and the protection of the many species that call this natural place their home.</p>	

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SPRNCA-I-237928	Alternative D best choice	<p>I think the best management plan is Alternative D. I think that this is the most efficient alternative because in my opinion, the number one priority should be restoring the river and the surrounding land and protecting the native wildlife. The positive aspects of this alternative would be the emphasis on resource protection and light restoration methods.</p> <p>Others may argue this alternative is not the best choice because all livestock grazing areas would no longer exist. They are worried about this hurting the livelihood of any farmers who keep their animals on the SPRNCA. I would argue that any livestock grazing of any kind would be detrimental to the surrounding environment, must be some other land those farmers could occupy. While it is public land and therefor open access, I believe open grazing areas, as proposed in alternative B would seriously degrade the environment of the SPRNCA. While livestock and farming are very important to the economy and to the individual farmer, I must insist that the BLM should not compromise the many native species of birds, mammals, amphibians, and plants that are already inhabiting the land. I would also like to mention that published science repeatedly demonstrates that livestock grazing in the arid desert has severely negative impacts on natural landscapes. Cite erosion and soil compaction, as well as the loss of food and cover for native wildlife would be insanely decreased by the removal of cattle from the SPRNCA. I would also like to express my strong resistance to Alternative C. I believe that the original intent and central purpose of conservation and protection of the riparian forest and its wildlife is not being emphasized. It also does not protect sensitive cultural heritage sites such as Charleston, Fairbank, Murray Springs, Clovis Springs and Presidio Santa Cruz de Terrente. Alternative D does.</p> <p>I have several more concerns about alternative C. To begin, the increase of areas that would then be open to the discharge of firearms could potentially make the SPRNCA dangerous to visitors. I feel like the noise would also be severely disruptive. One more concern about hunting would be, aren't we supposed to be protecting the wildlife here. Who would be in charge of hunting regulations? What would be the hunting regulations? This are important things to keep in mind. IN addition to this, it will continue to allow the cruel practice of trapping wildlife which will probably increase with more areas open to grazing. I believe that the safety of both visitors and native wildlife should prevail over all other considerations.</p> <p>Another concern about Alternative C would be that by allowing the widespread use of bulldozers and other heavy equipment would be extremely harmful to the surrounding vegetation, water quality and wildlife. Bulldozers today, asphalt tomorrow. Where is the line drawn? Not to mention the increase of roads open to vehicle traffic.</p> <p>My concern with more fencing is that it would greatly interfere with wildlife corridors which is again, literally the opposite of what I believe we're trying to do here. The SPRNCA is home to a plethora of diverse wildlife and contains the largest remaining riparian corridor in Arizona, It is vital to the survival of millions of migratory birds. The SPRNCA has so many rich recreational and educational opportunities that are fortunately, close to surrounding communities. SPRNCA is also an extremely valuable asset to the local economy. I insist that these values should be reflected in the management strategies preferred alternative. Conservation, protection and restoration should be put first.</p> <p>In conclusion, I am a local and I very much value all of the events and activities as well as the volunteer opportunities offered in the SPRNCA. Just this month my biology class took a field trip to study the ecosystem. It would be such a travesty if these lands were lost. I consider the SPRNCA a treasure and a diverse resource. I insist the RMP reflect that.</p> <p>-Emilee Simpson [REDACTED]</p>	
SPRNCA-I-237936	The BLM paid for the science	See attached letter.	SPRNCA_DRMP_VolI_508.pdf
SPRNCA-I-237944	Public Law 100-696	See attached letter	SPRNCA_DRMP_VolI_508_2.pdf
SPRNCA-I-241683	Too little area is protected from firearm discharge	It is impossible for a hiker, biker, birder, or a family on a picnic to enjoy their recreation with nearby shooting. The regions closed to hunting in Figure 2-23 are too small. For example, the trail from Murray Springs to Horsethief Draw and the San Pedro house should be protected. All areas along the river and washes that cross the San Pedro Trail should be closed to firearms.	
SPRNCA-I-241810	SPRNCA Resource Management Plan	<p>I am for Alternative C - the BLM's preferred alternative</p> <p>A mix of recreational opportunities, most of SPRNCA open to hunting, with only the uplands open to livestock grazing</p> <p>I believe that the SPR should be utilized by all people.</p>	
SPRNCA-I-242381	Livestock Grazing is Illegal on the SPRNCA	<p>I have attached my comments in PDF format. But your web form would not allow me to include the three enclosures associated with my comments.</p> <p>So, I also sent written versions of everything by certified U.S. mail to your office this afternoon.</p>	SPRNCA-DRMP-comments-Burgess-092118.pdf
SPRNCA-I-243853	Comment on SPRCA Draft RMP	See attached letter dated September 21, 2018 written by Clyde Morris	BLM San Pedro River RMP clyde.docx

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SPRNCA-I-244039	Select Alternative Plan D	The SPRNCA was established to help preserve a portion of the San Pedro River and its immediate surroundings. Alternative plan C favored by the BLM and federal government does not do this. I am a 50+ year resident of this valley and have seen and explored this river area as a youngster to now my early 60s. It is a true national resource that must be preserved for current and future generations and not exploited. Let citizens enjoy the beauty of the SPRNCA. Alternative plan D is the only choice. Please implement "D". Preserve and Protect the SPRNCA.Sincerely, Mike Needham	
SPRNCA-I-244059	SPRNCA is unique riparian habitat	SPRNCA is unique riparian habitat and is not suitable for livestock.	
SPRNCA-I-244134	I strongly support Alternative D	<p>Dear BLM officials:</p> <p>I wish to submit these comments on the San Pedro Riparian National Conservation Area (SPRNCA) Draft RMP/EIS. I am a frequent visitor to southern Arizona, and I know that the SPRNCA's aquatic and riparian habitats are extremely rare and precious. Indeed, protecting these scarce and fragile habitats is indispensable to the current and future conservation of many dependent special status species. Overall, I believe that excessive groundwater pumping, livestock grazing, and invasive weeds are the greatest threats.</p> <p>In reviewing the Draft RMP/EIS, I was disgusted and appalled to read Alternative B, which is the worst alternative and clearly inconsistent with the purposes of the SPRNCA. I believe that this Alternative B may have been created to make the BLM's Preferred Alternative C look somewhat more reasonable. However, Alternative C is very bad and its implementation would likely degrade many of the SPRNCA's resources and values. For example, it would restore livestock grazing in the uplands which would clearly jeopardize habitats in the riparian corridor, through watershed run off and degraded water quality and through the potential for further trespass grazing. BLM has a pattern of poor management of livestock grazing and a chronic inability to promptly stop trespass grazing. BLM refuses to learn from this past pattern and apparently is willing to risk re-starting it in the SPRNCA. BLM clearly puts the narrow interests of ranchers ahead of the broad public interest in protecting the SPRNCA.</p> <p>Of the four alternatives, I strongly support Alternative D. BLM should approve and implement this Alternative D because it would best protect the SPRNCA's resources and values (including special status species) and it is the most consistent with the conservation purposes of the SPRNCA. BLM should follow the law, best science, and do what is right to fully protect the SPRNCA.</p> <p>Thank you for considering my comments. Carolyn Borg</p>	

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<p>SPRNCA-I-244260</p>	<p>SPRNCA RMP Comment</p>	<p>Hello</p> <p>I am a Sierra Vista Native and had the pleasure of enjoying the San Pedro area throughout my childhood and still into adulthood. The San Pedro River is an asset to this area, and one that needs to be vehemently protected from the negative impacts of grazing and human traffic. Grazing has been found to be a threat to grasslands, as grazing cows eat pods dropped by mesquite tree and spread their seeds in their defecation. This leads to the perfect environment for a mesquite tree to grow. Mesquite trees out perform grasses in water consumption, as their roots reach deeper into the ground, consuming precious groundwater. In order to maintain the biodiversity of the SPRNCA, grazing should not be allowed to develop any further. The grazing already taking place should continue to be monitored, and the planning surrounding how to further manage the entirety of the SPRNCA land should be easily adaptive to change in climate, water use, and potential geographical changes. In allowing grazing in and around the SPRNCA and the herbicides and pesticides that accompany the treatment of the land could ruin the diversity of the area.</p> <p>If the SPRNCA is managed to its fullest, it has massive educational capacity. By protecting the area from human interference by restricting noisy activity and recreation like camping, hunting, and off-roading, the diversity and richness of the SPRNCA can thrive. Having a place so close to our schools helps foster a sense of community and an appreciation and respect for nature. An educational resource like the SPRNCA is invaluable in empowering students and teachers alike to push the boundaries of their educational experience. Human interaction could harm undiscovered and already protected historical and cultural sites.</p> <p>Alternative D has the potential to be the most beneficial to the ecosystem and the visitors of the area who appreciate the SPRNCA for what it is. Whatever plan is instituted, it needs to be able to consider any emerging issues and have the capacity to address them.</p> <p>Thank you for your time</p>	
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<p>SPRNCA-I-244431</p>	<p>Keep the SPRNCA as a nature conservation area.</p>	<p>"Environment is no one's property to destroy; it's everyone's responsibility to protect." Mohith Agadi I believe that the San Pedro River (SPRNCA) should remain as a natural area (Options A or D) and not be contaminated by the intrusion of cattle grazing, campgrounds, ATV trails among other "recreational" activities purported in Options B and C. My wife and I recently retired and relocated in Sierra Vista. Over the past fifteen years we have visited many parts of the U.S., and have long been attracted to the natural areas of this great country (i.e. National Parks, National Forests, National Monuments, Natural Conservation Areas, etc.). The last five years of our travels focused on the intent to find the place to retire that most relates to our interests, climate, and beauty. Sierra Vista continually ended up #1 on our retirement list surpassing areas in the Rocky Mountains, the Northwest temporal rainforests, and other high desert areas similar to Sierra Vista. One of the main reasons we chose Sierra Vista as our final destination is its close proximity to the San Pedro River and its penchant for wildlife, specifically bird habitat. The SPRNCA is one of the top natural areas in the State and I understand is the only free flowing river remaining in AZ. Indeed, the Cornell University Lab of Ornithology (http://www.birds.cornell.edu/page.aspx?pid=1658) has indicated that the San Pedro Riparian district is one of the top 5 hotspots in America for bird migration. "Riparian ecosystems are critically valuable to wildlife in arid regions of the western United States." http://www.birds.cornell.edu/pifcapemay/krueper.htm Since I discovered the San Pedro River's beauty and easy access seven years ago on a birding trip to the area, my wife and I have returned 10 times to visit, hiking the beautiful trails, photographing its wildlife and scenery and enjoying the wonderful climate. This area is famous among "birders" worldwide. I initially heard about the San Pedro from reading about it in Birdwatching Magazine back in 2009. With each visit we have met many other out-of-towners visiting for the same reason; people from other parts of Arizona, from other states as well as other countries. Travelers from every state in the Union and from Ireland, Australia, England, Sweden, Austria, Spain, Thailand are just some of the countries from which I recall meeting. They too were attracted by the San Pedro and its rich wildlife and natural habitat. I estimate that in our seven years of visits here, we have spent approximately \$6000.00 on lodging, restaurants, groceries, gas, and other expenditures. I can imagine that the Chambers of Commerce of the surrounding towns Sierra Vista, Hereford, Bisbee and Tombstone can attest to having enormously benefitted economically from the hundreds (if not thousands) of eco-tourists who visit each year. I would wager that the economic benefits from the eco-tourism far outweigh any profit to be made by leasing the land out to ranchers for grazing. Furthermore, if during my first visit to the San Pedro, I had to dodge cattle and cow pies and be aware of hunters and hear ATVs roaring around while I was hiking, I may not have determined this to be a place I would want to return to. Other visitors who I have met were equally disgusted at the thought and agreed they also would think twice about returning here if grazing, ATVs and hunting were part of the equation. As evidence to this was my first visit to Patagonia Lake State Park's "Sonoita Creek Trail" which is also a well-known bird trail in a Riparian setting. As much as I enjoyed the potential birds that bred there or called it their winter home, I spent more time watching where I was walking. The cattle waste was overwhelming (and I grew up on a Midwestern dairy farm). The trail was extremely dusty from the ground being hooved to death by the resident bovine. The cattle being allowed to wade in and loosen their excrement into the creek can't be very good for the health of the creek and ultimately the lake in which the creek empties? Even if cattle are not directly allowed in the San Pedro River itself, there are many studies (cited by others in this forum) that prove the rain run-off from nearby pastures ultimately lead to the river as gravity takes its course. This run-off contains dangerous amount of e-coli bacteria from cattle waste would eventually enter the water flow of the river, which is the final destination of run-off and seep its way into the aquifer. I would be absolutely disheartened, disgusted and enraged if this was also the fate of the San Pedro River. The SPRNCA currently may seem to have an adequate amount of water in its aquifer, but introducing grazing means the introduction of drinking troughs which in turn takes valuable water out of the this aquifer. At the meeting in Sierra Vista, the BLM acknowledged that they will have to put in 23 of these drinking troughs to accommodate the number of cattle that they may allow on SPRNCA land. These troughs will pump valuable water directly from the aquifer and despite the BLM's insistent claim that they have no rights to touch peoples' wells. This doesn't mean they won't take water from the aquifer which will directly affect the functionality of their wells. These are BLM political semantics at its best (or worst - depending who you are). If this practice is allowed and ultimately destroys the health of the river and aquifer, surrounding property values will plummet and the housing market will cease and years down the line will the Military want to stay at its Fort Huachuca Post? If the Military leaves, essentially Sierra Vista will become a ghost town. Is this what the BLM wants to be responsible for? All for the benefit of a few dollars gained from leasing out grazing rights? I would hope not. I will leave you with a few thoughts from some very insightful intelligent and influential persons: "A true conservationist is a man who knows that the world is not given by his fathers, but borrowed from his children." -John James Audubon "A nation that destroys its soils destroys itself. Forests are the lungs of our land, purifying the air and giving fresh strength to our people." -Franklin D. Roosevelt "There is a sufficiency in the world for man's need but not for man's greed." Mohandas K. Gandhi "It is horrifying that we have to fight our own government to save the environment." Ansel Adams "We owe it to ourselves and to the next generation to conserve the environment so that we can bequeath our children a sustainable world that benefits all." Wangari Maatha</p>	
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SPRNCA-I-244521	Comments on the SPRNCA_DRMP, Janet Grove	<p>My name is Janet Grove, and I retired from the USDA Forest Service after about 35 years of service. During my last 15 years (1995-2010) I worked as the riparian ecologist for the Tonto National Forest. Prior to that, I worked in Region One of the Forest Service (Montana, Idaho, North and South Dakota) for 20 years as a vegetation ecologist in both research and management at all levels of the bureaucracy. My job titles included research botanist, regional ecologist, forest ecologist, deputy district ranger, forest range staff, and district range conservationist. My comments focus on three issues: 1. Purpose and need statement and range of alternatives; 2. Consequences and effects of grazing and construction of range improvements in the affected area; and 3. The importance and uniqueness of the San Pedro Riparian National Conservation Area. Purpose and need statement and range of alternatives. The purpose and need statement never mentions why the SPRNCA was established. It simply says that it is time to address the management of all resources. Although the designation of the SPRNCA was for the restoration and management of the riparian ecosystem, alternatives seem primarily focused on a range of grazing strategies. To graze or not to graze seems to be the primary driver in the development of the alternatives for managing the San Pedro National Conservation Riparian Area. The incorporation of the newest scientific information and management techniques for the purpose of maintaining and improving the integrity of riparian ecosystems somewhat lacking in the alternatives. It's either active management including grazing or passive management and no grazing. Consequences and effects of grazing and construction of range improvements. I'm concerned about the costs and implications of the range developments - fencing and water systems. It's not just the original cost (47 miles of fence will be very expensive). My concerns are twofold. Maintaining improvements is always more difficult and problematic than construction. Ask any rancher or range conservationist. There is no place a cow would rather be in the summer than the nearby riparian area. Cattle are just like humans. They will seek out paradise - riparian areas, especially in the summer. There is water, shade, soft, flat cool areas and green feed. And then there are natural events, Floods, winds, downed trees, people who don't close gates, and ranchers and federal employees that can only do so much. Management will be a considerable problem. The other problem with these range improvements is the commitment they will bring. Once the agencies and ranchers go to these great lengths and spend all this money, it will be very difficult to reverse the decision to graze the SPRNCA even if the unauthorized use problems are persistent. The importance and uniqueness of the San Pedro Riparian National Conservation Area. Grazing in the San Pedro Riparian National Conservation Area just isn't worth it. The SPRNC is important nationally for many reasons. When I worked in the Northern Rocky Mountains, there were some places that had not been grazed. Reference areas. It doesn't mean they had not been affected by other land management activities. Or that they were pristine, whatever that is. They had not been grazed and were invaluable as comparison areas. When I came to Arizona, I realized that almost all riparian areas had been grazed, except for some few steep rocky areas of very limited size. To have a large, ungrazed representative riverine system as a reference area to help us understand site potential, successional patterns, and hydrological processes is invaluable. I have chosen not to get involved in land management issues since I retired in 2010, but the San Pedro is too important an area for me not to join the voices of those who understand the riparian value at risk here. Please listen and consider what the riparian experts tell you. There are not that many of them, and they seem to be speaking with one voice. Janet Grove, PhD Riparian Ecologist (retired) Tonto National Forest</p>	
SPRNCA-I-244589	Plan Alternative D	<p>I prefer Alternative D because from what I see this alternative plan uses more natural processes to keep the river environment healthier. Vegetation would be properly managed as well and that could have long term benefits for the riparian area. This plan also has more focus for the wildlife and nature in general. Activities such as hiking and sightseeing could be more common as well if this plan is utilized. If Alternative D is indeed utilized people could have a better chance to see the natural riparian area the way it is or supposed to be.</p>	
SPRNCA-I-244591	Comments on Draft RMP for SPRNCA	Attached please find my comments on the draft RMP/EIS for SPRNCA.	REDACTED, SPRNCA 9 24 18.pdf

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<p>SPRNCA-I-244617</p>	<p>Arizona Antelope Foundation Comments to Document 9-24-28</p>	<p>Amy Markstein SPRNCA RMP Coordinator Bureau of Land Management 1763 Paseo San Luis Sierra Vista, Arizona 85635 September 24, 2018 Re: San Pedro Riparian National Conservation Area (SPRNCA) RMP Scoping Arizona Antelope Foundation (AAF) is the only conservation organization in Arizona and the southwest with an exclusive mission to conserve, protect, and restore pronghorn antelope. We are a volunteer organization that is recognized by the Arizona Game and Fish Commission as a premier wildlife conservation organization. We compliment the BLM on undertaking this effort to develop action alternatives for SPRNCA. We further appreciate that the size and isolation of the San Pedro Riparian National Conservation Area (SPRNCA) from other public lands present a challenge in developing an RMP. Our conservation focus for the past 7 years has been in southeastern Arizona. AAF received a National Fish and Wildlife Foundation (NFWF) grant for modification of fences, water developments, and grasslands restoration. AAF has completed a GIS product that shows the results of the work and the positive response of pronghorn antelope populations. The baseline work included an extensive evaluation of existing and suitable habitats for pronghorn antelope in southeastern Arizona. Our work was in coordination with the Arizona Game and Fish Department Tucson Region and the big game program. The results did not identify the San Pedro Riparian Conservation Area (SPRNCA) uplands as suitable habitat. The issues are: The predominate Chihuahuan desert uplands with shallow soils and little evidence that grasslands restoration would be successful. Fragmentation of the connecting corridor to the west by sub-divisions and other human development. Unsuitable habitats in the river flood plain, effectively functioning as a movement barrier across SPRNCA. The Arizona Antelope Foundation recommends removing pronghorn antelope as a wildlife focus species from the RMP. We do not believe the statewide priorities for this species would ever result in serious consideration of a transplant of pronghorn to SPRNCA. If such an idea was proposed, the AAF would be opposed. AAF supports the expanded opportunities for motorized travel in the uplands and allowing of firearms discharge as described in Alternative "C" (Preferred Alternative). There are excellent small game (quail and rabbits), and also deer and javelina hunting opportunities in the uplands. We would suggest that the river bottom have a larger buffer for no firearms than is proposed in Alternative "C". A buffer around the trail that parallels the river should be included in the no firearms discharge zone. With these two modifications, the Arizona Antelope Foundation is in support of Alternative "C". Sincerely, Brian George, President Arizona Antelope Foundation</p>	
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SPRNCA-I-244647	Comments on draft SPRNCA RMP from FSPR President	<p>September 24, 2018 Amy Markstein BLM Tucson Field Office 3201 E. Universal Way Tucson, AZ 85756 Re: FSPR Comments on the San Pedro Riparian National Conservation Area Draft Resource Management Plan / Environmental Impact Statement Dear Ms. Markstein, Please consider the comments submitted in the attached letter (PDF) on behalf of Friends of the San Pedro River (FSPR) in response to BLM's release of the draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS) for the San Pedro Riparian National Conservation Area (SPRNCA). This PDF letter also will be submitted via email. The mission of our organization is focused solely on SPRNCA and most of its members are local residents who are dedicated to our mission to protect the SPRNCA and promote good stewardship. The comments raise issues of concern and recommendations for changes regarding the strategies to manage the area in response to BLM's draft RMP. The SPRNCA, a jewel among our National Conservation Lands, deserves an RMP that reflects that. On behalf of the board and members of the Friends of the San Pedro River, we thank you for your consideration. Robert Weissler President Friends of the San Pedro River</p>	FSPR_draft_SPRNCA_RMP_comments_rev7.pdf
SPRNCA-I-244653	Draft SPRNCA Comments	<p>BLM's stated preferred Alternative C allows expansion of livestock grazing to over 27000 acres, 43 miles of new fencing, 23 new wells for livestock watering, herbicide use over hundreds of acres (to kill native shrubbery, not just to kill invasive non-native species like tamarisk), use of heavy equipment to alter the landscape, open up roads in the conservation area, and allows hunting and trapping. None of these things are consistent with BLM's directive to conserve, protect, and restore National Conservation Lands of which SPRNCA is a part. It is irresponsible to tout the income from increased grazing rights in SPRNCA as a reason for increasing the amount of land available for grazing while ignoring the far greater economic benefits from tourism. Grazing degrades the landscape and makes it less attractive to birders and hikers who come from all over the world (and bring money into the local economy) to visit our wonderful riparian area. Trapping and hunting with bow or firearms will endanger bird watchers and hikers and is incompatible with both tourism and the directive to conserve, protect, and restore. Use of heavy equipment to modify the landscape would damage the fragile environment and speed up desertification. Herbicides should not be used to destroy mesquite forests in order to create "palatable" (i.e. things cattle like to eat) grasses. While far better than Alternative C, Alternative D still allows extensive herbicide use and mesquite removal in an apparent preparation for opening up the entire SPRNCA to cattle grazing at some time in the future. BLM should use the best available science, much of which is supplied by its own scientists, to prepare a plan that meets the directive of conserving, protecting, and restoring the national treasure known as SPRNCA.</p>	
SPRNCA-I-244662	Undefined	<p>My husband and I regularly visit the Casa de San Pedro & and the Hereford area for bird watching, bird photography, hiking. We eat in area restaurants, visit bird watching sites, and shop locally. We spend 10-30 days per year in the area. We enjoy walking, birding and photography in the San Pedro Riparian Conservation Area, especially seeing the Vermillion Flycatchers, Lazuli Buntings, Tanagers, and other Flycatchers that feed in the grassy areas. We are opposed to opening this area to cattle grazing, as it will negatively affect the ability to use this area for the above activities. Often I see other visitors to the SPRNCA as well, so I know that it is a popular walking area for local as well as out-of town visitors. Thank you for your consideration of these concerns. Katherine Petersen, [REDACTED]</p>	
SPRNCA-I-244675	Protect the river	Protect the river with Alternative D	

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SPRNCA-I-244680	Alternative D is preferred	<p>I prefer Alternative D for a number of reasons:</p> <p>Water Usage and Quality -- As stated in Section 3.2.3, Alternatives Analysis Comparison, "Alternative D is projected to use the least groundwater". This is also supported by Table 3.8. Also stated in this section, "Alternative D would improve water quality compared with Alternative A by eliminating livestock grazing within riparian areas". Additionally, from Section 3.2.3, Conclusions, "Alternative D would have the fewest impacts on reducing ground water supply and degrading water quality".</p> <p>Soil Quality impacted by grazing -- Section 3.2.2, Alternatives Analysis Comparison states, "Only Alternative D would decrease the area of sensitive soils disturbed by livestock grazing". Also, from the same section, "Alternative D would have no impacts on soils susceptible to erosion from grazing, because livestock grazing would not occur under Alternative D".</p> <p>Public Safety -- Comparing Figures 2-23 and 2-24, Discharge of Firearms, it is clear to me that there would be great potential compromise of public safety if hunting were mixed with current popular activities such as hiking and bird-watching in the southern part of the SPRNCA, as would be allowed if Alternatives B or C were adopted rather than Alternative D.</p> <p>In summary, Chapter 1, Section 1.3 states, "The purpose of the SPRNCA, as stated in Section 102 (a) of the Arizona-Idaho Conservation Act of 1988, is to conserve, protect, and enhance the riparian area and the aquatic, wildlife, archaeological, paleontological, scientific, cultural, educational, and recreational resources." I feel that Alternative D best meets this purpose.</p>	
SPRNCA-I-244683	Bureau of Land Management Draft Resource Management Plan	<p>I would like to add my comments on the proposed updated management plan for the SPRNCA. The enabling legislation was enacted on November 18, 1988, when Congress passed Public Law 100-696, the Arizona-Idaho Conservation Act of 1988, which stated "In order to protect the riparian area and the aquatic, wildlife, archeological, paleontological, scientific, cultural, educational, and recreational resources of the public lands surrounding the San Pedro River in Cochise County, Arizona, there is hereby established the San Pedro Riparian National Conservation Area". The act goes on to describe that "The Secretary shall manage the conservation area in a manner that conserves, protects, and enhances the riparian area." It states further that "The Secretary shall only allow such uses of the conservation area as he finds will further the primary purposes for which the conservation area is established." The SPRNCA is a world-famous draw for residents and tourists who are interested in experiencing natural and cultural heritage resources. In fact, SPRNCA was part of the reason why I decided to relocate to Sierra Vista upon my retirement. I often hike along the river or along the many trails that run throughout the SPRNCA. I am so enthused about what the SPRNCA has to offer that I became a docent for the Friends of the San Pedro River two years ago, leading river walks during which we educate both the general public as well as school children who visit as part of their classroom studies as a way of advocating for the preservation of the river. I have never had a participant who did not understand and appreciate what a special place the SPRNCA represents. The BLM Alternative C (Preferred Alternative) would put all that the last 30 years has accomplished toward the recovery of the river in jeopardy. Alternative C talks about "balance," but there is nothing balanced about an approach that would return the state of the river to its pre-SPRNCA condition. I occasionally visit Patagonia Lake State Park, but I dislike going there because the cattle which graze there have so thoroughly degraded the habitat. A place that should be a veritable haven for wildlife on the east shore of the lake is instead a place where you have to dodge the cow pies and flies while you hike among the fallen limbs and trees because of the overgrazing. I cannot imagine the impact of grazing to the SPRNCA! The term "balance" always sounds so reasonable, but areas that are preserved for the protection of wildlife continue to shrink and erode as they are opened up for "balanced" uses. Alternative C also lists the use of management tools, including heavy equipment and herbicides. The noise from heavy equipment would disrupt the peace and quiet that is important to wildlife as well as to people seeking a respite from their hectic lives. Herbicides would cause significant disruption for the 200 species of butterflies that have been documented on the SPRNCA. Hunting and trapping would severely impact some of the 350 species of birds and 80 species of mammals that inhabit the SPRNCA. I cannot understand how these proposed uses comply with the original intent for the SPRNCA to "conserve, protect, and enhance" the natural and cultural resources of the river. Alternative D is a testament to how successful the "light on the land" approach has been for the last 30 years for the SPRNCA. All the progress toward recovery that has been achieved has come without heavy equipment, herbicides, roads, hunting and trapping. Alternative D has been and is the only alternative that truly complies with the reasons the SPRNCA was established in the first place!</p>	
SPRNCA-I-244780	I support Plan D	<p>The San Pedro is a national treasure, light use is the only option here. Save the river!</p>	
SPRNCA-I-245026	Keep management system the same	<p>I have lived in the San Pedro Valley since 1959. I have seen the river in when there were no restriction be on grazing and I have seen it develop the into what it is now. I don't not want to see it regress to it's former state. The grazing plan in PLAN C will destroy 30 years of intelligent and thoughtful procedures. I can't think of any reason to open up this amazing natural resource to grazing. If it is to appease a handful of cattle ranchers to improve their bottom line, then our hearts are in the wrong place.</p> <p>I feel fortunate to have have such a rare natural resource close to home. I would like for my children and grandchildren feel as fortunate.</p>	

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SPRNCA-I-245038	OBJECTION TO PREFERRED ALTERNATIVE C; PREFERENCE FOR ALTERNATIVE D	<p>I want to express my concerns with the selection of the BLM's Preferred Alternative C because:</p> <ol style="list-style-type: none"> 1. I don't believe it has been illustrated why this sensitive area should expand livestock grazing, add miles of new fenced area restricting wild animal movement, expanding use of herbicides, allowing use of heavy equipment to alter the landscape, and allow hunting and trapping. 2. There has been 30 years of successful enhancement under current practices. 3. The new approach does not appear to follow the law's founding diirective. 4. It allows for an additional big impact on a dwindling water supply. 5. The BLM produiced a more viable alternative in Alternative D, except there is no need to allow expanded herbicide use and mesquite removal if grazing is not expanded. 	
SPRNCA-I-245134	Cochise Co & City of Sierra Vista Comments on SPRNCA Draft RMP/EIS	<p>September 25, 2018 Submitted Electronically to: https://go.usa.gov/xnTuM Bureau of Land Management Gila District Office 3201 E. Universal Way Tucson, Arizona 85756 RE: San Pedro Riparian National Conservation Area (SPRNC) Draft RMP/EIS Issued June 29, 2018 Mr. Feldhausen, Attached are the comments and suggested revisions submitted by Cochise County, Arizona ("County") and the City of Sierra Vista, Arizona ("City") to the June 29, 2018 draft Resource Management Plan prepared by the Bureau of Land Management ("BLM") presenting options for management goals for the San Pedro National Riparian Conservation Area ("SPRNCA"). All previous comments submitted by the City and County on this planning process are herein incorporated by reference. As cooperating agencies, the County and City appreciate the opportunity to work with the BLM and submit the enclosed comments in furtherance of the goal-a mutual one held by the County, City and BLM alike-of managing the SPRNCA in a manner that sustains the river and its unique riparian habitat, and the surrounding communities that enjoy it. If you have any questions or concerns regarding these comments or require clarification as to any comment, please contact Sara Ransom at [REDACTED] or contact Mary Darling at [REDACTED] Regards, Sara Ransom Mary Darling Cochise County Deputy Attorney Natural Resource Consultant [REDACTED] [REDACTED] [REDACTED]</p>	6.29.18 BLM RMP EIS - Cochise County_City Sierra Vista Comments (9.25.18 Submittal to BLM).pdf

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SPRNCA-I-245214	Alternative D should be selected	<p>Comments on the draft Resource Management Plan/Environmental Impact Statement (Draft RMP/EIS) for the San Pedro Riparian National Conservation Area (SPRNCA)My name is Susan Leskiw. Until the spring of 2017, my husband and I owned a second home in Palominas, AZ. We specifically bought a winter retreat there because of the world-class birding offered by Cochise County, especially the SPRNCA. We are members of Friends of the San Pedro (FSPR). I have volunteered in the San Pedro House Bookstore and continue to serve as editor of "River Roundup," FSPR's quarterly newsletter.The National Audubon Society (NAS) has designated the SPRNCA as a globally significant Important Bird Area, one of only 17 in the entire state of Arizona. According to the NAS, the SPRNCA is "the best example of desert riparian ecosystem in the United States," as well as serving as one of four major north-south migratory bird corridors in the Southwest. It supports the largest breeding population of Gray Hawks in the U.S. and the largest population of Yellow-billed Cuckoos in the U.S. Cochise County boasts 465 species of birds, more than half of the total tallied in North America and about the same number as the entire state of Colorado.People come from around the world to view the many rare birds of the San Pedro River, contributing greatly to the local economy. For example, Tucson Audubon has put together a Powepoint presentation entitled "Birds Mean Business in Cochise County." A 2011/3 Cochise County Visitor Survey found that 37% of visitors came to the county because they were "very or extremely interested in bird or wildlife watching," with another 24% being "somewhat interested." These are high-quality tourist dollars that would be diminished if the BLM adopts a resource management plan that does not accord the highest priority to protecting the SPRNCA.I have reviewed the four Alternatives outlined in the draft RMP/EIS. In my opinion, Alternative D is the best choice, because it emphasizes the original intent and central purpose of the SPRNCA's enabling legislation, Public Law 100-696. Even BLM's cover letter that sent the documents out for public review and comment states that the purpose is "creating a management strategy that best meets the needs of the resources and values in this area per the enabling legislation," which was to conserve, protect, and enhance the riparian area and the aquatic, wildlife, archaeological, paleontological, scientific, cultural, educational, and recreational resources of the public lands surrounding the San Pedro River.Alternative D would emphasize resource protection and conservation by eliminating grazing and limiting motorized recreation and hunting. (Who has not seen photographs of the devastated state that the SPRNCA was in prior to the removal of cattle from the riparian area in 1987/8?). Livestock grazing is not compatible with the values of the National Conservation Area. Alternative D would not eliminate hunting or motorized travel, as 48 percent of the SPRNCA would remain available to hunting and 42.5 percent open to motorized travel along designated roads and trails.Alternative D would prioritize approximately 42 percent of the SPRNCA to be managed for wilderness characteristics. (None of the other three alternatives would devote even a single acre for such management!) It would designate five areas totaling 13,070 of the SPRNCA's 55,990 acres as Areas of Critical Environmental Concern and would make the San Pedro suitable as recreational, scenic, and wild for inclusion in the National Wild and Scenic River System. Alternative D's "light on the land" management approach would focus on natural processes and passive resource management for restoration. It would further the primary purposes for which the conservation area was designated.Thank you for giving me the opportunity to submit comments on the future management of the San Pedro Riparian National Conservation Area.</p>	
SPRNCA-I-245232	Resource Availability and Water Scarcity Forecast	<p>Alternative D emphasizes resource protection and conservation, which if administred properly will achieve ecosystem restoration while enabling more primitive types of recreation. The San Pedro must be protected from forecast of drought, increased temperatures and negative impact of overgrazing. Non motorized access in back country settings would preclude additional fire and safety hazards from oil spills, engine combustion thus impacting environment via pollution levels (noise, air and fire hazards). Protection of wilderness through maintenance of vegetation is recommended as well for protection of cultural heritage, paleontological interest and historical relevance.</p>	

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SPRNCA-I-245288	Arizona Wildlife Federation Comment Letter	Amy Markstein SPRNCA RMP Coordinator Bureau of Land Management 1763 Paseo San Luis Sierra Vista, Arizona 85635 September 20, 2018 Re: San Pedro Riparian National Conservation Area (SPRNCA) RMP Scoping The Arizona Wildlife Federation (AWF), a 501(c)3 non-profit corporation was founded in 1923 to take politics out of Arizona's Game and Fish Management and to promote the management of Arizona's wildlife and natural resources based on the principles of "Sound Science". The AWF got its start as the Arizona Game Protection Association and celebrated 95 years of Arizona conservation activity in 2018. We compliment the BLM on undertaking this effort to develop action alternatives for SPRNCA. We further appreciate that the size and isolation of the San Pedro Riparian National Conservation Area (SPRNCA) from other public lands presenting a challenge in developing an RMP. We recommend removing pronghorn antelope as a wildlife focus species from the RMP. We do not believe the statewide priorities for this species would ever result in serious consideration of a transplant of pronghorn to SPRNCA due to the following issues; The predominate Chihuahuan desert uplands with shallow soils and little evidence that grasslands restoration would be successful. Fragmentation of the connecting corridor to existing pronghorn on the Sonoita Plains to the west by sub-divisions and other human development. Unsuitable habitats in the river flood plain, effectively functioning as a movement barrier across SPRNCA. We strongly support the expanded opportunities for motorized travel in the uplands and allowing of firearms discharge as described in Alternative "C" (Preferred Alternative). There is excellent small game (quail and rabbits), and deer and javelina hunting opportunities in the uplands. As such we are in support of Alternative "C" minus the focus on the restoration of Pronghorn Antelope. Sincerely Brad Powell President Arizona Wildlife Federation	
SPRNCA-I-245305	Undefined	Why undo what has worked? Please do not increase grazing in the San Pedro riparian area.	
SPRNCA-I-245464	SPRNCA drafy RMP	I am a local Hereford resident, nature lover and bird watcher, as well as a landscape artist. I use the SPRNCA, and the SPR on a regular basis. I am begging you, please DO NOT compromise the many species of birds and other wildlife, such as the beaver, who call the SPR their home (as do I). Th original intent for the SPRNCA should remain intact, with public access and continuing management regime. Increased livestock grazing will destroy this. And opening to hunting will endanger human life (birdwatchers and hikers, painters and joggers). The past mamangement strategies have been very successful, and your preferred Alternative C does not sufficiently emphasize the original intent or central purpose of conservation, protection and enhancement of the riparian forest along the river, or its wildlife. Nor does it protect the cultural heritage sites (shame on you)! Please do not significantly alter, or cast aside the strategies and management decisions that have served the SPRNCA for over 3 decades. Please think long and hard before destroying more resources. Our aquifer is already at risk, don't add to it!	
SPRNCA-I-245520	Keep the Regulations in Place	As a long time Arizona resident (32+ years) I strongly support keeping the San Pedro Riparian National Conservation area as naturally protected as possible. The regulations that have been in place for decades now have enabled to San Pedro River ecosystems to wonderfully renew themselves into much healthier states than they were when they were previous to their protection. Please keep the regulations currently in place that have worked so well. Thank you.	
SPRNCA-I-245523	Cattle in SPRNCA	I am against adding more livestock under option B and C. There is no conservation reason that support pollution of the riparian area by introduction of more cattle.	
SPRNCA-I-245990	comments on grazing on the SPRNCA	Further comments on grazing on the SPRNCA: The SPRNCA is a valuable riparian area for the following reasons. Please address how livestock grazing in the SPRNCA will effect these values. If the effects are negative, then livestock grazing should not be allowed in the SPRNCA. Alternative D should be chosen. Riparian areas that are working properly provide the following functions: purify water by removing sediments and other contaminants; reducing the risk of flooding and associated damage; reducing stream channel and streambank erosion; increasing available water and stream flow duration by holding water in stream banks and aquifers; supporting a diversity of plant and wildlife species; maintaining a habitat for healthy fish populations; providing water, forage, and shade for wildlife; and creating opportunities for recreationists to fish, camp, picnic, and enjoy other activities.	
SPRNCA-I-246163	Comments on draft management plan	I live near the San Pedro Riparian National Conservation Area and I am adamantly opposed to changes that would result in increasing cattle grazing pressure on this area. The San Pedro River corridor is already extremely stressed, and climate change in the form of increasingly severe droughts will pose greater threats. Adding more cattle grazing will make matters even worse. How can the BLM even consider such a dangerous management plan?	

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SPRNCA-I-246452	Alternative A choice	I believe Alternative A would be the best choice for the SPRNCA Resource Management Plan. Continuing the existing management plan and not opening more area to grazing or hunting would help keep the many species of birds and wildlife protected. I believe opening more areas to recreation, hunting or grazing would set the restoration efforts that have been made back decades. It is such an important migration corridor for birds and wildlife and one of the last free flowing rivers and opening it up to more human activity or grazing would greatly harm the corridor I believe. I have grown up in this valley and it is a wonderful and beautiful place. Please consider Alternative A as the choice in order to protect its' creatures and beauty.	
SPRNCA-I-246459	SPRNCA Draft RMP	Support Alt A; prefer holistic grazing for fire control. Oppose any "chemical treatments" in other Alternatives. Section 2.5.12 , p.2-44 #23...discharge of firearms not allowed within one-quarter mile of developed facilities" should be one whole mile as even small caliber .22 ammunition for decades has stated on boxes that the bullet can travel one mile, Unauthorized hunters trespassing on private property one-half mile from my property missed their target, bullet passed about twelve feet in elevation under 20ft in distance from myself attending to my livestock! In view of tightening Federal Budget the activity stated in most other Alternatives seem wishful. Honor the enabling legislation PL 100-696 and leave the River is as it is, perhaps only with further improvements using beavers. Lastly, all public hearings for the Draft were held at the same time of day- for consideration of ALL the public it would have been helpful for even one of the Sierra Vista dates to be held mid-day...rather than all evenings.	
SPRNCA-I-246464	PLEASE preserve the SPRNCA	If it ain't broke, don't fix it. I am writing as someone who has resided in Cochise County since 1982, enjoying its beauty and unique natural resources through hiking, birding, wildlife-watching, photography, and botanizing. There are no words that can adequately convey how dismayed I am that BLM is considering, through their Management Alternatives B and C, allowing increased grazing and hunting on the SPRNCA, which is one of the greatest treasures of this area and deserving of protection if any place here is. If hunting is allowed, I will no longer feel safe to be on the SPRNCA. If there is increased grazing, I fear that the SPRNCA will return to the degraded condition it was in prior to it becoming protected in 1988, making it undesirable as a destination. Aside from my personal concerns, there are larger issues. The SPRNCA is critical to the survival of migrating birds and other wildlife. Furthermore, it draws people from around the globe - people who leave their tourist dollars in Cochise County. Surely BLM should be managing the land for the benefit of wildlife and the local economy, not for cows, nor for hunting, which is better done farther away from where non-hunters are likely to go. I insist that the BLM either continue with Alternative A or give heavy consideration to Alternative D.	
SPRNCA-I-246466	San Pedro R is an irreplaceable treasure - do not change how it's managed	Alternative A is the best choice for managing the San Pedro NRCA. The area has thrived under the current management plan. Increasing grazing, opening it to hunting & wholesale restoration would disrupt the very delicate balance in this habitat, already threatened by continued population growth & consequent damage in the area, & have many negative consequences, even if unintended. Do not add to those threats by altering the management plan.	
SPRNCA-I-246470	Draft SPRNCA RMP & EIS - HHC Comments	September 26, 2018 Huachuca Hiking Club [REDACTED] BLM Tucson Field Office ATTN: Amy Markstein 3201 E. Universal Way Tucson, AZ 85756 Dear Amy: On behalf of the Huachuca Hiking Club (HHC), I wish to provide comments for consideration during the finalization of the SPRNCA RMP. I attached the comments since they were well over the 10,000 character limit for the "comments box." If the attached comments did not make it through your system or there are any othr issues with the attached comments, please contact me immediately. Thank you for the opportunity to provide these comments/recommendations. We look forward to working with you as the RMP process continues. Please let us know if it would be helpful to meet with you and other members of the BLM planning team to discuss our recommendations in more depth. Sincerely, Steve Scheumann HHC President [REDACTED] [REDACTED]	HHC Letter Re Draft SPRNCA RMP and EIS_FINAL_180926.docx

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SPRNCA-I-246471	Alternative D	<p>Hi there!</p> <p>Alternative C does not seem to be in line with the goals of "conserv[ing], protect[ing] and restor[ing]" significant landscapes, as a part of the mission of National Conservation Areas as set out in 16 USC 7202(a). It isn't shown in the DRMP how grazing, increased wells, herbicide management, heavy equipment, or allowing hunting & trapping will help protect, conserve, or restore this important landscape. The scientific evidence shows that grazing increases erosion and contributes to desertification; moreover, the wells needed for cattle will draw 2.5 million gallons a year during a period of increasing climate uncertainty. The San Pedro Riparian NCA has already been making a recovery by being left alone - how does alternative C improve upon that? The minimal disturbance alternative D is a better choice - management with hand tools and proscribed burns will be the best choice for minimizing/reversing erosion and conserving water.</p> <p>Please consider Alternative D. The San Pedro is one of the last large undammed rivers in the USA. Its recovery is important; there is plenty of other land to graze cattle on in our state.</p> <p>Thank you for your time</p>	
SPRNCA-I-246486	Draft SPRNCA RMP/EIS comments	<p>September 25, 2018Ms. Amy Markstein Bureau of Land Management 3201 East Universal Way Tucson, AZ 85756</p> <p>RE: Comments on the Draft Resource Management Plan for the San Pedro Riparian National Conservation AreaThe San Pedro Riparian National Conservation Area was established by Public Law 100-696 November 18, 1988 with the sole intent to "protect the riparian area and aquatic, wildlife, archeological, paleontological, scientific, cultural, educational, and recreational resource of the public lands surrounding the San Pedro River&hellip;". The Bureau of Land Management (BLM) preferred alternative in the Draft Resource Management Plan is absolutely not in concurrence with this law. According to the law, the San Pedro Riparian National Conservation Area (SPRNCA) is to be managed in a manor which further the purposes for which this beautiful area was established (Arizona-Idaho Conservation Act, 1988) and the BLM preferred alternative does not do this. Therefore, The BLM preferred alternative is not acceptable and should be rewritten to reflect the law by which it was established under.In addition to the request that the preferred alternative be rewritten it is also my request that livestock grazing never be considered an acceptable action on the SPRNCA in any alternative, at any time. The removal of cattle was one of the several protective and conservative actions carried out upon designation (Fredlake, M., personal communication, May 23, 2008) and should be honored. Studies have proven the many benefits of the removal of cattle from the SPRNCA which includes but is not limited to, the increase in vegetation and avian species (Kruepur, 1993; Krueper et al., 2003). There are also many studies providing evidence of the immense benefits and positive effects to the land which occur with the removal of cattle from areas in arid climates (Allington et al., 2001; Bock & Bock, 1993; Brady et al. 1989; Coalition, 2001). These studies along with original intent, should be more than adequate reason to continue managing the SPRNCA without ever allowing livestock grazing.For thirty years the River has been managed passively and is healing as a result. Reversing the management at this point goes against the law as well as the hard work which many people have done over the years to designate and protect the SPRNCA. As part of the original intent in establishing the SPRNCA, was for it to be a wildlife refuge (M. Gregory, personal communication, September 9, 2018). This is what it has become with passive management through protection and conservation. Therefore, to honor the work that has been done and to honor the land itself, hunting should be completely banned on the SPRNCA. This will allow for the animals to live in peace and for the original intent, the land and the people who enjoy tranquil recreation, to be honored. Myself, my family, and my friends enjoy the San Pedro Riparian National Conservation Area for her solitude, tranquility, hiking, backcountry camping, birdwatching, photography, wildlife sighting, botany, and wild opportunities. These opportunities would be altered forever if the BLM preferred alternative (as it is written now) becomes a reality and this would surely be a great tragedy of our time. It is my wish that my granddaughter can grow up learning and communing with nature on the San Pedro Riparian NCA just as she has done for the first year of her life. She should continue to have a place where she can go and be with nature, without the worry of gun fire from hunters or contaminated water from livestock waste. To have a place of true tranquility with minimum human disturbance is not a gift but a necessity for the human spirit to survive&hellip; All people need the wonderful San Pedro Riparian National Conservation Area as a place of untethered beauty to exist, for their survival and for their growth as human beings.Sincerely,Heather L Swanson [REDACTED]</p> <p>ReferencesAllington, G.R.H., & Valone T.J., 2011. Long-term livestock exclusion in an arid grassland alters vegetation and soil. Rangeland Ecology Management 64(4):424-428.Arizona-Idaho Conservation Act of 1988, Public Law No. 100-696 November 18, 1988.Bock, C.E., J.H. Bock. 1993. Cover of perennial grasses in southeastern Arizona in relation to livestock grazing. Conservation Biology 7: 371-377.Brady, W. W., Stromberg, E.F., Aldon, C.D., S.H. Henry. 1989. Response of a semidesert grassland to 16 years of rest from grazing. J. Grazing Management 42:284-288.Coalition for Sonoran Desert Protection. 2001. Livestock grazing and the Sonoran Conservation Plan.Krueper, D.J. 1993. Effects of livestock management on Southwestern riparian ecosystems. Bureau of Land Management, San Pedro Riparian National Conservation Area.Krueper, D.J., Bart, & Rich. 2003. Response of vegetation and breeding birds to the removal of cattle on the San Pedro River, Arizona (USA). Conservation Biology 17(2):607-615.</p>	

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SPRNCA-I-246488	Undefined	Please protect the San Pedro Riparian National Conversation Area in its current state and do not allow increased grazing. Birders contribute to our economy and areas like this Globally Important Bird Area encourage tourism in our beautiful state. Please do not disturb and disrupt this unique habitat.	
SPRNCA-I-246490	Concerns in reference to Alternatives B & C	I am a retired Army and High School Teacher living near the San Pedro River. I am also a horse back rider, hiker and cyclist for the past 34 years; particularly along the San Pedro River. I recently had a family tragedy that had kept me from participating at your public meetings. Believe me I wanted to attend. Unfortunately, I am cutting this under the wire as they say. I am concerned with Altenative B & C for many reasons. I always must ask myself, "Does this make sense?" If it does not, my life experience has shown me that there are not good alternative motives in the mist. I love the San Pedro River, like many in Cochise County. I am not what I consider far left nor far right. I simply would like to see a nurturing and caring environment fo the river valley as well as a recreational avenue for the residence that live in this beautiful county. I have to ask, "Does this make sense?" when I read Altenatives B & C. I do not have problem with cattle on the San Pedro River. However, I do have a problem with fencing that affects wild life migration, and the use of chemicals to maintain weed control. With cattles comes the requirement of water. Additional wells to provide water for cattle must be provided. With all the concern of lowered water tables, civilian wells in jepordy, and additional evasive construction. I am aware of the history of the past of cattle on the San Pedro River. They were on the San Pedro River, and they did provide a way to reduce the fire hazards that do exist. Let's be real. There have now been decades of no clearing nor cattle. The issue had far surpassed what your Alternative choices have to offer. If the reason for cattle is weed control, or economics in the county of Cochise, you have missed your mark. There is presently tonage of very dry tinder along this river. You have a population of citizins, who given a chance would volunteer to clear land along the San Pedro. Do not scuff at this. It is not one of your Alternative Options that you have presented to the public. On the topic of hunting.Over the 34 years of riding, hiking and biking along the San Pedro River; I have not seen an increase in wild life. Quite the opposite has been occurring. Why in the world would hunting be allowed in an area that is depleted of wildlife? I am speaking of all wildlife; reptile, fish, bird and mammal. What use to be an adventure of seeing many types and multiples of same species has developed into a rarity. Please, please, please do not allow hunting along the San Pedro River. If hunters want game, the make a deal with the sate of Iowa for hunting turkey and deer. This particular and delicate eco system is on the threshold of loosing ground fast. This is not a hunters paradise. It needs to be protected by all that care about its survival. My third gripe, if you will afford me, is the present lack of maintenance of what we already have. There is a presumption from your hundreds of pages of documents that all will be well. What I have experienced over the past 34 years is that BLM has grandious plans, but not maintenance plan. If this county would simply set aside a few recreational areas that will be funded and well maintained. All the retirees in Cochise County would benefit. There is a four mile stretch just south of the San Pedro house that would benefit many if reestablished. This was a trail network that use to be very active with cyclists, hikers and horse back riders. Not it is over grown and with no use. Once apon a time I witnessed many citizens make use of this trail network. I need to conclude my concerns. I hope this will be reviewed. If you have questions please contact me Sincerely, Pam	
SPRNCA-I-246493	Comments attached	All of my comments are in the attached document	SPRNCA DRMP Comment AWebb 2018 Sep 26.pdf
SPRNCA-I-246494	Please Protect the SPRNCA	I am commenting to say that protection of the SPRNCA is your first duty. It is the BLM's directive to "conserve, protect and enhance the riparian area and the aquatic, wildlife, archaeological, paleontological, scientific, cultural, educational, and recreational resources of the conservation area." Allowing grazing in the SPRNCA would be counter to this purpose. Anything which degrades the riparian health would be counter this purpose. I don't see that any of the proposed alternatives, especially your preferred alternative, as reasonable options and demand a reconsideration of a new alternative that truly addresses the riparian health and enjoyment of SPRNCA. Grazing should not be an option. Climate realities need to be thoroughly researched. The San Pedro is the last free-flowing river in Arizona and the habitat in SPRNCA is irreplaceable. i love to hike and wildlife watch there as do many others. There has already been to much destruction of riparian habitat in Arizona. Please don't destroy more. Thank you.	
SPRNCA-I-246501	No to alternative C	Hello, there is not enough water to sustainably support alternative C. I'm against the digging of wells and alterations of the landscape. It is in direct contrast to your mission statement of preservation for future generations. I support alternative D and protecting our natural resources.	
SPRNCA-I-246503	Against Alternative C	This does not promote conservation of anything. We need to preserve habitats and our precious water sources. Alternative D is much better	
SPRNCA-I-246504	Undefined	I would recommend in favor of alternative D, and *against* alternative C. Alternative C, and specifically grazing, runs counter to the BLM's mission.	
SPRNCA-I-246505	BLM San Pedro Arizona	I do not agree with changing the use of the San Pedro area. I believe that it is a valuable natural area that must be preserved.	

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SPRNCA-I-246506	No to alternative C	I am instead for alternative D. The depletion of water is most alarming to me and it deserves to be protected. This beautiful natural landscape needs to be preserved
SPRNCA-I-246508	We want Alternative D	I am strongly against water depletion. Alternative C is the worst option if we want to perserve what the earth has to offer. Alternative D is the best option to thelp protect htis land.
SPRNCA-I-246509	No to Alternative C	Alternative C is by far not the best option: There is a loss of biodiversity through so many means if alternative C is chosen. Alternative D is a much better option because it promotes conservation and sustainable ideas and sets a good example for the future generations.
SPRNCA-I-246510	Undefined	CHOOSE ALTERNATIVE D
SPRNCA-I-246511	Undefined	I am against Alternative C and support Alternative D
SPRNCA-I-246512	Please Go Back To The Drawing Board	After reviewing this document I do not feel that any of the alternatives, including the proposed alternative, adequate follow the BLM's directive to "conserve, protect and enhance the riparian area and the aquatic, wildlife, archaeological, paleontological, scientific, cultural, educational, and recreational resources of the conservation area." To allow grazing on the last free flowing river in Arizona is counter to the directive the BLM is tasked with, fails to protect what little water Arizona has left, and imperils native species and habitats. I am shocked this document is the best this agency could produce and ask that none of these alternatives be selected, with a new alternative developed to adequately protect and conserve the San Pedro river.
SPRNCA-I-246513	Alternative action a must!!!	I choose alternative D. There is no reason this land needs to be adulterated. No purpose is more worthy that conservation of water and biological diversity.
SPRNCA-I-246514	Reconsider Alternative C	Hello, my name is Branden and I live in Tucson, Arizona. I find the BLM's choice to go with Alternative C to be very troubling and bad for the continued future existence and health of the San Pedro Riparian Area. I ask that they please strongly reconsider this decision.
SPRNCA-I-246515	Undefined	Hello, my name is Rebecca and I am a student at the University of Arizona and I want to address the issues around Alternative C. Alternative C would open the San Pedro to environmentally destructive acts that is against the whole preis of the Bureau of Land Management. I am urging you to rethink plan C because of impacts it would have on the land, diversity of plant species and animals as well as the quality and quantity of water. I am standing in solidarity with Alternative D which would protect the beautiful space and maintain its diversity. Thank you.
SPRNCA-I-246516	Undefined	I am in support of Alternative D as opposed to C as resource conservation is heavily important.
SPRNCA-I-246517	Undefined	I am against alternative c and i support D
SPRNCA-I-246518	Save the San Pedro, do not develop	Please do not continue with alternative C. We love nature and love our rivers and do not want them to dry up due to overuse and overdraft. We need restoration and environmental protection not destruction and development. Please put our nature first and not profit.
SPRNCA-I-246519	Alternatives Preference	I prefer alternative D; preserving the natural resources should be the number one priority.
SPRNCA-I-246544	Undefined	As recent visitors to southern Utah and Arizona, we are appalled by the extreme lack of resources such as water, and the high degree of erosion. We understand that the new changes to the Land Management Act will result in downgrading a National Conservation Area to a National Recreation area. This bill as stated entirely fails to protect the intact wilderness landscapes, such as Labyrinth Canyon, and Muddy Creek, which are some of the wildest places in the nation. Even if the entirety of Muddy Creek and Labyrinth Canyon were added to the legislation, 49% of lands with wilderness character iin the county would still be left unprotected. It fails to protect the San Rafael Badlands, which contain some of the most significant archaeological and cultural records available to the public , reflecting nearly 13,000 years of human history.. It rolls back existing Wilderness Study Area protections to facilitate coal mining. It allows the State of Utah to continue its federal court litigation seeking highway rights-of-way through designated wilderness, instead of resolving Revised Statute (RS) 2477 issues. This bill simply does not do justice to this incredible landscape. This bill would dramatically affect the landscape by use of heavy equipment, opening up roads, allowing hunting and trapping, and the use of herbicide across hundreds of acres. We support th benefits of Alternative D, and feel there shouldn't be more grazing, more wells, herbicide use, mesquite forest removal, heavy equipment manipulation use, hunting or trapping. Alternative C does not follow the laws' founding directive, and science has clearly shown that grazing is harmful to fragile species compromising food sources and shelter. Wells for livestock waste precious water. Alternative D follows tthe founding directive, conserve, protect and enhance. Enhanced vegetation saves precious water and no hunting preserves public safety from bullets and fire.

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SPRNCA-I-246550	Undefined	<p>Dear Sir or Madam: Please see my comment letter at the attachment. Thank you. Sincerely, [REDACTED]</p>	REDACTED Ltr Re Draft SPRNCA RMP.docx
SPRNCA-I-246557	SPRNCA COMMENT	<p>I purchased 60-acres of land that straddles a perennial section of the San Pedro river in 1984. The land was completely devoid of grasses, aquatic vegetation and low hanging shrubs. The only plants were old and tall cottonwood, willow and mesquite trees. In essence there was no vegetation from ground level to a height that cattle could reach or motorcycles could trample. The reason that there were only old trees and no younger ones at that time was because cattle had eaten everything and motorcycles had trampled and not allowed any new growth to occur.</p> <p>A few years later the federal government purchased much of the surrounding land, created the SPRNCA and started limiting grazing and ORV use. When I first purchased my property, I knew that it did not look natural and why, so I immediately began shoring up the fences to keep cattle and ORV's out. At the time I also considered planting cat-tails, rushes, reeds and other aquatic plants so that my land looked and functioned more like a normal and healthy riparian area. None of these plants were present at that time. Not too much longer (after the BLM kicked cattle and ORV's off of the SPRNCA) there was a miraculous appearance of vegetation on my section of river and for miles up and down stream. Most people probably don't remember, or never noticed what the San Pedro looked like just 30 years ago, or earlier. It was a much different place.</p> <p>Many years later, I sold all but 13 acres of that same land to the BLM. I wanted it to stay protected and remain as an integral part of the SPRNCA. Likewise, I thought that the BLM would manage it as the SPRNCA had conceived of this fragile land being properly managed. The BLM now wants to put cattle and ORV's back on the river.</p> <p>This would be a horrible mistake and a violation of the enabling legislation that created the SPRNCA. Of the four proposed alternative plans, Alternative D comes the closest to how the SPRNCA should be managed. I say closest in the sense that even Alternative D does not go far enough to protect and enhance the river (as the legislation mandates). The largest threat to the health of the river nowadays is the over draft of the aquifers that feed the surface flow of the river. I believe that the BLM should exercise its right to limit over-drafting of the surrounding aquifers by exerting its decreed water rights and put a moratorium on all new private wells in the Upper San Pedro Watershed.</p>	
SPRNCA-I-246584	Undefined	<p>The San Pedro is a place of wonder, enjoyment and an important water resource for surrounding communities and wildlife; THE SAN PEDRO MUST BE CONSERVED. DO NOT OPEN THE SAN PEDRO TO LIVESTOCK OR AGRICULTURE.</p>	
SPRNCA-I-246592	Comments on the Draft RMP/EIS	<p>Upon review of the Bureau of Land Management (BLM) Draft Resource Management Plan, it is my conclusion that the BLM's preferred alternative (alt. C) is completely out of alignment with the Arizona-Idaho Conservation Act of 1988, Public Law No. 100-696 November 18, 1988. Therefore, I would prefer that the San Pedro Riparian National Conservation Area future management be depicted by alternative D, along with the continuance of the exclusion of livestock grazing and the complete exclusion of hunting. This will allow my family to continue enjoying the SPRNCA for its tranquility, hiking, and botany experiences. Sincerely, Skye Estrella [REDACTED]</p>	
SPRNCA-I-246601	Undefined	<p>I have lived in southern Arizona my whole life, and have witnessed the urban development and its consequences in this region. I strongly believe that Alternative C should NOT be considered, due to the likelihood that it will cause animal waste to contaminate the already dwindling water supply, as well as negatively impact wildlife in the area. I acknowledge that opening the land to grazing and hunting might be economically viable, but these practices do not support the sustainability of future generations. Aside from the deterioration of water quality, active hunting in the area would deter people who just want to enjoy the natural beauty of the San Pedro Riparian National Conservation Area.</p>	
SPRNCA-I-246602	Grazing and Hunting	<p>Grazing: The RMP acknowledges the negative effects of grazing. In implementing alternative C, I would assume that it would be done on a trial basis. With regards to vegetation management, only native species should be planted.</p> <p>Hunting: I support an increase in areas that can be hunted but would restrict firearms hunting in areas of the heavily used trails. Some areas could be designated to shotgun only during bird seasons.</p>	
SPRNCA-I-246603	Leave it as is	<p>As a local resident that has enjoyed using the SPRNCA since moving to Sierra Vista in January, 2000, I believe that any change to the existing plan would have an adverse effect on the wildlife/nature opportunities this land provides. Over the past several years, my family has used the Riparian to hike, camp, and cleanup trash as part of a local Boy Scout troop, as well as volunteering with the Audubon society doing bird banding and performing the annual wet-dry survey. I would hate to see vehicle use, additional livestock grazing, and excessive hunting access</p>	

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		<p>cause irreparable damage to this pristine area, one of only a few natural places left to enjoy. As this is a major migration corridor and treasure of wildlife and resources, it should continue to be protected as it has been for the past 3 decades.</p>	
<p>SPRNCA-I-246608</p>	<p>Request for Changes to Alternative C</p>	<p>Dear Ms. Markstein,</p> <p>The San Pedro River has given me so much. It's been a home, a haven, a way to connect with the world and be part of something. I have learned about the world, watched plants and animals come and go and gained various perspectives on life along this river. I live in Saint David and this river is my neighbor, it abuts the property upon which I live.</p> <p>This river's ecosystem, my neighbors are in danger. There are many various threats to water and the life that relies upon it throughout the southwest, especially Arizona. And the life along this river has more than it's fair share of those. I am concerned that this BLM Draft RMP for the SPRNCA actually poses a threat to the San Pedro River ecosystem.</p> <p>While I understand that the enabling legislation is meant to protect the river and in no way is the DRMP meant to endanger this ecosystem, there are elements of the Alternative C that trouble me and I question whether the appropriate priorities are in order. While, I do understand that there are drastically opposing interests tied to the SPRNCA, and Alternative C does find a common ground on some issues, there are elements of this DRMP that have me questioning whether it will actually serve the purpose for which the enabling legislation SPRNCA was originally intended.</p> <p>Specifically, I'm concerned about the "Upland Vegetation" and "Transportation and Access." As for vegetation, I noticed that on "Wetland Vegetation" there is a phrase on p. 2-16, Objective 2: "Manage for a mixture ecological sites" I would like to see these words on p. 2-17, Objective 3, and I would like it to read: "In the Chihuahuan desert scrub vegetation community, manage for a mixture of ecological sites to increase species of native annual and perennial herbaceous plants, creating necessary habitat for every animal species other than cattle, who will thrive there, based on ecological site potential." I am concerned under Alternative C, the uplands would be open to grazing. Whether that happens or not, either way, I am perturbed to see the word "palatable" in 2 out of the 3 objectives for the uplands and question whether the RMP has the best interest of the SPRNCA or the cows in mind. Further, I would like to see an Objective 4 that reads "There is emphasis on improving the upland ecosystem to increase biodiversity on the SPRNCA, through developing more habitat for species other than cattle."</p> <p>As for "Transportation," on page 2-46 under "Land Use Allocations," #2, I respectfully request that the Alternative D option is used instead of Alternative C for that specific item. I have experienced primitive land, specifically along the SPRNCA, that is used by vehicles and seen how it negatively impacts the surrounding life, as well as the view. While it is important to have a few vehicular primitive roads and trails available for rare use in such occasions of emergency or to improve habitat through research and restoration, it is not necessary to have OHV in the SPRNCA for any reason under the enabling legislation. So, I request Alternative D in this matter, in order to adhere to the legislation as well as to protect those species whose homes are around these primitive roads and trails.</p> <p>As for the remainder of the document, when making final decisions, I just request that you keep in mind the health of the river, the hearts of the humans who love it, the species who rely on it, and the enabling legislation, in order to make the best decisions for the SPRNCA.</p> <p>Thank you for your time.</p> <p>Sincerely,</p> <p>Catie Armstrong</p>	

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SPRNCA-I-246609	Hunting in the SPRNCA	Opening the entire San Pedro Area to hunting will increase the potential for hunting incidents. It will also remove one of the things that makes the San Pedro River attractive to tourists. My wife and I like to walk around the San Pedro House, and along the river. So do many families with small children. Allowing hunting over the entire area will bring hunters in conflict with tourists - and cause tourists to leave. It won't be pleasant hunting either. I suggest that the back country and more remote areas be opened for hunting, and the more populated ones be closed for hunting. Also, per one BLM official, there is one AZ Game and Fish officer assigned to the San Pedro. That is not nearly enough to handle a drastic increase in hunting, especially near populated areas. I suggest increasing the number of officers to at least six full time to handle the demand.	
SPRNCA-I-246610	Livestock Grazing in the SPRNCA	Increasing the amount of grazing on the San Pedro will negatively affect tourism, which is an important concern of the State of Arizona - and Sierra Vista. My wife and I moved to Sierra Vista because of a previous birdwatching trip to the San Pedro. My mom and her friend both attended a nature trip this summer that went to the San Pedro. And I have personal experience leading trips to the Sierra Vista Environmental Operations Park - some of those trips have had a dozen participants who were visiting Sierra Vista explicitly for birdwatching, particularly in July and August. One advantage of the San Pedro River for tourism is that you can walk around without worrying about running into cattle or manure. Another is that you can view a non-degraded river bank, and the wildlife that uses it. Now, I have walked at Patagonia State Park, where the area is supposedly fenced off - but the fences are broken. I have shared the trails with 100 head of cattle. I have found a dead cow that got lost up a wash, and I have waded in the lake filled with floating cow manure. Patagonia State Park is advertised as a tourist destination, but I doubt any tourist would find its trails appealing. Patagonia is a state park, where cattle are prohibited. If managing one three mile fence for cattle is so difficult there, then there will be free-ranging cattle everywhere in the San Pedro once grazing is increased. These cattle will destroy the river banks and degrade the habitat, turning grass into mud as they do in every dairy pasture I've seen. A degraded river filled with cow manure is not an easy sell to tourists, and tourism will decline. Thus, I suggest that grazing be confined to those places it already exists, or barring that, be permitted in a few areas away from the river and definitely away from existing public use areas. This will minimize the amount of effect on the river bank and tourism dollars.	
SPRNCA-I-246614	Livestock Crossing Permits	Grazing erodes riverbanks and destroys their vegetation - this is obvious, but let's make it my personal observation growing up across from a dairy farm and fishing in the pond and stream. Many places along the river have banks five or more feet high. Since those places are not suitable for crossing, only the low places will be used, which are also the most popular for swimming and fishing access. These places will rapidly degrade, becoming mud on both sides, and hazardous to humans and cattle. Thus tourists will no longer have access to the easily-reached parts of the river, and after a short while the river crossing will become unusable, except by using heavy machinery to fix it. Given that their benefits are limited, and they severely degrade the river, livestock crossing permits should not be allowed across riparian areas.	
SPRNCA-I-246615	Off-Road Vehicle Recreation	The San Pedro River is a natural conduit for illegal immigration and drug trafficking. Allowing off-road vehicle travel in the area is a great boon for these criminals, as instead of walking, they can use ATVs. Right now, an off-road vehicle will draw attention, since they are forbidden. Once they are allowed, it will be easy for a smuggler to act like an off-road enthusiast. I suggest that if off-road vehicles are allowed on the San Pedro for recreation, law enforcement should be increased dramatically and BLM coordinate with the Border Patrol. It would be a good idea to stop and search off-road vehicles as well. Naturally, the law enforcement officers should have their own off-road vehicles.	
SPRNCA-I-246619	Preserve SPRNCA without harmful chemicals	Alternative D is my preferred choice for upcoming RMP. Alternative C, whilst appears to be balanced, has many complications to SPRNCA and its wildlife. First, the use of heavy machinery. Habitats would have higher probability of being damaged or destroyed due to the increase usage of heavy machinery. In addition, the noise would disrupt the activities of a variety of species. Second, Grazing. The grasslands in themselves are a habitat to many species. One of which is insects which other species rely on as a source of food. In addition, fencing for the cattle may restrict certain types of wildlife in reaching the river for water. Third, Pesticides. The use of pesticides would further intoxicate the land and potentially damage SPRNCA's wildlife permanently. The pesticides would eventually infiltrate the aqueducts poisoning the water not just for humans but the several other thousands of species which use SPRNCA as a water source. In addition, the cattle would consume the poisoned plants and become contaminated. When harvested, Humans would eventually accumulate even higher amounts of toxins damaging current and future generations. On another note, there is no saying that the native grasses would be able to make a full recovery. Many different species of birds migrate to SPRNCA almost year-round. Carrying seeds from other lands. An Ideal situation would be to limit grazing and usage of heavy machinery. Pesticide usage is dangerous for all wildlife and shouldn't be used to combat any alien plants. I would like to keep public access to SPRNCA where it is on its current system. In the end we are sharing the land with nature.	

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SPRNCA-I-246662	Problems with Alternative C / Preference for Alternative D	Alternative C does not focus on conservation and the protection of natural resources. It allows cattle grazing and increased use of ground water. Neither of these options are desirable. Also, Alternative C allows the discharge of firearms in the southern portion of the SPRNCA. This is a great threat to the safety of people using the SPRNCA for recreation (hiking, birdwatching) in the area between the San Pedro House and Hereford Road. Alternative D is a far better option. It focuses on natural processes and the use of "light on the land" management methods which will better protect the SPRNCA resources, both plant and animal. It allows for no livestock grazing -- "livestock grazing in riparian areas has the potential to degrade water quality" (from Section 3.2.2). It also provides for "fewest impacts on reducing ground water supply and degrading water quality" (from Conclusions, Section 3.2.2). It also protects vegetation and people engaged in recreation from firearm discharge.	
SPRNCA-I-246665	Propose Alternative C with exceptions (exclude grazing and herbicide use)	I would like to propose a hybrid to Alternative C that would exclude grazing and herbicide use. Other aspects including hunting, recreational use, etc. are ok. The grazing poses too much risk for increased water use, damage to the land through soil compaction and overgrazing. The use of herbicide is dangerous to the health of humans and wildlife both in the river and on the land.	
SPRNCA-I-246675	Alternative D with bits of C	My preference is heavily toward Alternative D, but open to elements of Alternative C. Generally, I think that the Conservation in SPRNCA is the priority. While I'm sure that pressure from Washington is heavily biased towards "Get the most uses out of it, particularly ones that benefit business", I don't think the majority of the local community feels the same way. I know that few of the people I know feel that way, and my circle is not the hippy eco-freak community by any stretch of the imagination. Until the SPRNCA has been restored ecologically, I oppose any grazing within the lands. Water that would be required to support livestock would be better used to maintain or increase river flow. Of course, "restored ecologically" could mean lots of things. My preference would be to see BLM research and publicize what the SPRNCA ecology was in the early to mid-1800's, possibly even as early as the Mexican land grants, then discuss what would be required to return the SPRNCA to that condition. The writings of the California Column (Colonel Stephen Kearney and Lt William Emory) and the photos of CS Fly would provide good sources. I would be open to limited use of heavy equipment to extract invasive species and work erosion control projects. I am open to continuing motorized vehicle access to sites and over roads that are currently in use, but opposed to any increased motorized traffic. Hike-in camping strikes me as acceptable, as does developing and protecting existing archeological sites. In ten or twenty years, as the restoration projects take effect, then more development will make sense. Still, however, that development should be both secondary to conservation and focused on recreational and historical/archeological efforts.	
SPRNCA-I-246678	Preferred Alternative D is closer to the intent Order 3308 than Alternative C	I wish to comment that Alternative D should be the preferred alternative to conserve, protect and restore a nationally significant strip of riparian habitat that is the San Pedro National Conservation Area. We need to continue 30 years of natural enhancement, save precious water for the river (2.5M gallons per year) by not pumping water for cattle, protect fragile plants and animals and protect the public from hunting. Fiscally Alternative D is also the wiser choice. Costs that Alternative C would incur with the erecting of 43 miles of fencing, 23 new wells for livestock, the costs of herbicides and the costs of the use of heavy equipment. Save money, save the ecosystem and save the research done so far on the precious ribbon of life sustaining a riparian habitat. I also don't accept that hunting can coexist with the current public uses of the land namely nature walks and bird watching done by bird watchers, school children, tourists and community members. And I'm worried that e-coli from cattle waste finding it's way to the river with storm in runoff will not be controllable. Out of all of BLM's grazing land, does an area especially set aside for riparian species and ecosystems, need also to have to adapt to cattle? I think not. Lower precipitation and higher temperatures are already challenging the SPRINCA from where it stood 30 years ago. The cowboy culture can exist through private lands and other leases with the BLM without spoiling an extremely precious and extremely globally important riparian corridor. Home, home on the range where the deer and the antelope. Natural unspoiled areas are a much of cowboy and Western culture as it cattle grazing. Let's not play loose and fast with our national conservation areas and our hemisphere's biodiversity.	
SPRNCA-I-246703	Preserve the SPRNCA	BLM needs to protect and preserve the last free-flowing river in Southern AZ. Not only because it's the right thing to do, but also because the recreational opportunities (hiking, birding) it provides support the area economically. The habitat is crucial for all the flora and fauna that call it home. At some point, the environment needs to take priority, or soon there will not be one to protect. Assuming this comment falls on deaf ears, please provide a more viable "alternative" than the one presented. Thank you.	
SPRNCA-I-246707	Alternative Option - Combination of Alternative A & C	Thank you for considering my attached comments.	Janices Beam's SPRNCA comments to BLM.docx
SPRNCA-I-246709	Alternative C without new cattle expansion	Thank you for considering my attached comments.	Joe Beam's SPRNCA comments to BLM.docx

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SPRNCA-I-246716	Advocate for Alternative D	<p>To Whom It May Concern,</p> <p>I am a resident of Sierra Vista, and frequently drive Highway 90 through the SPRNCA, and sometimes stop to walk there. I have lived in this area since 1970, and have watched the riparian area spring back from total wasteland, when it was overgrazed. BLM's purpose is to be good stewards of the land. If you favor the declining ranching industry (our children/grandchildren will eat much less beef and pork, and ranching in this climate is not a sustainable practice with current methods) over the best interests of the wider public (preserving the recharge area, allowing the land to continue to rest and heal), BLM is not serving the public's best interest. I beg you to implement Alternative D.</p>	
SPRNCA-I-246725	Conserve the SPRNCA	<p>The San Pedro River National Conservation Area is a national treasure. It is one of the last free-flowing perennial rivers in the southwest and our last in southern Arizona. It provides very important habitat for many species of migrating birds as well as resident populations of many species. I visit this area to hike and to observe wildlife. Protecting this area requires assuring adequate water to keep it flowing. This means that the federal government must exercise and defend its water rights. This means opposing increases in groundwater exploitation in the San Pedro Valley. Groundwater is directly connected to a healthy flow in the river. Future climate change must also be considered in planning for the river and its flow. Cattle grazing is not an appropriate use of the national conservation area. Because of their behavior patterns, cattle tend to concentrate at times along the river, degrading water quality and habitat. None of your alternatives adequately protect this irreplaceable critical habitat. Please reconsider your alternatives and create one that adequately protects this river. Sincerely, Glenn Furnier</p>	
SPRNCA-I-246727	Cattle grazing is not conservation.	<p>The SPRNCA DRMP asks for public comment, so this is mine. When I log on to your website, the very first statement that pops out to me is this: "The San Pedro riparian area, containing about 40 miles of the upper San Pedro River, was designated by Congress as a National Conservation Area (NCA) on November 18, 1988. The primary purpose for the designation is to protect and enhance the desert riparian ecosystem, a rare remnant of what was once an extensive network of similar riparian systems throughout the Southwest." That's your mission statement, your reason for existing as an organization. Looking at the four options outlined in your plan, two of them are in direct conflict with that mission statement. Alternative B would open all of the conservation area to grazing, Alternative C would open more of it to grazing, and throw hunting and road building into the mix. Neither of these options 'protect and enhance the desert riparian ecosystem.'" They would only modify, and degrade that ecosystem. Adding "more palatable" (to cattle) grasses into the ecosystem reduces the natural grasses and other plants that are native to the area...the very plants that you are tasked to conserve.</p> <p>The past thirty years have been a success for the SPRNCA, and continuing the management practices of the last three decades (Alternative A) would be at least minimally acceptable, but you could better "enhance" the desert riparian ecosystem by removing the cattle from the land entirely (they are simply not a natural part of that ecosystem), and then gently mitigating the effects they have had on the land through careful restoration.</p> <p>A recent study published by the National Academy of Sciences found that 60 percent of all mammals on Earth are those raised for livestock. Those few species of animals, plus the 36 percent of mammals that are humans, mean that the total of all WILD mammal species, like the foxes, beavers, squirrels, coyotes, mice, voles, etc. that are native to the San Pedro River environment make up only 4% of the mammals on Earth. 70% of all birds are farmed, with only 30% of birds on Earth being wild. Those few depend quite heavily on the SPRNCA as a bird migration corridor, as is well known throughout the southwest.</p> <p>This situation has worsened considerably, in the last 40 years, as animal populations worldwide have decreased by 58% , worldwide, in that time. Continuing on our present path is not enough. I recommend adopting Alternative D, removing the livestock grazing on SPRNCA land, and improving the natural, native, riparian ecosystem through light impact restoration methods.</p> <p>Lawrence Hargis, [REDACTED]</p>	
SPRNCA-I-246732	State of Arizona Attorney General Comment Regarding Notice of Availability of the Draft San Pedro Riparian National Conservation Area Resource Management Plan and Associated Environmental Impact Statement	State of Arizona, Attorney General Comment Regarding the Notice of Availability of the Draft San Pedro Riparian National Conservation Area Resource Management Plan and Associated Environmental Impact Statement	Arizona Attorney General's Comment Re San Pedro.pdf

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<p>SPRNCA-I-246734</p>	<p>Comments from Cascabel Conservation Association</p>	<p>The Cascabel Conservation Association (CCA) appreciates the opportunity to comment on the Draft San Pedro National Riparian Conservation Area (SPNRCA) Resource Management Plan (RMP). CCA is a non-profit organization with over 150 members located in the community of Cascabel in the Middle San Pedro River Valley. We are dedicated to the collaborative stewardship of the Middle San Pedro River watershed in a way that promotes the health, stability and diversity of the whole community, including its earth, waters, plants, and animals. We strive to integrate the needs of the land with the needs of a sustainable human community through educational, economic, agricultural, contemplative and other conservation-related endeavors. Our primary concern is that the intent of the enabling legislation be followed: SEC. 102. (a) GENERAL AUTHORITIES.-The Secretary shall manage the conservation area in a manner that conserves, protects, and enhances the riparian area and the aquatic, wildlife, archeological, paleontological, scientific, cultural, educational, and recreational resources of the conservation area. Such management shall be guided by this title and, where not inconsistent with this title, by the provisions of the Federal Land Policy and Management Act of 1976 (hereinafter in this title referred to as "FLPMA"). (b) USES.-The Secretary shall only allow such uses of the conservation area as he finds will further the primary purposes for which the conservation area is established. [Emphasis ours] We are very concerned that some of the new directions indicated in the BLM's Preferred Alternative C are not supported by the above cited legislation. Foremost among our concerns is the proposal to increase grazing in SPRNCA to include about half the conservation area, with all the attendant fencing and other improvements that would be required. The enabling legislation does not mandate grazing and no justification is given for how grazing would help to meet the goals of the enabling legislation. While CCA approves of the concept of restoration of habitats, and the re-establishment of native vegetation, as envisioned in Alternatives B and C, details of how this would be done are minimal and there is no indication of how funding would be obtained from Congress to pay for expensive, labor-intensive treatments. Since these treatments seem integral to Alternatives B and C in order to compensate for and mitigate the negative impacts of grazing, this lack of planning for funding makes these Alternatives seem unrealistic at best. Likewise, we are opposed to opening SPRNCA to increased hunting and ORV use. While the enabling legislation mentions "recreational resources," it does not specify which ones, but does state clearly that only such uses are authorized which would further the primary purposes for which the conservation area was established. Furthermore, a thriving economy has arisen around birding, wildlife watching and other natural history uses, which are not compatible with increased hunting and ORV use. In lieu of comments on specific sections of the RMP, we incorporate by reference the comments of the Lower San Pedro Watershed Alliance. If the above elements of the Preferred Alternative C cannot be changed, we would recommend Alternative D as a much better fit with the mandate to conserve, protect and enhance this conservation area. Thank you, Pearl Mast Anna Lands Co-chairs, Conservation Committee Cascabel Conservation Association [REDACTED]</p>	<p>CCA Comments, SPRNCA RMP.pdf</p>
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<p>SPRNCA-I-246737</p>	<p>Southeastern Arizona Bird Observatory comments on San Pedro Riparian National Conservation Area Resource Management Plan</p>	<p>Thank you for the opportunity to comment on the proposed Resource Management Plan for the San Pedro Riparian National Conservation Area. We know this has been a long process with many participants and we appreciate the time and effort that has gone into the alternatives presented. The SPRNCA is truly a national treasure and represents the best of the public lands that are entrusted to the BLM for management. Our organization, the Southeastern Arizona Bird Observatory, has had a Memorandum of Understanding with BLM for cooperative programs on the SPRNCA since 1996 as well as a Special Use Permit for research and Interpretive tours since 1996 as well. Our research and many of our tours depend on a healthy riparian system to exist. We are speaking on behalf of our membership from around the U.S. and the many people we introduce to the river when we say that the SPRNCA is too precious and fragile to subject to heavy-handed management. We have watched the river recover under BLM's management from the abuses of the past since the establishment of the conservation area. Among the proposals outlined in the alternatives, several stand out as counter to the establishing legislation and stated mission of the SPRNCA. One of the most dramatic recoveries on the river has been a result of the grazing moratorium. Despite the ongoing problem of trespass cattle, the understory and wildlife diversity recovery has been impressive and well-documented. Dave Krueper's research on the recovery of bird species after cattle were largely removed is proof enough of the impact of grazing on the diversity for which the riparian area was protected. We are particularly qualified to comment on this since we conducted a MAPS (Monitoring Avian Productivity and Survivorship) bird banding project from 1996-2001 on the San Pedro River south of the SPRNCA in Mexico where cattle are allowed on the river. The difference in vegetation and bird diversity is remarkable. No one would be going to the San Pedro in Mexico for hiking, birding or nature study. Economically, increasing grazing on the Conservation Area makes no sense. Many of the interior fences have been removed, and to achieve the stated management of grazing only the uplands will require tens of thousands of dollars to build fences and water features away from the river. This will benefit only a few lessees who will pay less than five cents a day per animal unit to utilize the public land that belongs to us all. In contrast, The Southeastern Arizona Bird Observatory pays six dollars a day per person to take hikers on guided tours where every effort is made to minimize our impact. Wildlife watching is a billion-dollar industry in Arizona, and Cochise County and the San Pedro River are at the heart of that tourism industry. To jeopardize that to benefit a handful of ranchers is foolish at best. Another concern is the expansion of hunting on the SPRNCA. BLM is rightly concerned about public safety as was evident in the quick action at the San Pedro House concerning the hazard presented by the aging cottonwood trees. To then propose opening to hunting areas that are used by school field trips, hikers, birders, and dog walkers seems short-sighted. To be clear, we are advising the BLM by this comment that expanding the hunting area poses a serious public safety risk for which they may be held liable. Again, hunters in Arizona comprise less than 5% of the population, much fewer than hikers, photographers and birders. The BLM website states that 99% of BLM land is open to hunting. Do we really need to add to that? The current hunting boundaries seem to work fine for everyone, why change them? Although studying and proposing a wide variety of management strategies for the SPRNCA is an interesting and necessary exercise, realistically and practically, the realities of budget and staff must enter into the equation. We have watched over the years as the staff of the SPRNCA fell from 10 or more to 8 to 6 until now the Sierra Vista Office is nearly empty with SPRNCA and Las Cienegas sharing 2 people. Without the efforts of dozens of dedicated volunteers of the Friends of the San Pedro most programs would be abandoned. Budgets and staff are unlikely to increase anytime soon, and BLM must do the best with what they have. The river ecosystem would be best served by Alternative D, a completely hands-off policy or at least the present management Alternative A. Any proposal that requires additional BLM management is doomed to failure, and the river is too important to the people and the wildlife of the area and the entire United States for that to be allowed to happen. Again, thank you for the opportunity to comment on the SPRNCA RMN. Tom Wood, Director Southeastern Arizona Bird Observatory [REDACTED]</p>	
<p>SPRNCA-I-246738</p>	<p>SPRNCA Use comment</p>	<p>I agree with the removal of the special protection classifications of the areas within the SPRNCA since this will ultimately increase their protection and simplify the management. I appreciate the suggested best option as it allows for looking into the use of the land as a resource. I ask that the study (presented during the conference in Sierra Vista) on the water contamination from cattle grazing be evaluated and investigated prior to any grazing leases being let. At no point should current grazing be curtailed or not renewed. They should remain grandfathered.</p> <p>The one thing that I specifically do not believe should be incorporated into the SPRNCA is ATV use. I believe that this function could be facilitated on other less sensitive BLM managed land rather than within the SPRNCA managed areas.</p> <p>Another concern that was brought up that I would like incorporated into the updated plan is firearm use. It was stated that this is the only BLM managed area that does not allow for firearm use. I do not recall if that was within Arizona managed areas or throughout BLM as a whole. I know this is an emotional issue for some, but it was stated that there has not been a gun safety issue in the rest of the BLM areas that allow for it. Thank you for your time and efforts.</p>	

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SPRNCA-I-246738	SPRNCA Use comment	I agree with the removal of the special protection classifications for the areas within the SPRNCA since this will ultimately increase their protection and simplify the management. I appreciate the suggested best option as it allows for looking into the use of the land as a resource. I ask that the study (presented during the conference in Sierra Vista) on the water contamination from cattle grazing be evaluated and investigated prior to any grazing leases being let. At no point should current grazing be curtailed or not renewed. They should remain grandfathered. The one thing that I specifically do not believe should be incorporated into the SPRNCA is ATV use. I believe that this function could be facilitated on other less sensitive BLM managed land rather than within the SPRNCA managed areas. Another concern that was brought up that I would like incorporated into the updated plan is firearm use. It was stated that this is the only BLM managed area that does not allow for firearm use. I do not recall if that was within Arizona managed areas or throughout BLM as a whole. I know this is an emotional issue for some, but it was stated that there has not been a gun safety issue in the rest of the BLM areas that allow for it. It should be a part of the new plan! Thank you for your time and efforts.	
SPRNCA-I-246744	In Support of Alternative D	Out of the 4 Alternatives offered, I strongly support Alternative D. I support Alternative D because it protects the San Pedro River National Conservation Area at a status level that it warrants and richly deserves. Alternative D would create 23,000 acres as wilderness while also designating areas of the river as "Wild and Scenic River" status which would cause "light on the land" restoration methods to be implemented (like natural processes). Also, I support Alt D because it would terminate livestock grazing in the area and limit motorized vehicle use. Many people, including your agency, have worked many years to achieve the current conditions at SPRNCA and no grazing or vehicle traffic will continue to heal the land and water quality and watershed. Lastly, I support Alt D since it would designate 5 areas as "ACECs" (Areas of Environmental Concern) equating to reintroducing species that were once present in the area, including plants.	
SPRNCA-I-246748	SPRNCA Alternative recommendation	I would like to see public access to the SPRNCA increased to all stakeholders, not just a limited few who want the public to pay the bills, but not reap the rewards or enjoyment of the area. I recommend Alternative C-Balance appropriate use levels with established conservation values, balancing resource protection, public access, livestock grazing and recreation. Grazing can help reduce fires, and with proper management (good fencing, etc) can have a positive effect on the environment.	
SPRNCA-I-246750	WWP and Sierra Club 2018 comments on DRMP/DEIS	Attached are the comments of Western Watersheds Project and the Grand Canyon Chapter of the Sierra Club. I will also be providing a hard copy of these comments and a DVD with all of the attachments and references to BLM's Tucson office.	WWP 2018 Comments on the DRMP DEIS Sept 27.pdf

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SPRNCA-I-246752	Comments on SPRNCA DRMP Vol I	<p>27 Sep 2018W. HWY 80Bisbee, AZ 85603Amy Markstein USDI-BLM3201 E. Univeral Way Tucson, Arizona 85756via email: amarkstein@blm.govDear, Ms. Markstein,I would like to begin by expressing my utter disappointment with BLM's proposed management alternatives for SPRNCA presented to the public. Alternatives A-C focuses on allowing destructive activities that counters the directive to protect and conserve the San Pedro River natural ecosystems.If I had to choose one of the proposed alternatives, I would prefer Alternative D. I believe alternative D aligns closest with the goal to preserve and conserve.I moved to this county for it's natural beauty. I live along Banning Creek. I enjoy observing the bird migrating seasons and cherish the biodiversity in our canyons. My granddaughter lives with us and I strive to model stewardship to our small acreage. My intention is that she may enjoy sharing it with her future family.Our family visits the San Pedro River frequently. We take the opportunity to teach my granddaughter the value of respecting and understanding the natural ecosystem. I would be horrified to hear gunshots, to see littering lead bullets or to know cruel traps are set or we may encounter unleashed hunting dogs. I would not feel safe if hunting by gun, dogs, traps or bow were allowed in the SPRINCA.The idea to allow more cattle grazing is an absurd proposition for the SPRNCA. Increased fencing will interfere with the wildlife access to water, food and shelter. Fences do fail. That is how I have learned first hand on our property how destructive cattle can be on the soil and vegetation. The plan to remove existing vegetation to make way for palatable grasses for cattle grazing is also ridiculous. Accommodating the ranchers in the county only benefits a few while the delicate ecosystem suffers.I'm dismayed that herbicide use would be considered to suppress "invasive/noxious weeds" as needed, leaving an opening for multiple interpretations for "as needed". The synthetic herbicide industry has proven to lie about the safety of their products. A great number of lawsuits are underway. The end does not justify the means. Just say no to the use of pesticides in the SPRNCA.I watched the deterioration of the Hot Well Dunes near Bowie, AZ. My last visit was over a decade ago. The camping, RV and ATV activity destroyed the natural landscape, vegetation, and the peaceful experience I was looking for. Another example is what happened to the Dells in WI. Many years ago I discovered beautiful B&W photos taken in the Dells in early 1900s so when I was traveling in the area, I planned to spend a day there. Between the time the photographs were taken and the time I visited a carnival culture took over. Lets nip the thoughts of profit or capitalizing on public interest in the SPRNCA area right now. I strongly oppose any plans that allow what I call, "loving the SPRNCA to death." Limit the human activity for the purpose of education and research.I value the last free flowing river in the southwest. I value the birds and animals that live there. I appreciate the decades of effort by all concerned parties to restore the SPRNCA. I learned a great deal during the time I volunteer with the Bird Branding project. The stresses imposed on the area; climate change, sewage seeping in from the south, historical mining operations toxic containment breaches, and population growth is already more than enough to greatly challenge our beloved river. Build on the existing conservation effort by limiting human activities. Human activities caused the concern for conservation in the first place. Honestly, I think more thought toward conservation is needed for the SPRNCA management plan.Finally, I appreciate how the BLM SPRNCA management plan considers how changes will affect the local citizen's experience with the riparian and historical areas. More important to me is the millions of migratory birds that are dependant on the availability of crucial natural resources to reach their final destination for nesting or overwintering sites. It's about survival of a species for them. We have other recreation areas to choose from. The birds don't.Sincerely,Carol Taylor</p>	
SPRNCA-I-246753	EPNG Comment on Draft RMP/Draft EIS for SPRNCA	EPNG Comment on Draft RMP/Draft EIS for SPRNCA - See attached.	EPNG Comments Draft RMP for SPRNCA.pdf
SPRNCA-I-246758	Audubon Arizona and Tucson Audubon Society	<p>Comments on: ISSUE-SPECIFIC COMMENTS 2.2.3 Alternative C (Preferred Alternative) Livestock Grazing 2.5.1 I MANAGEMENT ACTIONS AND ALLOWABLE USES: UPLAND VEGETATION (CHIHUAHUAN DESERT SCRUB AND GRASSLANDS) Page 1-13 Section 1.8.3; Pages 3-40 through 3-99 WATER MANAGEMENT VEGETATION MANAGEMENT: RIPARIAN VEGETATION COMMUNITY ECONOMIC IMPACT OF SPRNCA</p>	AuAz_TAS_SPRNCA_DRMP_09272018).docx
SPRNCA-I-246772	ADEQ Comments on Management Plan	Please see PDF attachment.	ADEQ_BLM_comments_FINAL.pdf
SPRNCA-I-246779	Possible Error with Visual Resources data on Alternative A	<p>The Visual Resource total for Alternative B, C, & D is 55,990 on table ES-2 yet Alternative A's total is 25,990. A difference of 30,000. The Visual Resource total for Alternative B, C, & D is 55,990 on table 2.5.9.C yet Alternative A's total is 43,870. A difference of 17,880. Please verify that these tables are correct and make any necessary adjustments.</p>	

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SPRNCA-I-246784	Very against the proposed action on San Pedro river	Alternative D should be the only option the BLM is considering. This area needs to be protected as much as possible! Alternative C should not be taken!!!! I fear that not only will alternative C be bad for the community but it will cause extreme strain on the few water resources available in this area. It will deplete what little is left of the natural habitat and it will put many animals in danger.As a member of the community, I want to feel safe in the public land that belongs to all of us and the possibility of hunters accidently firing near innocent people is EXTREMELY UNACCEPTABLE!OUR WILDERNESS NEEDS TO BE PROTECTED. THE BLM IS MEANT TO SERVE THE GREATER INTERESTS OF THE AMERICAN COMMUNITY AND CHIPPING AWAY AT OUR NATURAL AREAS IS NOT THE WAY TO DO THAT.!	
SPRNCA-I-246786	Comments from Tucson Audubon, Audubon Arizona and American Bird Conservancy	Comment is too long for page. Please see attachment.	TAS_AuAz_SPRNCAdraftRMP92718.docx
SPRNCA-I-246787	Comment Letter from Sky Island Alliance	Please see attached comment letter.	SIA SPRNCA Comments 9_27_18.docx
SPRNCA-I-246793	Draft SPRINCA RMP/EIS	I STRONGLY URGE THE ADOPTION AND IMPLIMENTATION OF BLM'S PLAN D FOR THE SAN PEDRO RIPARIANNATIONAL CONSERVATION AREA BECAUSE; IN CONTRADISTINCTION TO PLAN C; IT FOCUSES ON THE PROTECTION OF RESOURCES AND THE CONSERVATION OF THEM NO LIVESTOCK IS ALLOWED IT AIMS FOR THE CONTINUED CREATION OF LANDS WITHWILDERNESS CHARACTERISTICS NO HUNTING OR TRAPPING WILL BEPERMITTED NO NEW ROADS WILL BEPERMITTED, BUT: RECREATIONAL USE BY HUMAN BEINGS COMPATIBLE WITH STATED PURPOSE OF THE SPRINC WILL BE ALLOWED HEAVY EQUIPMENT WILL BE ALLOWED ONLT FOR FIRE FIGHTING IT IS UNFORTUNATE THAT HERBICIDES WILL STILL BE PERMITTED-- AND I STILL STRONGLY OPPOSE THAT. NB; IN A PREVIOUS HANDWRITTEN LETTER, I LISTED MANY--BUT NOT ALL-- OF THE DELETEROUS EFFECTS OF THE BLM's PLAN C, WHICH PLAN SEEMED TO HAVE ALMOST LITERALLY DESIGNED TO UNDO DECADES OF SUCCESSFUL REHABILITATION	
SPRNCA-I-246793	RE SPRINCA PLAN; PREFER D	THE BLM's MANAGEMENT PLAN D FOR THE SAN PEDRO RIPARIAN NATIONAL CONSERVATION AREA IS FAR SUPERIOR TO THE CURRENTLY FAVORED PLAN C, WHICH (PLAN C) MIGHT LITERALLY HAVE BEEN DEVISED TO DESTROY DECADES OF SUCCESSFUL REHABILITATION OF THE SAN PEDRO.IN PARTICULAR, PLAN D:FOCUSES ON PROTECTION OF RESOURCES, AND ON CONSERVATIONALLOWS NO LIVESTOCK GRAZING, WHICH COULD WITHOUT ANY OTHER NEGATIVE IMPACT RUIN THE SPRINCAENCOURAGES THE CREATION OF LANDS WITH WILDERNESS CHACTERISTICSALLOWS NO HUNTING OR TRAPPINGALLOWS NO NEW ROADSALLOWS HUMAN USE COMPATIBLE WITH SPRINCAONLY EMERGENCY USE OF HEAVY EQUIPMENT	
SPRNCA-I-246793	Undefined	THE BLM's MANAGEMENT PLAN D FOR THE SAN PEDRO RIPARIAN NATIONAL CONSERVATION AREA IS FAR SUPERIOR TO THE CURRENTLY FAVORED PLAN C, WHICH (PLAN C) MIGHT LITERALLY HAVE BEEN DEVISED TO DESTROY DECADES OF SUCCESSFUL REHABILITATION OF THE SAN PEDRO. IN PARTICULAR, PLAN D: FOCUSES ON PROTECTION OF RESOURCES, AND ON CONSERVATION ALLOWS NO LIVESTOCK GRAZING, WHICH COULD WITHOUT ANY OTHER NEGATIVE IMPACT RUIN THE SPRINCA ENCOURAGES THE CREATION OF LANDS WITH WILDERNESS CHACTERISTICS ALLOWS NO HUNTING OR TRAPPING ALLOWS NO NEW ROADS ALLOWS HUMAN USE COMPATIBLE WITH SPRINCA	

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SPRNCA-I-246793	Undefined	THE BLM'S MANAGEMENT PLAN D FOR THE SAN PEDRO RIPARIAN NATIONAL CONSERVATION AREA IS FAR SUPERIOR TO THE CURRENTLY FAVORED PLAN C, WHICH (PLAN C) MIGHT LITERALLY HAVE BEEN DEVISED TO DESTROY DECADES OF SUCCESSFUL REHABILITATION OF THE SAN PEDRO. IN PARTICULAR, PLAN D: FOCUSES ON PROTECTION OF RESOURCES, AND ON CONSERVATION ALLOWS NO LIVESTOCK GRAZING, WHICH COULD WITHOUT ANY OTHER NEGATIVE IMPACT RUIN THE SPRINCA ENCOURAGES THE CREATION OF LANDS WITH WILDERNESS CHACTERISTICS ALLOWS NO HUNTING OR TRAPPING ALLOWS NO NEW ROADS ALLOWS HUMAN USE COMPATIBLE WITH SPRINCA	
SPRNCA-I-246795	Entire document	Dear SPRNCA RMP/EIS Team,Environmental activism is not about self-gain nor self-enrichment. There is almost nothing to be gained by the people who defend nature. It's a service to us all and to all of life. It is tirelessly done by a few for the benefit of all. In the absence of healthy functioning ecosystems that oxygenate the air, clean the water, decompose detritus, revitalize our soils along with countless other ecological "services," the human species will ultimately perish. We may think of ourselves as independent from nature, but this is a faulty, species-centric perception. We are as interconnected with nature as are the ants, the trees, the bacteria. If we do not protect nature, we will perish along with the nature that we permit to die. When you talk about "stakeholders" you're talking about people who want to take something from the SPRNCA. Environmentalists only wish to follow the enabling law of the SPRNCA. That puts them are on your side. I believe the most expedient way to acknowledge this is to change your preferred alternative from C to D, and clean up D so that it strictly complies with the enabling law. The stakes ultimately are the survival of complex life on the planet. Responsible management of the SPRNCA is how we can do our part in Cochise County. It's time to embrace what is unpopular, but what is right. I encourage you to ask the environmental community for help. We need to work together.Sincerely,Sharon Rock	
SPRNCA-I-246796	Pascua Yaqui Tribe Comments	The attached are the comments of the Pascua Yaqui Tribe	Comments.docx
SPRNCA-I-246802	Livestock Grazing	Alternative D is preferred as Livestock Grazing should be prohibited in order to protect the SPRNCA riparian area, BLM Gila District encompasses over 2 million acres and there is sufficient area open to Livestock grazing.	

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SPRNCA-I-246805	Brief General Comment	<p>Most of my work on this document has been presented in the collaborative work submitted by the Community Watershed Alliance. These comments are my own and may not reflect entirely the views of the CWA.</p> <p>First I would like to recognize the effort and time by the people involved in creating this document. Having participated on and off with the BLM in issues related to the SPRNCA since the early 90s I know a little about some of the issues that needed to be dealt with.</p> <p>My overall preference for the presented alternatives is B. This is because B provides the broadest and greatest flexibility for managing the SPRNCA. Alternative D is nothing but the fantasy of preservation with little to no actual managing, restricting or preventing virtually any action to maintain or enhance the SPRNCA. While Alternative B may appear to some as "giving away the store" it actually gives the BLM and partners the maximum flexibility to meet its varied mandates, goals and objectives. Alternative C sounds like a reasonable compromise on the surface, but in reality it doesn't accomplish the objectives of either real management or the "leave it to nature" perspective.</p> <p>My main concern with this document has to do with the apparent perception that livestock are only used for extractive purposes, to profit individuals. Further is the public perception that livestock are inherently destructive. While there were a few mentions of conditions improving under the presence of livestock there is really very little acknowledgement of the potential benefits in using livestock as tools to improve and enhance conditions that are listed as goals and objectives in this draft RMP. Livestock do not just make trails and eat grass. Through various management actions they can be used to heal cut banks and other erosion, manage fuels, control brush, prepare soil for seeding, even spread desirable seed. Livestock are the easiest large animal for humans to manage in working to enhance the functioning of ecosystems, especially in the arid west. When done well, bare ground and soil erosion is reduced, plant vigor and nutritive value are enhanced, dry fuels are cycled into the soil rather than contributing to catastrophic fires, water absorption and infiltration is improved, springs and seeps appear or enlarge, landscapes are maintained. Livestock need to be considered in this document and in general for wider purposes than what one puts on a grazing allotment. There needs to be provisions for using this tool in restoration, fuels management, landscape maintenance and other projects or objectives. Alternative B at least allows the possibility to look at this (and any) management tool.</p> <p>My second concern has to do with people. Historically and indeed prehistorically, the San Pedro River has been a working landscape. Farming and ranching and even hunting and fishing are not something that should be shunned and excluded. They are a part of the culture of this area and should be recognized (protected and enhanced?) just as any other cultural resource should. These activities also provide much needed values to the area, not just economic ones. Open space, maintenance and protection of buffer areas, landscape stability and continuity, historical knowledge, place knowledge, are all important attributes contributed by people that live and work here. I would like to see more credit given to this population. They are becoming rare and threatened too.</p> <p>Please consider the use of livestock as a tool, and remember to include the traditional culture of the area when considering the matter of the resources that exist here.</p> <p>Thank you, Kali Holtschlag</p>	
SPRNCA-I-246806	San Pedro Riparian NCA grazing: OPPOSITION	<p>To whom it may concern, Bureau of Land Management, Re: Grazing of livestock in the San Pedro Riparian NCA We do not wish to see livestock grazing in the SP Riparian NCA. In fact, we want: No cows. The uplands are key to the river recharge and riparian function, and the BLM must manage to enhance the San Pedro Riparian NCA, not degrade it. There is already ongoing degradation from trespass livestock in the river corridor, and more cows in the area will likely result in even more unauthorized use. The existing allotments should be closed and the entire area should be given the protections Congress intended. No new fences. The entire area is a haven for wildlife and adding more miles of barbed wire will fragment, fracture, and impair this special place. Even "wildlife friendly" options are dangerous to native wildlife and disruptive to recreational users. No new wells. The San Pedro River is already extensively overdrawn and suffering severe declines. Pumping more water out of the system for livestock is an unreasonable and inefficient use of precious resources. No way. Multiple use doesn't mean every use in every place. These lands are set aside for the purposes of conserving, protecting, and enhancing irreplaceable resources, and the BLM cannot allow uses that degrade these important values. The American people value their wildlife and wild lands. We want them protected. No grazing of cattle in the San Pedro Riparian NCA! Sincerely, Kelly R Sweeney</p>	
SPRNCA-I-246809	Livestock Grazing benefit a few	<p>Alternative D is preferred as Livestock Grazing would benefit a few politically connected ranchers while excluding the general public from our public lands.</p>	
SPRNCA-I-246809	Livestock Grazing destructive to the land	<p>Alternative D is preferred as Livestock Grazing is destructive to the land, Public Law 100-696 requires protection of the riparian area and recreational resources of the public lands</p>	

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SPRNCA-I-246809	Livestock Grazing & recreational use	Alternative D is preferred as Livestock Grazing is destructive to the land and lessens or eliminates the recreational use of the public land.	
SPRNCA-I-246809	Livestock Grazing current allotments	Alternative D is preferred as Livestock Grazing should not be expanded beyond the current 7,030 acres on four allotments that are partially located on the SPRNCA.	
SPRNCA-I-246809	Livestock Grazing cost analysis	Has the costs of setting up fencing and water tanks and managing Livestock Grazing been analyzed versus the limited income from Grazing fees.	
SPRNCA-I-246809	Livestock Grazing water use	As water is of upmost concern to the San Pedro River and the SPRNCA, has the impact of pumping water for Livestock Grazing been analyzed to the impact on water flow in the river?	
SPRNCA-I-246809	Firearms and Hunting	All SPNRNC lands should be closed to discharge of firearms for safety reasons. All land on both sides of the river is uphill from the river and predominately gentle sloping. Bullets travel further downhill, thus endangering anyone walking along the river. An accidental shooting would potentially open the BLM to a lawsuit for failure to protect the public.	
SPRNCA-I-246809	Right-of-way corridors	Right-of-way corridors in Alternatives A, B, and C should be limited to existing state highway corridor and existing Charleston Road ROW utility corridor.	
SPRNCA-I-246809	Right-of-way corridors in Alternatives D	Right-of-way corridors in Alternatives D should be allowed to be considered at existing state highway corridor and existing Charleston Road ROW utility corridor.	
SPRNCA-I-246809	Areas of Critical Environmental Concern	Areas of Critical Environmental Concerns in Alternatives A must be maintained and expanded per Alternatives D. Alternatives B and C do not protect Critical Environmental areas and should be unacceptable.	
SPRNCA-I-246809	Transportation and Access	Existing Administrative Vehicle Routes should be maintained for BLM maintenance and emergency use.	
SPRNCA-I-246809	Off-highway vehicle (OHV)	Off-highway vehicle (OHV) are highly destructive to the land and use should be prohibited in order to protect the SPRNCA riparian area, BLM Gila District encompasses over 2 million acres plenty of which is open to OHV.	
SPRNCA-I-246809	Herbicides	Herbicides should be avoided to protect the health of aquatic, birds, and mammal wildlife. Light on the land methods is best to protect the SPRNCA riparian area	
SPRNCA-I-246809	Public Law 100-696	All Alternatives should comply with Public Law 100-696, Establishment San Pedro Riparian Conservation Area, to protect the riparian area and the aquatic, wildlife, archeological, paleontological, scientific, cultural, educational, and recreational resources of the public lands surrounding the San Pedro River in Cochise County, Arizona assure protection of the riparian area and the aquatic, wildlife, archeological, paleontological, scientific, cultural, educational, and recreation resources and values of the conservation area.	
SPRNCA-I-246809	FLPMA	Sec. 460xx-I. Management (a) General authorities - is clear that provisions of the Federal Land Policy and Management Act of 1976 (43 United States Code [USC] 1701 et seq.) only where not inconsistent with this subchapter, Sec. 460xx-I. Management of Public Law 100-696	
SPRNCA-I-246809	Protect thee SPRNCA	BLM Tucson Field Office manages more than 600,000 acres, is it too much to ask to protect 55,990 acres of Riparian Conservation land so important to resident and migrating birds, wildlife and the public who enjoys and treasures the natural beauty to the SPRNCA?	
SPRNCA-I-246809	Alternative D	Alternative D emphasizes resource protection and conservation which complys with Public Law 100-696, the Establishment San Pedro Riparian Conservation Area, to protect the riparian area and the aquatic, wildlife, archeological, paleontological, scientific, cultural, educational, and recreational resources of the public lands surrounding the San Pedro River in Cochise County	

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<p>SPRNCA-I-246815</p>	<p>SPRNCA/RMP comment</p>	<p>I'm a multigenerational Arizonan with a degree in resources/range management. The majority of rangeland in the state is already overgrazed, increasingly over populated and, literally, drying up due to prolonged drought and climate change. Yet the BLM is proposing a management plan for the San Pedro that will exacerbate these problems within the designated conservation area, potentially reversing three decades of conservation efforts.</p> <p>The 56,000-acre San Pedro Conservation Area includes 47 miles of one of the last viable riparian areas in the desert Southwest. As such, its value is incalculable. It provides habitat for more than 400 bird species and millions of migratory songbirds. More than 80 species of mammals, 50 species of reptiles and amphibians (the canaries in the coal mine&hellip;) and, historically, 13 species of native fishes are supported by SPRNCA. It provides habitat for 18 federally listed, or proposed, threatened and endangered species. There is prolific research going back decades that documents the devastating impact of livestock grazing on riparian areas and EVERY species of flora/fauna associated with them. But, rather than conserving, protecting, and enhancing this riparian area, BLM is proposing to remove long-standing protections in the name of more livestock grazing, more herbicide use, and more heavy equipment to remove vegetation (necessitating more and bigger roads, a.k.a. "increased demand for access.") Increased grazing in upland areas with soils that have a severe susceptibility to erosion will, research clearly demonstrates, impact water quality within the San Pedro River and deteriorate the health of the surrounding watershed.</p> <p>Having attended the Tucson meeting and having read the notes from the Sierra Vista meeting, I fail to see how the proposed RMP addresses what the BLM designates as a major consideration: increased groundwater demand. The proposed plan does not take into account future water demands from the Gila Adjudication or the recent AZ Supreme Court decision to allow 7000 new residences in nearby Sierra Vista. There is no consideration in the RMP for the dual impacts of long-term drought and (scientifically substantiated) climate change. There is not a perennial flow contingency in the plan. If the allotment acreage is increased, there will be no oversight for "water features," namely, groundwater wells put in to provide water for livestock. Also, the final EIS and subsequent RMP must include watershed data pertaining to possible long-term effects on the "living" Kartchner Caverns.</p> <p>There is no place for hunting in ANY management plan for SPRINCA. Hunting in a conservation area that includes the main water source for the entire NCA conflicts with every other current or future use of SPRNCA. Eighty-five percent of Arizona is state or federal (public) land and most of it is open to hunting. I repeat: ABSOLUTELY NO HUNTING IN SPRNCA!</p> <p>To summarize, of the four alternatives proffered by BLM, alternative D most closely supports the legislative mandate to conserve, protect and enhance SPRNCA. Under alternative A, the current plan, much has been accomplished. Perhaps going forward, BLM should consider combining elements of alternatives A and D: No grazing; Limited set of tools with a case-by-case consideration; Expanded ACECs to include those listed and the four rarest habitat types in the Southwest found in SPRNCA (Fremont cottonwood/Goodding willow forests, cienegas, big sacaton grasslands and mesquite bosques); Adding 23,810 acres with wilderness characteristics; Wild and scenic river determination for the San Pedro and scenic detrmination for the Babocomari.</p>	
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SPRNCA-I-246818	Future of the SPRNCA	<p>After attending three meetings, ordering 3 books on southwest lands and grazing, and rereading at least 100 times the law that established the SPRNCA, the only alternative I see that coincides with the purpose of the 1988 law is "D". This area is unique and one of the last riparian areas left in AZ. The goal was to protect, conserve and enhance. It even states that "the use of motorized vehicles in the conservation area shall only be allowed on roads specifically designated for such use as part of the management plan." The plan shall "contain provisions designed to assure protection of the riparian area and the aquatic life, wildlife" and so on--"and values of the conservation area". It appears the purpose of this law was indeed to protect, enhance and conserve this important migratory and wildlife corridor. It does not come under the other 2.5 million acres of grazing land that BLM manages in this state. If this area was to be used for ranching then why was this law ever passed. Now BLM wants to use the SPRNCA like their other lands. 73% of AZ is already grazed to the detriment of the ecology of many of those places. I failed to find any articles, books or any research materials from the University of New Mexico, or the University of Arizona or NAU or the University of Texas that encouraged the use of arid desert lands for grazing purposes. Why, I ask does BLM want a plan that gives ranchers yet another piece of our state to enhance their pocketbook. This additional area will only increase what they already have by .005% of the total. Cochise County has greatly changed over the 3 decades and ranching is not a big income or job producer, but the beautiful San Pedro draws people from all over the world. Cows will reduce the biodiversity of plants, mammals and birds. Birders bring millions of dollars to Sierra Vista. The San Pedro is one of the most studied rivers in the USA so the recovery and increasing health is recorded by numerous scientists. Where are the scientists that suggest returning cows will continue to enhance or even preserve this recovery? I found the alternatives did not address future issues such as water, increasing drought, higher soil surface temperatures, higher low temperatures, and depletion of the aquifer without which there will be no river. Since we are planning for the future these concerns are paramount. The introduction of cows will increase e-coli in the river, harm aquatic life, decrease the number of birds, cause further erosion that still is not completely healed, decrease the number of mammals, as cows also eat forbes once they are done with the grass. Then there is the damage done to the soil surface, plants, and aquifer by providing cows with wells, ponds, fences. I could not believe that the BLM plans to provide 23 wells and ponds and 2.5 million gallons of water for private enterprise. Just building this infrastructure will certainly cause disruption and damage to the wildlife. As the BLM is schooled in ecology and wildlife they know the health of the uplands cannot be separated from the river. The two are part of a whole. Nature does not divide her habitats into separate distinct parcels without interaction. I want the BLM to focus on the conservation and preservation of the SPRNCA, as in completing the restoration that has begun. Major work is needed to slow the washes down especially the big ones. This is being done in Mexico near the border with great success and on at least one ranch on the US side. The beaver could sure use some help so they are not washed out every year. Finally the intent of the law is not to make this area into a giant park or hunting ground. No one spoke to the needs of biodiversity and the preservation of wildlife at the meetings. Everyone spoke for what they could get from the river as if it was a pie to divide. It is not. Preserve this for our grandchildren.</p>	
SPRNCA-I-246862	SPRNCA	<p>Bringing back grazing and hunting to SPRINCA makes no sense to me at all. The land and the economy and people will suffer. The San Pedro is a gem. Protecting this watershed matters in so many ways. That this isn't widely understood is a real problem. We humans rely on healthy watersheds as much as the plants and animals do. Please abandon expanding grazing and hunting to this area. There are many responsible ranchers and hunters who know this is problematic. And the business in eco-tourism that has built over the years will be destroyed. Birders and hunters in the same place? And you know it will be at the same time. The season lines right up. Please consider 2.5.4 Vegetation Communities; IV. VEGETATION MANAGEMENT: UPLAND VEGETATION (CHIHUAHUAN DESERT SCRUB AND GRASSLANDS) B. OBJECTIVES: UPLAND VEGETATION (CHIHUAHUAN DESERT SCRUB AND GRASSLANDS) Objective 1: "Manage 40,310 acres of upland vegetation toward restoring the perennial native grass component to address shrub encroachment." Thank you, Deb Sparrow</p>	
SPRNCA-I-246866	BLM SPRNCA RMP	<p>I DO NOT agree with nor favor Alternatives A, B or C. The SPRNCA is a nature sanctuary and should remain as such. The grasslands, wildlife, breeding birds as well as migrant and wintering birds need to remain protected. The area needs to remain available for peaceful and safe family oriented recreation for local residents as well as global tourists. We do not need to ruin the area with urban development, cows, herbicides, hunting and any damaging of endangered species and wildlife. Therefore, I recommend that the BLM relook Alternative Plan D instead in order to allow this natural habitat to remain undamaged for present and future generations to enjoy while maintaining clean water and water resources from being disrupted.</p>	

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<p>SPRNCA-1-246872</p>	<p>PLEASE DO NOT CHOOSE ALT C</p>	<p>The Bureau of Land Management has done a great of rebuilding SPRNCA since it became protected by Congress in 1988, why would we(as in all of us since this is public lands that we pay taxes) re-deplete it with grazing and guns? Your "preferred" alternative C , which allows grazing and hunting) is completely contradicting to your mission statement when it comes to sustaining "the health and productivity of the public lands for the use and enjoyment of present and future generations?</p> <p>The Resource Management Plan should not be inherently destructive; how it is possible to not recognize that grazing is a threat to recreational, public use? How are hunters wielding guns in the same proxicity considered safe for the rest of the public trying to safely and respectfully enjoy it too?</p> <p>The San Pedro River will already take on the 7,000 housing development in Sierra Vista, why would we make its preservation any more challenging by adding grazing to the picture? Is the water quality of the riparian habitat and the living ecosystem at large not enough a concern? It is one of the few remaining free-flowing perennial streams in the entire state. The San Pedro is and has been home for many beings humans, though it is historically significant for humans too dating back over 13,000 years ago.</p> <p>Rivers are a big deal in the desert. The San Pedro is special to us. Please don't ruin it with Alternative C.</p> <p>Unless the individuals who make the final decision have vested interests, something to gain personally from the livestock industry that would benefit from grazing, any reasonable human being would not permit, much less "prefer" alternative C over alternative D. These resources, especially the water, are precious and finite and already under human caused stress. Once the ecosystem is damaged, how will it recover in the face of climate change, especially? With over 12,000 acres of public lands under your management, is there not somewhere else to permit grazing?</p> <p>As a tax paying citizen and supporter of public lands and their preservation, please choose alternative D.</p>	
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