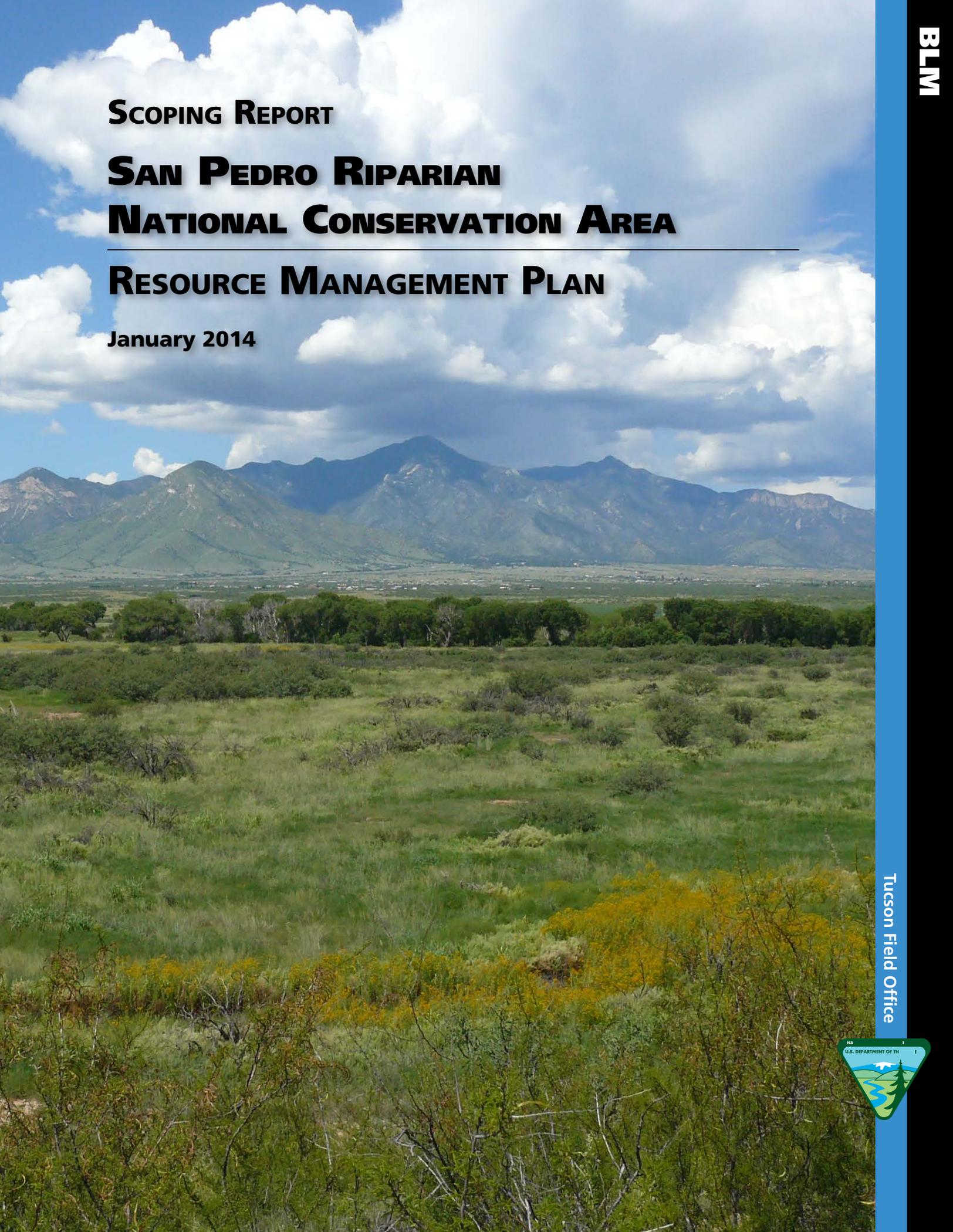


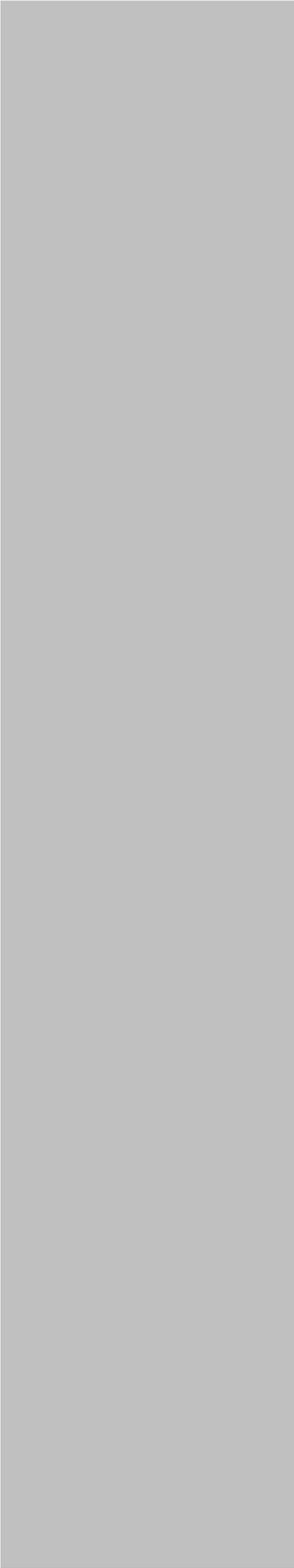
SCOPING REPORT

**SAN PEDRO RIPARIAN
NATIONAL CONSERVATION AREA**

RESOURCE MANAGEMENT PLAN

January 2014





Scoping Report

San Pedro Riparian National Conservation Area Resource Management Plan

Bureau of Land Management

San Pedro Riparian National Conservation Area
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1.0 INTRODUCTION

1.1 Purpose of Scoping

A Notice of Intent was published in the *Federal Register* on April 30, 2013, announcing the beginning of the scoping process. The Council on Environmental Quality regulations require scoping meetings to be conducted in support of the resource management plan and environmental impact statement (RMP/EIS) process pursuant to the National Environmental Policy Act (NEPA) of 1969. Scoping is the process by which federal agencies solicit input on the issues, impacts, and potential alternatives that the RMP/EIS will address, as well as determine the extent to which those issues and impacts will be analyzed. Scoping ensures that a range of reasonable alternatives will be evaluated in the RMP/EIS.

1.2 Purpose and Need for the Resource Management Plan

Management of the area has been guided by the *San Pedro River Riparian Management Plan*, which was approved in 1989, and the *Safford District Resource Management Plan*, which was signed in 1992 and 1994. The planning effort is needed to provide long-range management and protection of the San Pedro Riparian National Conservation Area's (SPRNCA's) resources, including aquatic, wildlife, archaeological, paleontological, scientific, cultural, educational, and recreational resources and values, in accordance with Public Law 100-696.

The purpose of the RMP is to identify the current management situation, desired future conditions to be maintained or achieved, and management actions necessary to achieve those objectives. Through the RMP process, decisions will:

- Set desired future conditions for water quantity and quality, riparian and wetland function, and riparian vegetation and upland plant communities.
- Identify priority fish and wildlife species and set desired habitat conditions for those species.
- Identify ecologically important areas or scarce, limited habitats for special status species.
- Evaluate existing, and consider need for designating additional, areas of critical environmental concern and research natural areas.
- Designate Visual Resource Management classes.
- Designate special recreation management areas, extensive recreation management areas, or both.
- Designate areas as open, limited, or closed to motorized vehicles.
- Allocate cultural properties to specific uses.
- Identify right-of-way avoidance and exclusion areas.
- Determine which areas are open and closed to grazing.

1.3 Description of the Planning Area

The planning area includes public lands within the SPRNCA and possibly public lands within the surrounding watershed (Figure 1-1). The planning area boundary is an issue that was considered during scoping.

The SPRNCA (56,431 acres) is located in Cochise County, Arizona, with 40 miles of the upper San Pedro River flowing north from the U.S.-Mexico border near Palominas to St. David near Benson. The SPRNCA was designated by Congress as the first riparian national conservation area on November 18, 1988. The enabling legislation (Public Law 100-696, Arizona-Idaho Conservation Act of 1988) established that the land must be managed “to conserve, protect and enhance the riparian area and the aquatic, wildlife, archaeological, paleontological, scientific, cultural, educational, and recreational resources of the conservation area.” The SPRNCA is part of the BLM’s National Landscape Conservation System, or National Conservation Lands.

The San Pedro River flows through the Chihuahuan and Sonoran Deserts. The riparian habitat and surrounding grasslands provide important migratory bird habitat. In 2013, the National Audubon Society recognized the SPRNCA as a Globally Important Bird Area. More than 100 species of breeding birds and 250 species of migrant and wintering birds depend on the riparian corridor.

In addition to riparian and grassland habitats, the SPRNCA contains four of the rarest habitat types in the Southwest, including Fremont cottonwood/Goodding willow forests, marshlands locally known as cienegas, big sacaton grasslands, and mesquite bosques. These unique habitats contribute to the diversity of species. The SPRNCA is home to 84 mammal species, 14 fish species, and 60 native species of reptiles and amphibians. SPRNCA provides potential habitat for 14 federally listed endangered and threatened species—the Huachuca water umbel, Canelo Hills ladies’ tresses, Chiricahua leopard frog, desert pupfish, Gila topminnow, Gila chub, loach minnow, spikedace, southwestern willow flycatcher, northern aplomado falcon, lesser long-nosed bat, jaguar, ocelot, and Mexican wolf—and the proposed threatened species yellow-billed cuckoo and northern Mexican gartersnake. The planning area contains critical habitat for Huachuca water umbel and southwestern willow flycatcher and proposed critical habitat for northern Mexican gartersnake, jaguar, and possibly yellow-billed cuckoo.

The area also contains important cultural sites and resources. The river was also important to prehistoric cultures. The SPRNCA contains two cultural sites, the Murray Springs Clovis Site and Lehner Mammoth Kill Site, which have been designated as national historic landmarks. These sites represent the remains of human occupation from 13,000 years ago. The Presidio Santa Cruz de Terrenate is the ruins of a Spanish fortress occupied between 1776 and 1780. Numerous mining towns and mills represent the peak of silver mining in the Southwest.

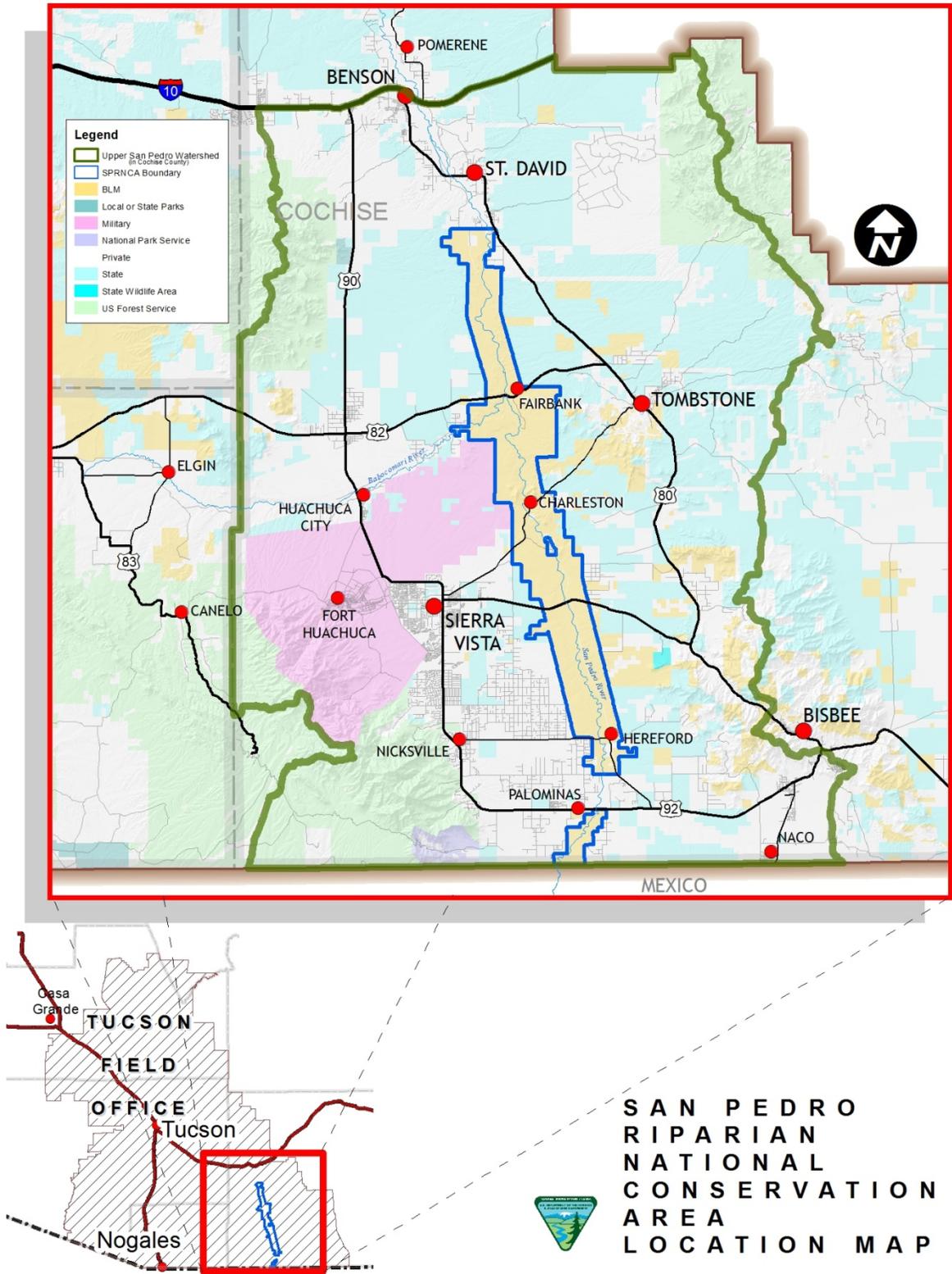


Figure 1-1. Location Area

The SPRNCA provides a variety of recreation opportunities including birding and wildlife viewing, hiking and backpacking, primitive camping, hunting, and fishing. The San Pedro House, an interpretive facility, is located on Highway 90 near the San Pedro River. Interpretive exhibits are located at the historic town site of Fairbank, the Murray Springs Clovis Site, the Presidio Santa Cruz de Terrenate, Boquillas, Hereford, and San Pedro House.

1.4 Description of the Scoping Process

Public involvement is a vital and legal component of the RMP/EIS process. Direction for implementing public involvement under NEPA is in 40 Code of Federal Regulations 1506.6. Section 202 of the Federal Land Policy and Management Act (FLPMA) directs the Secretary of the Interior to implement public involvement during land use planning actions on public lands; the BLM *Land Use Planning Handbook* (H-1601-1) and the BLM *NEPA Handbook* (H-1790-1) provide guidance for such implementation. Public scoping satisfies the requirements of both NEPA and FLPMA.

During public scoping, the BLM solicits comments from federal, state, and local agencies; Native American tribes; the public; stakeholders; and other interested parties. The BLM then organizes and analyzes comments and identifies issues to address in developing the land use plan and EIS. These issues form the framework to develop the range of alternatives and the scope of the analysis.

1.4.1 Scoping Meeting Announcements

Initiation of the SPRNCA RMP/EIS process and the public scoping meetings were announced through:

- The Notice of Intent in the *Federal Register*
- The BLM project website
- News releases

1.4.2 Notice of Intent

The Notice of Intent published in the *Federal Register* on April 30, 2013 (78 FR 25299) formally notified the public of BLM's intent to develop the SPRNCA RMP/EIS and officially initiated the public scoping period (Appendix A). The original scoping period was scheduled for at least 90 days. The BLM extended the scoping period through September 27, 2013, for a total of 150 days. BLM will consider comments received throughout the planning process, but this scoping report is limited to public input received through September 27, 2013.

1.4.3 Websites

The BLM established a project website (http://www.blm.gov/az/st/en/prog/planning/san_pedro.html) and posted the project on the ePlanning site (<http://on.doi.gov/1492NLo>) to serve as public repositories for project- and RMP/EIS-related information such as:

- Planning area description
- Scoping meeting information
- Public involvement opportunities

- Preliminary issue areas
- Contact information
- Maps and documentation

1.4.4 News Releases

BLM published three news releases during the public scoping period. The news releases announced public involvement opportunities, scoping meetings, and educational forums. The news releases were published on the BLM news releases website (<http://www.blm.gov/az/st/en/info/newsroom/2013.html>) on May 31, 2013; August 15, 2013; and August 22, 2013.

1.4.5 Public Meetings

Following publication of the Notice of Intent, the BLM conducted three strategic planning meetings. The purpose of the meetings was to present information about the RMP process, discuss public involvement plans, solicit recommendations to encourage public involvement, and share lessons learned from other public involvement experiences. Table 1-1 lists the date, location, and attendance at these meetings.

Table 1-1. Strategic Planning Locations and Attendance

Date	Location	Attendance
May 15, 2013	Sierra Vista	43
June 18, 2013	Benson	29
June 20, 2013	Tucson	18
Total		90

Participants in the strategic planning meetings voiced interest in holding educational forms on relevant topics to inform public comments in the scoping period. As a result, five forums were held in Sierra Vista from July 20 to August 24. Each forum consisted of 20-minute presentations by three to four subject-matter experts, followed by a 10-minute question-and-answer period. After the presentations, the participants were invited to meet with the presenters and BLM resource specialists. Table 1-2 lists the date, topic, and attendance at each forum.

Table 1-2. Education and Scoping Forums

Date	Topic	Attendance
July 20, 2013	Water and riparian	35
July 27, 2013	Watershed and range	48
August 10, 2013	Wildlife and threatened and endangered species	33
August 17, 2013	Cultural resources and recreation	44
August 24, 2013	Socioeconomics	22
Total		182

The BLM hosted four public scoping meetings in August and September to provide information to the public and agencies (Table 1-3). The meeting attendees were invited to submit comments and share issues and concerns related to the RMP. A total of 46 participants attended the scoping meetings.

Table 1-3. Public Scoping Meeting Locations and Attendance

Date	Location	Attendance
August 13, 2013	Benson	11
August 15, 2013	Tucson	9
August 21, 2013	Sierra Vista	22
September 12, 2013	Bisbee	4
Total		46

The public scoping meetings consisted of a hybrid meeting format: presentation, question-and answer period, and open house. Each scoping meeting started with introductions and a 20-minute presentation by BLM staff. The presentation described the scoping process, provided information on submitting scoping comments, and summarized the range of planning decisions to be considered in the RMP/EIS. Following the presentation, participants were given the opportunity to ask questions. The last hour of each scoping meeting was an open-house format in which participants could talk one-on-one with BLM resource specialists.

1.5 Collaborative Involvement Process

In addition to formal scoping, the BLM has implemented collaborative outreach that includes working with cooperating agencies. The BLM will continue to meet with interested parties and organizations throughout the planning process.

1.5.1 Lead and Cooperating Agencies

The BLM is the lead agency for the SPRNCA RMP/EIS. A cooperating agency is a federal, state, or local government agency or Native American tribe that makes a formal agreement with the lead federal agency to help develop the RMP/EIS. Cooperating-agency status provides a formal framework for government units to engage in active collaboration with the lead federal agency to implement the NEPA requirements. Cooperating agencies are involved in developing information and analysis for which the agency has particular expertise and shares the responsibility for defining the issues to be examined in the RMP/EIS.

In December 2012 and January 2013, the BLM sent letters to 33 federal, state, local, and tribal representatives inviting them to be cooperating agencies. As of November 2013, 6 of the 33 invitees have agreed to participate in the RMP/EIS as cooperating agencies (Table 1-4).

Table 1-4. Cooperating Agencies

Agencies and Tribes Invited to be Cooperating Agencies	Accepted as of November 2013
Fort Huachuca (U.S. Army)	X
U.S. Department of Homeland Security	
Coronado National Forest (U.S. Forest Service)	
U.S. Fish and Wildlife Service	
National Park Service	
National Historic Landmark Program	
Natural Resources Conservation Service	
Agricultural Research Service	
Bureau of Reclamation	X
U.S. Geological Survey	
Cochise County	X
City of Benson	
City of Bisbee	
City of Tombstone	
City of Sierra Vista	X
Arizona State Land Department	
Arizona Game and Fish Department	X
Arizona Department of Transportation	X
Arizona Department of Water Resources	
Arizona Department of Environmental Quality	
Hereford Natural Resource Conservation District	
Redington Natural Resource Conservation District	
San Pedro Natural Resource Conservation District	
Whitewater Draw Natural Resource Conservation District	
Winkelman Natural Resource Conservation District	
Salt River Indian Community	
Gila River Indian Community	
Tohono O'odham Nation	
Ak-Chin Indian Community	
Pueblo of Zuni	
Hopi Tribe	
San Carlos Apache	
White Mountain Apache	

1.5.2 Collaboration and Consultation with Tribes

The BLM initiated tribal consultation on December 17, 2012, by distributing initial consultation letters and cooperating agency invitations to eight tribes. The BLM archaeologist attends monthly Four Southern Tribes meetings. The participating tribes are the Tohono O'odham Nation, Salt River Pima-Maricopa Indian Community, Gila River Indian Community, and Ak-Chin Indian Community. The purpose of these meetings is to update the tribes on the status of the RMP process and to provide a forum for the tribes to offer feedback. Government-to-government consultation will continue throughout the RMP process to ensure that the concerns of tribal groups are considered in developing the RMP/EIS.

1.5.3 Coordination

Through the scoping period, participants suggested establishing partnerships with stakeholders, advisory committees, steering committees, adjacent landowners, organizations, and special-interest groups. They suggested that these partnerships could be used to gather information about resource condition, to leverage specific expertise, to implement a regional approach to watershed management and land health, and to educate the public. As appropriate, BLM will coordinate with stakeholders, organizations, and individuals during the RMP process.

2.0 COMMENT SUMMARY

2.1 Method of Comment Analysis

Comment analysis is a method of evaluating public comments to derive information and summarize themes and common concerns. While this summary does not seek to capture every specific concern, it strives to identify thematic issues for decision-makers and the public. This process and resulting analysis do not replace comments in their original form. The planning team and public are encouraged to review actual letters firsthand.

Public comments that were received by September 27, 2013, were evaluated and are documented in this report. Comments received after September 27, 2013, will be reviewed by BLM and considered in the formulation of alternatives and the planning process, but they are not included in this report.

A total of 133 unique comment letters were received. Most comment letters were received via email. Other comment letters were mailed, hand delivered, or submitted at the public scoping meetings. In some instances, identical comment letters from the same individual were received via both email and mail. These identical comment letters were counted as one submittal.

Each letter was logged, numbered, and reviewed to identify comments relevant to the development of the RMP/EIS. Each comment was then assigned to a comment category (Table 3-1). Although some comments are potentially applicable to multiple comment categories, each comment was coded to only one category, whichever was the most relevant. Most comment letters contained more than one comment.

The coded comments were then entered into CommentPro®, which is a comment tracking and analysis database. The comments were then sorted by comment categories. Where possible, similar comments in each comment category were grouped and summarized. An issue statement was prepared for each comment summary. Consistent with the BLM NEPA Handbook (H-1790-1), the issue statements were phrased in the form of questions.

2.2 Summary of Public Comments Received

2.2.1 Written Submissions by Affiliation

Each respondent's affiliation was tracked during the comment analysis process (Table 2-1). Comments were received from various organization types, but the majority of them were from the general public (67 percent) and preservation/conservation organizations (18 percent).

Table 2-1. Written Submissions by Organization Type

Organization Type	Number of Respondents
Government employee/union	4
Federal agency/elected official	2
General public	89
Preservation/conservation	24
American Indian government agency/elected official	1
Recreational (nonspecific)	2
Recreation/conservation organization	3
Nonmotorized/nonmechanized recreation	2
State government agency/elected official	1
Town/city government agency/elected official	1
Utility group	1
Other organization	3
Total	133

2.2.2 Written Submissions by Geographic Area

Each respondent's geographic area was tracked during the comment analysis process (Table 2-2). Comment letters were received from 10 different states, but the majority of them were from Arizona (84 percent).

Table 2-2. Written Submissions by State

State	Number of Respondents
Arizona	111
California	3
Hawaii	1
Iowa	2
Maryland	1
Minnesota	1
New Mexico	1
New York	1
Oregon	1
Texas	2
Undetermined	9
Total	133

3.0 SUMMARY OF PUBLIC COMMENTS

3.1 Planning Issue Categories

To highlight specific concerns and for simplicity in identifying specific issues, comments have been grouped by category, consolidated, and edited. The comments were summarized by grouping comments of similar content into a singular statement that the RMP/EIS writers can address. Table 3-1 lists the number of external comments received during the formal scoping period.

Table 3-1. Number of External Comments by Comment Category

Comment Category	Number of Comments	Percent
Planning area boundary	19	4
Recreation, travel management, scientific research, public health and safety, and firearms	129	26
Special designations (ACECs, wilderness, wild and scenic rivers), visual resources, and wilderness characteristics	18	4
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	93	19
Fish and wildlife habitat and special status species	41	8
Water resources	52	10
Lands and realty, livestock grazing, and energy and mineral resources	92	18
International border	11	2
Cultural resources, paleontological resources, and Native American concerns	38	8
Socioeconomics	6	1
Total	499	

The following sections present comment summaries and issue statements grouped by category. The issue statements are based on written public comments and internal scoping by the BLM interdisciplinary team. Issues appear as bulleted questions. Except for the Planning Area Boundary category, the comment summaries and issue statements are further grouped by the following subcategories:

- Relevant to the SPRNCA
- Relevant to the scattered parcels within the watershed

3.1.1 Planning Area Boundary

BLM requested public input regarding whether to expand the planning area beyond the SPRNCA boundary to include BLM-administered land within the watershed. Comments ranged from supporting the expansion of the planning area beyond the SPRNCA boundary to maintaining the planning area to the SPRNCA boundary. Comments supporting expansion indicated that planning for BLM-administered

lands beyond the SPRNCA boundary would improve the health of the watershed, which would directly benefit resources within the SPRNCA. Comments supporting planning only for the lands within the SPRNCA boundary indicated that including additional lands in the planning area would dilute the designation of the SPRNCA. One comment suggested planning just for the SPRNCA to clarify the scope, goals, alternatives, and analysis of the RMP. Other comments noted that expanding the planning area boundary would expand the management of the SPRNCA and restrict resource uses on lands outside the SPRNCA boundary.

- Which areas should be included in the planning area boundary to best manage for the nine conservation values in the SPRNCA as mandated by Public-Law 100-696?

3.1.2 Recreation, Travel Management, Scientific Research, Public Health and Safety, and Firearms

This category includes issues related to recreation (e.g., permits and hunting); travel management (e.g., areas closed, limited, or open to motorized vehicles, off-highway-vehicle (OHV) use, and trails); interpretation, education, and scientific research; public health and safety; and firearms.

Relevant to the SPRNCA

Recreation

Comments on hunting ranged from prohibiting hunting to allowing for hunting in specific areas of the SPRNCA. Some comments suggested that hunting should not be allowed due to conflicts with other uses, public safety issues, and protection of special status species. Several comments noted that hunting around high-use areas raises public safety issues for visitors. Some comments suggested limiting hunting to bow hunting, while other comments suggested allowing for rifle, shotgun, and bow hunting.

Several comments recommended improvements to designated trails to accommodate access for people with disabilities. Other comments suggested offering transportation alternatives to sites otherwise inaccessible to people with disabilities.

Comments suggested considering the following trails:

1. A rail-trail on the right-of-way of the old Union Pacific Railroad
2. The San Pedro Trail
3. A conceptual trail from Fairbank to Schieffelin Monument
4. A conceptual trail from Fairbank to and along the Babocomari River
5. A conceptual trail from the City of Sierra Vista Environmental Operations Park to the Murray Springs trailhead
6. A backcountry byway along the east boundary of the SPRNCA from Charleston Road to Highway 82
7. A historic trail for the Mormon Battalion from the border to St. David

Comments suggested adding recreation facilities, such as picnic sites, benches, and campgrounds; establishing off-leash dog areas; restricting fishing; limiting high-use trails to hiking; restricting bicycling and equestrian use; and installing wildlife blinds. Other comments recommended prohibiting geocaching, paintball and airsoft guns, and uses or activities that interfere with the calm, quiet appreciation of nature.

Comments recommended developing sites to educate the public about the values and resources of the SPRNCA.

Comments recommended upgrading trails and pathways in the St. David Cienega and adding educational kiosks and signs.

- Are there areas that should be open or closed for hunting?
- Which recreation activities should be enhanced or restricted based on the desired recreation experience in the special recreation management area (SRMA)?
- Should the SPRNCA's current SRMA designation be maintained or be converted to an extensive recreation management area (ERMA)?
- Should other recreation-based designations, such as recreation management zones, be put in place in the SPRNCA?
- Are there areas in the planning area where potential conflict between recreational use and resource values require special management (e.g., type, season, intensity, fee, closure)?
- Should there be a limit on the number of permits for certain recreation activities?
- Which areas will be available for interpretation and environmental education?
- What recreation improvements would be consistent with the recreation experience?

Travel Management

Comments ranged from prohibiting motor vehicle use, to prohibiting off-highway vehicle (OHV) use, to allowing some limited use of OHVs. Comments noted that OHV use could disturb wildlife, disrupt the recreation experience, and impact the environment.

Comments requested improving access to the St. David Cienega and SPRNCA to meet the needs of users and for maintenance purposes. Other comments requested improving highways, turning lanes, and parking areas to meet future regional travel demand and growth.

Comments suggested that BLM work and coordinate with U.S. Customs/Border Patrol and other federal agencies to limit disturbance from their activities, including motorized access, in the SPRNCA.

- Which areas should be open, limited, or closed to motorized vehicles?
- Which areas should be available or suitable for transportation facilities?
- What types of transportation facilities are appropriate to meet the primary purposes for which the conservation area was established?

- What improvements are needed to increase access consistent with the Americans with Disability Act? (implementation level because to do this would mean creating specific access points which is implementation level)
- Which trails should be open, closed, or limited use?
- Which trails should be open to motorized use, nonmotorized use, or both?
- Which trails should be restricted to a specific use?

Public Health and Safety

Part of the SPRNCA is identified by the U.S. Army Corps of Engineers as a Formerly Used Defense Site. There are ongoing remedial investigations for potential munitions and contamination hazards that need to be addressed.

- What management actions are needed to address public safety, especially in the area identified as a Formerly Used Defense Site by the U.S. Army Corps of Engineers?

Firearms

Comments ranged from prohibiting firearms, target shooting, and hunting to allowing concealed carry in accordance with Arizona laws and limited hunting in some areas. Some comments recommended posting “no guns allowed” signs near high-visitation areas and parking areas.

- How should use of firearms for protection, hunting, and recreation be managed?
- What types of firearms (pistols, rifles, paintball guns) should be managed?

Relevant to the Scattered Parcels within the Watershed

Recreation

Comments on hunting ranged from prohibiting hunting to allowing for hunting in specific areas of the SPRNCA.

Comments recommended upgrading trails and pathways in the St. David Cienega and adding educational kiosks and signs.

- Are there areas that should be open or closed for hunting?
- What recreation improvements would be consistent with the recreation experience?

Travel Management

Comments suggested that BLM work and coordinate with U.S. Customs/Border Patrol and other federal agencies to limit disturbance from their activities, including motorized access, in the SPRNCA.

- Which areas should be open, limited, or closed to motorized vehicles?
- Which areas should be available or suitable for transportation facilities?

- What transportation facilities (parking, access points, road improvements) will best meet travel management objectives while furthering the primary purposes for which the conservation area is established?
- What specific route network will best meet travel management objectives in the SPRNCA, while protecting resources?

Public Health and Safety

There are no comment summaries or issue statements for this subcategory.

Firearms

There are no comment summaries or issue statements for this subcategory.

3.1.3 Special Designations (ACECs, Wilderness, Wild and Scenic Rivers), Visual Resources, and Wilderness Characteristics

This category includes issues related to areas of critical environmental concern (ACECs), wilderness, wild and scenic river suitability, visual resources, and wilderness characteristics.

Relevant to the SPRNCA

Special Designations (ACECs, Wilderness, Wild and Scenic Rivers)

The San Pedro Research Natural Area (RNA) and ACEC, the San Rafael RNA and ACEC, and the St. David Cienega RNA and ACEC should retain their special designation. Comments recommended identifying potential ACECs to protect resources and values of the San Pedro River.

Comments requested continued protection of the 44 miles of the San Pedro River identified as suitable for Wild and Scenic River designation. Comments recommended an inventory of other river segments for possible Wild and Scenic River designation.

- Are there special designations, such as the San Pedro RNA and St. David Cienega, that will help further the primary purposes for which the conservation area was established?
- Are there special designations, such as the San Pedro RNA and ACEC, the San Rafael RNA and ACEC, and the St. David Cienega RNA and ACEC, which will help further the primary purposes for which the conservation area was established?
- What areas would be considered for ACECs?
- In addition to the Riparian National Conservation Area designation, what other designations does BLM need for managing the resources?
- How will management actions address the outstandingly remarkable values of the segment identified as suitable for Wild and Scenic River designation?

Visual Resources

Comments recommended managing for the overall scenic quality of the area that contributes to the visitor experience.

- What management actions are needed to maintain the visual resource qualities and values?
- What Visual Resource Management (VRM) classes and associated management actions are compatible with the conservation values (Table 3-2)?

Wilderness Characteristics

Comments identified the need to protect wilderness characteristics by keeping trails to a minimum, prohibiting utility corridors, limiting landscape modifications, removing invasive species, restricting hunting, and allowing overnight camping by permit only.

- What management actions are needed to preserve wilderness characteristics?
- Which areas should be managed for wilderness characteristics?

Table 3-2. VRM Class Definitions

VRM Class	Definition
Class I	To preserve the existing character of the landscape. The level of change to the characteristic landscape should be very low and must not attract attention.
Class II	To retain the existing character of the landscape. The level of change to the characteristic landscape should be low.
Class III	To partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate.
Class IV	To provide for management activities which require major modification of the existing character of the landscape. The level of change to the characteristic landscape can be high.

Relevant to the Scattered Parcels within the Watershed

Special Designations (ACECs, Wilderness, Wild and Scenic Rivers)

There has been an increase in development and population in Sierra Vista and the area surrounding the SPRNCA. Comments noted that additional development should be limited.

- Are there any special designations that will help BLM manage the resources in areas near the SPRNCA-urban interface?

Visual Resources

Comments recommended managing for the overall scenic quality of the area that contributes to the visitor experience.

- What management actions are needed to maintain the visual resource qualities and values?
- What VRM classes and associated management actions are compatible with the conservation values (Table 3-2)?

Wilderness Characteristics

There are no comment summaries or issue statements for this subcategory.

3.1.4 Land Health (Uplands and Watershed Function), Soil Resources, Vegetation, Fire Management, Adaptive Management/Climate Change, and Riparian Areas, Floodplains, Wetlands, and Aquatic Habitats

This category includes issues related to adaptive management, climate change, uplands, watershed function, watershed restoration, soils, erosion, vegetation management, fire management, wildland-urban interface, riparian areas, native grasslands, floodplains, wetlands, and aquatic habitats.

Relevant to the SPRNCA

Land Health (Uplands and Watershed Function)

Comments recommended removal of noxious and invasive species (bullfrog and tamarisk); management of livestock grazing; and management of riparian and upland vegetation communities, including native grasslands.

Comments recommended identifying desired future conditions that protect the San Pedro River and allow for functioning upland and riparian habitat to support a diversity of fish and wildlife species.

Comments suggested that management actions are needed to control erosion and sediment load and to recharge the aquifer.

Comments suggested managing native grasslands to maintain a properly functioning watershed and suggested that BLM consider the important role that native grasslands play in aquifer recharge. Comments also suggested that BLM evaluate grassland restoration in shrub-dominated areas.

Comments recommended studying the Babocomari allotment for riparian recovery, the effects of grazing on riparian habitat, and test plots for upland mesquite removal.

There has been an increase in development and population in Sierra Vista and the area surrounding the SPRNCA since the 1989 publication of the *San Pedro River Riparian Management Plan*. Consequently, there are emerging issues throughout all of the resource areas related to the SPRNCA's interface with urban areas.

- What are the desired future conditions for upland vegetation? What defines a healthy watershed?
- What use restrictions are needed to achieve desired future conditions?
- What management actions are needed to achieve desired future conditions?
- How can native grasslands be managed to increase infiltration, decrease runoff, and control erosion and sedimentation?
- What criteria should be put in place to evaluate native grassland restoration in shrub-dominated areas?

- What metrics are needed to track changes in upland vegetation and watershed health?
- What impacts will the SPRNCA-urban interface have on establishing desired future conditions?

Soil Resources

Comments indicated that the RMP needs to include an erosion-control plan that identifies soil stabilization opportunities and methods.

- Are there areas with highly erodible or sensitive soils that need protection via management actions or allocations?

Vegetation

Comments requested detailed mapping of vegetation communities and wetlands.

Comments recommended maintaining habitats such as the cienegas, sacaton bottomlands, mesquite bosques, and cottonwood gallery forest.

Comments recommended using a combination of tools such as fire and mechanical, manual, biological, and chemical treatments to reduce fuel loads, manage for desired vegetation communities, and remove noxious and invasive species. Comments also recommended that BLM actively manage nonnative grasses to prevent them from spreading to lands outside the SPRNCA and from competing with Huachuca water umbel. Comments suggested that BLM continue to eradicate tamarisk.

- What monitoring is needed to track trends in vegetation types and noxious and invasive plants?
- What are the desired conditions of the unique habitats of the SPRNCA, including cienegas, sacaton bottomlands, mesquite bosques, and cottonwood gallery forest?
- How should noxious species be managed?
- What types of vegetation treatments (fire, mechanical, manual, biological, and chemical) are needed to manage vegetation communities and remove noxious and invasive plant species, including nonnative grasses?
- What criteria should BLM use to determine where invasive shrubby vegetation should be removed in areas that once were native grasslands?
- What management actions should BLM take to encourage native grasses after invasive shrubs have been removed?
- How should BLM prevent the spread of nonnative plants outside the SPRNCA to the detriment of existing stands of native grasses on adjacent land?

Fire Management

Comments recommended the use of prescribed fire to reduce fuel load and modify vegetation communities toward desired conditions. Some comments suggested a fire management plan to protect the cottonwood and willow gallery forest from catastrophic fire and to restore grassland habitats.

- In what areas could fire be utilized as a management tool for vegetation treatments?
- Which areas should be prioritized for prescribed fire use?
- How will fire be managed in the wildland-urban interface?
- What management actions should be taken to reduce the fuel load?
- How should fire be used as a tool to manage vegetation?

Adaptive Management/Climate Change

Comments recommended including adaptive management principles to allow for changing resource and environmental conditions that could occur over the long term. The changes could be due to climate change, use patterns, use types, or other conditions.

Comments recommended managing for a range of natural variability, such as climate change, alterations to the natural environment, and drought conditions. Comments suggested distinguishing between natural variability and desired future conditions to accommodate the uncertainty of future environmental conditions.

- How will adaptive management be incorporated into the RMP?
- How will natural variability, such as drought and climate change, be incorporated into desired future conditions?
- What management actions are needed to make the system more resilient to drought and climate change?

Riparian Areas, Floodplains, Wetlands, and Aquatic Habitats

Comments recommended monitoring of biological resources and riparian habitat to develop condition trends. Comments recognized the need to protect riparian habitats and maintain the unimpaired flow of the San Pedro River. Several comments noted the need to protect the cottonwood and willow gallery forest, mesquite bosques, cienega wetlands, and other sensitive riparian habitats. Comments recommended monitoring the biological metrics of aquatic and riparian ecosystem health to adapt management to changing environmental conditions. A comment was raised regarding Land Health and Water Resources and the need to discuss both of these resources in an interrelated manner. The comment suggested that under both issues the management of evapotranspiration be added to evaluate and manage the two interrelated resources.

- What monitoring is needed to track trends in riparian, wetland, and aquatic habitat conditions?
- What are the desired aquatic/riparian plant communities and priority species?
- What are the desired wetland conditions?

- What are the desired conditions of the unique habitats including cienegas, sacaton bottomlands, mesquite bosques, and cottonwood gallery forest?
- What are the desired habitat conditions for core fish habitat and priority species?
- What management actions are needed to ensure that riparian areas, floodplains, wetlands, and aquatic habitat objectives are met?
- What are the desired conditions of the San Pedro River for proper functioning condition?
- What management actions are needed to conserve, protect, and enhance riparian vegetation and water quantity as mandated by Public Law 100-696?

Relevant to the Scattered Parcels within the Watershed

Land Health (Uplands and Watershed Function)

Comments recommended removal of noxious and invasive species (bullfrog and tamarisk); management of livestock grazing; and management of riparian and upland vegetation communities, including native grasslands.

Comments recommended identifying desired future conditions that protect the San Pedro River and allow for functioning upland and riparian habitat to support a diversity of fish and wildlife species.

Comments suggested that management actions are needed to control erosion and sediment load and to recharge the aquifer.

Comments suggested managing native grasslands to maintain a properly functioning watershed and suggested that BLM consider the important role that native grasslands play in aquifer recharge. Comments also suggested that BLM evaluate grassland restoration in shrub-dominated areas.

Comments recommended studying the Babocomari allotment for riparian recovery, the effects of grazing on riparian habitat, and test plots for upland mesquite removal.

- What are the desired future conditions for upland vegetation? What defines a healthy watershed?
- What use restrictions are needed to achieve desired future conditions?
- What management actions are needed to achieve desired future conditions?
- How can native grasslands be managed to increase infiltration, decrease runoff, and control erosion and sedimentation?
- What criteria should be put in place to evaluate native grassland restoration in shrub-dominated areas?
- What metrics are needed to track changes in upland vegetation and watershed health?

Soil Resources

Comments indicated that the RMP needs to include an erosion-control plan that identifies soil stabilization opportunities and methods.

- Are there areas with highly erodible or sensitive soils that need protection via management actions or allocations?

Vegetation

Comments recommended using a combination of tools such as fire, mechanical, manual, biological, and chemical treatments to remove noxious and invasive species. Comments also recommended that BLM actively manage nonnative grasses to prevent them from spreading to lands outside the SPRNCA and from competing with Huachuca water umbel.

- What monitoring is needed to track trends in vegetation types and noxious and invasive plants?
- How should noxious species be managed?
- What types of vegetation treatments (fire, mechanical, manual, biological, and chemical) are needed to manage vegetation communities and remove noxious and invasive plant species, including nonnative grasses?
- What criteria should BLM use to determine where invasive shrubby vegetation should be removed in areas that once were native grasslands?

Fire Management

Comments recommended the use of prescribed fire to reduce fuel load and modify vegetation communities toward desired conditions. Some comments suggested a fire management plan to protect the cottonwood and willow gallery forest from catastrophic fire and to restore grassland habitats.

- In what areas could fire be utilized as a management tool for vegetation treatments?
- Which areas should be prioritized for prescribed fire use?
- How will fire be managed in the wildland-urban interface?

Adaptive Management/Climate Change

Comments recommended including adaptive management principles to allow for changing resource and environmental conditions that could occur over the long term. The changes could be due to climate change, use patterns, use types, or other conditions.

Comments recommended managing for a range of natural variability, such as climate change, alterations to the natural environment, and drought conditions. Comments suggested distinguishing between natural variability and desired future conditions to accommodate the uncertainty of future environmental conditions.

- How will adaptive management be incorporated into the RMP?

- How will natural variability, such as drought and climate change, be incorporated into desired future conditions?
- What management actions are needed to make the system more resilient to drought and climate change?

Riparian Areas, Floodplains, Wetlands, and Aquatic Habitats

There are no comment summaries or issue statements for this subcategory.

3.1.5 Fish and Wildlife Habitat and Special Status Species

This category includes issues related to fish and wildlife habitat, nongame wildlife species, fisheries, migratory birds, and special status species. *Special status species* include federally listed or proposed species and BLM sensitive species, which include both federal candidate species and delisted species within 5 years of delisting.

Relevant to the SPRNCA

Fish and Wildlife Habitat

Comments emphasized the protection of the cottonwood and willow gallery forest, mesquite bosques, other sensitive riparian habitats, and upland grasslands. These habitats support migratory birds and other wildlife.

Comments recognized the value of riparian and upland habitats that support migratory birds, fish, and mammal species. Comments recommended managing for beaver, fish, migratory birds, mule deer, and pronghorn antelope. Additionally, comments recommended collection and sharing of water inventory data for wildlife needs. Comments also suggested that BLM evaluate the effect of reintroducing beaver on the San Pedro River and consider management decisions related to beaver in the RMP.

Comments ranged from suggesting that the BLM manage the SPRNCA to support sport fishing to suggesting that the BLM manage the SPRNCA to recover, restore, or introduce native fish species. Comments suggested management actions to recover, restore, or reintroduce species such as native fish, Colorado pikeminnow, and pronghorn antelope. Comments noted that supporting management actions would need to be considered to support these fish and wildlife actions. These management actions could include wildlife habitat improvement projects, cooperative agreements and projects with land management agencies and adjacent landowners, and maintenance of wildlife water developments.

Comments also suggested adding fish barriers to prevent nonnative fish species, such as bass and sunfish, in the San Pedro River. Comments suggested that BLM consider the influx of nonnative fish species from Mexico and to consider managing the upper San Pedro River as a sports fishing area. Comments also suggested that BLM increase the number of fish in the upper San Pedro River to provide a diversity of recreation and to increase fish for birds and other wildlife.

- What are the desired future conditions for habitat types that support a wide variety of game, nongame, and migratory bird species such as cottonwood/willow forests, mesquite bosques, riparian areas, and grasslands?
- How should ponds for birds and other wildlife be managed?
- What management, including use restrictions, is needed to achieve, maintain, or improve desired conditions for fish and wildlife habitats?
- What metrics are needed to determine whether habitat objectives are being met?
- What management actions are needed to maintain habitat values and movement corridors on scattered BLM lands in and adjacent to the SPRNCA?
- How will water and habitat needs for fish and wildlife be identified, allocated, and managed?
- Which species and habitats will the RMP identify as priority species and habitats?
- What management actions are needed to manage for priority species?
- Which species should be recovered, restored, or reintroduced?
- Which fish species should be managed for?
- What management actions are needed to manage for fish species, including special status species?
- Should the SPRNCA be managed to support sport fishing?

Special Status Species

Comments identified the need to protect habitats that support special status species. Comments identified the need to protect habitats, including riparian areas and flyways, that support special status species.

Comments suggested evaluating the introduction of native minnow species.

- Which habitats need protection and/or management to support special status species, such as the Huachuca water umbel, southwestern willow flycatcher, yellow-billed cuckoo, northern Mexican gartersnake, jaguar, and ocelot?
- What are the habitats with potential for reintroduction of federally listed and special status species?
- What management actions and strategies are needed to support desired outcomes to support special status species and their habitats?
- Which actions from recovery plans, conservation strategies, and biological opinions that result in a reasonable conservation strategy for each species should be incorporated into management actions?
- How should threatened and endangered species and special status species be managed with species that are not threatened or endangered?

- What stipulations or criteria should be included that would be applied to implementation actions?
- What are the desired habitat conditions for special status species in the uplands?
- What are the habitats/locations with potential for reintroduction of federally listed and special status species?
- What are the desired conditions for all migratory birds, including those on the BLM sensitive species list?
- How will BLM incorporate the Migratory Bird Treaty Act into objectives and management actions?
- What are the habitats/locations with potential for reintroduction of federally listed and special status species?
- Which areas and resources will be allocated for the conservation of special status species, including critical habitat designated by the U.S. Fish and Wildlife Service?
- Which habitats need protection to support special status plant species such as the Huachuca water umbel?

Relevant to the Scattered Parcels within the Watershed

Fish and Wildlife Habitat

Comments emphasized the protection of the cottonwood and willow gallery forest, mesquite bosques, other sensitive riparian habitats, and upland grasslands. These habitats support migratory birds and other wildlife.

Comments recognized the value of riparian and upland habitats that support migratory birds, fish, and mammal species. Comments recommended managing for beaver, fish, migratory birds, mule deer, and pronghorn antelope. Additionally, comments recommended collection and sharing of water inventory data for wildlife needs. Comments also suggested that BLM evaluate the effect of reintroducing beaver on the San Pedro River and consider management decisions related to beaver in the RMP.

Comments ranged from suggesting that the BLM manage the SPRNCA to support sport fishing to suggesting that the BLM manage the SPRNCA to recover, restore, or introduce native fish species. Comments suggested management actions to recover, restore, or reintroduce species such as native fish, Colorado pikeminnow, and pronghorn antelope. Comments noted that supporting management actions would need to be considered to support these fish and wildlife actions. These management actions could include wildlife habitat improvement projects, cooperative agreements and projects with land management agencies and adjacent landowners, and maintenance of wildlife water developments.

Comments also suggested adding fish barriers to prevent nonnative fish species, such as bass and sunfish, in the San Pedro River. Comments suggested that BLM consider the influx of nonnative fish species from Mexico and to consider managing the upper San Pedro River as a sports fishing area.

Comments also suggested that BLM increase the number of fish in the upper San Pedro River to provide a diversity of recreation and to increase fish for birds and other wildlife.

- What are the desired future conditions for habitat types that support a wide variety of game, nongame, and migratory bird species such as cottonwood/willow forests, mesquite bosques, riparian areas, and grasslands?
- How should ponds for birds and other wildlife be managed?
- What management, including use restrictions, is needed to achieve, maintain, or improve desired conditions for fish and wildlife habitats?
- What metrics are needed to determine whether habitat objectives are being met?
- What management actions are needed to maintain habitat values and movement corridors on scattered BLM lands in and adjacent to the SPRNCA?
- How will water and habitat needs for fish and wildlife be identified, allocated, and managed?
- Which species and habitats will the plan identify as priority species and habitats?
- What management actions are needed to manage for priority species?
- Which species should be recovered, restored, or reintroduced?

Special Status Species

Comments identified the need to protect habitats, including riparian areas and flyways, that support special status species.

Comments suggested evaluating the introduction of native minnow species.

- Which habitats need protection and/or management to support special status species, such as the Huachuca water umbel, southwestern willow flycatcher, yellow-billed cuckoo, northern Mexican gartersnake, jaguar, and ocelot?
- What are the habitats with potential for reintroduction of federally listed and special status species?
- What management actions and strategies are needed to support desired outcomes to support special status species and their habitats?
- Which actions from recovery plans, conservation strategies, and biological opinions that result in a reasonable conservation strategy for each species should be incorporated into management actions?
- How should threatened and endangered species and special status species be managed with species that are not threatened or endangered?
- What stipulations or criteria should be included that would be applied to implementation actions?
- What are the desired habitat conditions for special status species in the uplands?

- What are the habitats/locations with potential for reintroduction of federally listed and special status species?

3.1.6 Water Resources

This category includes issues related to surface and groundwater.

Relevant to the SPRNCA

Comments raised concern about the availability of water to sustain the San Pedro River and riparian habitats. Comments suggested that regional growth and the demand for housing have contributed to a decrease in the availability of water resources. Comments suggested constructing retention basins, diversion structures, and artificial recharge basins to slow and retain stormwater runoff and to recharge the aquifer. Other comments recommended coordinating with local and regional governments to implement a balanced water budget.

Comments recognized the need to conduct studies and research to maintain water quantity, water quality, and base flows.

Comments indicated a concern for water resources and land beyond the SPRNCA boundary. These comments recommended including water and land resources beyond the SPRNCA boundary as part of the cumulative effects area of the RMP. Comments suggested that BLM analyze the direct, indirect, interdependent, and interrelated impacts of the non-SPRNCA BLM parcels of the land on the desired water quantity and quality of the SPRNCA. Comments suggested that BLM consider sufficient water for sustainable human use throughout Cochise County.

Comments noted that future development within the watershed could impact available water resources in the SPRNCA and downstream.

- What is the desired water quantity and quality and what management actions are needed?
- What management actions are needed to ensure water availability for multiple uses, including functioning, healthy riparian and upland systems in the SPRNCA?
- What monitoring, hydrology investigations, studies, or research need to be conducted to track water trends, including trends in streamflow, groundwater level, and water quality?
- Are there use restrictions that should be put in place to meet desired future conditions for water quality?
- How will cumulative effects on water resources downstream and upstream of the SPRNCA be addressed and analyzed?
- How will BLM management actions affect cumulative water uses in the basin?

Relevant to the Scattered Parcels within the Watershed

Comments suggested purchasing water rights or conservation easements outside the SPRNCA. Comments suggested that BLM purchase water rights, conservation easements prohibiting

development, ground water infiltration areas, and Central Arizona Project water. Comments also suggested that BLM engage in urban enhancement runoff and stormwater recharge and other supplemental groundwater augmentation programs.

Comments raised concern about the availability of water to sustain the San Pedro River and riparian habitats. Comments suggested that regional growth and the demand for housing have contributed to a decrease in the availability of water resources. Comments suggested constructing retention basins, diversion structures, and artificial recharge basins to slow and retain stormwater runoff and to recharge the aquifer. Other comments recommended coordinating with local and regional governments to implement a balanced water budget.

Comments recognized the need to conduct studies and research to maintain water quantity, water quality, and base flows.

Comments indicated a concern for water resources and land beyond the SPRNCA boundary. These comments recommended including water and land resources beyond the SPRNCA boundary as part of the cumulative effects area of the RMP. Comments suggested that BLM analyze the direct, indirect, interdependent, and interrelated impacts of the non-SPRNCA BLM parcels of the land on the desired water quantity and quality of the SPRNCA. Comments suggested that BLM consider sufficient water for sustainable human use throughout Cochise County.

Comments noted that future development within the watershed could impact available water resources in the SPRNCA and downstream.

- Should BLM take actions outside the SPRNCA, such as purchasing water rights or conservation easements, to meet the purpose for which the conservation area was designated?
- What is the desired water quantity and quality and what management actions are needed?
- What management actions are needed to ensure water availability for multiple uses, including functioning, healthy riparian and upland systems in the SPRNCA?
- What monitoring, hydrology investigations, studies, or research need to be conducted to track water trends, including trends in streamflow, groundwater level, and water quality?
- Are there use restrictions that should be put in place to meet desired future conditions for water quality?
- How will cumulative effects on water resources downstream and upstream of the SPRNCA be addressed and analyzed?
- How will BLM management actions affect cumulative water uses in the basin?

3.1.7 Lands and Realty, Livestock Grazing, and Energy and Mineral Resources

This category includes issues related to mining; salable, leasable, and locatable minerals; renewable energy; rights-of-way; utility corridors; land tenure; communication sites; and livestock grazing.

Relevant to the SPRNCA

Lands and Realty

Comments recommended identifying, evaluating, and analyzing right-of-way avoidance and exclusion areas to protect sensitive resources.

Comments recommended acquiring nonfederal inholdings and adjacent land.

- Are there lands that should be designated as right-of-way avoidance or exclusion areas?
- Are existing designated utility corridors adequate in the SPRNCA? Are new corridors needed?
- Are there lands in the SPRNCA that should be identified as exclusion areas for future utility corridors?
- Are any changes needed to the current acquisition criteria for the SPRNCA?
- Can land tenure adjustments be made to improve wildlife corridors and connections between key habitat areas in the SPRNCA?
- Are there land tenure adjustments that can be made to maintain or improve riparian areas, fish and wildlife habitat, watershed function and condition, visual resources, or other resources and uses?
- Should BLM authorize communication sites in the watershed? If so, what are the impacts on Fort Huachuca's mission?
- Where should utility corridors be designated?

Livestock Grazing

Comments ranged from not allowing livestock grazing to protect sensitive riparian resources to allowing active and productive livestock grazing practices to benefit riparian habitat and native grasslands and reduce fuel loads.

For existing grazing and potential grazing, comments suggested limiting grazing during migratory breeding seasons, modifying rotations and stocking rates, frequent and regular monitoring of grazing practices, and monitoring of available forage to ensure that preferred species population trends are not declining.

The *San Pedro River Riparian Management Plan* (1989) closed the majority of the SPRNCA to grazing. Revising the decision in the upcoming RMP will result in addressing forage allocation concerns.

- Are there areas where grazing should be, or should not be, available in the SPRNCA?
- Where and under what conditions can grazing be compatible with the resource values in Public Law 100-696?
- What will be the allocation of forage resources and water for special status species, wildlife, aquatic species, migratory birds, and potentially livestock?

Energy and Mineral Resources

Comments suggested closing the SPRNCA to renewable wind energy, especially to wind turbines. Comments noted that wind turbines could impact bats and flyways for migratory birds.

- How will renewable energy be managed while protecting the primary purposes for which the SPRNCA was established?
- How will the potential effect of wind turbines on bats and migratory birds be addressed?

Relevant to the Scattered Parcels within the Watershed

Lands and Realty

Comments recommended acquiring nonfederal inholdings and adjacent land.

- Are there land tenure adjustments that can be made to maintain or improve riparian areas, fish and wildlife habitat, watershed function and condition, visual resources, or other resources and uses?
- Should BLM authorize communication sites in the watershed? If so, what are the impacts on Fort Huachuca's mission?
- Where should utility corridors be designated?

Livestock Grazing

The *San Pedro River Riparian Management Plan* (1989) closed the majority of the SPRNCA to grazing. Revising the decision in the upcoming RMP will result in addressing forage allocation concerns.

- What will be the allocation of forage resources and water for special status species, wildlife, aquatic species, migratory birds, and potentially livestock?

Energy and Mineral Resources

Comments requested the BLM to participate in discussions about resuming local mining activities that would affect the volume of water in the watershed. A comment suggested coordinating with mining developments in Mexico that could affect the regional aquifer.

Comments noted that wind turbines could impact bats and flyways for migratory birds.

- How will energy, mineral, and renewable energy resources be addressed?
- What type of stipulations should be placed on oil and gas development and activity, including hydraulic fracturing (commonly referred to as "fracking")?
- What areas should be open or closed to renewable energy development?
- How will the potential effect of wind turbines on bats and migratory birds be addressed?

3.1.8 International Border

This category includes issues related to the international border with Mexico and coordination with Mexico.

Relevant to the SPRNCA

Comments recommended establishing agreements with the Department of Homeland Security and the U.S. Border Patrol to address effects from OHV use, helicopter use, and patrolling the international border. Comments noted that the agreements should address noise reduction, environmental impacts on sensitive resources, creation of new trails, effects on cultural and prehistoric sites, high-intensity lighting, and garbage collection.

Comments recommended coordinating with upstream and downstream agencies and landowners.

- How will the plan address environmental effects from U.S. Border Patrol activities and individuals crossing the international border?
- How will the plan address environmental effects of water withdrawals and water contamination that affect the SPRNCA due to land use practices in Mexico?
- How will BLM coordinate with Mexican agencies and upstream landowners?

Relevant to the Scattered Parcels within the Watershed

Comments recommended coordinating with upstream and downstream agencies and landowners.

- How will BLM coordinate with Mexican agencies and upstream landowners?

3.1.9 Cultural Resources, Paleontological Resources, and Native American Concerns

This category includes issues related to cultural resources, paleontological resources, and Native American traditional cultural properties and other concerns.

Relevant to the SPRNCA

Cultural Resources

Some comments requested more enforcement around known cultural resource sites such as Murray Springs and Presidio Santa Cruz de Terrenate, while others requested interpretive kiosks with information to educate the public. Some comments suggested increased public access to cultural sites, especially the stamp mill sites.

Comments encouraged archaeological research in the SPRNCA. Some comments recommended a goal of 100 percent inventory for cultural resources, with a baseline condition for each site.

Comments suggested that BLM consider managing historic ranching features so that they do not deteriorate and that BLM complete a comprehensive cultural inventory.

- Which cultural areas need to be allocated to a specific use?

- What type of restrictions should be developed to protect cultural resources?
- What areas will be prioritized for archaeological and historical research?
- What will be the criteria for recognizing potential cultural resource conflicts in the SPRNCA?
- How should BLM manage historic ranching features?

Paleontological Resources

Comments recommended developing the Lehner Mammoth Kill Site to encourage visitation and public education of paleontological resources.

- Which paleontological sites need to be allocated to a specific use?
- What type of restrictions should be developed within areas that contain or are likely to contain vertebrate or scientifically important invertebrate and plant paleontological resources?

Native American Concerns

Comments from the Tohono O'odham Nation identified lands within the SPRNCA as traditional-use lands. The Nation emphasized the protection of traditional cultural sites and natural landscapes.

- How will management actions address traditional-use lands of tribal nations?

Relevant to the Scattered Parcels within the Watershed

Cultural Resources

Some comments recommended considering restrictions to protect cultural resources. Other comments requested increased public access to cultural sites. In addition, comments encouraged archaeological research in the SPRNCA.

Comments suggested that BLM consider managing historic ranching features so that they do not deteriorate and that BLM complete a comprehensive cultural inventory.

- Which cultural areas need to be allocated to a specific use?
- What type of restrictions should be developed to protect cultural resources?
- What areas will be prioritized for archaeological and historical research?
- How should BLM manage historic ranching features?

Paleontological Resources

Comments recommended developing paleontological sites to encourage visitation and public education of paleontological resources.

- Which paleontological sites need to be allocated to a specific use?
- What type of restrictions should be developed within areas that contain or are likely to contain vertebrate or scientifically important invertebrate and plant paleontological resources?

Native American Concerns

There are no comment summaries or issue statements for this subcategory.

3.1.10 Socioeconomics

This category includes issues related to generating a socioeconomic baseline and integrating socioeconomics into the analysis portion of the RMP.

Relevant to the SPRNCA

Comments recognized the value of the SPRNCA to the local and regional economy. Comments noted that management of the SPRNCA could potentially impact the economic viability of lessees on BLM-administered lands outside the SPRNCA.

Comments noted that there are populations in the region that are on limited budgets. Impacts to these populations should be addressed in the RMP.

- How will the economic values of the SPRNCA to the local and regional economies be analyzed?
- How will the social and economic conditions of the region be analyzed?
- What impacts will management actions have on socioeconomic concerns and environmental justice?
- How will ecosystem services be incorporated into the analysis of management actions?

Relevant to the Scattered Parcels within the Watershed

Comments recognized the value of the SPRNCA to the local and regional economy. Comments noted that management of the SPRNCA could potentially impact the economic viability of lessees on BLM-administered lands outside the SPRNCA.

Comments noted that there are populations in the region that are on limited budgets. Impacts to these populations should be addressed in the RMP.

- How will the economic values of the SPRNCA to the local and regional economies be analyzed?
- How will the social and economic conditions of the region be analyzed?
- What impacts will management actions have on socioeconomic concerns and environmental justice?
- How will ecosystem services be incorporated into the analysis of management actions?

3.2 Issues Addressed through Policy or Administrative Actions

Some issues raised during scoping can be addressed through policy or administrative action. This includes those actions that are implemented by the BLM as standard operating procedures, because

laws or regulations require them or because they are BLM policies. These issues do not require a planning decision to implement. The following such issues were raised during the scoping process:

- Manage cultural resources—including maintaining up-to-date inventories, addressing inadvertent discoveries, performing annual monitoring, and identifying cultural sites potentially eligible for listing on the National Register of Historic Places.
- Prohibit the feeding of wildlife.
- Incorporate the SPRNCA as a state wildlife area designated under state law so that the regulations pertinent to the SPRNCA are enforceable by state officers.
- Ensure that the take of wildlife under special license by the Arizona Game and Fish Department (such as for scientific-collection purposes) is not restricted where it does not conflict with the purposes of the SPRNCA.
- Address the trespass of livestock grazing within the SPRNCA.
- Do not allow bird banding.
- Do not allow smoking.
- Clarify the roles and responsibilities of volunteers and volunteer organizations that benefit the SPRNCA.
- Improve signage in the SPRNCA.
- Provide more law enforcement resources.
- Address adequate staffing and funding.
- Improve maintenance of the SPRNCA.
- Explain the purpose and need for revising the RMP/EIS.
- Carry forward the objectives from the existing RMP.
- Streamline the process for special recreation permits.
- Address how BLM will accomplish Section 7 consultation with the U.S. Fish and Wildlife Service.
- Allow administrative access to tribal entities, indigenous people, and their informed specialists.
- Allow administrative access to state agencies, such as the Arizona Game and Fish Department, to manage wildlife and wildlife harvest objectives.
- Identify flora and fauna with signage.
- Process research permits for scientific research.
- Develop citizen and student programs to help collect field data.
- Include fisheries biologists from the Arizona Game and Fish Department on a team to enhance the sports fishery in the upper San Pedro River.

- Build functional fences that address resources and uses such as wildlife, habitats, grazing, access, and recreation.
- Consider allowing the public to harvest live and dead mesquite and other unwanted trees to use as fuelwood in areas where mesquite removal is determined necessary.
- Furniture-size mesquite, oak, walnut, and other natural woods should be made available for harvest by the public or commercial furniture builders before it is destroyed.
- BLM should participate in activities such as WaterWise, which encourage water conservation in the watershed.
- BLM should work with the Upper San Pedro Watershed to influence land use and management outside the SPRNCA and BLM parcels of land in the watershed.

3.3 Issues beyond the Scope of the Resource Management Plan

Some issues raised during scoping are beyond the scope of the RMP and will not be considered. Issues beyond the scope of the RMP are not related to decisions that would occur as a result of this planning process. In short, they include decisions that are beyond the capability of the BLM to resolve as part of the planning process. Issues identified in this category are as follows:

- Protect federally reserved water rights and acquire additional water rights to maintain groundwater levels and base flows consistent with Public Law 100-696 Section 102(d): “(d) WATER RIGHTS.—Congress reserves for the purposes of this reservation, a quantity of water sufficient to fulfill the purposes of the San Pedro Riparian National Conservation Area created by this title. The priority date of such reserve rights shall be the date of enactment of this title. The Secretary shall file a claim for the quantification of such rights in an appropriate stream adjudication.”
- If BLM management decisions, past, present, or future, impact the quantity of groundwater or groundwater baseflow to the river, BLM should plan to mitigate those impacts. For example, if a decision is made to further enhance riparian vegetation at the expense of increased evapotranspiration, thus reducing groundwater volume, BLM should be responsible for mitigating the impacts on groundwater baseflow to the river.
- Mitigation of BLM impacts on groundwater should be included as an issue.
- BLM should continue to monitor and reporting for groundwater wells, including ensuring sufficient funding is received for this monitoring and reporting.
- Purchase of water rights, conservation easements prohibiting development, groundwater infiltration areas, Central Arizona Project water, urban enhanced runoff and stormwater recharge, and other supplemental groundwater augmentation programs should be addressed.
- BLM should be proactive in developing viable funding mechanisms to ensure adequate groundwater is available to the SPRNCA.
- The RMP should include a discussion of how BLM will work with Congress to fund groundwater augmentation, mitigation costs, or both.

- Withdraw the SPRNCA from mineral entry, close the SPRNCA to mineral leasing, and close the SPRNCA to mineral material sales. From Public Law 100-696: “(c) Withdrawals—Subject to valid existing rights, all Federal lands within this conservation area are hereby withdrawn from all forms of entry, appropriation, or disposal under the public land laws; from location, entry, and patent under the United States mining laws; and from disposition under all laws pertaining to mineral and geothermal leasing and all amendments thereto.”
- Purchase Central Arizona Project water.
- Secure the international border.
- Maintain Fort Huachuca and its mission.
- Maintain Fort Huachuca, its customs and culture, and its value in protecting our national security.
- Work to find ways to be a good neighbor with Fort Huachuca, including ways to ensure that the Fort continues to have adequate water for its federal purposes.
- Recognize that Fort Huachuca has expended tens of millions of dollars to mitigate its impacts on Fort-attributable groundwater use both on and off post.
- Identify and fund projects to mitigate non-Fort-attributable groundwater use on its lands, including recharge and slow-the-flow projects.
- During the NEPA process, fully consider impacts from BLM actions on national security.
- Recognize that the electromagnetic spectrum within the San Pedro River Valley is a significant natural resource for the United States that can be damaged by human actions and infrastructure, including actions that may be undertaken by BLM or on BLM lands, including crossing of BLM lands.
- Evaluate potential impacts on the electromagnetic spectrum as if it is a natural resource, not a national security issue.
- Develop viable funding mechanisms to ensure adequate groundwater is available to the SPRNCA.
- Include a discussion of how BLM will work with Congress to fund groundwater augmentation, mitigation costs, or both.
- Address predator management.
- Recognize that the Upper San Pedro River watershed has significant water quality and quantity reductions caused by water use in Mexico.
- Restrict development on private land adjacent to the SPRNCA.

3.3.1 Implementation-Level Decisions

The RMP will contain broad-scale decisions that guide future land management actions. Subsequent site-specific implementation, often characterized as project-level or activity-level decisions, will require the BLM's final approval of on-the-ground actions. Implementation decisions require a more detailed,

site-specific environmental analysis that tiers off of the EIS prepared for the RMP. These decisions generally constitute final approval of on-the-ground actions to proceed (BLM Land Use Planning Handbook H-1601-1). The following are implementation level issues brought forward during scoping. Typically implementation level decisions are not incorporated into the RMP. However, the BLM Land Use Planning Handbook does allow implementation level decisions based on the size of the planning area and management priorities:

- Areas of high bird watching use within riparian habitat should address the number of trails, including loop trails with one-way traffic.
- Address the concentration of recreationists caused by having too few access points on the SPRNCA.
- Work with adjacent landowners to potentially increase access and/or trails or reach cooperative agreements.
- Provide transportation facilities to meet travel management objectives while furthering the primary purposes for which the conservation area was established.
- Identify the specific route network to best meet travel management objectives in the SPRNCA while protecting resources.
- Identify any improvements needed to increase access consistent with the Americans with Disabilities Act.
- Identify which trails should be open, closed, or limited use.
- Identify which trails should be open to motorized use, nonmotorized use, or both.
- Identify which trails should be restricted to a specific use.
- Install wildlife blinds.
- Build additional restrooms throughout the SPRNCA.
- Install kiosks, boardwalks, and signs.

4.0 DRAFT PLANNING CRITERIA

The BLM planning regulations (43 Code of Federal Regulations 1610.4-2) require the development of planning criteria to guide preparation of the RMP. *Planning criteria* are the constraints, ground rules, guidelines, and standards used to ensure that the RMP is tailored to the identified issues and that unnecessary data collection and analyses are avoided. Planning criteria are based on applicable laws and regulations; agency guidance; the result of public participation; and coordination with any cooperating federal, state, and local agencies and Native American tribes.

The following preliminary criteria were developed by BLM staff and were included in the Notice of Intent published in the *Federal Register*.

- The RMP will comply with FLPMA; NEPA; and all other applicable laws, regulations, and policies.
- For program-specific guidance for decisions at the land use planning level, the process will follow the BLM's policies in Appendix C of the *Land Use Planning Handbook*, H-1601-1.
- The RMP will recognize all valid existing rights.
- Alternatives will recognize valid existing water rights (state and federal).
- The RMP will meet the requirements of the Arizona-Idaho Conservation Act of 1988, (Public Law 100-696) to conserve, protect, and enhance the riparian area and the aquatic, wildlife, archaeological, paleontological, scientific, cultural, educational, and recreational resources of the conservation area.
- The RMP will not address SPRNCA boundary adjustments or proposals to change Public Law 100-696.
- Develop a range of alternatives within the bounds of the enabling legislation (Public Law 100-696).
- Decisions in the RMP will be compatible with local plans, zoning, ordinances, and policies to the extent consistent with the laws governing the administration of the public lands.
- The BLM will conduct government-to-government consultation with affiliated Native American tribes in accordance with Executive Order 13175.
- The planning process will include the consideration of any impacts on Native American trust assets.
- The decisions of the RMP will comply with the Endangered Species Act (and be consistent with BLM Manual 6840, *Special Status Species*) and follow interagency agreements with the U.S. Fish and Wildlife Service regarding the Section 7 consultation and species recovery process.
- Coordination with the Arizona State Historic Preservation Office will be conducted throughout the planning process.

- The RMP will recognize Arizona Game and Fish Department's authority to manage wildlife, including hunting and fishing, within the planning area pursuant to the master memorandum of understanding with the Arizona Game and Fish Commission that establishes coordination and cooperation between agencies.

5.0 DATA SUMMARY/DATA GAPS

Public scoping comments identified information sources to consider in the land use planning process. These information sources will be considered, along with new and existing data and resource information. The following paragraphs summarize relevant data and information provided or identified as available.

The U.S. Geological Survey groundwater/aquifer sustainability report should be available by fall 2013. The report is expected to document groundwater health indicators that can be used as tools to identify ecological condition.

The National Riparian Service Team conducted SPRNCA-wide riparian surveys in April 2012 and presented its findings in the *Riparian Conditions along the San Pedro River: Proper Functioning Condition (PFC) Riparian Assessment Report*.

One commenter submitted a paper on implementing detention basins and effective stormwater management to restore and maintain the sustainable yield of the regional aquifer.

The Sierra Club Water Sentinels program has had a San Pedro River project for the past 2½ years. At several times during the year, volunteers visit five places on the river to conduct water quality testing. The locations are typically upstream from each of the bridges crossing the river in the SPRNCA. This water quality testing includes taking a sample to check for *E. coli* and using meters to check water temperature, pH, conductivity, and particulate matter. The volunteers also record qualitative observations such as flood evidence, water color, fish presence, and channel blockage. The Sierra Club Water Sentinels also collects data from monthly checks on the water levels in 14 test wells in the Curry Draw (Murray Springs Clovis Site) area.

Since 2000, the U.S. Geological Survey has collected and reported on a broad suite of hydrologic data from the SPRNCA and adjacent areas of the subwatershed. The data ranges from groundwater levels to stream flow and aquifer storage change.

The report by L. Arriana Brand, *Projecting Avian Response to Linked Changes in Groundwater and Riparian Floodplain Vegetation along a Dryland River: A Scenario Analysis*, should be used to develop avian monitoring metrics that link avian abundance to depth to groundwater and surface water flows.

The report by Juliet Stromberg in the U.S. Geological Survey's Scientific Investigations Report 2005-5163 provides data as a baseline for status of the vegetation community. The methods in the report could be implemented for repeat monitoring of status and trend of riparian condition.

The study *Synthesis of Upper Verde River Research and Monitoring* by Daniel G. Neary, Alvin L. Medina, and John N. Rinne could form the basis to assess the Babocomari River as it relates to cattle grazing.

The U.S. Geological Survey's stream-gauge records could be used to determine how much surface water is needed to sustain perennial flow of the San Pedro River within the SPRNCA through the driest time of the year.

There is a growing body of scientific information on the interactions between riparian vegetation and groundwater hydrology. The information provides a scientific basis to determine desired future conditions for groundwater availability within the SPRNCA.

6.0 FUTURE STEPS IN THE PLANNING PROCESS

The BLM will use the comments collected during scoping and issues identified to develop a range of alternatives. These alternatives will address the issues identified during scoping and will meet the purpose and need of the project and the goals and objectives developed by the BLM. Consistent with NEPA, Council on Environmental Quality regulations, and BLM NEPA and land use planning guidance, the alternatives should consider a reasonable range of alternatives. A detailed analysis of the alternatives will be completed and documented in the Draft RMP/EIS.

Although public input is accepted throughout the planning process, the next official public comment period begins when the Draft RMP/EIS is available for public review. The availability of the Draft RMP/EIS will be announced in the *Federal Register* and on the project website. Public comments will be accepted for a minimum of 45 days, during which public meetings will be held to receive comments on the adequacy of the Draft RMP/EIS. The BLM will review and consider all the comments received on the Draft RMP/EIS.

After the end of the public comment period, the Draft RMP/EIS will be revised based on public comments. Substantive comments and responses will be incorporated into the Proposed RMP/Final EIS. The availability of the Proposed RMP/Final EIS will be announced in the *Federal Register* and on the project website. The Notice of Availability begins the 30-day public protest period. During this time, the public can submit protests on planning-level decisions.

Following the public protest period, the BLM will resolve protests and inconsistencies and then publish the Approved RMP and Record of Decision. The availability of these documents will be announced in the *Federal Register* and on the project website.

For information about this project, visit the project website or contact the BLM project manager:

- *Project website:*
http://www.blm.gov/az/st/en/prog/planning/san_pedro.html
- *BLM project manager:*
Amy Markstein
3201 East Universal Way, Tucson, AZ 85756
(520) 258-7231
amarkstein@blm.gov.

Appendix A

Notice of Intent

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Appendix A

Notice of Intent

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invite the general public and other Federal agencies to take this opportunity to comment on this ICR. This collection is scheduled to expire on September 30, 2013.

DATES: To ensure that your comments on this IC are considered, we must receive them on or before July 1, 2013.

ADDRESSES: Please submit a copy of your comments to the Information Collection Clearance Officer, U.S. Geological Survey, 807 National Center, 12201 Sunrise Valley Drive, Reston, VA 20192 (mail); 703-648-7195 (fax); or dgovoni@usgs.gov (email). Reference Information Collection 1028-0059 in the subject line.

FOR FURTHER INFORMATION CONTACT: Lori E. Apodaca at 703-648-7724 (telephone); lapodaca@usgs.gov (email); or by mail at U.S. Geological Survey, 989 National Center, 12201 Sunrise Valley Drive, Reston, VA 20192.

SUPPLEMENTARY INFORMATION:

I. Abstract

The collection of this information is required by the Comprehensive Test Ban Treaty (CTBT), and will, upon request, provide the CTBT Technical Secretariat with geographic locations of sites where chemical explosions greater than 300 tons TNT-equivalent have occurred.

II. Data

OMB Control Number: 1028-0059.

Form Number: 9-4040-A.

Title: Comprehensive Test Ban Treaty.

Type of Request: Extension of a currently approved collection.

Affected Public: Business or Other-For-Profit Institutions: U.S. nonfuel minerals producers.

Respondent Obligation: Voluntary.

Frequency of Collection: Annually.

Estimated Number of Annual Responses: 2,500.

Annual Burden Hours: 625 hours. We expect to receive 2,500 annual responses. We estimate an average of 15 minutes per response.

Estimated Reporting and Recordkeeping "Non-Hour Cost" Burden: We have not identified any "non-hour cost" burdens associated with this collection of information.

Public Disclosure Statement: The PRA (44 U.S.C. 3501, et seq.) provides that an agency may not conduct or sponsor a collection of information unless it displays a currently valid OMB control number and current expiration date.

III. Request for Comments

Comments: We are soliciting comments as to: (a) Whether the proposed collection of information is

necessary for the agency to perform its duties, including whether the information is useful; (b) the accuracy of the agency's estimate of the burden time to the proposed collection of information; (c) how to enhance the quality, usefulness, and clarity of the information to be collected; and (d) how to minimize the burden on the respondents, including the use of automated collection techniques or other forms of information technology. Please note that the comments submitted in response to this notice are a matter of public record. Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment, including your personal identifying information, may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee we will be able to do so.

Dated: April 18, 2013.

John H. DeYoung, Jr.,
Director, National Minerals Information Center, U.S. Geological Survey.

[FR Doc. 2013-10118 Filed 4-29-13; 8:45 am]

BILLING CODE 4311-AM-P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

**[LLAZG02200.L16100000.
D0000.LXSS206A0000]**

Notice of Intent To Prepare a Resource Management Plan for the San Pedro Riparian National Conservation Area and Associated Environmental Impact Statement, Arizona

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of intent.

SUMMARY: In compliance with the National Environmental Policy Act of 1969 (NEPA), as amended, the Federal Land Policy and Management Act of 1976 (FLPMA), as amended, and the Arizona-Idaho Conservation Act of 1988 (creating the San Pedro National Conservation Area), the Bureau of Land Management (BLM) Tucson Field Office, Tucson, Arizona, intends to prepare a Resource Management Plan (RMP) with an associated Environmental Impact Statement (EIS) for the San Pedro Riparian National Conservation Area (SPRNCA) and by this notice is announcing the beginning of the scoping process to solicit public comments and identify issues. The RMP

will replace the existing Safford RMP decisions for the BLM land within the planning area.

DATES: This notice initiates the public scoping process for the RMP with associated EIS. Scoping will begin when the notice is published and extend for at least 90 days. The date(s) and location(s) of any scoping meetings have not yet been determined. All public meetings will be announced at least 15 days in advance through local media, newspapers, and the BLM Web site at: http://www.blm.gov/az/st/en/fo/tucson_field_office.html. The BLM will accept scoping comments throughout the planning effort. However, in order to be included in the Scoping Report, comments must be received prior to the close of the 90-day scoping period. Documentation of public meetings and all scoping comments received will be available in the public room of the BLM Tucson Field Office for public inspection and for any participant who wishes to clarify the views they have expressed. Additional opportunities for public participation will be provided throughout the process.

ADDRESSES: You may submit comments on issues and planning criteria related to the SPRNCA RMP/EIS by any of the following methods:

- *Email:*
blm_az_tfo_sprnca_rmp@blm.gov.
- *Fax:* 520-258-7238.
- *Mail:* Bureau of Land Management Tucson Field Office, 3201 East Universal Way, Tucson, AZ 85756.

Documents pertinent to this proposal may be examined at the Tucson Field Office.

FOR FURTHER INFORMATION CONTACT: Amy Markstein, Assistant Planner, telephone 520-258-7231; address 3201 East Universal Way, Tucson, AZ 85756; email amarkstein@blm.gov. Persons who use a telecommunications device for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1-800-877-8339 to contact the above individual during normal business hours. The FIRS is available 24 hours a day, 7 days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours.

SUPPLEMENTARY INFORMATION: This document provides notice that the BLM Tucson Field Office, Tucson, Arizona, intends to prepare an RMP with an associated EIS for the SPRNCA, announces the beginning of the scoping process, and seeks public input on issues and planning criteria. The planning effort is focused on the SPRNCA, which encompasses 56,431 acres of public land located within

Cochise County, Arizona. The planning area boundary (geographic extent of the planning area) has not yet been determined, and is an issue that will be considered during scoping. Decisions in the RMP will be limited to BLM-administered land within the planning area boundary. The purpose of the public scoping process is to determine relevant issues that will influence the scope of the environmental analysis including the planning area boundary and alternatives to be considered. Preliminary issues for the planning area have been identified by the BLM personnel; Federal, State, and local agencies; and other stakeholders.

The planning effort is needed to provide direction for the long-range management and protection of the SPRNCA's resources, including aquatic; wildlife; archaeological; paleontological; scientific; cultural; educational; and recreational resources and values, as stated in Public Law 100–696 and codified at 16 U.S.C. 460xx.

The purpose of the RMP is to identify the current management situation, desired future conditions to be maintained or achieved, and management actions necessary to achieve those objectives for the aforementioned resources.

The issues include:

- The geographic extent of the planning area (the planning area boundary);
- Desired future conditions for water quantity;
- Desired future conditions for riparian and upland plant communities;
- Management of riparian vegetation along the San Pedro River;
- SPRNCA's designation as a Globally Important Bird Area;
- Determining which areas should be open and closed to grazing;
- Use restrictions for resource protection; and
- Management of resources near the urban interface.

Preliminary planning criteria include:

- The RMP will comply with FLPMA, NEPA, and all other applicable laws, regulations, and policies.
- Program specific guidance for decisions at the land use planning level. The process will follow the BLM's policies in Appendix C of the Land Use Planning Handbook, H–1610–1.
- The RMP will recognize all valid existing rights.
- The RMP will meet the requirements of the Arizona-Idaho Conservation Act of 1988 (Pub. L. 100–696) to conserve, protect, and enhance the riparian area and the aquatic, wildlife, archaeological, paleontological, scientific, cultural, educational, and

recreational resources of the conservation area.

- The RMP will not address any National Conservation Area boundary adjustments or proposals to change Public Law 100–696.
- The BLM will conduct government to government consultation with affiliated Native American tribes in accordance with Executive Order 13175.
- The planning process will include the consideration of any impacts on Native American Trust assets.
- The RMP decisions will comply with the Endangered Species Act (and be consistent with BLM Manual 6840 Special Status Species) and follow interagency agreements with the Fish and Wildlife Service regarding Section 7 Consultation and species recovery process.
- Coordination with the Arizona State Historic Preservation Office will be conducted throughout the planning process.
- The RMP will recognize Arizona Game and Fish Department's authority to manage wildlife, including hunting and fishing, within the planning area pursuant to the master memorandum of understanding (MOU) with the Arizona Game and Fish Commission establishing coordination and cooperation between agencies.

You may submit comments on issues and planning criteria in writing to the BLM at any public scoping meeting, or you may submit them to the BLM using one of the methods listed in the **ADDRESSES** section above. The BLM will accept scoping comments throughout the planning effort. However, in order to be included in the Scoping Report, comments must be received prior to the close of the 90-day scoping period. Documentation of public meetings and all scoping comments received will be available in the public room of the BLM Tucson Field Office for public inspection and for any participant who wishes to clarify the views they have expressed. Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. The BLM will evaluate identified issues to be addressed in the plan and will place them into one of three categories:

1. Issues to be resolved in the plan;

2. Issues to be resolved through policy or administrative action; or

3. Issues beyond the scope of this plan.

The BLM will provide an explanation in the Draft RMP/Draft EIS as to why an issue was placed in category two or three. The public is also encouraged to help identify any management questions and concerns that should be addressed in the plan. The BLM will work collaboratively with interested parties to identify the management decisions that are best suited to local, regional, and national needs and concerns.

The BLM will use information about historic and cultural resources within the planning area in identifying and evaluating impacts to such resources in the context of both NEPA and Section 106 of the NHPA.

The BLM will consult with Indian tribes on a government-to-government basis in accordance with Executive Order 13175 and other policies. Tribal concerns, including impacts on Indian trust assets and potential impacts to cultural resources, will be given due consideration. Federal, State, and local agencies, along with tribes and other stakeholders that may be interested in or affected by the proposed action that the BLM is evaluating, are invited to participate in the scoping process and, if eligible, may request or be requested by the BLM to participate in the development of the environmental analysis as a cooperating agency.

The BLM will use an interdisciplinary approach to develop the plan in order to consider the variety of resource issues and concerns identified. Specialists with expertise in the following disciplines will be involved in the planning process: Rangeland management, outdoor recreation, archaeology, paleontology, wildlife, fisheries, lands and realty, hydrology, sociology, and economics.

Authority: 40 CFR 1501.7, 43 CFR 1610.2

Raymond Suazo,

State Director.

[FR Doc. 2013–10058 Filed 4–29–13; 8:45 am]

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Appendix B

Coded Comments by Category

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Planning Issue Category	Comment
Planning area boundary	The first step should be to determine parameters. Nobody can really know what they are talking about unless the parameters of the plan are set. I have never seen a plan discussed where the areas involved were not designated. Seems like a half done way to make a plan.
Planning area boundary	Please do use the watershed boundary for the planning process—can't talk about effects on natural resources without looking at the watershed.
Planning area boundary	I urge the BLM to include the entire watershed that feeds into the SPRNCA as they plan the extent of the Resource Management Plan. Certainly all BLM lands in the Upper San Pedro Basin should be included.
Planning area boundary	Because the health of the SPRNCA and the river itself is integrally tied to the health of the watershed in which it is situated, BLM should consider the planning boundaries for the SPRNCA plan to include the entire Upper San Pedro River watershed south of Interstate 10, since management of these public lands affects the hydrology and health of the river system. Limiting the planning area boundary to the NCA improperly limits the extent to which BLM could be conserving, protecting, and enhancing "the riparian area and the aquatic, wildlife, archeological, paleontological, scientific, cultural, educational, and recreational resources of the conservation area." Pub. L. 100-696. Each BLM-administered parcel in the watershed should be considered a part of the whole picture towards managing the SPRNCA.
Planning area boundary	Ultimately, BLM needs to ensure base flows in the river for these habitats. It can do that by expanding the scope of the RMP to include the entire Sierra Vista/Upper San Pedro Valley watershed.
Planning area boundary	In order to slow, stop and even reverse the annual groundwater deficit, BLM must expand the planning area to include the entire Sierra Vista Subwatershed and possibly additional adjacent areas of the middle San Pedro River near Benson.
Planning area boundary	As the health of the SPRNCA depends to some extent on conditions in the watershed, it would seem that the planning area should include nearby BLM lands in the watershed that are located both east and west of the SPRNCA. From a recreation perspective, we believe that BLM should consider including BLM lands located in the area between the SPRNCA and the town of Tombstone (both north and south of Charleston Road).
Planning area boundary	BLM should consider the planning boundaries for the SPRNCA plan to include the entire Upper San Pedro River watershed south of Interstate 10, since management of these public lands affects the hydrology and health of the river system.

Planning Issue Category	Comment
Planning area boundary	"Scattered" parcels of BLM land should fall under a different plan. Those parcels serve completely different purposes.
Planning area boundary	For this reason it is inappropriate to include additional parcels beyond the outlines of the current NCA unless they are contiguous or near contiguous or unless they are riparian zones along tributary washes. By including additional parcels management efforts and the original purpose of the NCA will be diluted. Decisions which make sense in Tucson do not necessarily make sense with respect to the local area.
Planning area boundary	Do not limit the plan to the current SPRNCA, but do include in the plan all BLM lands which affect the watershed function. (This primarily means BLM lands where water runoff will eventually enter the SPRNCA, but might include, for example, downstream areas where channelization might migrate into the SPRNCA.)
Planning area boundary	The scope of the RMP needs to address the adaptive management of groundwater and surfacewater beyond the terrestrial boundaries of the SPRNCA, working closely with local partners, to effectively address the needs of the larger hydrologic system over the long-term.
Planning area boundary	Cochise County recommends BLM use the existing SPRNCA boundary for planning purposes. This will clarify the scope, goals, alternatives and analysis.
Planning area boundary	Therefore, I want to encourage BLM to include all of its parcels within the San Pedro River watershed when and where the RMP addresses groundwater and surface flow issues. I believe that the water issue cannot be adequately addressed if the study is limited to the SPRNCA.
Planning area boundary	I support the inclusion of the existing scattered BLM parcels in the planning area.
Planning area boundary	The scope of the RMP should be the basin, not just SPRNCA lands and not just the subwatershed.
Planning area boundary	This also requires the consideration of the entire watershed and active engagement beyond the boundaries of the conservation area.
Planning area boundary	Sierra Club urges the BLM to define the planning area as broadly as possible to include the greatest possible geographic extent of public lands managed by the BLM within the upper San Pedro River watershed. At a minimum, the planning area boundary must encompass the entire 56,431 acres of public land located within SPRNCA boundaries that are described in the Act. The planning area also should include public lands managed by BLM located outside of the SPRNCA boundaries but within the upper San Pedro River watershed.

Planning Issue Category	Comment
Planning area boundary	The draft RMP must address the "big picture" to include management plans, actions, and strategies to achieve safe yield in the greater Sierra Vista sub-watershed outside the boundaries of the SPRNCA.
Recreation, travel management, scientific research, public health and safety, and firearms	BLM should continue to restrict firearm and off-road vehicle use and grazing in the river channel and in all other areas along the river.
Recreation, travel management, scientific research, public health and safety, and firearms	BLM should continue to restrict firearm and off-road vehicle use and grazing in the river channel and in all other areas along the river.
Recreation, travel management, scientific research, public health and safety, and firearms	Im not concerned with target shooting or the hunting seasons this area has. My concern is our inalienable right to protect ourselves if needed.
Recreation, travel management, scientific research, public health and safety, and firearms	My suggestion for personal carry of firearms on this National Land is to follow the National Park Systems guidelines and allow concealed carry in accordance with the laws of the state of Arizona. The National Park laws are fair to whatever area of the U.S. you may be in, allowing for our safety and freedoms to flourish.
Recreation, travel management, scientific research, public health and safety, and firearms	As a local resident, the San Pedro Riparian National Conservation Area (SPRNCA) is an incredible recreational and educational resource, right on the doorstep of Sierra Vista, Bisbee, Tombstone, and other local communities.
Recreation, travel management, scientific research, public health and safety, and firearms	In addition, BLM should continue to prohibit off-road motor vehicle use, especially in the river channel itself or anywhere that is not on designated, paved roads and highways in the SPRNCA.
Recreation, travel management, scientific research, public health and safety, and firearms	Finally, BLM should continue restrictions on the use of firearms (especially target shooting), particularly for public safety in the vicinity of heavily visited venues like San Pedro House and Fairbank Schoolhouse.
Recreation, travel management, scientific research, public health and safety, and firearms	I oppose allowing any hunting or trapping on this land.
Recreation, travel management, scientific research, public health and safety, and firearms	We also believe that the San Pedro Riparian Zone should not become a race track for off road vehicles. These machines provide no useful physical or mental benefit to their owners and only make life miserable for the plants and animals that depend upon a quiet and relatively undisturbed environment. This is not possible if the area becomes a track for off road vehicles.
Recreation, travel management, scientific research, public health and safety, and firearms	Neither should gun enthusiasts be allowed to invade the peace and quiet of SPRINCA just to take pot shots at animal life and any undocumented visitors who might cross their paths.
Recreation, travel management, scientific research, public health and safety, and firearms	In your plans, please ensure that ATVs and other Off Road Vehicles are NOT allowed to enter the off the road settings.

Planning Issue Category	Comment
Recreation, travel management, scientific research, public health and safety, and firearms	Restriction or denial of access to ATVs and private vehicles.
Recreation, travel management, scientific research, public health and safety, and firearms	Define areas where hunting is allowed and post with signs.
Recreation, travel management, scientific research, public health and safety, and firearms	Do not allow hunting within 1/2 mile of any maintained trail or facility used by the public.
Recreation, travel management, scientific research, public health and safety, and firearms	Do not expand the currently allowed hunting areas.
Recreation, travel management, scientific research, public health and safety, and firearms	Do not allow any shooting except in designated hunting areas during hunting season.
Recreation, travel management, scientific research, public health and safety, and firearms	Do not allow, plinking, "soft shooting", paintballing, etc.
Recreation, travel management, scientific research, public health and safety, and firearms	Post "NO GUNS ALLOWED" signs where they will be seen.
Recreation, travel management, scientific research, public health and safety, and firearms	Allow motorized wheelchairs to be used on designated trails.
Recreation, travel management, scientific research, public health and safety, and firearms	Offer transportation of handicapped individuals to sites otherwise unavailable to them.
Recreation, travel management, scientific research, public health and safety, and firearms	Set up a camping/RV location near a parking area, with picnic tables and grills.
Recreation, travel management, scientific research, public health and safety, and firearms	Opening the area to cattle and motorized vehicles would cause irreparable harm to the fragile San Pedro environment, disturbing the birds and other wildlife, and generally changing the peaceful habitat that has made SPRNCA so attractive and unique.
Recreation, travel management, scientific research, public health and safety, and firearms	Prohibit off-road vehicle use within the SPRNCA or limit off road vehicle use to established roads only.
Recreation, travel management, scientific research, public health and safety, and firearms	My suggestion for personal carry of firearms on this National Land is to follow the National Park Systems guidelines and allow concealed carry in accordance with the laws of the State of Arizona.
Recreation, travel management, scientific research, public health and safety, and firearms	BLM should continue to prohibit off-road motor vehicle use, especially in the river channel itself or anywhere that is not on designated, paved roads and highways in the SPRNCA.
Recreation, travel management, scientific research, public health and safety, and firearms	Finally, BLM should continue restrictions on the use of firearms (especially target shooting), particularly for public safety in the vicinity of heavily visited venues like San Pedro House and Fairbank Schoolhouse.

Planning Issue Category	Comment
Recreation, travel management, scientific research, public health and safety, and firearms	I do not believe that recreational shooting or hunting are appropriate in the SPRNCA as they pose a danger to others, and the RMP should address this and appropriate law enforcement to keep this activity out of the SPRNCA.
Recreation, travel management, scientific research, public health and safety, and firearms	Please prohibit all dogs from the SPRNCA, establish a special dog walking area or collect an entrance fee for dogs.
Recreation, travel management, scientific research, public health and safety, and firearms	Please establish safe zones for walkers to prevent accidents.
Recreation, travel management, scientific research, public health and safety, and firearms	Please prohibit irresponsible fishing at SPRNCA ponds.
Recreation, travel management, scientific research, public health and safety, and firearms	The benches where one can sit and rest in the SPRNCA are either located in the sun all day long or provide no visual enjoyment at all unless one wants to look right into mesquite bushes. The BLM employee responsible for their placement hopefully works no more for the United States Government. please make adjustments and charge the cost to that employees benefit package.
Recreation, travel management, scientific research, public health and safety, and firearms	Please continue to keep the San Pedro Riparian Area closed to all forms of motorized transportation. Motorcycles, ATVs, and four-wheel drive vehicles should not be allowed.
Recreation, travel management, scientific research, public health and safety, and firearms	I am totally opposed to any motorized vehicle activity anywhere in the San Pedro Riparian Area.
Recreation, travel management, scientific research, public health and safety, and firearms	I oppose parts of the proposed Management Plan what would permit cattle grazing and off-road vehicle access. I believe that such uses would disturb the fragile wildlife, interfere with use, and damage the area.
Recreation, travel management, scientific research, public health and safety, and firearms	Permit no dogs in the area. Many are off the leash and the amount of excrement left is unsanitary and disgusting and dangerous.
Recreation, travel management, scientific research, public health and safety, and firearms	Allow no fishing. Many anglers leave behind huge amounts of trash including thousands of cigarette butts, fishing line, hooks and bait.
Recreation, travel management, scientific research, public health and safety, and firearms	No bikes- this is dangerous to pedestrians and wildlife.
Recreation, travel management, scientific research, public health and safety, and firearms	No hunting- dangerous and unhumanitarian in a conservation area.
Recreation, travel management, scientific research, public health and safety, and firearms	Id like to see a boardwalk out over the deepest part of the Cienega with signage indicating the depth there and that a cow would sink in only ankle deep due to the grasses interwoven root system.
Recreation, travel management, scientific research, public health and safety, and firearms	I enjoy the upgrade at San Pedro House with all the new pathways. Similar pathways in the Cienega would keep people

Planning Issue Category	Comment
safety, and firearms	on paths.
Recreation, travel management, scientific research, public health and safety, and firearms	We need an easier entry point into the Cienega. It could become a lucrative tourist attraction.
Recreation, travel management, scientific research, public health and safety, and firearms	I interviewed first families about their fond memories of the Cienega. One guy remembered a spring that had such force he could jump into it and have it propel him right back out. I would love that spring to be IDd (but caged over to keep new youngsters from trying the same thing). (John McCommas was the daredevil.)
Recreation, travel management, scientific research, public health and safety, and firearms	Keep all vehicles out (but service BLM trucks). But please allow the public in.
Recreation, travel management, scientific research, public health and safety, and firearms	Part of the SPRNCA has been identified as a Formerly Used Defense Site (FUDS) by the U.S. Army Corp of Engineers in the vicinity of the Charleston town site. As remedial investigations continue to analyze for potential munitions hazards or contamination within the area it is recommended this activity be identified as an ongoing operations.
Recreation, travel management, scientific research, public health and safety, and firearms	Off road vehicles would disturb bird mating, nesting, and migration patterns. It would also make the area unfriendly and very noisy to visitors who wish to enjoy the beauty of the area. There are very few places like the San Pedro.
Recreation, travel management, scientific research, public health and safety, and firearms	It is also important to me to increase access to the area. Children, in particular, need to have a chance to enjoy nature.
Recreation, travel management, scientific research, public health and safety, and firearms	Please also do add camping facilities as well as some nice picnic areas.
Recreation, travel management, scientific research, public health and safety, and firearms	NO off road vehicle use.
Recreation, travel management, scientific research, public health and safety, and firearms	BLM should continue to prohibit off-road motor vehicle use, especially in the river channel itself or anywhere that is not on designated, paved roads and highways in the SPRNCA.
Recreation, travel management, scientific research, public health and safety, and firearms	Trails should be trimmed of tall vegetating encroaching or obstructing designated trails and other paths in heavily visited areas like San Pedro House, Kingfisher Pond, Hereford and Palominas trailheads, and Fairbank.
Recreation, travel management, scientific research, public health and safety, and firearms	Trails should be clearly marked, while SPRNCA maps and guides should be annotated to note their location and promotional materials should publicize their availability.

Planning Issue Category	Comment
Recreation, travel management, scientific research, public health and safety, and firearms	Currently, some for-profit tour operators obtain the necessary Special Recreation Permit (SRP) and submit fees required to bring tour groups into the SPRNCA as part of an advertised tour itinerary, while other operators do not, but proceed into SPRNCA anyway. The same situation might occur with photography workshops and similar events. Since enforcement is problematical, BLM should consider streamlining the permit process.
Recreation, travel management, scientific research, public health and safety, and firearms	For multiple non-motorized means of travel, like mountain biking, equestrian rides, hiking, birding, and picnicking, BLM should consider use restrictions in sensitive places like Fairbank Cemetery and Murray Springs and in crowded places like San Pedro House and Fairbank.
Recreation, travel management, scientific research, public health and safety, and firearms	Meanwhile, motorized vehicle access should be limited, as it currently is, to existing designated roads and highways that provide access to visitor contact stations and trailheads. BLM should continue to prohibit off-road motor vehicle use, especially in the river channel itself.
Recreation, travel management, scientific research, public health and safety, and firearms	Finally, BLM must find a way to accommodate handicap and wheel-chair access including low-horsepower, single-person conveyances to satisfy requirements of the Americans With Disabilities Act at the most popular visitor sites.
Recreation, travel management, scientific research, public health and safety, and firearms	There is considerable interest in improved trails, in terms of both condition and connections the length of the river. One particularly interesting trail concept is a rail-trail on the right-of-way of the old railroad currently owned by Union Pacific.
Recreation, travel management, scientific research, public health and safety, and firearms	Another set of recreational uses of SPRNCA is for both day uses like picnics and for overnight camping.
Recreation, travel management, scientific research, public health and safety, and firearms	Some recreational uses are too damaging or intrusive to allow in the SPRNCA. For example, paint ball or air soft gun games require considerable space away from trails and visitor sites, but SPRNCA is narrow by its nature. The cleanup after such events is problematical to complete quickly and cost-effectively. The quality of view sheds would be diminished. Similarly, bow hunting and recreational shooting and other uses of firearms cannot be done safely near heavily visited places like San Pedro House and Fairbank Schoolhouse, nor near trails, since it is often difficult to see through thick vegetation whether or not a trail is occupied. Another example is geo-caching.
Recreation, travel management, scientific research, public health and safety, and firearms	Horseback riding, bunting (of any kind), motorized vehicles and bicycles should be banned from these sites.

Planning Issue Category	Comment
Recreation, travel management, scientific research, public health and safety, and firearms	The current restriction on possession and discharge of firearms for hunting or any other purpose between Charleston Road and Highway 92 during the entire year should continue. However, existing signs are inadequate to properly inform the public about these restrictions. BLM should place appropriate signage at all facilities and marked trails within this area. This would include: <ul style="list-style-type: none"> • Charleston Road parking area south of Charleston Road • Escapule Road parking area • Murray Springs parking area • San Pedro House • Hereford Bridge parking area • Lehner Mammoth Kill Site parking area
Recreation, travel management, scientific research, public health and safety, and firearms	Current regulations allow hunting during established Arizona state seasons north of Charleston Road and south of Highway 92, except for areas within one-quarter mile of developed facilities. BLM should identify "developed facilities" for clarity. We recommend that they include: <ul style="list-style-type: none"> • Palominas parking area/trailhead • Millville parking area/trailhead • Little Boquillas Ranch and trailhead • Fairbank Historic Townsite • Presidio Santa Cruz de Terrenate • St. David Cienega parking area/trailhead
Recreation, travel management, scientific research, public health and safety, and firearms	For the purpose of public safety, BLM should expand the existing restriction to also include popular marked, designated trails. Visitors could be walking on these trails at any time and should not have to be concerned about their personal safety during hunting seasons. Non-hunters are often not even aware of the timing of hunting seasons. These trails include: <ul style="list-style-type: none"> • Millville Historic Townsite/Rock Art Discovery Trail • Little Boquillas Ranch - trailhead parking area to the Ranch site • Fairbank loop trail including trail to cemetery • Presidio Santa Cruz de Terrenate – trailhead on InBalance Road to Presidio • St. David Cienega trail
Recreation, travel management, scientific research, public health and safety, and firearms	And again, proper signage is essential to inform the public of these restrictions. Given the range of firearms today and to ensure public safety, BLM should increase the exclusion zone around trails and developed facilities from one-quarter mile to one-half mile.
Recreation, travel management, scientific research, public health and safety, and firearms	Bowhunting is currently permitted throughout the SPRNCA during all established Arizona seasons, except within one-quarter mile of developed facilities. For public safety BLM should increase this restriction to one-half mile.
Recreation, travel management, scientific research, public health and safety, and firearms	BLM should maintain the restriction on target shooting and "plinking" throughout the SPRNCA. There are numerous nearby areas where the public can legally engage in these hobbies. Law enforcement should be increased to ensure that target shooting and plinking is not occurring.

Planning Issue Category	Comment
Recreation, travel management, scientific research, public health and safety, and firearms	a. Roadless Areas: Motorized vehicles should be allowed only on designated paved highways, roads and access roads to trailhead parking areas, visitor contact stations, and other signed facilities. This guidance will help preserve roadless areas with wilderness characteristics. Any roadless area should be considered for inclusion in "lands with wilderness characteristics" if it meets the size requirements. No Border Patrol vehicles should be allowed on such parcels. Border Patrol activity should be minimal and performed on foot or horseback.
Recreation, travel management, scientific research, public health and safety, and firearms	We strongly urge BLM to ban the use of ATVs, UTVs and motorized trail bikes in the SPRNCA in order to maintain the reputation we have as a source of wholesome and relaxing recreation
Recreation, travel management, scientific research, public health and safety, and firearms	The Border Patrol wants BLM to make the road that runs parallel to the San Pedro River an all-weather road. This road goes from Highway 92 to the border and isnt a maintained road. the Friends of the San Pedro River strongly recommend that this road not be improved.
Recreation, travel management, scientific research, public health and safety, and firearms	The land between Charleston Road and Fairbank should be off limits to hunting. This is where almost all the coati are and an ocelot was observed in that area.
Recreation, travel management, scientific research, public health and safety, and firearms	Prohibit the use of firearms in SPRNCA or on BLM Location near the river. I hear firearms in use to the west of me at the BLM Location down by the river. It is unsettling to know someone is shooting, not know the type of firearm, its range or the expertise of the shooter. lead ammunition is also harmful to wildlife.
Recreation, travel management, scientific research, public health and safety, and firearms	Trails. We strongly support the San Pedro Trail system and recommend its role and importance be highlighted in the RMP.
Recreation, travel management, scientific research, public health and safety, and firearms	a. Conceptual Trail from Fairbank to Schieffelin Monument (see map at enclosure 1). There is an abandoned railroad grade that goes from Fairbank to Tombstone. It could form the basis for a spur trail from Fairbank to Schieffelin Monument. This route is currently used informally by hikers but an improved trail would greatly enhance hiker safety and enjoyment. Perhaps a right-of-way could be acquired to use the old railroad grade outside of the SPRNCA boundary.
Recreation, travel management, scientific research, public health and safety, and firearms	b. Conceptual Trail from Fairbank to and along the Babocomari River (see map at enclosure 2). There is an abandoned railroad grade that goes from Fairbank to and along the Babocomari River west of the San Pedro River. It could form the basis for a spur trail from Fairbank to and along the Babocomari River inside of the SPRNCA boundary.

Planning Issue Category	Comment
Recreation, travel management, scientific research, public health and safety, and firearms	c. Conceptual Trail from the City of Sierra Vista Environmental Operations Park (EOP) to the Murray Springs Trailhead (see map at enclosure 3). There is an abandoned railroad grade that goes west from the Murray Springs Trailhead to an area just north of the EOP. Perhaps a BLM and City of Sierra Vista partnership could examine the mutual benefit and feasibility of developing a connector trail between the EOP and Murray Springs Trailhead using the old railroad grade.
Recreation, travel management, scientific research, public health and safety, and firearms	d. Rail-to-Trail Conversion within the SPRNCA. We urge BLM to monitor the planned use of the north-south rail line within the SPRNCA and to seek a rail-to-trail conversion if and when the line is abandoned, or to file for interim trail use as the opportunity arises.
Recreation, travel management, scientific research, public health and safety, and firearms	2. Campgrounds. We believe the BLM should consider developing one or more campgrounds within the SPRNCA to better accommodate visitors from outside the area.
Recreation, travel management, scientific research, public health and safety, and firearms	3. Back Country Byways. We believe the BLM should consider providing opportunities for the public to access interior portions of the SPRNCA via backcountry byways.
Recreation, travel management, scientific research, public health and safety, and firearms	In addition, there is a section of road that goes north-south along the east boundary of the SPRNCA between Charleston Road and Hwy 82 that should be considered for use as a back country byway (see map at enclosure 5).
Recreation, travel management, scientific research, public health and safety, and firearms	I believe allowing recreational use would be a disaster for the wildlife and plants of the area and a major deterrent to other users of the area.
Recreation, travel management, scientific research, public health and safety, and firearms	Limited hunting should be allowed with rifle or shotgun. Bow hunting does not adequately kill game in the SPRNCA
Recreation, travel management, scientific research, public health and safety, and firearms	Carrying a firearm in accordance with AZ law for personal protection should be allowed.
Recreation, travel management, scientific research, public health and safety, and firearms	The use of Off-Road vehicles should be eliminated in areas of cultural sensitivity.
Recreation, travel management, scientific research, public health and safety, and firearms	We would be very upset if cattle were aloud to graze and four wheelers to be able to run there and ruin the peace and quiet. Also the destruction of the grasses would be a real problem.
Recreation, travel management, scientific research, public health and safety, and firearms	My hope is that this area will be kept in strict conservation and even expanded and no other uses such as off road vehicle access or grazing will be allowed.
Recreation, travel management, scientific research, public health and safety, and firearms	It is very important to me that we keep areas like the NPRSCA safe from uses which could interfere with the calm, quiet appreciation of nature which is available to everyone.
Recreation, travel management, scientific research, public health and safety, and firearms	<ul style="list-style-type: none"> • Hunting restrictions should continue and be expanded.

Planning Issue Category	Comment
safety, and firearms	
Recreation, travel management, scientific research, public health and safety, and firearms	Current restrictions on the use of firearms for all purposes but hunting in limited areas should continue.
Recreation, travel management, scientific research, public health and safety, and firearms	<ul style="list-style-type: none"> • Restrictions barring the use of any motor vehicle anywhere in the SPRNCA should continue, with no exceptions except for BLM administrative purposes.
Recreation, travel management, scientific research, public health and safety, and firearms	Thus, I would like to see the buffer for the use of guns near developed areas to be expanded from the current 1/4 mile to 1/2 mile. With the power of hunting rifles, this seems prudent. The same rule should apply to bow hunters. Developed areas should be defined in such a way as to include any marked, maintained trail. That would include the Millville Trail, Terrenate, Fairbank Loop Trail, Curry Draw, Clanton Ranch to San Pedro House, trails at least as far as Garden Wash from the San Pedro House, and trails near the Hereford and Palominas Trail heads.
Recreation, travel management, scientific research, public health and safety, and firearms	Improvements to Fairbank: <ul style="list-style-type: none"> • A group picnic area should be constructed at Fairbank. There is an informal grouping of tables in the townsite now, but there is no shade and it is hard for groups to interact. I would like to see a roofed shelter. The site host trailers should be moved from the town site to near the parking lot, close enough to watch the site, but no longer detracting from the site sight lines. • Interpretive signs should discuss the Native American, Hohokam, village that existed there. • Interpretive signs should be added at the railroad bridges at the west and south edges of the townsite.
Recreation, travel management, scientific research, public health and safety, and firearms	A primitive, front country campground should be added somewhere that it can be reached by road for tent camping.
Recreation, travel management, scientific research, public health and safety, and firearms	An "Immigrant Trail" hiking route should be created from the Border to St. David marking the 49er immigrant trail along the River.
Recreation, travel management, scientific research, public health and safety, and firearms	A rails for trails initiative to develop trails along some of the old railroad grades in the SPRNCA would create another destination hike and biking trail.
Recreation, travel management, scientific research, public health and safety, and firearms	It is important that the Bureau of Land Management (BLM) keep existing protections and restrictions in place (e.g., prohibiting grazing permanently and effectively, ATV use, etc., encouraging research and educational efforts) but it is also important that the BLM begin to actually and consistently enforce and actively promote these policies on a more comprehensive basis.

Planning Issue Category	Comment
Recreation, travel management, scientific research, public health and safety, and firearms	Allow independent visitation by tribal entities and indigenous people and their informed specialists. In some cases allow them vehicle access along existing roads to that the elderly can get to their ancestors sites.
Recreation, travel management, scientific research, public health and safety, and firearms	Consider the needs of the handicapped public in making your plan. Most of SPRNCA cannot be made handicapped-accessible, but some of it can. I would suggest the following projects: 1. Build a bridge over Curry Draw, to make the Murray Springs Clovis site interpretive trail accessible. (This would not only affect the officially "handicapped", but also many others who have problems with stairs.) 2. Check the latrines in parking areas, and if necessary add ramps to make them accessible. (Especially do this where some facilities are accessible -- i.e. San Pedro House, Fairbank, and hopefully Murray Springs.) 3. Check the SPH nature trail. My guess is that at the moment the two ends of the trail are handicapped-accessible when it is not muddy, but the middle is not. If the whole trail cant be made accessible, plan to make part of it so (e.g. by a cutoff trail or official turnaround points). It would be really nice if the handicapped could at least get down to the bank above the river, and to Kingfisher Pond. 4. Put out a document (single page or brochure) which lists which facilities in SPRNCA are handicapped-accessible, and which are not.
Recreation, travel management, scientific research, public health and safety, and firearms	Assess hunting and other recreation impacts on the cienega.
Recreation, travel management, scientific research, public health and safety, and firearms	We encourage continued prohibition of off-road driving in SPRNCA, along with improved barriers and signage. Particular attention should be paid to gaps in fencing around the north end.
Recreation, travel management, scientific research, public health and safety, and firearms	In considering travel and access management alternatives for the SPRNCA, the planners should recognize the importance of partnering with the transportation agencies to maintain a safe, efficient and effective system especially with regard to the State Highways. Additional vehicular access should not be granted from new locations along the state routes. The access as provided should be sufficient to meet the needs of the area for both user benefit and maintenance purposes. If for management purposes some access may be relocated, abandoned or changed-use this should be undertaken through the ADOPT encroachment permit process and consultation with the district permitting staff and regional traffic engineer. We further request that the existing easement be retained and not reduced in size or number to ensure adequate space for safe roadway operations.
Recreation, travel management, scientific research, public health and safety, and firearms	The RMP should also recognize the possibility of future regional travel demand growth and the potential need to improve the highways for greater capacity and potentially for added turning lanes.

Planning Issue Category	Comment
Recreation, travel management, scientific research, public health and safety, and firearms	Areas of high bird watching use within riparian habitat should address the number of trails including loop trails with one-way traffic.
Recreation, travel management, scientific research, public health and safety, and firearms	Options to install wildlife blinds for viewers and photographers should be considered to increase public enjoyment within riparian areas while decreasing disturbance to wildlife.
Recreation, travel management, scientific research, public health and safety, and firearms	Reservation-only riparian bird nesting area visitation at certain times of year should be considered.
Recreation, travel management, scientific research, public health and safety, and firearms	A variety of easy and more difficult trails should be established through riparian corridors to spread out visitors and increase visitor enjoyment.
Recreation, travel management, scientific research, public health and safety, and firearms	A number of parking options to facilitate group, individual and handicapped opportunities close to riparian areas need to be considered.
Recreation, travel management, scientific research, public health and safety, and firearms	To assure that recreational users do not cause water pollution, additional rest room facilities should be placed throughout SPRNCA, especially at all access points.
Recreation, travel management, scientific research, public health and safety, and firearms	The value of kiosks, boardwalks, signs and other educational tools in riparian areas should be addressed.
Recreation, travel management, scientific research, public health and safety, and firearms	Due to the influx of nonnative fish from Mexico including bass and sunfish and the lack of suitable fish barrier sites on the USPR, BLM should bring forward the issue of managing the USPR as a sports fishing area.
Recreation, travel management, scientific research, public health and safety, and firearms	Assure that SPRNCA remains open to hunting.
Recreation, travel management, scientific research, public health and safety, and firearms	Concentration of recreationists caused by having too few access points on the SPRNCA needs to be addressed.
Recreation, travel management, scientific research, public health and safety, and firearms	The transportation needs of group, individual, handicapped and dispersed recreational visitors should be addressed.
Recreation, travel management, scientific research, public health and safety, and firearms	The SPRNCA is a relatively long, narrow corridor. Given the range of today's hunting rifle (over a half mile), most people using the SPRNCA for recreational activities are within range of a stray bullet. Having someone harmed by a stray shot would not be in anyone's best interest and could certainly lead to more restrictive controls on hunters.
Recreation, travel management, scientific research, public health and safety, and firearms	It is important that our agency be directly involved during the route planning and designating process as a member of the planning team to identify important areas for fish and wildlife resources and to ensure necessary access for management and reasonable public access for wildlife-related recreation.

Planning Issue Category	Comment
Recreation, travel management, scientific research, public health and safety, and firearms	The BLM should consider the needs of the Department to actively manage wildlife, including wildlife harvest objectives, in designation of routes and administratively allowed uses off of designated routes.
Recreation, travel management, scientific research, public health and safety, and firearms	Public access needs should be evaluated. The Department is especially interested in maintaining and enhancing hunter opportunity per executive order 13443.
Recreation, travel management, scientific research, public health and safety, and firearms	The BLM should reevaluate current restrictions on firearm possession and use and develop policy and regulation that ensures compliance with state and federal law and ensures that firearm use is not unnecessarily restricted where such use does not conflict with the purposes of the NCA. The Department would like to work closely with the BLM to determine the necessity of current and future closures.
Recreation, travel management, scientific research, public health and safety, and firearms	I urge the BLM to amend the firearms restrictions as soon as possible to bring them into compliance with Federal and State of Arizona gun laws.
Recreation, travel management, scientific research, public health and safety, and firearms	Facilities and trails in the SPRNCA should support a range of appropriate recreational and education uses that will contribute to an appreciation for the area and sense of stewardship among local residents.
Recreation, travel management, scientific research, public health and safety, and firearms	The peace and quiet of the SPRNCA should continue to be a resource that is treasured, so no motorized access should be granted within the SPRNCA boundaries.
Recreation, travel management, scientific research, public health and safety, and firearms	Recreational use of the SPRNCA should be encouraged in the RMP, with emphasis placed on developing and maintaining picnic areas, a campground and the two existing visitor contact stations at Fairbank and the San Pedro House.
Recreation, travel management, scientific research, public health and safety, and firearms	The draft RMP should evaluate and analyze recreation designations.
Recreation, travel management, scientific research, public health and safety, and firearms	BLM should continue the current closure and prohibitions against firearms use and consider ther they should be extended to include other areas within the SPRNCA (i.e. north of Charleston Road to the northern boundary of the SPRNCA and south of Arizona Highway 92 to the U.S. –Mexico border to protect public safety.
Recreation, travel management, scientific research, public health and safety, and firearms	Another important issue that should be addressed in the draft RMP is travel management and off road vehicle use in the SPRNCA.
Recreation, travel management, scientific research, public health and safety, and firearms	The draft RMP should continue the current prohibition against the use of unlicensed ORVs within the SPRNCA and the current limitation of ORV use to designated roads within the SPRNCA. BLM should address how the agency will enforce compliance with current prohibitions and limits on ORV use within the SPNCA in the draft RMP

Planning Issue Category	Comment
Recreation, travel management, scientific research, public health and safety, and firearms	Recreational use of ATVs should not be allowed on the SPRNCA.
Recreation, travel management, scientific research, public health and safety, and firearms	In regards to the travel management plan, I would like to add in addition to being included in future planning, I would like to identify the opportunity to increase sportsmens access on the east side of the SPRNCA both north and south of Charleston Rd., specifically between Charleston Rd. and SR 82, and south of Charleston Rd. to the Lindsey Ranch headquarters in the event the Department reaches a future access agreement with Mr. Lindsey.
Recreation, travel management, scientific research, public health and safety, and firearms	Access - maintain the established routes of trails and roads as well as additional access points for educational experience and observation.
Recreation, travel management, scientific research, public health and safety, and firearms	Meanwhile, BLM should continue to prohibit off-road motor vehicle use, especially in the river channel itself or anywhere that is not on designated, paved roads and highways in the SPRNCA.
Recreation, travel management, scientific research, public health and safety, and firearms	Finally, BLM should continue restrictions on use of firearms (e.g. target shooting), particularly for public safety in heavily visited places like San Pedro House and Fairbank Schoolhouse.
Special designations (ACECS, wilderness, wild and scenic rivers), visual resources, and wilderness characteristics	Apply for this designation to give added protection and recognition to SPRNCA.
Special designations (ACECS, wilderness, wild and scenic rivers), visual resources, and wilderness characteristics	Apply for this designation to give added protection and recognition to SPRNCA.
Special designations (ACECS, wilderness, wild and scenic rivers), visual resources, and wilderness characteristics	Protect wilderness characteristics for the SPRNCA.
Special designations (ACECS, wilderness, wild and scenic rivers), visual resources, and wilderness characteristics	Despite these threats, the SPRNCA also has many areas with wilderness characteristics that should be preserved to the maximum extend possible.
Special designations (ACECS, wilderness, wild and scenic rivers), visual resources, and wilderness characteristics	In addition, some 44 miles of the river could be designated "Recreational" status under the Wild & Scenic Rivers Act. BLM should pursue this designation.
Special designations (ACECS, wilderness, wild and scenic rivers), visual resources, and wilderness characteristics	Furthermore, areas of critical environmental concern should be identified and protected.

Planning Issue Category	Comment
Special designations (ACECS, wilderness, wild and scenic rivers), visual resources, and wilderness characteristics	b. Naturalness: Human activity in these areas should be mostly unnoticeable. Trails should be kept to a minimum and marked in the current, nonintrusive fashion. Fences should be allowed so as to keep livestock out of the area. No development or utility corridors should be allowed. Landscape modifications should be limited to fire management (controlled burn), eradication of invasive species, and drought mitigation. Overnight camping should be by permit only.
Special designations (ACECS, wilderness, wild and scenic rivers), visual resources, and wilderness characteristics	c. Outstanding Opportunities for Solitude: BLM should work with Border Patrol so that agents dont overreact to peaceful hikers or a prearranged cleanup activity, use helicopters sparingly and judiciously, and treat the public respectfully. Hunting should not be allowed within areas with wilderness characteristics.
Special designations (ACECS, wilderness, wild and scenic rivers), visual resources, and wilderness characteristics	d. Supplemental Values: BLM should continue to protect features of scientific, educational, scenic, and historical value within the SPRNCA and the RMP boundary. BLM should designate these areas as Visual Resource Management Class I or II.
Special designations (ACECS, wilderness, wild and scenic rivers), visual resources, and wilderness characteristics	Forty-four miles of the San Pedro River have been identified as Suitable for Wild & Scenic designation in the Recreational category. BLM should protect the free-flowing condition, water quality, and outstandingly remarkable values of those sections. In addition, BLM should inventory possible sections for Scenic and Wild designation and manage those sections accordingly while waiting for Congress to act.
Special designations (ACECS, wilderness, wild and scenic rivers), visual resources, and wilderness characteristics	The San Pedro River Research Natural Area and the St. David Cienega (Appendix 13 pages 370-371, San Pedro River Riparian Management Plan and Environmental Impact Statement June 1989). These two areas are valuable resources and should retain their special designation.
Special designations (ACECS, wilderness, wild and scenic rivers), visual resources, and wilderness characteristics	I believe the resources and values of the San Pedro River are sufficient to support special designations such as Area of Critical Environmental Concern and Wild and Scenic River, and to warrant withdrawal from mineral, oil and gas exploration and development.
Special designations (ACECS, wilderness, wild and scenic rivers), visual resources, and wilderness characteristics	Continued protection for and promotion towards designation of the San Pedro as Wild and Scenic.
Special designations (ACECS, wilderness, wild and scenic rivers), visual resources, and wilderness characteristics	Given that 44 miles of the Dan Pedro has already been identified as suitable for Wild & Scenic designation, management for those identified values should be part of the RMP. BLM should protect the free-flowing condition, water quality, and remarkable values of those sections. In addition, BLM should inventory other sections for possible Wild & Scenic designation values and manage those sections accordingly.

Planning Issue Category	Comment
Special designations (ACECS, wilderness, wild and scenic rivers), visual resources, and wilderness characteristics	Current and potential areas for ACEC designation should be addressed in the draft RMP.
Special designations (ACECS, wilderness, wild and scenic rivers), visual resources, and wilderness characteristics	BLM should address visual resource values in the SPRNCA, including the overall scenic quality of the area in the development of the draft RMP.
Special designations (ACECS, wilderness, wild and scenic rivers), visual resources, and wilderness characteristics	Remain sensitive to and incorporate the Visual Resource Perspective with each management option.
Special designations (ACECS, wilderness, wild and scenic rivers), visual resources, and wilderness characteristics	In addition, some 44 miles of the river could be designated "recreational" status under the Wild & Scenic Rivers Act. BLM should pursue this designation.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	BLM Should promote the highest possible protection and restoration to all of the riparian habitats essential to all our our natural wildlife.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	The riparian ecosystem of the San Pedro River is vital to the survival of millions of migratory and resident birds and other wildlife.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	I am a Tucson resident and have hiked along the San Pedro River several times. The bird species alone that it supports warrants protection for this unique river. I sis one of the few that flow north along the border of the U.S. The San Pedro River boasts the nations first Riparian National Conservation Area - the SPRNCA. This important area houses a robust cottonwood/willow gallery forest that provides habitat for more than 350 species of birds, 84 species of mammals, 14 species of fish, and 41 species of reptiles and amphibians. Please choose a course of action that protects this beautiful and important river.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	I am very concerned about the unimpaired flow of the San Pedro River, so that it can continue to be a special habitat for birds and other wild species.

Planning Issue Category	Comment
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	If our federal land is to continue to be called a "riparian conservation area", then a supply of surface water MUST be assured regardless of the continually increasing water use in the surrounding lands. Therefore, the characteristics of the surrounding lands must serve as a background and platform on which to base this planning effort. In addition, all agency legal efforts must be planned for and funded in full.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Additionally, the Babocomari allotment presents a quality opportunity for continued riparian restoration research. The recently released, peer reviewed study entitled Synthesis of Upper Verde River Research and Monitoring by Daniel G. Neary, Alvin Medina and John N. Rinne provides applicable information for riparian research and long-range biological assessment of Arizona semi-arid habitats and the warm water fish that are native to southern Arizona. The opportunity in SPRCA to further scientific knowledge of these unique habitats is of value to conservation of Arizona aquatic habitats and to an informed understanding of grazing/riparian effects. This value should be recognized and included as a significant benefit of continuing current management.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Parts of the Babocomari River in the SPRCA are grazed and others are not. This would be an excellent opportunity to use the criteria of the Riparian Study Team and UVR research to compare the recovery process.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Remove non-native plants and animals such as Bullfrogs, Tamarisk and Mesquite (above the flood plain).
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Restore Sacaton grasslands and other native plants and eradicate infestations of non-native plant species (e.g., tamarisk, Johnson grass and Russian thistle) within the SPRNCA.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	It seems pertinent to outline a series of alternate resource management plans that you can switch between based on changing conditions. I believe implementing a threshold based management plan would be most effective.

Planning Issue Category	Comment
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	The BLM must look at the near-term management of the last free-flowing perennial river in the southwest and manage for the impacts it can control: livestock grazing affects to water quality and quantity, vegetation conditions, non-native weed infestations and invasions, flammability, wildlife habitat, and recreational and scenic enjoyment.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Remove Tamarisk and woody shrubs like Mesquites.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	ID all the flora and fauna with signage.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	The issue appears to be the technical standards which much of this work was done by. It is recommended the RMP identify a sustainable program by what standards the San Pedro River will be monitored, who is responsible and how findings will be reported.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	The RMP must identify a baseline in order to evaluate condition and trend of the riparian zones.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	It is recommended an erosion control plan be incorporated into the RMP identifying soil stabilization opportunities and methods to achieve this.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	It was stated a Range Site (Major Land Resource Area) Inventory using Ecological Site Descriptions for the SPRNCA had recently been completed and the soil survey published in 2001. With these two tools the RMP should determine what level of condition each plant community should be managed for.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	It is highly recommended measures be identified to use prescribed fire to reduce fuel load and change the uplands from a pure shrub mix to a more traditional grass/shrub complex. A fire management plan should be incorporated into the RMP.

Planning Issue Category	Comment
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	As stated in the water resource section establishment of a minimum base flow for the San Pedro River is essential to maintaining proper wildlife habitat.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	I would strengthen SPRNCA for water and wildlife values through the RMP.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	In considering management alternatives for the SPRNCA, BLM should promote above all else the protection of the cottonwood/willow gallery forest, mesquite bosques, and other sensitive riparian habitats essential to birds and other wildlife, managing for a range of natural variability.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Furthermore, BLM should manage for a range of natural variability as distinguished from a desired future condition, since there is a great uncertainty in future environmental circumstances given climate change and alterations to the natural environment of the valley as a whole.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Management decisions should be science-driven with the goal of promoting, protecting and enhancing a healthy riparian ecosystem.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Despite the seemingly hopeless nature of bullfrog and tamarisk removal efforts, they should be continued to reduce the population as much as feasible.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	The BLM must look at the near-term management of the last free-flowing perennial river in the southwest and manage for the impacts it can control: livestock grazing affects to water quality and quantity, vegetation conditions, non-native weed infestations and invasions, flammability, wildlife habitat, and recreational and scenic enjoyment.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	2. Proper upland management is essential to the survival of the riparian areas. Brush management and rotational grazing have been shown to improve the alluvial water table. The lowering of static water levels near the Babocomari River and the appearance of a new spring just below range improved areas are clear evidence of this. This will only continue if the allotments are in place.

Planning Issue Category	Comment
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	3. The Babocomari River could be an excellent area to study grazing on riparian habitat because part is grazed and part is not grazed.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	3. A biological plan with clear cut goals for riparian corridors should be adopted.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Proper upland management is essential to the survival of the riparian areas. Brush management and rotational grazing have been shown to improve the alluvial water table. The lowering of static water levels near the Babocomari river and the appearance of a new spring just below range improved areas are clear evidence of this. This will only continue of the allotments are in place.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	The Babocomari River could be an excellent area to study grazing on riparian habitat because part is grazed and part is not grazed.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	A biological plan with clear cut goals for riparian corridors should be adopted.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	The BLM should cooperate in limited test plots for upland mesquite removal.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	The BLM should resist any future initiative to remove the cottonwoods from the SPRNCA.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Implement a strategy to evaluate progress toward desired future conditions within the floodplain and adjacent terraces of the San Pedro River.

Planning Issue Category	Comment
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Develop citizen science and student naturalist programs to help collect field data.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Identify, preserve and manage mesquite bosque habitats with an understory of native bunchgrasses and sacaton.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Conserve and, if possible, expand the extent of sacaton grasslands in the flood channels and upper terraces within the San Pedro River floodplain. A bird that is an indicator for this habitat and the bunchgrass community is the Botteris Sparrow.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Manage the upland grasslands to protect and enhance native plant communities. Where cattle are allowed under current grazing leases, coordinated resource management teams should be charged with developing appropriate standards for each lease and BLM should consider eliminating the lease on any parcel that does not meet the standard developed. In some cases, this may mean installation of new fences and/or waterers and may involve vegetation management actions.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Map and evaluate extent of downcutting in the adjacent upland tributaries feeding groundwater into the cienega. Initiate a more thorough inventory of biological and socio-cultural-historical resources. See Photo Gallery Part 1.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Use adaptive management approach to plan and implement longer-term management actions.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	If short-term recommendation 5 indicates that downcutting is responsible for SDC dewatering, consider installing gabions (perhaps using the abundant, left over railroad bed gravels) to backfill incised channels with sediment.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains,	Expand biological inventory and monitoring of the site, with feedback to the community.

Planning Issue Category	Comment
wetlands, and aquatic habitats	
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Detailed mapping of the potential plant communities and wetland extend with a more detailed soil survey.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	The plan should aggressively protect the River and its sources, including the surrounding habitat.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Use existing condition and trend data for uplands, including both active grazing allotments and areas not permitted for grazing, to describe the affected environment in the RMP NEPA document (for example, percent bare ground over time in grasslands). Descriptions of vegetation, soils, and erosion dynamics are essential
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Use the decision key from the DOI Adaptive Management Technical Guide, to determine which decisions can most benefit from adaptive management.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Consider the potential impacts of intensive and extended drought. Analyze management options to prepare for droughts, and describe contingency plans for responding to drought.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	The RMP should address management and restoration of upland condition throughout the SPRNCA to benefit of riparian health, but especially in the contributing watersheds of the NRST "functional-at-risk" reaches.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	We encourage proactive fire planning for both uplands and the riparian woodland, including the implementation of prescribed burns to decrease woody species in grasslands. The US Fish & Wildlife Service is working to develop guidelines for riparian fire management in the desert Southwest, and should probably be engaged in this planning process.

Planning Issue Category	Comment
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Abandoned agricultural fields have unique restoration needs and opportunities that we would like to see evaluated. There is a need to restore natural sheetflows across these fields as a key part of restoring their ecological functions and native vegetation by removing upland berms. Also allow for ephemeral flows and sediment transport from the tributary drainages where fields are blocked by berms, dikes and diversions. Describe desired conditions for these areas and consider additional restoration tools such as erosion control, prescribed fire, re-seeding, and prescribed grazing as appropriate to meet desired conditions for each site.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Analyze ways to improve upland vegetation conditions using the most effective combination of tools, including fire, mechanical treatment, and prescribed grazing.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	The RMP needs to address the issue of how BLM plans to balance the volume of riparian vegetation with flow in the San Pedro River to ensure that enhancement of one resource does not impact the enhancement of another resource.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	The RMP needs to consider the issue of whether or not the increase in ET from the increasing riparian vegetation can be offset by a decrease in evaporation from shaded surface water and should quantify the delta.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	The issue of how to manage for a wide diversity of native riparian vegetation while allowing for recreation, wildlife management, and cultural resources needs to be addressed.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	BLM should stop the spread of nonnatives to adjacent lands outside SPRNCA.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	The RMP needs to consider the issue of management of critical habitat for the Huachuca Water Umbel (HWU) versus non-native grasses as well as the impact of failure to manage these non-native grasses on surrounding lands so that appropriate management decisions can be made.

Planning Issue Category	Comment
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	BLM should manage upland vegetation to assure the sediment load in the USPR is in balance
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Native grasslands are able to absorb up to an inch per hour in precipitation without significant runoff. Healthy grasslands control erosion and sedimentation.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Precipitation that travels beyond the root zone of native grasses can be recharged to the aquifer over time.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Grassland restoration in currently shrub-dominated areas should be evaluated so that proper management decisions can be made.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Consider allowing public to harvest live and dead mesquite and other unwanted trees to use as fuel wood in areas where mesquite removal is determined necessary.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Furniture size mesquite, oak, walnut and other natural woods should be made available for harvest by the public and/or commercial furniture builders before it is destroyed.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Removal of invasive shrubby vegetation in areas that were once native grasslands and native grassland restoration in currently shrub-dominated areas should be evaluated so that proper management decisions can be made.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Where possible, manage areas where invasive shrubs have been removed in ways to encourage native grasses. Every effort should be made to avoid establishment of non-native grasses (Lehmans, Johnson, and bermuda, among others) within the restoration areas.

Planning Issue Category	Comment
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Design a balanced vegetative management plan that includes the goal of preventing the spread on nonnative plants outside the SPRNCA to the detriment of existing stands of native grasses on adjacent lands.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Continue to eradicate tamarisk where found.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Fire is a natural effect in the region. Appropriate vegetation management through a well-planned and controlled use of fire should be included in the RMP.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Adaptive management and monitoring are important planning elements and should be included within the RMP to allow agencies to respond to unforeseen conditions including drought, decline in habitat conditions, invasive species, fire, etc.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Riparian areas should be managed to ensure recruitment of riparian vegetation such as cottonwood and will seedlings.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	The BLM should establish a monitoring program that monitors biological metrics of the aquatic and riparian ecosystem health separate and apart from Proper Functioning Condition which is not designed for this purpose.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	The RMP should address any potential for the introduction of noxious weeds, pathogenic fungi (chytridiomycota), and other organisms which may cause disease or alteration to ecological functions.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	The BLM should consider climate change, groundwater depletion, and the importance of upland health in the watershed in evaluating future water supply needs for the river.

Planning Issue Category	Comment
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	The BLM should identify where mesquite removal is appropriate (such as grassland restoration projects) to achieve habitat goals and objectives and where mesquite removal is inappropriate (such as native bosque habitats.)
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	The BLM should identify what upland health conditions that affect riparian and aquatic health should be improved. The BLM should identify what federal programs through which agencies could be applied to benefit upland health conditions and make recommendations for prioritization of funding of those programs in the watershed.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	It is important for the SPRNCA plan to focus on the desired conditions that will be of most benefit to the ecosystem as a whole, and some of the actions needed to get it there may conflict with single species management objectives.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	I believe the uplands need fire.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	The Babocomari allotment should become a prime study area. The improvements in and recovery of the riparian habitat in the Babocomari allotment have been well documented over the last 26 years. This trend should continue. Parts of the Babocomari River in the SPRCA are grazed and others are not. This would be an excellent opportunity to use the criteria of the Riparian Study Team and UVR research to compare the recovery process.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	The draft RMP must address how BLM plans to conserve, protect, and enhance this exceptional plant biodiversity, especially the existing Fremont cottonwood (<i>Populus freemontii</i>) / Goodings willow (<i>Salix goodingii</i>) gallery forest that is the signature woodland habitat type within the SPRNCA.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	The RMP / EIS also must address how BLM plans to manage invasive plant species within the SPRNCA such as tamarisk (<i>Tamarix chinensis</i> , <i>T. ramosissima</i> , or hybrids) and Johnson grass. The RMP must address management and alternatives for restoration of desired native plant communities in the uplands and riparian areas of the SPRNCA.

Planning Issue Category	Comment
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	The RMP should include management actions and alternatives to identify potential sacaton grassland restoration sites within the SPRNCA. In particular, opportunities for active management and restoration of sacaton grasslands on abandoned agricultural fields within the SPRNCA should be addressed in the draft RMP.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	In the draft RMP, BLM will need to: identify priority riparian/aquatic species and desired habitat, identify areas for reintroduction of native species, and limited habitats for special status species.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	The draft RMP should include management actions and alternatives designed to identify, preserve, and protect the remaining cienega wetlands habitat within the SPRNCA. The draft RMP also should identify opportunities to expand and enhance cienega habitat within the SPRNCA
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	The draft RMP must address how BLM will conserve, protect, and enhance existing cottonwood / willow Gallery forests.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	The draft RMP must include a fire management plan for managing existing fuel loads and vegetation within and near the SPRNCA. Priority should be given to the protection of the existing cottonwood / willow gallery forest from catastrophic wildfire. The draft RMP should include an updated fire management plan which contains an analysis of opportunities to utilize managed fire to restore the native grassland habitats on the pre-entrenchment terraces of the San Pedro River, including the use prescribed burns on old agricultural fields.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	The draft RMP should address how BLM plans to reduce tamarisk along the San Pedro River and control its spread within the SPRNCA. The RMP should describe how BLM plans to continue aggressive tamarisk control efforts in the northern region of the SPRNCA near St. David.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	The draft RMP should include management plans and alternatives to maintain and enhance the diversity of the main vegetation types within the SPRNCA including the cottonwood / willow forests, mesquite bosques, sacaton grasslands, and cienega wetlands. By protecting the biodiversity of the riparian plant communities and major vegetation types, the BLM also will maintain and protect a diverse assemblage of bird species that makes the SPRNCA a globally important bird area. BLM should place a particularly high priority on maintaining the cottonwood / willow habitat within the SPRNCA.

Planning Issue Category	Comment
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Actions will be taken within the SPRNCA and on adjacent jurisdictions where possible and appropriate to maintain, improve, and ensure adequate ground water levels to sustain robust riparian vegetation communities (including phreatyophytes) in the SPRNCA that would be expected to occur along the length of the San Pedro River and its tributaries within the natural range of variability.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Please promote ABOVE ALL ELSE the protection of the cottonwood/willow gallery forest, mesquite bosques, & other sensitive riparian habitats essential to birds, other wildlife & re-toration of upland grasslands.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Fire - re-institute the use of fire to manage brush encroachment and grassland health.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Erosion - utilization of heavy equipment (dozers, excavator etc.) to address the down cutting (de-watering of the land surface) and to rebuild or construct new detention basins for water infiltration and provide wildlife options in expansion of habitat in an area that is constrained by lack of maintained water sources. Utilization of these tools also for Spring/Cienega remediation.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	Brush abatement - through the use of multiple tools; mechanical, herbicide, fire, animal grazing for grassland improvement and soil fertility.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	IN considering management alternatives for the SPRNCA, BLM should promote above all else the protection of the cottonwood/willow gallery forest, mesquite bosques, and other sensitive riparian habitats essential to birds and other wildlife, managing for a range of natural variability.
Land health (uplands and watershed function), soil resources, vegetation, fire management, adaptive management/climate change, and riparian areas, floodplains, wetlands, and aquatic habitats	BLM should manage for a range of natural variability as distinguished from a desired future condition since there is great uncertainty in future environmental circumstances given climate change and alterations to the natural environment of the valley as a while.

Planning Issue Category	Comment
Fish and wildlife habitat and special status species	In considering management alternatives for the SPRNCA, BLM should promote above all else the protection of the cottonwood/willow gallery forest, mesquite bosques, and other sensitive riparian habitats essential to birds and other wildlife, not to mention restoration of upland grasslands. This alternative is in harmony with the enabling legislation for the SPRNCA, so it should be a high priority.
Fish and wildlife habitat and special status species	Protect the habitat of the Water Umbrel, willow Flycatcher, Yellow-billed Cuckoo and Mexican Garter Snake.
Fish and wildlife habitat and special status species	Protect habitat that may attract wildlife in the future, such as Jaguar, Ocelot, etc.
Fish and wildlife habitat and special status species	In considering management alternatives for the SPRNCA, BLM should promote above all else the protection of the cottonwood/willow gallery forest, mesquite bosques, and other sensitive riparian habitats essential to birds and other wildlife, not to mention restoration of upland grasslands.
Fish and wildlife habitat and special status species	I believe a County ordinance exists which prohibits the feeing of wildlife. The BLM should set a good example and prohibit this practice including the feeding of birds anywhere in the SPRNCA.
Fish and wildlife habitat and special status species	Please consider refusing to permit the continuance of the longstanding practice of bird banding in this area.
Fish and wildlife habitat and special status species	Allow no bird banding- birds are frequently left in the hot sun trapped in mist nets during breeding. How humanitarian is that?
Fish and wildlife habitat and special status species	Little Joe Spring has 4 endangered species behind a wire fence. Turn the whole area into a preserve adding more fenced-in areas for endangered species. Make it a veritable endangered species zoo.
Fish and wildlife habitat and special status species	The RMP should be such as to foster the wellbeing of rare and endangered species and seek out protections for them. it is critical that we defend the flyway.
Fish and wildlife habitat and special status species	Habitat for sensitive or at-risk species like Yellow-billed Cuckoo must be protected.
Fish and wildlife habitat and special status species	With the success of the beaver re-introduction, consideration should be given to the restoration of some of the native fish species once found in the San Pedro. Since the river itself is constantly restocked with exotics from elsewhere in the watershed, this may require the construction and management of a separate wetlands area, away from the main stem of the river.
Fish and wildlife habitat and special status species	Many local government authorities are opposed to any designation of critical habitat, but the SPRNCA is home to a number of threatened and endangered species and seeking approval for designations of critical habitat for these species needs to continue to be a priority.
Fish and wildlife habitat and special status species	This is a note to encourage continued protection of the San Pedro Riparian NCA for wildlife habitat. Currently the NCA is a wonderful sanctuary for many forms of wildlife.

Planning Issue Category	Comment
Fish and wildlife habitat and special status species	Use beavers as a natural technique for restoring the stream channel and increasing bank recharge where appropriate.
Fish and wildlife habitat and special status species	Continue the MAPS (Monitoring Avian Productivity and Survivorship) bird banding stations.
Fish and wildlife habitat and special status species	BLM should continue to support the establishment of a stable beaver population within the SPRNCA as an important part of the ecosystem, along with monitoring their population size and effects on vegetation and other wildlife.
Fish and wildlife habitat and special status species	BLM has introduced beaver which have spread throughout the length of the SPRNCA. The issue of beaver management and its impacts on riparian vegetation needs to be evaluated in the RMP so that appropriate management decisions can be made.
Fish and wildlife habitat and special status species	The opportunity to increase the number of fish for birds and other wildlife should be assessed.
Fish and wildlife habitat and special status species	Introduction of threatened or endangered native minnow species within the SPRNCA should be thoroughly evaluated based on the ongoing presence and influx of non-native minnow-eating fish and other species that prey on minnows.
Fish and wildlife habitat and special status species	A non-threatened or non-endangered species or invasive species should not be managed to the detriment of a T&E species, especially in that species critical habitat.
Fish and wildlife habitat and special status species	Due to recreational objectives, the issue of predator management needs to be addressed. Public safety is a concern.
Fish and wildlife habitat and special status species	With the restoration of native grasslands, the reintroduction of pronghorn antelope in these grasslands should be considered.
Fish and wildlife habitat and special status species	Fish and Game has expressed concern with the decline in numbers of Mule Deer. I believe this is the only trophy/meat species within the SPRNCA available to hunters, it would not be unreasonable for a moratorium to be placed on hunting until Fish and Games concern for the overall health of the species is resolved.
Fish and wildlife habitat and special status species	Necessary management actions may include releases of wildlife into currently unoccupied habitats, maintenance of existing wildlife water developments, construction of new wildlife water (or other) developments, and implementation of various wildlife habitat improvement projects, including development of cooperative agreements and projects with land management agencies and adjacent landowners in order to maintain open space and travel corridors necessary for wildlife movement, forage, breeding, and genetic exchange, and any necessary wildlife management activities consistent with the wildlife-related purposes for which the area was designates as a National Conservation Area.

Planning Issue Category	Comment
Fish and wildlife habitat and special status species	The RMP should consider all potential management actions which may be necessary for wildlife and habitat management purposes and include those actions in the plan to avoid unnecessary compliance documentation in the future.
Fish and wildlife habitat and special status species	The RMP should evaluate and consider conservation activities which actively promote reintroduction and management for native fishes, including native big river fishes historically present in the river but now extirpated, such as the Colorado pikeminnow as appropriate. Specifically, the BLM should address the needs for reintroduction, intensive management, sportfish management, and in-situ rearing facilities for native fishes to achieve conservation goals for restoration of these fishes to the river. The BLM should consider opportunities to cooperate with the Department on such management activities and facilities.
Fish and wildlife habitat and special status species	All waters should be inventoried for wildlife needs. Waters should be available to wildlife year round. Water inventory data should be shared between agencies to that areas deficient in available water may be evaluated for future development. The full range of species that benefit from water should be considered when evaluating waters.
Fish and wildlife habitat and special status species	Fawning cover should be monitored in areas where deer and pronghorn declines are an issue.
Fish and wildlife habitat and special status species	Executive Order 13443 requires the BLM to "ensure that agency plans and actions consider programs and recommendations of comprehensive planning efforts such as State Wildlife Action Plans (SWAP), the North American Waterfowl Management Plan, and other range-wide management plans for big game and upland game birds". The Department urges the BLM to utilize the SWAP and the species lists therein.
Fish and wildlife habitat and special status species	The BLM may consider incorporating the NCA as a State Wildlife Area under state law to easily facilitate the designation of regulations pertinent to the NCA enforceable by state officers.
Fish and wildlife habitat and special status species	The BLM should identify how the Department can assist the in enhancing and restoring wildlife and habitat in the NCA and determine if a Habitat Management Plan should be developed separately or incorporated into the RMP.
Fish and wildlife habitat and special status species	The BLM should ensure that take of wildlife under special license by the Department (such as for scientific collecting purposes) is not unnecessarily restricted on the NCA where it does not conflict with the purposes of the NCA.
Fish and wildlife habitat and special status species	Monitoring of beaver as already committed.

Planning Issue Category	Comment
Fish and wildlife habitat and special status species	A number of species have been or are being proposed for listing under the Endangered Species Act whose habitat includes desert riparian areas. The San Pedro River is, or should be, critical habitat for those species. Management for protection of this habitat, already essentially dictated under the enabling legislation that established the SPRNCA, should be a component of the RMP.
Fish and wildlife habitat and special status species	The RMP should recognize and encourage the designation and protection of habitat for rare and endangered species.
Fish and wildlife habitat and special status species	In the draft RMP, the BLM will have to identify and designate priority species and habitats, as well as identify desired future conditions for habitat types that support a wide variety of game, non-game, and migratory bird species.
Fish and wildlife habitat and special status species	the draft RMP should include native fishery management goals and objectives and a recovery plan that, over the long term, will result in the restoration of the native fish fauna of the San Pedro River where feasible. The draft RMP should include conservation actions to benefit recovery of native fishes, especially management actions to control or eliminate non-native fish species. At a minimum, the draft RMP should prohibit the continued stocking of non-native game fish in the San Pedro within the SPRNCA. The BLM should include management actions to create or protect refugia for the few remaining native fish species in tributaries to the San Pedro River.
Fish and wildlife habitat and special status species	The draft RMP should include plans for continued research on mammalian species richness to recommend future management actions and alternatives to maintain the San Pedro as a mammalian "hotspot." In particular, BLM should investigate management of the impact of human activities on the mammals of the San Pedro watershed. People influence mammals directly (i.e., hunting and road kill) and indirectly through habitat modification.
Fish and wildlife habitat and special status species	BLM should address and designate priority species and habitats for significant special status species and identify desired future conditions using BLM strategic plans, state agency strategic plans, and other similar sources.
Fish and wildlife habitat and special status species	The draft RMP should address how BLM will accomplish required consultations under Section 7 of the Endangered Species Act: Consultation with the United States Fish and Wildlife Service is required by §7 of the Endangered Species Act for actions that may affect listed species and designated critical habitat. Section 7 consultation is needed if actions are likely to jeopardize the continued existence of a proposed species, or result in the destruction or adverse modification of proposed critical habitat

Planning Issue Category	Comment
Fish and wildlife habitat and special status species	Efforts should be made to maintain the viability of beaver populations in the SPRNCA. In addition to the known benefits of beaver to riparian systems such as raising water tables and improving water storage, they are also highly beneficial to bat populations due to their contribution to the persistence of pooled water for drinking, their creation of wetland riparian and wetland habitat, the increase in aquatic emergent insect prey for bats from beaver dam pools, and in some cases the creation of snags for roosting as mature trees are killed by rising water levels.
Water resources	My biggest concern is on the question of water availability for sustaining the San Pedro River. Clearly, the water table of surrounding areas has been dropping, entities such as the city of Sierra Vista are planning to grow and pump ever more water from the aquifer, and with climate change the rate of recharge will likely be less than in the past.
Water resources	Bottom Line: We cannot allow any more water to be pumped out of the aquifers that support the San Pedro River, beyond the annually updated estimates of recharge amounts. If this cannot be controlled, this project is a waste of time, money, effort, and other resources.
Water resources	Creating a new Resource Management Plan for the SPRNCA that will guarantee protection of water quality and resources for the future.
Water resources	Given that the lands along the San Pedro, downstream of our conservation area, are also of great environmental value, it must be recognized that what you and we plan to do on our lands will have direct impact on those lands. We must ensure that our actions are not detrimental to their future.
Water resources	I believe one of the most important characteristics of the river that needs to be managed for is a base flow of water that can support the mesquite bosques and willow/cottonwood corridors. This includes limiting, most, if not all, motorized vehicle use in the area to prevent erosion and compaction of soils, creating buffer of at least 100 feet/30 meters from grazing areas and advocating for limited groundwater pumping and recharging of the aquifer.
Water resources	It is also important that we maintain the flow of the San Pedro River. Water usage in the area is affecting the flow of this river. Its continual flow must be assured in the future.
Water resources	Water usage plans for Sierra Vista that allow the river to keep flowing.
Water resources	Pursue legal rights to base flow.
Water resources	Build retention basins and encourage others to do the same.
Water resources	Ensure that recharge water from the Sierra Vista Environmental Operations Park is contaminant free.

Planning Issue Category	Comment
Water resources	Construct diversion structures and artificial recharge basins in appropriate locations within the floodplain to slow and retain stormwater runoff and to recharge the regional aquifer to sustain the base flow of the San Pedro River.
Water resources	Provide technical and financial support for annual wet/dry mapping of the San Pedro River to monitor base flow of the river and to support adaptive management of the river to sustain base flows.
Water resources	Because the BLM is tasked with conserving, protecting, and enhancing the resources of the SPRNCA, it must consider whether permitting impacts to the critical ecological element – water – in the uplands of the watershed is a benefit to the conservation and protection of the river.
Water resources	The best climate models predict hotter and drier weather for the project area, and any anthropogenic impacts in the SPRNCA must be addressed as cumulative stressors on the plants, animals, and ecosystems found there.
Water resources	At all cost please secure plenty water flow in the San Pedro River sufficient to nourish the riparian area in its entirety. Such protection must include groundwater in the Upper San Pedro River Watershed.
Water resources	Cone of depression. If only we could initiate legislation that for every new home built from now on you have to tear down an existing abandoned home. This water overuse is the most upsetting to me. Eventually the San Pedro could start running north to south as this vortex sucks in all available water.
Water resources	Radio-isotope-evaluate the water to determine from where the Cienega is being fed. Is it groundwater?
Water resources	Restore all original waterways into the Cienega.
Water resources	The future development of Chocise County within the San Pedro watershed will have a direct affect upon the CPRNCA and its capability to support the requirement of PL 100-696. The cumulative impact of incremental development and the requirement for additional water resources has the high probability to negatively impact available water resources. Developing a proposed action within the scope of this activity will be difficult if adjacent activities are not addressed.
Water resources	The BLM should do whatever it takes and work with other agencies and within the court system to be sure that the water quality and quantity is not degraded.
Water resources	I would strongly encourage you to and support you in taking whatever measures necessary to ensure that surface flow is maintained in the river channel in perpetuity.

Planning Issue Category	Comment
Water resources	Ultimately, BLM should promote adoption of a balanced water budget by the city, county and other members of the Upper San Pedro Partnership (USPP) in the watershed.
Water resources	BLM should encourage its partners in the USPP to combine resources to implement both effluent and stormwater recharge basins and detention structures in strategic locations in the watershed, including in the SPRNCA. BLM must address water quality issues in the same fashion.
Water resources	Get a handle on groundwater pumping all along the river.
Water resources	My highest priority would be toward the protection of the water table associated with the upper San Pedro River. The continuing groundwater pumping deficit in this region is the more serious threat to the rivers future and any and all actions necessary to protect this vital resource should be taken.
Water resources	the USGS recommends that part of the discussion regarding the SPRNCAs Resource Management Plan address the long-term data needs for resource management and the funding to support it. An ideal data plan would include both representative groundwater monitoring at existing SPRNCA wells, streamflow monitoring at sites with established records, and aquifer storage monitoring across the Subwatershed (to assess groundwater available to sustain the San Pedro riparian system and base flow in the river itself).
Water resources	Establish long-term hydrologic monitoring of depth to groundwater for the 14 identified river segments.
Water resources	Block south end culvert to prevent further loss of flow, and to return flow to the cienega.
Water resources	Install piezometers at upstream, mid-wetlands, and lower wetlands locations to monitor groundwater stage elevations.
Water resources	Investigate the extend of groundwater withdrawal upslope of SDC on the Whetstone Mountains east bajada.
Water resources	Develop a SDC-specific groundwater model, informed by the piezometer data.
Water resources	A geomorphic and hydrologic investigation of the channel stability and the surface-and groundwater response in the channel that drains south of SDC to the San Pedro River. Determine if surface water or perched groundwater is diverted from the SDC. See Photo Gallery Part 2.
Water resources	A geomorphic and hydrologic investigation of the effects of railroad beds, roads, berms, and pipeline corridors on surface-and ground-water flow to the SDC. See Photo Gallery 3.
Water resources	A geomorphic, soil, and hydrologic investigation of the incised channels west of the SDC to determine if surface water or perched groundwater is diverted from the SDC.

Planning Issue Category	Comment
Water resources	A geomorphic, soil, and hydrologic investigation of the channel (polygon G) that drains north of SDC to determine if it is capturing groundwater and dewatering the SDC. See Photo Gallery 4.
Water resources	A geohydrologic investigation to determine the source(s) of water for SDC - true cienega is groundwater dependent.
Water resources	As additional groundwater management measures are implemented, it will be especially important to determine their effectiveness and performance through hydrologic monitoring, including assessment of aquifer recharge facilities.
Water resources	Desired future conditions in terms of water quantity should be clarified as part of the RMP, so that ongoing collaborative regional water management efforts, such as aquifer recharge projects, can contribute toward these specific goals.
Water resources	We recommend BLM utilize the suite of indicators from the USGS report on sustainable yield of groundwater expected to be published by the end of 2013 for their hydrologic monitoring framework. This report draws on the collaborative interagency hydrologic monitoring efforts over the past 13 years in the Sierra Vista Subwatershed.
Water resources	Mechanisms to ensure that consistent BLM staff resources are available to meet these ongoing hydrological monitoring needs are important.
Water resources	The RMP needs to bring forward all viable alternatives to address water quality, quantity and timing issues.
Water resources	BLM should continue to monitor and reporting for groundwater wells, including ensuring sufficient funding is received for this monitoring and reporting.
Water resources	BLM should be proactive in developing viable funding mechanisms to assure adequate groundwater is available to SPRNCA.
Water resources	The RMP should include a discussion of how BLM will work with Congress to fund groundwater augmentation and/or mitigation costs.
Water resources	Where necessary to maintain ponds for birdlife and other wildlife, dredging of ponds should be considered where benefits outweigh adverse impacts.
Water resources	The water table that sustains the San Pedro River needs to be protected to ensure continued surface flow. The RMP should address the upper San Pedro watershed as a whole in order to include the sources that flow into the River.
Water resources	BLM must address the complex question of how much surface water and ground water is needed to sustain the San Pedro riparian ecosystem in this draft RMP.

Planning Issue Category	Comment
Water resources	BLM should address both surface water and groundwater availability in the draft RMP and ground its draft management actions and alternatives on the current broad conceptual understanding of the relationship between hydrology and the riparian ecosystem of the San Pedro River.
Water resources	The draft RMP must evaluate how BLM will maintain and fund USGS stream gages located along the San Pedro River and how BLM will support annual wet/dry mapping of the San Pedro River.
Water resources	BLM also must address how to implement a long-term groundwater monitoring strategy to monitor groundwater availability and changes in groundwater flowpaths to the river.
Water resources	Because of their unique physiology, bats are particularly prone to water loss, sometimes losing up to 30% of their body weight to evaporative water loss in a 12 hour period. Pooled surface water is therefor essential for bats, and they must drink nightly during the hottest and driest times of the year, especially reproductive females. Any appropriate management actions that maintain or increase surface water flow in the San Pedro during these times are desirable.
Water resources	The effects of climate change, specifically the decrease in available ground and surface water and the associated effects on riparian habitat needs to be considered for all future management actions in the SPRNCA. This should include climate envelope modeling and adaptation and mitigation planning.
Lands and realty, livestock grazing, and energy and mineral resources	BLM should continue to restrict firearm and off-road vehicle use and grazing in the river channel and in all other areas along the river.
Lands and realty, livestock grazing, and energy and mineral resources	Please do not allow livestock grazing to resume or expand in the SPRNCA. In fact, try and expand the areas that arent grazed.
Lands and realty, livestock grazing, and energy and mineral resources	If you proceed to remove BLM grazing allotments along the San Pedro and its tributaries, years of good work and achievement will be lost and who will then work and maintain the allotments? Will non-use promote return of the land to an 18th century appearance or rather a weeded and overrun 21st century "Natural Area"?
Lands and realty, livestock grazing, and energy and mineral resources	If allotments, on the other hand, are being abused, remove and hold accountable the allotment holder, not the cattle and not the ranchers who have the will and instincts to improve the allotments an downstream lands.
Lands and realty, livestock grazing, and energy and mineral resources	My comments would be that selling or swapping land in this beautiful area, that is conserved for all of us to enjoy, would be a failure to honor the agreement set in place in 1988. The environmental, air, water or any other issues have certainly not improved over time. To say a bunch of new homes would not affect the area is not believable. Scientists claiming no changes would be suspect to me and I would wonder what they would be receiving in return.

Planning Issue Category	Comment
Lands and realty, livestock grazing, and energy and mineral resources	So I am opposed to any change to the plan regarding any home building in the area.
Lands and realty, livestock grazing, and energy and mineral resources	I do not think it is appropriate to allow grazing or commercial interests there.
Lands and realty, livestock grazing, and energy and mineral resources	No grazing should be allowed on any of this national land. The cattle ranchers are ripping off national taxpayers who own this land. The cheap cattle ranchers pay \$1.38 an acre and private land owners get \$20.00 for use of the same amount of land leased by cattle ranchers. Why is this govt agency allowing this rip off of the national treasury. I would like an investigation of this. I do not support this grazing because the grazing ruins the land and leaves it in poor shape with all natural plants and wildlife gone and dead.
Lands and realty, livestock grazing, and energy and mineral resources	We are strongly in favor of continued active and productive grazing in the SPRCA allotments. Much high quality conservation and water enhancement work has been done by the allotment holders. Grazing in its present form is highly compatible with resource values. There are 26 years of documented riparian habitat improvement with current grazing management. Range science clearly demonstrates that Arizona native grass species benefit from well-managed light to moderate livestock grazing and that managed grazing is highly compatible with conservation of Arizona riparian species.
Lands and realty, livestock grazing, and energy and mineral resources	It is our understanding that the law establishing the San Pedro Riparian National Resource Area clearly states that grazing is to be one of the productive uses of the area.
Lands and realty, livestock grazing, and energy and mineral resources	The Babocomari area has shown its sustainability under current management and has become a model for riparian enhancement. Please encourage and facilitate current conservation livestock grazing.
Lands and realty, livestock grazing, and energy and mineral resources	The grazing allotments in the SPRCA should remain active. They should be closely monitored. The Babocomari allotment should become a prime study area. The improvements in and recovery of the riparian habitat in the Babocomari allotment have been well documented over the last 26 years. This trend should continue.
Lands and realty, livestock grazing, and energy and mineral resources	I wanted to express my horror at the idea of developing the 7,000 unit real estate project on or near the upper San Pedro Valley. Do not allow this to happen!
Lands and realty, livestock grazing, and energy and mineral resources	Do not expand grazing acreage.
Lands and realty, livestock grazing, and energy and mineral resources	Do not allow mining or fracking because of heavy water use and possible water contamination.
Lands and realty, livestock grazing, and energy and mineral resources	If power generation devices are placed, put them where they will not be seen or heard.
Lands and realty, livestock grazing, and energy and mineral resources	Work with land-owners and other organizations to expand the boundaries of the SPRNCA

Planning Issue Category	Comment
Lands and realty, livestock grazing, and energy and mineral resources	Offer assistance to abutting land-owners who wish to bequeath or sell their land to BLM.
Lands and realty, livestock grazing, and energy and mineral resources	Opening the area to cattle and motorized vehicles would cause irreparable harm to the fragile San Pedro environment, disturbing the birds and other wildlife, and generally changing the peaceful habitat that has made SPRNCA so attractive and unique.
Lands and realty, livestock grazing, and energy and mineral resources	Prohibit livestock grazing within the SPRNCA.
Lands and realty, livestock grazing, and energy and mineral resources	Seek federal funding to purchase private inholdings adjacent to the SRPNCA or to purchase water rights to provide more integrated resource management of the upper San Pedro River watershed and to sustain a perennially flowing San Pedro River within the SPRNCA.
Lands and realty, livestock grazing, and energy and mineral resources	The forthcoming EIS should take a hard look at the evidence provided by the NRST and incorporate management changes to livestock grazing allotments that would conserve, protect, and enhance the SPRNCA values.
Lands and realty, livestock grazing, and energy and mineral resources	Secretarial Order 3308 also requires the incorporation of science into the decision-making process for the NLCS, stating, "[S]cience shall be integrated into management decisions concerning NLCS components in order to enhance land and resource stewardship and promote greater understanding of lands and resources through research and education." BLMs 15-Year Strategy for the Conservation Lands reiterates this commitment to science by stating that BLM will "provide a scientific foundation for decision-making." Unless BLM can scrounge up some range "science" that purports to show that livestock grazing conserves, protects, and enhances the aquatic, wildlife, archeological, paleontological, scientific, cultural, educational, and recreational resources of the public lands, it cannot consider introducing or continuing to allow livestock grazing in the SPRNCA. Instead, the vast majority of site-specific science from the SPRNCA shows the benefit of livestock exclusion on ecological and biological health.
Lands and realty, livestock grazing, and energy and mineral resources	Moreover, the intensive management that is occurring on some of the allotments should be revealed in context of any monitoring data or overarching conclusions about grazing impacts. For example, the Babocomari allotment is under an intensive rotation/exclusion schedule. The expense and feasibility of implementing such programs for the remaining SPRNCA grazing allotments should be disclosed.
Lands and realty, livestock grazing, and energy and mineral resources	Any consideration of livestock grazing impacts must occur within the context of increasing aridity and temperatures in the southwest.
Lands and realty, livestock grazing, and energy and mineral resources	I request that grazing allotment contracts not be renewed when they expire.

Planning Issue Category	Comment
Lands and realty, livestock grazing, and energy and mineral resources	While I believe Mike should be allowed to continue to hold his grazing lease and manage it wisely as he has done to date, I do not think any part of the San Pedro RNCA, not already in a grazing lease, should be opened to livestock grazing!
Lands and realty, livestock grazing, and energy and mineral resources	I oppose parts of the proposed Management Plan what would permit cattle grazing and off-road vehicle access. I believe that such uses would disturb the fragile wildlife, interfere with use, and damage the area.
Lands and realty, livestock grazing, and energy and mineral resources	Do not permit cows to graze in the SPRINCA this is detrimental to nesting birds, to the vegetation and to confrontation with humans.
Lands and realty, livestock grazing, and energy and mineral resources	Rangeland recovery. Mike Hayhurst and George Monzingo (two local ranchers) used NRCD funds to alleviate bushy shrubs from their grasslands leading to the recovery of springs on their properties. This wasnt addressed in the Rangeland education seminar. It seems we are at a place where the only way to meet our water needs will be to start cutting back on wastage. Encourage all ranchers to stimulate grass growth.
Lands and realty, livestock grazing, and energy and mineral resources	The RMP needs to address chronic livestock trespass.
Lands and realty, livestock grazing, and energy and mineral resources	A discussion of the railroad right of way through the SPRNCA would be appropriate. If this ROW were to be activated what would be the impacts?
Lands and realty, livestock grazing, and energy and mineral resources	I have been around for four winters and there have been between 6 and 10 head of cattle roaming the area near the San Pedro House for most of each winter. I understand that BLM had difficulty getting the owners to promptly remove them. However, my point is that this small number of cattle did a lot of damage by trampling the stream side vegetation. The damage was particularly bad in areas where the cattle tended to concentrate.
Lands and realty, livestock grazing, and energy and mineral resources	Cattle grazing would greatly put pressure on the water resources that the birds are so dependent on.
Lands and realty, livestock grazing, and energy and mineral resources	NO livestock grazing.
Lands and realty, livestock grazing, and energy and mineral resources	NO sand and gravel mining.

Planning Issue Category	Comment
Lands and realty, livestock grazing, and energy and mineral resources	The acquisition of land adjacent to the SPRNCA or purchase of development rights in these areas could be an important tool for protecting the area. The FSPR would like to recommend these actions be taken in this regard: • The BLM should seek partnership with the Nature Conservancy and other organizations with funding and administrative infrastructure to perform this action. • Sensitive areas should be identified and targeted for acquisition. • The BLM should coordinate with other Government entities to cooperate on the designation of sensitive areas, for example with Cochise County to zone lands adjacent to the SPRNCA for low density, non-industrial usage. • The BLM should maintain awareness of lands that become available in sensitive areas and work towards acquisition. As an example, a number of derelict residences have recently become vacant in the Palominas area in highly visible areas along the border of the SPRNCA in that area.
Lands and realty, livestock grazing, and energy and mineral resources	We would like to see BLM enforce the removal of illegal cattle within the riparian areas and where there are no existing grazing allotments; and to penalize those ranchers who consistently break the law.
Lands and realty, livestock grazing, and energy and mineral resources	. Given the huge amounts of water required to conduct the mining and refining activities and potential for pollution of the aquifer, we would encourage the BLM to participate in any discussions with appropriate agencies related to the resumption of local mining activities.
Lands and realty, livestock grazing, and energy and mineral resources	BLM should also stay informed about mining developments in Mexico, particularly in the Cananea area, and initiate dialogue with stakeholders south of the border, including measures to protect the regional aquifer.
Lands and realty, livestock grazing, and energy and mineral resources	With respect to mining, NCA land should be • Recommended for withdrawal from mineral entry. • Closed to mineral leasing or allow leasing only with no surface occupancy with no exceptions, waivers, or modifications. • Closed to mineral material sales.
Lands and realty, livestock grazing, and energy and mineral resources	The threat to birds and bats from wind turbines has been well documented; BLM should be mindful of its primary responsibility to protect the riparian habitat and the internationally important flyway for migratory birds along the river.
Lands and realty, livestock grazing, and energy and mineral resources	NCA land should be closed to renewable energy development.
Lands and realty, livestock grazing, and energy and mineral resources	Exclude all new rights-of-way including transmission, except for already approved transmission corridors.
Lands and realty, livestock grazing, and energy and mineral resources	Habitual offenders that are running their cattle on the SPRNCA have to be punished and their cows have to be removed.
Lands and realty, livestock grazing, and energy and mineral resources	Prohibit grazing on or near SPRNCA or the river.

Planning Issue Category	Comment
Lands and realty, livestock grazing, and energy and mineral resources	Cattle need to be kept out of the riparian area, at all times.
Lands and realty, livestock grazing, and energy and mineral resources	Effects of livestock grazing within the watershed include impacts to the water quality and water quantity issues that the BLM must confront in the SPRNCA.
Lands and realty, livestock grazing, and energy and mineral resources	It should be clarified in the RMP/EIS that BLM has the authority to exclude livestock from federal lands with or without the neighbors consent.
Lands and realty, livestock grazing, and energy and mineral resources	It cannot consider introducing or continuing to allow livestock grazing in the SPRNCA.
Lands and realty, livestock grazing, and energy and mineral resources	The EIS/RMP should require that any future monitoring of grazing on the SPRNCA use weight-based utilization measurements and the planning should specify monitoring intervals that must be met or grazing will be suspended.
Lands and realty, livestock grazing, and energy and mineral resources	We would be very upset if cattle were aloud to graze and four wheelers to be able to run there and ruin the peace and quiet. Also the destruction of the grasses would be a real problem.
Lands and realty, livestock grazing, and energy and mineral resources	My hope is that this area will be kept in strict conservation and even expanded and no other uses such as off road vehicle access or grazing will be allowed.
Lands and realty, livestock grazing, and energy and mineral resources	The four grandfathered grazing allotments should remain active
Lands and realty, livestock grazing, and energy and mineral resources	4. The plan should be left open to allow for therapeutic grazing on the non-allotted areas of the SPRCA.
Lands and realty, livestock grazing, and energy and mineral resources	Brush management and land acquisition like the Nature Conservancy has done should be encouraged.
Lands and realty, livestock grazing, and energy and mineral resources	The four grandfathered grazing allotments should remain active.
Lands and realty, livestock grazing, and energy and mineral resources	The plan should be left open to allow for therapeutic grazing on the non-alloted areas of the SPRCA.
Lands and realty, livestock grazing, and energy and mineral resources	Brush management and land acquisition like teh Nature conservancy has done should be encouraged.
Lands and realty, livestock grazing, and energy and mineral resources	<ul style="list-style-type: none"> Grazing should continue to be restricted. The riparian area is still recovering from 100 years of overgrazing and abuse. The current allotments in the Babocomari drainage should continue. In the future, I would support limited grazing in upland areas. However, the riparian corridor itself should not be open to grazing in any form.
Lands and realty, livestock grazing, and energy and mineral resources	Despite the moratorium on cattle grazing, cattle are routinely found within the boundaries of the SPRNCA. Efforts to bring this to the attention of the BLM have gone unheeded. Irreparable damage to cultural resources is consequently occurring.

Planning Issue Category	Comment
Lands and realty, livestock grazing, and energy and mineral resources	Its with great urgency that I write to strongly encourage the Bureau of Land Management (BLM) to continue to allow active and productive grazing in the San Pedro Riparian National Conservation Area (SPRNCA). Such grazing is important not only to ensure the continued viability of local ranchers, but also for the SPRNCA itself, which benefits ecologically from the conservation and land use practices of the ranchers and their families.
Lands and realty, livestock grazing, and energy and mineral resources	Kreuper, et al.2003 reported that removal of cattle led to rapid and substantial recovery of riparian and mesquite bosque vegetation and bird populations. Resuming cattle grazing within these vegetation communities is not recommended, and if done should be approached with great caution.
Lands and realty, livestock grazing, and energy and mineral resources	The Gray Hawk will respond favorably to habitat guidelines for the Western Yellow-billed Cuckoo. For both birds avoid livestock grazing during the growing season and nest disturbance should be avoided during the breeding season of March-July for the hawk and July-September for the cuckoo.
Lands and realty, livestock grazing, and energy and mineral resources	Remove trespass livestock.
Lands and realty, livestock grazing, and energy and mineral resources	Use a collaborative process to set incentives, and create ongoing rewards for permittees who succeed at meeting range condition objectives, and, conversely, consistent deterrents for trespass grazers.
Lands and realty, livestock grazing, and energy and mineral resources	Utilize an adaptive management approach for uplands to modify rotations and stocking rates in response to available forage, as opposed to establishing less flexible standards, in order to sustain or increase basal area of native grasses and protective cover.
Lands and realty, livestock grazing, and energy and mineral resources	Unmanaged trespass grazing in SPRNCA is problematic for riparian habitat conditions. The RMP should address ways to improve controls on trespass grazing, especially in the riparian zone. WE suggest identifying areas where it is the greatest problem, evaluate strategies to address the issue, and identify ways to monitor effectiveness of those strategies.
Lands and realty, livestock grazing, and energy and mineral resources	Well managed livestock grazing should be considered to reduce fuel loads in a cost efficient manner, especially in the uplands.
Lands and realty, livestock grazing, and energy and mineral resources	Native grassland restoration should be managed with the goal of including targeted livestock grazing in these restored areas.
Lands and realty, livestock grazing, and energy and mineral resources	Given that these cattle are within the SPRNCA illegally, I am asking that the current laws be upheld and all steps necessary be taken to remove illegal cattle. Having this clearly stated in the RMP will allow concerned citizens to take their case to Phoenix.

Planning Issue Category	Comment
Lands and realty, livestock grazing, and energy and mineral resources	I have recently read of cattle being fed baled sacatone grass as a way of dispersing their seeds and restoring native grasses. I would like to suggest that a similar program be explored with those ranchers that have allotments, practice good grazing rotations, and do not allow their cattle to illegally roam within the SPRNCA.
Lands and realty, livestock grazing, and energy and mineral resources	Livestock forage should be monitored to ensure that preferred species are not declining in frequency or abundance. All allotments should be on a rest-rotation plan. Drought should be taken into account and less utilization should be allowed during drought. Adaptive management language should be included in all allotment plans.
Lands and realty, livestock grazing, and energy and mineral resources	I do not believe it will be beneficial to allow grazing in areas where it is currently excluded. I also do not believe grazing has been excluded from all areas where it out to be.
Lands and realty, livestock grazing, and energy and mineral resources	I also support both the purchase and exchange of lands in the San Pedro Valley for the purpose of protecting major drainages and connecting them to the river.
Lands and realty, livestock grazing, and energy and mineral resources	No cattle grazing with the SPRNCA. Better vigilance for and removal of trespass cattle.
Lands and realty, livestock grazing, and energy and mineral resources	Participation in the administrative process in all federal and state grazing allotments in the proximity of SPRNCA to prevent the erosion and increased sedimentation resulting from the nearby grazing.
Lands and realty, livestock grazing, and energy and mineral resources	Cattle grazing is a highly contentious issue. Although we believe it is possible to achieve a healthy ranching balance on the land, it is very complex and needs a lot of monitoring. If restoration of native grasslands is to be attempted, introducing cattle into that proposition would require very careful management, so the cattle dont disperse non-native seeds that could harm a restoration effort.
Lands and realty, livestock grazing, and energy and mineral resources	I am in favor of any active grazing allotments in the SPRNCA.
Lands and realty, livestock grazing, and energy and mineral resources	You should continue to facilitate current conservation livestock grazing.
Lands and realty, livestock grazing, and energy and mineral resources	The grazing allotments in the SPRCA should remain active.
Lands and realty, livestock grazing, and energy and mineral resources	Sierra Club supports full implementation of the withdrawal of all federal lands within the SPRNCA from all forms of entry, appropriation, or disposal under the public lands laws. In particular, we support full implementation of the Acts provisions relating to the withdrawal of federal lands from location, entry, and patent under the mining laws of the United States and from disposition under all laws pertaining to mineral and geothermal leasing and all amendments to those laws.

Planning Issue Category	Comment
Lands and realty, livestock grazing, and energy and mineral resources	The draft RMP should address the issues of mineral leasing and the management of sand and gravel mining operations on BLM-administered lands in the San Pedro River watershed.
Lands and realty, livestock grazing, and energy and mineral resources	BLM should identify, evaluate, and analyze right-of-way avoidance (limited) and exclusion (no access) areas in the draft RMP.
Lands and realty, livestock grazing, and energy and mineral resources	The draft RMP should address BLMs acquisition strategy and reserve the right to make recommendations to Congress on whether additional lands should be included in the conservation area. For example, BLM may want to acquire private lands or inholdings within the SPRNCA boundaries to better manage and protect the riparian area and its resource values in a more integrated way. BLM may seek to mitigate habitat fragmentation and to improve connectivity between SPRNCA units by acquiring private lands located north of Highway 92 to establish a continuous riparian corridor that extends from the U.S. Mexico Border to the northern boundary of the SPRNCA.
Lands and realty, livestock grazing, and energy and mineral resources	BLM should clarify in the draft RMP that the planning criterion which states that BLM will not seek amendments to the Arizona Idaho Conservation Act of 1988 does not preclude future acquisition of real property or interests in land such as water rights or conservation easements to further the general purposes of the SPRNCA. BLM should clarify that the stated planning criteria do not preclude appropriate implementation of an acquisition strategy to conserve, protect, and enhance the SPRNCA riparian area and its resource values.
Lands and realty, livestock grazing, and energy and mineral resources	BLM should include stronger provisions in the draft RMP to address the problem of trespass livestock grazing within the SPRNCA.
Lands and realty, livestock grazing, and energy and mineral resources	The draft RMP should include management plans and actions consistent with this federal mineral withdrawal. BLM also should clarify whether there are any existing mineral claims or patents within the SPRNCA and how BLM will address them under the draft RMP.
Lands and realty, livestock grazing, and energy and mineral resources	We are not opposed to grazing on the portions of the SPRNCA where this use is still permitted, however we feels strongly that protecting and maintaining riparian values will be dependent on the proper (seasonal) timing and duration of use as well as the stocking rate.
Lands and realty, livestock grazing, and energy and mineral resources	Cattle grazing should not be allowed on the SPRNCA but should be considered on other available public lands not adjacent to the SPRNCA.
Lands and realty, livestock grazing, and energy and mineral resources	Include "limited" livestock grazing in areas of the SPRNCA deemed suitable to control growth to reach a state of suitable habitat conditions that are beneficial to selected wildlife species.

Planning Issue Category	Comment
Lands and realty, livestock grazing, and energy and mineral resources	One way that BLM can protect riparian habitat and other sensitive areas is to prohibit cattle grazing in the river channel itself and to restrict it elsewhere to existing grandfathered grazing allotment in the SPRNCA. Nevertheless, BLM should partner with ranchers to encourage sustainable grazing as a continued land use adjacent to the SPRNCA and in grandfathered allotments in SPRNCA.
International border	Likewise, to limit damage to sensitive habitats BLM should seek an inter-agency agreement with Border Patrol activities, including off-road and helicopter patrols and pursuit of undocumented migrants, have increased significantly in recent years with the increased presence of border Patrol; Environmental damage also has increased as a result. Such an agreement should address noise reduction and address other impacts within SPRNCA including damage to cultural and pre-historic sites.
International border	Work with Border Patrol to determine where and when they should patrol within SPRNCA.
International border	Likewise, to limit damage to sensitive habitats BLM should seek an inter-agency agreement with Border Patrol. Patrol activities, including off-road and helicopter patrols and pursuit of undocumented migrants, have increased significantly in recent years with the increased presence of Border Patrol; Environmental damage also has increased as a result. Such an agreement should address noise reduction and address other impacts within SPRNCA including damage to cultural and pre-historic sites.
International border	Unfortunately the San Pedro river corridor has been used as a point of illegal entry into the United States resulting in increased activity by the U.S. Border Patrol. Unwanted trash accumulates and unmaintained roads/trails alter the landscape. These activities do have an impact upon the SPRNCA and need to be a part of the discussion.
International border	Likewise, to limit damage to sensitive habitats BLM should seek an inter-agency agreement with Border Patrol. Patrol activities, including off-road and helicopter patrols and pursuit of illegal migrants, recently have increased significantly as has resultant environmental damage. Such an agreement should address noise reduction and address other impacts like high-intensity lighting within SPRNCA and damage to cultural and pre-historic sites.
International border	BLM should seek an inter-agency agreement with Border Patrol to limit activities, including off-road patrols and pursuit of illegal migrants.
International border	<ul style="list-style-type: none"> • The BLM should work with the Border Patrol to reduce the impact the Border Patrol has on sensitive areas.
International border	The international border should be secured within SPRNCA to avoid threats to public safety and resource damage.

Planning Issue Category	Comment
International border	During the NEPA process for actions undertaken by BLM, BLM should fully consider impacts on national security.
International border	Oppose continued attempts by Department of Homeland Security to destroy SPRNCA values. This should include prohibition of the proposed all-weather roads.
International border	Likewise, to limit damage to sensitive habitats BLM should seek an inter-agency agreement with Border Patrol. Patrol activities, including off-road and helicopter patrols and pursuit of illegal migrants, recently have increased significantly as has resultant environmental damage. Such an agreement should address noise reduction and address other impacts like high-intensity lighting within SPRNCA and damage to culture and pre-historic sites.
Cultural resources, paleontological resources, and Native American concerns	BLM should prohibit removal of artifacts in sensitive pre-historic and historic sites like Murray Springs and Presidio Santa Cruz de Terrenate.
Cultural resources, paleontological resources, and Native American concerns	Given the changing hydrologic conditions at Murray Springs Clovis site, plan for and secure funding for protection of the site.
Cultural resources, paleontological resources, and Native American concerns	Divert the water from the EOP that is currently seeping into Murray Springs.
Cultural resources, paleontological resources, and Native American concerns	Increase police presence in areas of cultural heritage sites, such as the Presidio and Fairbank Cemetery.
Cultural resources, paleontological resources, and Native American concerns	Encourage archaeological research within the SPRNCA.
Cultural resources, paleontological resources, and Native American concerns	BLM should prohibit removal of artifacts in sensitive pre-historic and historic sites like Murray Springs and Presidio Santa Cruz de Terrenate.
Cultural resources, paleontological resources, and Native American concerns	Mammoth Kill Site. I am looking forward to the development of this site. We tried to visit it once but were discouraged by others who told us you would pass right by it without knowing.
Cultural resources, paleontological resources, and Native American concerns	Fairbank cemetery. Thank you for all youve done on the Fairbank township but more could be done with the cemetery. Something more like Boothill would be nice and ID some of the first families members. The State Museum at UofA has a replica of an actual stamp mill. Having a photo of that would help people imagine the enormity of the operation. Also the water pits purpose in front of the stamp mill was confusing.
Cultural resources, paleontological resources, and Native American concerns	The RMP needs to clearly identify and ensure Federally recognized tribes with a cultural affiliation to the CPRNCA and adjacent BLM properties are invited to consult per Executive Order 13175.

Planning Issue Category	Comment
Cultural resources, paleontological resources, and Native American concerns	There is wide interest and support to see the locations of Charleston, Millville, Drews Station, Contention, Fairbank and associated stamp mills protected and increase public access to these locations.
Cultural resources, paleontological resources, and Native American concerns	the BLM indicated there is significant interest by various groups to pursue excavation activities. The RMP should clearly identify what activities would be considered, the approval process and most importantly what is in the best interest of the CPRNCA and not the gain of some researchers pursuit. The RMP should address known federally owned and controlled archeological collections and records collected from the SPRNCA per 36 CRF Part 79 to ensure collections are properly processed, maintained and curated.
Cultural resources, paleontological resources, and Native American concerns	There are historic and archeological sites of value and they need protection as well as probably more elucidation for the education of the general public.
Cultural resources, paleontological resources, and Native American concerns	BLM should prohibit removal of artifacts in sensitive pre-historic and historic sites like Murray Springs and Presidio Santa Cruz de Terrenate.
Cultural resources, paleontological resources, and Native American concerns	Horseback riding, bunting (of any kind), motorized vehicles and bicycles should be banned from these sites.
Cultural resources, paleontological resources, and Native American concerns	We also support the preservation of the cultural resources in the SPRNCA. Many sites are adobe structures that are rapidly dissolving. Other structures are made of wood that is deteriorating and requires stabilization or they will cease to exist.
Cultural resources, paleontological resources, and Native American concerns	Interpretation of the cultural resources of the SPRNCA will help foster an appreciation of the history of the area and increase visitation. We believe that encouraging appreciative visitation actually helps protect these sites. The SPRNCA is one of the few places in the Sierra Vista area in which public can learn about the history of their area.
Cultural resources, paleontological resources, and Native American concerns	Finally, we believe that archeological and historical research in the SPRNCA should be encouraged. Although cultural resources are non-renewable, we believe that careful research using non-destructive methods or involving excavation of portions of sites should be encouraged.
Cultural resources, paleontological resources, and Native American concerns	The protection of the many cultural sites should remain a priority.
Cultural resources, paleontological resources, and Native American concerns	The Tohono Oodham Nation regards the lands of the San Pedro National Conservation Area Resource Management Plan as part of the Traditional-Use Lands of the Tohono Oodham nation.
Cultural resources, paleontological resources, and Native American concerns	The Tohono Oodham Nation considers the preservation and protection of cultural sites in the San Pedro National Conservation Area of utmost importance.

Planning Issue Category	Comment
Cultural resources, paleontological resources, and Native American concerns	The Tohono Oodham Nation considers the preservation and protection of the traditional cultural and natural landscapes of high importance. There needs to be a strong effort in a new management plan to address the identification and protection of such sites.
Cultural resources, paleontological resources, and Native American concerns	There needs to be a contingency plan developed in the event of inadvertent discoveries of cultural sites in the San Pedro Riparian National Conservation Area.
Cultural resources, paleontological resources, and Native American concerns	<ul style="list-style-type: none"> • Cultural resources should be protected in the SPRNCA.
Cultural resources, paleontological resources, and Native American concerns	<ul style="list-style-type: none"> • The BLM should actively encourage archeological and historical research, granting permits to professionals.
Cultural resources, paleontological resources, and Native American concerns	When information is not current the nature and value of cultural resources within the SPRNCA cannot be evaluated. In turn, appropriate management policies cannot be developed and enacted. It is imperative that BLM resource managers familiarizing themselves with the most current literature before considering management of and effects to these resources.
Cultural resources, paleontological resources, and Native American concerns	Site-specific evaluation of National Register of Historic Places (NRHP) significance must be based on current theoretical and substantive knowledge of the discipline. This approach should be applied to the SPRNCA and its resources.
Cultural resources, paleontological resources, and Native American concerns	The value of resources to indigenous people must also be considered as part of this process..
Cultural resources, paleontological resources, and Native American concerns	Wome sites like Presidio of Santa Cruz de Terrenate (AZ EE:4:11) and Santa Cruz del Pitaitutgam (AZ EE:8:15) have been slated for public visitation. Yet, they hold so much more information potential than originally thought when the SPRNCA was established. These sites must be reevaluated every few years to ensure a balance between visitation and information loss.
Cultural resources, paleontological resources, and Native American concerns	Traffic from illegal migrants is creating trails and clearings in encampments at numerous sites. Trash left by these migrants is also damaging the integrity of sites. These are having significant impacts on several fragile Apache and Sobaipuri sites (AZ EE:4:25, AZ EE:4:169, AZ EE:8:424, as well as many more sites further south) and on site of all periods.

Planning Issue Category	Comment
Cultural resources, paleontological resources, and Native American concerns	There has been recent discussion of an ACEC designation for the +/-30 Sobaipuri sites I have identified and recorded through the years in the SPRNCA. Preservation is encouraged, but an ACEC would be good if, and only if it does not prevent research. An ACEC may not be needed because it's already an NCA and the notoriety that offers provides a level of protection. Instead (or at least first), it would be useful to prepare a National Register Nomination for these important sites, as I have been arguing for decades. This would fulfill a legal requirement for federal agencies and would also provide valuable management information to the BLM.
Cultural resources, paleontological resources, and Native American concerns	A goal to provide 100% inventory of the SPRNCA for cultural resources and that the inventory efforts should seek to identify a baseline condition for each site. The size of the management area suggests to us that this is a reasonable goal.
Cultural resources, paleontological resources, and Native American concerns	A goal to develop an integrated, area-wide cultural resources interpretive plan that can enable an interested visitor to experience and learn about the human record in SPRNCA.
Cultural resources, paleontological resources, and Native American concerns	A goal that all priority sites/areas in the SPRNCA shall receive at least annual monitoring.
Cultural resources, paleontological resources, and Native American concerns	BLM has allowed numerous historic ranching features to deteriorate. The RMP needs to include proper management of these resources, including completion of a comprehensive cultural inventory and request budgeting for this effort.
Cultural resources, paleontological resources, and Native American concerns	Cultural and archaeological resources should be given the appropriate protection, along with coordination with Native Americans who have connection to these sites.
Cultural resources, paleontological resources, and Native American concerns	Cultural resources sites in the SPRNCA should be protected and preserved, with adequate staffing and budget in the law enforcement and cultural resource management arenas to make this a reality.
Cultural resources, paleontological resources, and Native American concerns	In the RMP, BLM will need to allocate cultural properties to specific uses.
Cultural resources, paleontological resources, and Native American concerns	BLM should prohibit removal of artifacts in sensitive pre-historic and historic sites like Murray Springs and Presidio Santa Cruz de Terrenate.
Socioeconomics	The SPRNCA is an asset to the local economy given the income associated with eco-tourism, which is a low-impact, renewable source of revenue for businesses throughout the San Pedro Valley. These values should be reflected in the management alternatives that the BLM analyzes.
Socioeconomics	Many people do not realize the huge economic impact of eco tourism to SE Arizona. Yet, if the River flows on, these dollars will continue to support our interests and the economic viability of Sierra Vista.

Planning Issue Category	Comment
Socioeconomics	As discussed in the information meetings the SPRNCA has the potential to become a larger economic player within the region due to its unique natural and cultural resources. The RMO should discuss the various courses of action that could be reasonably implemented to achieve this.
Socioeconomics	The SPRNCA is an asset to the local economy given the income associated with eco-tourism, which is a low-impact, renewable source of revenue for businesses throughout the San Pedro Valley.
Socioeconomics	If the BLM decides to include lands outside the SPRNCA for this RMP/EIS planning process, they need to acknowledge the fact that decisions the agency makes on BLM lands have a potential to impact lessees ability to remain economically viable.
Socioeconomics	In addition, many areas of the subwatersheds contain populations that are on limited budgets. These issues should be included in the RMP.