



TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

Fwd:PUBLIC COMMENT ON FEDERAL REGISTER totally an out of control spending plan - taxpayer being gouged to death in america

1 message

Wed, May 1, 2013 at 11:59 AM

To: BLM_AZ_TFO_SPRNCA_RMP@blm.gov, AMARKSTEIN@blm.gov, AMERICANVOICES@mail.house.gov, INFO@emagazine.com
Cc: LETTERS@newsweek.com, TODAY@nbc.com, SPEAKERBOEHNER@mail.house.gov, SECRETARY@ios.doi.gov, SCOOP@huffingtonpost.com

Sent: Tue, Apr 30, 2013 9:33 am
Subject: totally an out of control spending plan - taxpayer being gouged to death in america

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.

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.

BLM SEEMS TO BE LEAVING OUT THE PUBLIC AND PUBLIC COMMENT FROM THE OWNERS OF THE LAND, THE NATIONAL CITIZENS OF 325 MILLION PEOPLE. BLM SEEMS TO THINK THEY CAN TAKE NATIONAL LAND AND RUN IT SOLELY FOR THE LOCALS. LOCALS CAN DO THAT WITH THE LAND THEY BUY. THIS IS NATIONAL LAND PAID FOR BY NATIONAL TAXPAYERS. THE REST ARE ALL LEACHES ON THE NATIONAL LAND.

IN NO WAY DO I FAVOR ARIZONA FISH AND GAME BEING ALLOWED TO "KILL" ANY WILDLIFE OR BIRDS ON NATIONAL LAND. ALL PLANS FOR THOSE BIRDS AND WILDLIFE WHICH ARE NATIONAL IN ORIGIN, SHOULD BE DONE BY NATIONAL CITIZENS, THIS IS AGAIN NOT A LOCAL SITUATION AND MAKES NO SENSE. THIS NEEDS CHANGE. YOU SEND THE BILLS FOR THIS LAND TO NATIONAL TAXPAYERS AND THEN YOU LET LOCALS RUN ROUGHSHOD OVER THIS LAND. WHAT A RIPOFF BLM IS WORKING IN.

IS BLM TAKING SO MANY BRIBES THAT THEY HAVE LOST ALL RELATIONSHIP TO SANITY? THIS SET UP WITH AZ GAME AND FISH IS WEIRD. I OPPOSE ALLOWING ANY HUNTING OR TRAPPING ON THIS LAND. PEACEFUL USE OF THIS LAND IS THE EPITOME. WE DONT WANT MORE ASSAILANTS LIKE THE ONE WHO SHOT GABBY GIFFORDS ENCOURAGED BY GUN WACKO POLICIES. PLEASE MAKE SURE I AM KEPT UP TO DATE ON ANY PLANS AS THEY GO FORWARD BY PAPER COPIES TO 2 GLENWAY DRIVE, FLEMINGTON NJ 08822. ON NATIONAL LAND, NATIONAL WANTS ARE FOREMOST. LOCALS GET FIRST DIBS ON THEIR OWN BOUGHT AND PAID FOR LAND. ARE BLM EMPLOYEES BEING PAID BY LOCALS OR DO THEY GET NATIONAL TAXPAYER CHECKS? PLEASE REMEMBER THAT. THIS COMMENT IS FOR THE RECORD. JEAN PUBLIC

[Federal Register Volume 78, Number 83 (Tuesday, April 30, 2013)]
[Notices]
[Pages 25299-25300]
From the Federal Register Online via the Government Printing Office [www.gpo.gov]
[FR Doc No: 2013-10058]

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[LLAZG02200.L1610000.DO0000.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

[[Page 25300]]

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

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;

SPRNCAs 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]

BILLING CODE 4310-32-P



TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

Proposed 7,000-unit suburban development planned for the upper San Pedro Valley

1 message

Fri, Jun 7, 2013 at 5:56 AM

[REDACTED]
To: blm_az_tfo_sprnca_rmp@blm.gov

Good morning,

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. My husband and I have visited this area and found it to be a life affirming sanctuary. Is nothing sacred? And there are so many devastating effects beyond the desecration of this area ... water is in ever increasing short supply.

Do not allow this to happen!

Sincerely,

[REDACTED]



TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

San Pedro Recommendations

1 message

Thu, Jun 27, 2013 at 1:24 PM

[REDACTED]
To: blm_az_tfo_sprnca_rmp@blm.gov

Hello,

I am a Tucson resident and very glad to see the San Pedro labeled the first Riparian National Conservation Area. I believe one of the most important characteristics of the river that needs to be managed for it 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 a buffer of at least 100 feet/30 meters from grazing areas and advocating for limited groundwater pumping and recharging of the aquifer.

Thank you,
[REDACTED]



TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

San Pedro BLM land

1 message

Mon, Jul 1, 2013 at 9:17 PM

[REDACTED]
To: blm_az_tfo_sprnca_rmp@blm.gov

A recent blink of a news story raised a question about the San Pedro Riparian Site and whether or not the BLM was going to sell a large amount of our land to a developer to build a vast number of homes. The woman speaking, and I hope I'm wrong, that the proposed land use would create no problems for the area, habitat or otherwise. She said the BLM would like to hear from the public.

In reading available information on your sites, I could not find anything referring to this land deal, only that a scoping and some public meetings would be scheduled.

I do not believe the BLM has made much of an effort to get this information out to the public. That news story on channel 4 was the one and only time I saw anything about this issue. I only get the weekend paper. I also know many people who would be interested in this information and none of them are aware of it. It isn't been talked about on facebook amongst very active environmental Arizonans. I also think it is manipulative to schedule this during the summer when people are in and out of the state on vacations.

I need more information. What is being decided? What are the issues to be decided? Where can I find this information?

Without knowing all the facts I find it difficult to comment, yet I want to be included in the community planning or whatever it is that requires you to comment within a certain time period.

That being said, 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.

So I am opposed to any change to the plan regarding any home building in the are.

Again, I hope the little bit of information I have discovered is incorrect.

Thank you.

[REDACTED]



TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

Re: San Pedro BLM land

1 message

Wed, Jul 3, 2013 at 5:31 PM

[REDACTED]
To: blm_az_tfo_sprnca_rmp@blm.gov

Hi Amy,

Thank you so much for your reply. It was terrific and clarifying. I'll be reading all the meeting and presentation minutes and participating in the Tucson meeting. Wish I could make it to all the informative sessions in Benson but have a beloved 14 & 1/2 yr old dog just diagnosed yesterday with a nasal carcinoma. So future is a little uncertain as far as making plans right now. I will be reading the informational sessions too.

I was very impressed with your office in having solutions for the queries posted at the first meeting and especially happy about the scoping deadline being extended. Such simple, plausible problem solving without all the drama.

I have to apologize for sounding vehement about BLM land being sold or swapped. I thought the real reason behind the cruel rounding up of the wild mustangs was because they are on pristine land owned by all of us through the BLM and developers want it. I'm sure you are aware of the catastrophic effect these roundups have on the mustang population and the amount of money being spent to keep them in very unacceptable warehouses. It's been going on for years.

This is what I was thinking of when I wrote to you. My thinking went there when the news story spoke of a developer wanting to build 7000 homes and pumping groundwater that should be feeding the San Pedro. I am still astonished that any developer would build 7000 homes anywhere in this economy, let alone near Sierra Vista. It seems sinister to me when you think about the lack of infrastructure, available roads and employment. I wonder if it isn't going to be someone's tax write off. Will it end up being another Sunsites near Cochise's stronghold?

I am sorry if I sounded like an idiot in my last email. (And maybe even in this one?)

Thanks Again,
[REDACTED]

-----Original Message-----

From: TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

To: [REDACTED]

Sent: Wed, Jul 3, 2013 9:43 am

Subject: Re: San Pedro BLM land

Hi [REDACTED]

Thank you for your concern regarding the San Pedro Riparian National Conservation Area.

We are in the beginning stages of writing a new Resource Management Plan for the BLM's San Pedro Riparian National Conservation Area. The new Resource Management Plan for the San Pedro Riparian National Conservation Area will guide the management of the BLM land within the planning area for the next several years. The new Resource Management Plan will set goals and objectives for the resources within the San Pedro Riparian National Conservation Area but will not include getting rid of any of the land that is currently part of the Riparian National Conservation Area. The Riparian National Conservation Area was designated by Congress in 1988 and encompasses approximately 56,431 acres of BLM land along the San Pedro River. The congressional act that designated the Riparian National Conservation Area included certain restrictions about how the land could be managed and used by the BLM. One of these restrictions was that none of the land in the Riparian

National Conservation could be disposed or exchanged.

I hope that this explanation of what the Resource Management Plan is and is not for the San Pedro Riparian National Conservation Area helps clarify your questions. I am also attaching a copy of the public law that designated the San Pedro Riparian National Conservation Area in 1988 and states that the land cannot be disposed of.

If you are interested in being involved in upcoming public involvement opportunities related to the development of the Resource Management Plan for the San Pedro Riparian National Conservation Area please visit our website at the following address: <http://on.doi.gov/11YKfGO>

Please let me know if you have any additional questions or concerns.

Regards,

Amy Markstein

Amy Markstein
Assistant Planner--SPRNCA RMP
BLM--Tucson Field Office
3201 E. Universal Way
Tucson, AZ 85756
amarkstein@blm.gov
520-258-7231

On Mon, Jul 1, 2013 at 9:17 PM, [REDACTED] wrote:

A recent blink of a news story raised a question about the San Pedro Riparian Site and whether or not the BLM was going to sell a large amount of our land to a developer to build a vast number of homes. The woman speaking, and I hope I'm wrong, that the proposed land use would create no problems for the area, habitat or otherwise. She said the BLM would like to hear from the public.

In reading available information on your sites, I could not find anything referring to this land deal, only that a scoping and some public meetings would be scheduled.

I do not believe the BLM has made much of an effort to get this information out to the public. That news story on channel 4 was the one and only time I saw anything about this issue. I only get the weekend paper. I also know many people who would be interested in this information and none of them are aware of it. It isn't been talked about on facebook amongst very active environmental Arizonans. I also think it is manipulative to schedule this during the summer when people are in and out of the state on vacations.

I need more information. What is being decided? What are the issues to be decided? Where can I find this information?

Without knowing all the facts I find it difficult to comment, yet I want to be included in the community planning or whatever it is that requires you to comment within a certain time period.

That being said, 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.

So I am opposed to any change to the plan regarding any home building in the are.

Again, I hope the little bit of information I have discovered is incorrect.

Thank you.

[REDACTED]

8/20/13

DEPARTMENT OF THE INTERIOR Mail - Re: San Pedro BLM land

Tuesday, July 16, 2013

To: BLM staff

Subject: Public input on SPRNCA Resource Management Plan scoping

My wife and I moved to the area originally because of the unique natural resources of the Upper San Pedro River Valley. The San Pedro River at its heart is a refuge for diverse wildlife and represents the last, best riparian habitat in Arizona. The riparian ecosystem of the San Pedro River is vital to the survival of millions of migratory and resident birds and other wildlife. 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. 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.

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.

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. 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. BLM should prohibit removal of artifacts in sensitive pre-historic and historic sites like Murray Springs and Presidio Santa Cruz de Terrenate. 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.

The San Pedro River, a jewel among our National Conservation Lands, deserves an RMP that reflects that.

Thank you for your consideration of these concerns and suggestions.

Robert Weissler
Executive Director, Friends of the San Pedro River
E-mail: fsprdirector@sanpedroriver.org
Hereford, Arizona



Markstein, Amy <amarkstein@blm.gov>

SPRNCA Management Comments

1 message

Fri, Jul 26, 2013 at 10:35 AM

Reply-To: [REDACTED]
To: "amarkstein@blm.gov" <amarkstein@blm.gov>

Dear Ms. Markstein,

I won't be able to attend your much appreciated meeting in Sierra Vista on July 27, 2013 so I am submitting my comments in writing. I live in Sierra Vista and visit the SPRNCA often to birdwatch, hike, walk my dog, and volunteer at the San Pedro House. 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.

I can't blame the cattle for wanting out of the overgrazed ranges you see between Sierra Vista and the San Pedro House and I would hate to see that fate visited upon the River.

Sincerely,

[REDACTED]
Sierra Vista.



TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

COMMENTS for the SPRNCA RMP

1 message

[REDACTED]
To: blm_az_tfo_sprnca_rmp@blm.gov

Tue, Jul 30, 2013 at 5:03 PM

I HAVE THE RIGHT TO PROTECT MYSELF

My topic is The Right to Bear Arms for personal safety on BLM property. In this case the San Pedro Riparian Nat. Conservation Area. Now, the Supplemental Rules for this area prohibit the possession of firearms for personal safety. I'm not concerned with target shooting or the hunting seasons this area has. My concern is our inalienable right to protect ourselves if needed. My wife and I hold Concealed Carry License for most of the states in the U.S. and have taken our right to defend ourselves very seriously and have acquired the skills and education to exercise that right proficiently. When we go to a Nat. Parks our rights are not infringed upon because of the way our U.S. Constitution was written for the Government to follow.

The SPRNCA lies in a state that has preemptive gun laws, basically meaning no local laws can overrule the gun laws legislated by that state. The land that is managed by BLM is property of the citizens of the U.S. and we should not be made to disarm when we visit this land. Next, The Organ Pipe Nat. Park is rated the most dangerous Nat. Park in the park system because of human and drug trafficking from Mexico and it is located very close to this area. On the Web Site of The SPRNCA it warns you about not approaching or letting anyone approach you in this area that looks suspicious. There are also check points set up by the Border Patrol along the high way that borders this land for illegal trafficking. The list for danger in this area is long.

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.

Respectfully; [REDACTED]

I HAVE THE RIGHT TO PROTECT MYSELF

My topic is The Right to Bear Arms for personal safety on BLM property. In this case the San Pedro Riparian Nat. Conservation Area. Now, the Supplemental Rules for this area prohibit the possession of firearms for personal safety. I'm not concerned with target shooting or the hunting seasons this area has. My concern is our inalienable right to protect ourselves if needed. My wife and I hold Concealed Carry License for most of the states in the U.S. and have taken our right to defend ourselves very seriously and have acquired the skills and education to exercise that right proficiently. When we go to a Nat. Parks our rights are not infringed upon because of the way our U.S. Constitution was written for the Government to follow.

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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.

Respectfully





PUBLIC COMMENT/ REGISTRATION

U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management - Arizona

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PLEASE LEAVE COMMENTS AT THE MEETING REGISTRATION TABLE
Or Send To: BLM Tucson Field Office, 3201 E. Universal Way,
Tucson AZ 85756
Attn: Amy Markstein

Please Read Carefully

Comments, including names, street addresses, e-mail addresses, and phone numbers of respondents will be available for public review at the BLM during regular business hours (8 a.m. to 4:00 p.m.) Monday through Friday, except holidays. **Individual respondents may request confidentiality. If you wish to withhold your name, address, phone number or e-mail address from public review or from disclosure under the Freedom of Information Act, you must check the box below and initial the statement at the beginning of your comments.** Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety.

Name _____ Phone Number _____
Organization (if any) _____
Address _____
City _____ State _____ Zip Code _____
Email _____

Public Disclosure: I request confidentiality to the extent allowed by law. Initial: _____

Comments:

Involving a younger demographics in the SPRMed + environmental issues in general is always difficult. A strategy I've seen in Illinois may be appropriate here. They recruited a few highly motivated high schooler to participate in a small research project ~~that~~ in the summer between Junior + Senior years, by pairing a student with a local researcher. The program is voluntary, but provides the student with experience + makes them more competitive in college applications. The researcher benefits by getting help w/ their work + also helps involve + increase interest in the local youth to the local environment.

Check here if additional comments are on back or attached to this page.

Signature: _____ Date: _____



PUBLIC COMMENT/ REGISTRATION

U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management - Arizona

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RECEIVED

PLEASE LEAVE COMMENTS AT THE MEETING REGISTRATION TABLE

Or Send To: BLM Tucson Field Office, 3201 E. Universal Way,
Tucson AZ 85756

Attn: Amy Markstein

BUREAU OF LAND MANAGEMENT
TUCSON, AZ

Please Read Carefully

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Name [REDACTED] Phone Number [REDACTED]
 Organization (if any) none
 Address [REDACTED]
 City [REDACTED] State [REDACTED] Zip Code [REDACTED]
 Email [REDACTED]

Public Disclosure: I request confidentiality to the extent allowed by law. Initial: _____

Comments: My husband and I have lived in Sierra Vista for fourteen years. We enjoy visiting the San Pedro River on average twice a week. As birdwatchers we appreciate the tremendous variety of birds but also the mammals, reptiles, native vegetation and beautiful scenery. This is truly one of the greatest places on earth and we wish to keep it that way.

We belong to no organization but have adopted the area of the river we frequently visit.

Check here if additional comments are on back or attached to this page.

Signature: _____ Date: _____

Additional Comments:

On a very regular basis we pick up trash and haul it out including heavy items such as automobile tires.

Please consider the following suggestions.

- ① Do not permit cows to graze in the SPRINCA. This is detrimental to nesting birds, to the vegetation and to confrontation with humans.
- ② Permit no dogs in the area. Many are off the lease and the amount of excrement left is unsanitary and disgusting and dangerous.
- ③ Allow no fishing. Many anglers leave behind huge amounts of trash including thousands of cigarette butts, fishing line, hooks and bait.
- ⑤ Allow no smoking—a tremendous fire hazard and source of litter.
- ⑥ Allow no bird banding—birds are frequently left in the hot sun trapped in mist nets during breeding. How humanitarian is that?
- ⑦ No bikes—this is dangerous to pedestrians and wild life.
- ⑧ No hunting—dangerous and unhumanitarian in a conservation area.
- ⑨ Encourage regular trash pickups.

Thank you.



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U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management - Arizona

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Or Send To: BLM Tucson Field Office, 3201 E. Universal Way,
Tucson AZ 85756
Attn: Amy Markstein

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Name _____ Phone Number _____
Organization (if any) _____
Address _____
City _____ State _____ Zip Code _____
Email _____

Public Disclosure: I request confidentiality to the extent allowed by law. Initial: _____

Comments: With so many uncertainties outside the boundaries of the Conservation Area in terms of groundwater pumping, climate change, etc., 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.

Check here if additional comments are on back or attached to this page.

Signature: _____ Date: _____



TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

Protecting the San Pedro Riparian zone

1 message

[REDACTED]
To: blm_az_tfo_sprnca_rmp@blm.gov

Sat, Aug 10, 2013 at 10:34 AM

BLM, Sierra Vista, AZ

Dear friends of the San Pedro,

Since moving to Sierra Vista several months ago, my wife and I have become aware of the BLMs vital role in protecting the San Pedro River. We knew about birding before we moved here, but did not realize the significance of the San Pedro and the BLMs role in protecting this vital resource.

One major reason for us settling in Sierra Vista rather than some other city congenial to retirees was the birding, hiking, and small city environment that Sierra Vista now offers.

If the San Pedro river flow can be protected, we will all benefit, birds and humans alike.

It is all about sustainability. If we lose the river, we lose the birding experience, and spring will be more silent than even Rachel Carson could have imagined.

If the River is protected, irresponsible population growth will have to be restrained and controlled to allow all life forms to live in harmony.

There are many endangered species living along the River and millions of birds depend on its surface water for their migrations.

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.

The military may reduce its presence or go away altogether someday. But, if the San Pedro continues to flow, eco tourism will continue to thrive.

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.

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.

WE wish the BLM the best in fulfilling their mandate to protect the few remaining wilderness and specie friendly zones in all of the United States, but particularly here in SE Arizona.

Mining operations, if allowed, could provide jobs for a few years, yet the pollution would go on for decates--it always has in the past--it will continue to be a befouling industry that has no place anywhere near a vital plant and animals survival zone.

Again, best wishes in fulfilling you mandate to protect SE AZ from nonsustainable use and development.

[REDACTED] residents [REDACTED]



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Tucson AZ 85756

Attn: Amy Markstein

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Name Phone Number

Organization (if any)

Address

City State Zip Code

Email

Public Disclosure: I request confidentiality to the extent allowed by law. Initial: TL *address public OK phone/email confid. pls.*

Comments: ① Thank you for a well-prepared presentation on the RMP Planning process (Karen)

② Pls do use the watershed body for the planning process - can't talk about effects on Nat. resources without looking at the watershed.

③ I like the idea of field visits for the internet public to get F2F look at the resource(s) of concern/interest.

④ What are the BLM team's priority changes to mgmt based on implementation of the previous RMP - i.e., what needs changing the most?

Check here if additional comments are on back or attached to this page.

Signature: Date: 8.15.13.



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Organization (if any)

Address

City State Zip Code

Email

Public Disclosure: I request confidentiality to the extent allowed by law. Initial: _____

Comments:

Please consider incorporating the upcoming USGS ~~to~~ Groundwater/Aquifer Sustainability Report indicators of groundwater health ~~in your~~ as a tool to identify tipping points of ecological condition. Report should be published late fall, 2013. Talk to Bruce Gungler or James Callagary from USGS.

Check here if additional comments are on back or attached to this page.

Signature: Date: 8/15/2013



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Organization (if any)

Address

City State Zip Code

Email

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Comments: 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. To the extent your plan can include lands covered by your cooperating agencies, their cooperation should be solicited in creating and ~~implementing~~ implementing the plan.

Check here if additional comments are on back or attached to this page.

Signature:

Date: 8/17/2013

Ms. Markstein
Resource Management Plan Coordinator
BLM Tucson Field Office
3201 E. Universal Way
Tucson, AZ 85656

Dear Ms. Markstein:

I'd like to provide my input toward the development of your revised Resource Management Plan (RMP) for the San Pedro Riparian National Conservation Area (SPRNCA). I've been a volunteer for the Friends of the San Pedro River for over 15 years and believe that the SPRNCA is a national treasure that should be preserved and protected so that future generations can enjoy its many natural and cultural 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 river's future and any and all actions necessary to protect this vital resource should be taken.

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.

There is one further topic associated with natural resource protection that concerns me and that topic is cattle grazing. While I understand and accept that grazing in the upland portions of the SPRNCA may be compatible with the BLM mission to protect and preserve, cattle within the riparian area has long been and remains a big problem. Cattle need to be kept out of the riparian area, at all times.

While the natural resources of the SPRNCA are what draw most visitors to it, the protection of the many cultural sites should remain a priority.

I appreciate being given the opportunity to comment on this topic.

Sincerely,

██████████



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Name [redacted] Phone Number [redacted]
Organization (if any) NATIONAL AUDUBON. EX PRESIDENT-HUACHUCA AUDUBON
Address [redacted]
City [redacted] State [redacted] Zip Code [redacted]
Email [redacted]

Public Disclosure: I request confidentiality to the extent allowed by law. Initial: _____

Comments:

PLEASE CONTINUE TO KEEP THE SAN PEDRO RIPARIAN AREA CLOSED TO ALL FORMS OF MOTORIZED TRANSPORTATION. MOTOR CYCLES, ATVS, AND FOUR-WHEEL DRIVE VEHICLES SHOULD NOT BE ALLOWED TO DISTURB THE PEACE AND QUIET OF THIS GREAT ARIZONA HABITAT, WHICH IS A MAJOR CORRIDOR FOR MIGRATING BIRDS, A SANCTUARY FOR NESTING BIRDS, AND HOME TO A LARGE NUMBER OF MAMMALS

PLEASE CONSIDER REFUSING TO PERMIT THE CONTINUANCE OF THE LONGSTANDING PRACTICE OF BIRD BANDING IN THIS AREA. HAS ANY SINGLE BIRD, OR SPECIES, EVER BENEFITED FROM THIS CRUEL PRACTICE WHICH RESULTS IN DEATHS OR INJURIES TO SOME NETTED

Check here if additional comments are on back or attached to this page.

Signature: [redacted] Date: 9.2.13

Additional Comments:

BIRDS EACH SEASON. [PERSONAL OBSERVATIONS]

PLEASE JOIN THE EFFORTS TO STOP ALL ATTEMPTS BY CASTLE AND COOK TO TAP INTO THE VALLEY'S GROUND WATER FOR THEIR PLANNED TRIBUTE HOUSING PROJECT. SUCH ACTION CAN ONLY BRING HARM TO THE SAN PEDRO RIVER

KINDLY ACKNOWLEDGE RECEIPT OF THESE COMMENTS AND ENSURE THEY ARE MADE PART OF THE PUBLIC RECORD

THANK YOU. Willquest



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City State Zip Code
Email

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Comments:

The BLM's SPRNCA RMP should include planning to maintain the infrastructure in the SPRNCA. This should include appropriate staffing to include performances of:

- Trash removal.
- Mowing trails.
- Toilet cleaning.
- Posting and maintenance of signage.
- Repair/rebuilding of fences and marking closures.
- Organization/coordination of volunteer work groups.
- Trail maintenance.

Current staffing level (one park ranger appears inadequate) meaning he cannot keep up with the amount of work that needs to be accomplished.

Check here if additional comments are on back or attached to this page.

Signature:

Date: 3 Sep 13



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Organization (if any)
Address
City State Zip Code
Email

Public Disclosure: I request confidentiality to the extent allowed by law. Initial: _____

Comments:

The BLM's SPRNCA RMP should recognize the significance of the Paleo-Indian sites by improving its interpretation for public consumption.

- a. Currently Murray Springs has trail and signage but that leaves a lot to be desired. Visitors are just looking at trenches a pits with very little context for the significance of what happened there. Replication of the original excavation site with just a few concrete walls depicting labeled native strata of interest and a covered site, say at the Big Eloise with a replica of the dig with in situ fossil display would be a start and should be the minimal acceptable level of display.
- b. The Lehner Site is poorly (in reality not developed)—it currently has a sign and that is some distance away from the area of significance. Anyone who would come to the Lehner Site would be certainly disappointed with the current appearance of the site (which they cannot see) and would feel they wasted a trip. This site needs more development in the same manner as Murray Springs.

Check here if additional comments are on back or attached to this page.

Signature: Date: 3 Sep 13



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Date: 3 Sep 13



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BUREAU OF LAND MANAGEMENT
TUCSON, AZ

2013 AUG -09 PM 4:07

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Name [redacted] Phone Number [redacted]
Organization (if any) _____
Address [redacted]
City [redacted] State [redacted] Zip Code [redacted]
Email [redacted]

Public Disclosure: I request confidentiality to the extent allowed by law. Initial: _____

Comments: I lived in sierra vista 7 years and volunteered for the Friends of the San Pedro over 800 hours including, 7 years of monthly bird walks, Book store, leading hikes, bird banding, gardening at the SP House, etc. The river is extremely fragile and important. The fly way for migration is critical. We must preserve the aquifer at all cost.

Check here if additional comments are on back or attached to this page.

Signature: [redacted]

Date: 9-4-13



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2013 AUG -0 P 4: 11

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Attn: Amy Markstein

BUREAU OF LAND MANAGEMENT
TUCSON, AZ

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Name [REDACTED] Phone Number [REDACTED]
 Organization (if any) SUN CITY ORO VALLEY BIRDERS GROUP, ORO VALLEY, AZ
 Address [REDACTED]
 City [REDACTED] State [REDACTED] Zip Code [REDACTED]
 Email [REDACTED]

Public Disclosure: I request confidentiality to the extent allowed by law. Initial: _____

Comments: SEE BACK OF THIS PAGE

Check here if additional comments are on back or attached to this page.

Signature: [REDACTED] Date: 9-6-2013

I am writing in regard to the San Pedro Riparian National Conservation Area (SPRNCA) Resource Management Plan process.

I am concerned about a proposal to allow motorized vehicles, including motorcycles and ATVs to utilize the San Pedro Riparian Area for recreation.

As a bird watcher, I am totally opposed to any motorized vehicle activity anywhere in the San Pedro Riparian Area. I belong to Sun City Oro Valley bird watchers group. Our group visits the San Pedro River two or three times a year. After morning birding near the San Pedro House, our group- with up to twenty birders- always eats lunch at a restaurant in Sierra Vista.

Birders know from experience that birds leave any area where there is noise. A good example is the recent Labor Day weekend departure of a Blue-footed Booby, a diving-for-fish ocean bird, from Patagonia Lake State Park. Birders came from all over the United States to see this bird, bringing income to the nearby communities of Nogales, Patagonia and Sonoita. However, motor boat activity on Patagonia Lake during the 3-day holiday, with boats even motoring near to this rare (for Arizona) water bird, frightened the bird so much that it either left the area or died of starvation. Rare or out-of-place birds are always posted on various nationwide birding websites. There are many avid birders who will fly cross-country just to see and log a new bird. Southeast Arizona, and especially Cochise County, cannot overlook the revenue these birders bring. Renting cars, hotel/motel stays, dining out, and hiring local birding guides are just a few things where they spend their money with us.

There are few places in Arizona as pristine as the San Pedro River Riparian Area. Permitting any kind of motorized vehicle in this area would destroy its uniqueness. And birds migrating through here would soon find another route.

Please retain the unique, pristine San Pedro River Riparian Area by prohibiting any motorized vehicles in the area.



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Name [REDACTED] Phone Number [REDACTED]
 Organization (if any) San City Oro Valley Birders Group Oro Valley AZ
 Address [REDACTED]
 City [REDACTED] State [REDACTED] Zip Code [REDACTED]
 Email [REDACTED]

Public Disclosure: I request confidentiality to the extent allowed by law. Initial: _____

Comments: see back of this page

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Signature [REDACTED] Date: 9-6-2013

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Attn: Amy Markstein

BUREAU OF LAND MANAGEMENT

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Name [redacted] Phone Number [redacted]
Organization (if any) _____
Address [redacted]
City [redacted] State [redacted] Zip Code [redacted]
Email [redacted]

Public Disclosure: I request confidentiality to the extent allowed by law. Initial: _____

Comments: The San Pedro River and it's natural habitat have been very important to me over the years. It's representation of the history of the San Pedro River and all the natural habitat have been a joy to study + experience.

It would be a shame to destroy all the progress that has been made by allowing visitors to use motorized vehicles on these lands. It seems to undo so much that has been done in this fragile invironment. If "special needs" visitors need assistane, why not have special times where volunteers can man vehicles such as a golf cart.

Check here if additional comments are on back or attached to this page.

Signature: [redacted] Date: 9/6/13



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U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management - Arizona

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PLEASE LEAVE COMMENTS AT THE MEETING REGISTRATION TABLE

Or Send To: BLM Tucson Field Office, 3201 E. Universal Way,
Tucson AZ 85756

Attn: Amy Markstein

Please Read Carefully

Comments, including names, street addresses, e-mail addresses, and phone numbers of respondents will be available for public review at the BLM during regular business hours (8 a.m. to 4:00 p.m.) Monday through Friday, except holidays. Individual respondents may request confidentiality. If you wish to withhold your name, address, phone number or e-mail address from public review or from disclosure under the Freedom of Information Act, you must check the box below and initial the statement at the beginning of your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety.

Name _____ Phone Number _____
Organization (if any) _____
Address _____
City _____ State _____ Zip Code _____
Email _____

Public Disclosure: I request confidentiality to the extent allowed by law. Initial: _____

Comments:

As a professional in Rangeland Management for over 40 years in the area, I would like to comment on the future use and management of the San Pedro Riparian National Conservation Area and the Resource Management Planning process.

My understanding is that this area was established via public law 100-696 to protect the riparian area of the San Pedro River and all its associated natural resources (plants, animals, cultural, archaeological, etc.) within the boundary of the 56+ thousand acres. I understand there are four existing, small, grazing allotments on the area that came with the land in the original trade/purchase of the property in 1988.

Check here if additional comments are on back or attached to this page.

Signature: _____ Date: 9-8-13

Additional Comments:

I have knowledge of only one of these. It is the allotment owned by Mike Hayhurst along the eastern portion of Babacomari creek near its confluence with the San Pedro. I know Mike and know how he grazes and manages this small allotment. I believe his management has resulted in good riparian plant communities along the creek and the adjacent uplands. This pasture is only grazed in the winter and ungrazed each year in the spring-summer growing season. It is also vital to the integrity of Mike's "Brookline Ranch".

I do not know the other three existing grazing allotments and cannot comment on them. They need to be, in my opinion, judged on their own merits, and upon the performance of the individual ranch owners as to whether or not they live up to their responsibilities as leasees of public lands.

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.

There is no environmental or scientific reason to allow grazing on the SPRNCA and given the intent of the public law which established it, in my opinion, it would be counter-productive to do so.

These are my opinions alone.

9-8-13

RECEIVED

2013 SEP 12 A 11: 37

BUREAU OF LAND MANAGEMENT
TUCSON, AZ

Hi Amy,

My SPRNCA comments
are enclosed,

Thanks,




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Bureau of Land Management – Arizona

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Name

Phone Number

Organization (if any)

Address

City

State

Zip Code

Email

Public Disclosure: I request confidentiality to the extent allowed by law. Initial: _____

Comments:

The attached comments to the SPRNCA RMP/EIS are respectfully submitted

I look forward to participating as this process continues.

Check here if additional comments are on back or attached to this page.

Signature: _____

Date: 10 Sep 13

10 September 2013

SUBJECT: Comments to Bureau of Land Management (BLM) Scoping San Pedro Riparian National Conservation Area (SPRNCA) Resource Management Plan (RMP) and Environmental Impact Statement (EIS).

1. The following comments are provided to identify and assist in the development of the SPRNCA RMP and EIS based on statutory requirements, public involvement, and professional observations. Comments will be broken down based on the five educational forums that were presented and one other area entitled additional comments.

2. Water and Riparian Resources

- a. The SPRNCA could be considered the end-state of the overall condition of water resources in the San Pedro watershed. The science indicates base flow of the river will continue to decline which will prove problematic for the BLM in meeting its responsibilities under Public Law 100-696. Since these impacts go far beyond the fence line of this proposed action, it is highly recommended a number of key cooperating agencies be formally identified. They are U.S. Army – Ft. Huachuca, U.S. Fish and Wildlife Service and U.S. Forest Service – Coronado National Forest. Coordinating status with the cities adjacent to the SPRNCA, Chocise County Board of Supervisors, Arizona Departments of Environmental Quality and Water Resources is essential to identifying a complete water analysis.
- b. During the informational meetings BLM officials stated one of the decisions to be made was whether to incorporate BLM properties not within the boundaries of the SPRNCA but located within the San Pedro watershed into the RMP. To exclude these properties outside the RMP would advance an incomplete analysis. Additionally to include these properties in the RMP but incorporate them under a separate Record of Decision (ROD) would raise issues of segmentation.
- c. The BLM does not seem to be lacking for water resource data that has been collected by various agencies and interest groups over the years. 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.
- d. Riparian areas are dynamic communities subject to continual change. The RMP must identify a baseline in order to evaluate condition and trend of the riparian zones.
- e. Within the SPRNCA areas of active soil erosion and stream bank down cutting exist degrading water quality and the ability to retain moisture in the soil mantle.

It is recommended an erosion control plan be incorporated into the RMP identifying soil stabilization opportunities and methods to achieve this.

3. Watershed and Rangeland Management

- a. Throughout the information forums and scoping numerous comments were made concerning trespass livestock grazing on the SPRNCA and the need to eliminate it altogether. It's apparent that the San Pedro valley has been subjected to historic overgrazing subsequently changing it from a grassland community to a shrub community. However managed grazing should be an integral tool in managing a healthy plant community on the SPRNCA. The intensity, duration and timing of grazing will help in development of an enhanced plant community. The RMP needs to address chronic livestock trespass.
- b. 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. Consistent inventory measures will identify trends and stocking rates can be adjusted accordingly.
- c. There was minimal discussion concerning fire on the SPRNCA. It is highly recommend 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.
- d. It was stated the SPRNCA contained approximately 125 miles of fence. The RMP has to address how fences and other improvements are going to be maintained. What level of resources and manpower is required to accomplish this activity needs to be identified.

4. Wildlife and Threatened and Endangered Species

- a. The SPRNCA without question provides a critical pathway for migratory birds in the Southwestern United States and a unique riparian habitat. Without adequate water resources this system is in danger of collapsing. 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.

5. Cultural Resources and Recreation

- a. The RMP needs to clearly identify and ensure Federally recognized tribes with a cultural affiliation to the SPRNCA and adjacent BLM properties are invited to consult per Executive Order 13175.
- b. Throughout the SPRNCA there is considerable evidence of pre-history and historic activities. Although a portion of this story has been recorded, it is incomplete. Of specific interest to the public is the development along the San Pedro supporting the Tombstone mining district. 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.

- c. 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 SPRNCA and not the gain of some researcher's pursuit. The RMP should address known federally owned and controlled archeological collections and records collected from the SPRNCA per 36 CFR Part 79 to ensure collections are properly processed, maintained and curated.

6. Socioeconomic

- a. The future development of Chocise County within the San Pedro watershed will have a direct affect upon the SPRNCA and its capability to support the requirements 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. Section 102 of the National Environmental Policy Act and Council of Environmental Quality Regulations state the proponent must analyze the environmental effects of past actions when they describe the cumulative environmental effects of a proposed action. As discussed in the information meetings, resolution of the Gila River adjudication is far off. Developing a proposed action within the scope of this activity will be difficult if adjacent activities are not addressed.
- b. 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 RMP should discuss various courses of action that could be reasonably implemented to achieve this.
- c. Recommend the RMP discuss the level of support the BLM has received to manage the SPRNCA both in terms of what was programmed and what was actually appropriated. This should be in terms of personnel and operations and maintenance. Did appropriated funds meet the intent of Section 107 of PL 100-696?

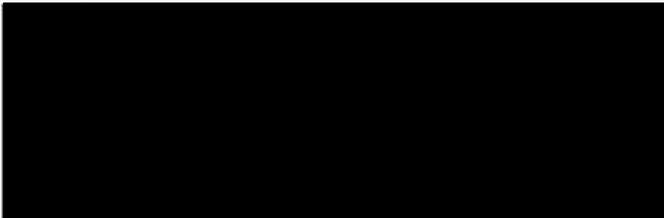
7. Additional Comments

- a. The SPRNCA RMP/EIS has the potential to create public expectations far beyond the scope of the document(s). Recommend a succinct screening criteria be developed to focus the scope to the original proposed action.
- b. During the scoping meetings the BLM officials appeared confident there were few data gaps to hinder completion of this analysis. A common practice used to hinder document completion is to claim additional studies/analysis is needed to make an informed decision. If there are any significant data gaps they need to be resolved.
- c. Recommend the RMP/EIS discuss the number of Cooperative Agreements developed under the authorization of PL100-696.

- d. Recommend the RMP/EIS discuss the activities of the San Pedro Riparian National Conservation Area Advisory Committee as authorized in Section 104 of PL100-696.
- e. Many SPRNCA activities involving public participation are accomplished by volunteer organizations. Recently an activity resulted in litigation against a volunteer organization. The RMP clearly needs to state the roles and responsibilities of volunteer organizations that are used to support the SPRNCA.
- f. 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.
- g. 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?
- h. 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 recommend this activity be identified as an ongoing operation.

8. I look forward to review of the Draft document as it is developed through this process.

Respectfully submitted:





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Bureau of Land Management - Arizona

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PLEASE LEAVE COMMENTS AT THE MEETING REGISTRATION TABLE P 1:06

Or Send To: BLM Tucson Field Office, 3201 E. Universal Way,
Tucson AZ 85756

Attn: Amy Markstein

BUREAU OF LAND MANAGEMENT
TUCSON, AZ

Please Read Carefully

Comments, including names, street addresses, e-mail addresses, and phone numbers of respondents will be available for public review at the BLM during regular business hours (8 a.m. to 4:00 p.m.) Monday through Friday, except holidays. **Individual respondents may request confidentiality. If you wish to withhold your name, address, phone number or e-mail address from public review or from disclosure under the Freedom of Information Act, you must check the box below and initial the statement at the beginning of your comments.** Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety.

Name [redacted] Phone Number [redacted]
Organization (if any) _____
Address [redacted]
City [redacted] State [redacted] Zip Code [redacted]
Email [redacted]

Public Disclosure: I request confidentiality to the extent allowed by law. Initial: _____

Comments:

I am a concerned citizen. There is on-going discussion of allowing motorized vehicles in the San Pedro Riparian Area. I object most strongly. This area is most important to migrating birds. This is one of SCANT NORTHERN MIGRATORY ROUTES FROM SW. A FRAGILE, IMPORTANT AREA. WE SO ENJOY THE

Check here if additional comments are on back or attached to this page.

Signature: [redacted] Date: 9.11.13

RIPARIAN AREA IT'S ABUNDANT
MOTORIZED VEHICLES IN SP



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Bureau of Land Management - Arizona

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PLEASE LEAVE COMMENTS AT THE MEETING REGISTRATION TABLE

Or Send To: BLM Tucson Field Office, 3201 E. Universal Way,

Tucson AZ 85756

Attn: Amy Markstein

Please Read Carefully

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Name [Redacted] Phone Number [Redacted]
Organization (if any) UNAFFILIATED
Address [Redacted]
City [Redacted] State [Redacted] Zip Code [Redacted]
Email [Redacted]

Public Disclosure: I request confidentiality to the extent allowed by law. Initial: _____

Comments: A) PLEASE DO NOT ALLOW ANY TYPE OF CAMPING IN THE SPANCA.
WHO WOULD CLEAN UP AFTER CAMPERS? WHO WOULD SEE TO IT THAT TOILET
FACILITIES ARE KEPT CLEAN? HOW WOULD YOU PREVENT VANDALISM?
B) PLEASE PROMINENTLY PROHIBIT THE USE OF PLAYBACK DEVICES TO LURE
BIRDS INTO VIEW IN THE SPANCA.

Check here if additional comments are on back or attached to this page.

Signature: [Redacted] Date: 9/26/13



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U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management - Arizona

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PLEASE LEAVE COMMENTS AT THE MEETING REGISTRATION TABLE
Or Send To: BLM Tucson Field Office, 3201 E. Universal Way,
Tucson AZ 85756
Attn: Amy Markstein

Please Read Carefully

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Name Phone Number
Organization (if any)
Address
City State Zip Code
Email

Public Disclosure: I request confidentiality to the extent allowed by law. Initial: _____

Comments: 1. "SCATTERED" PARCELS OF BLM LAND SHOULD FALL UNDER A DIFFERENT PLAN. THOSE PARCELS SERVE COMPLETELY DIFFERENT PURPOSES.
2. LIMITED HUNTING SHOULD BE ALLOWED WITH RIFLE OR SHOTGUN. BOW HUNTING DOES NOT ADEQUATELY CULL GAME IN THE SPANCA.
3. CARRYING A FIREARM IN ACCORDANCE WITH AZ LAW FOR PERSONAL PROTECTION SHOULD BE ALLOWED. I LOVE HIKING THERE, BUT IT IS NOT SAFE.

Check here if additional comments are on back or attached to this page.

Signature: Date: 09/20/13



canada goose parka clearance

1 message

Mon, Oct 14, 2013 at 6:05 AM

Reply-To: [REDACTED]

To: blm_az_tfo_sprnca_rmp@blm.gov

Cc: info@sanpedroriver.org, [REDACTED]

Ms. Amy Markstein
Resource Management Plan Coordinator
Bureau of Land Management
3201 E. Universal Way
Tucson, AZ 85656

To: Ms. Markstein and Bureau of Land Management Tucson Field Office Staff
Subject: Friends of the San Pedro River input on SPRNCA RMP scoping

As a resident of canada goose parka clearance, The more trees we wrap, the further more inland the beavers travel to cut down trees for dam setting up activities.

[url=<http://wbl-online.org.uk/view/view.php?id=2514>]canada goose parka clearance[/url]

canada goose parka clearance

canada goose parka clearance

GAIL GRIFFIN
STATE SENATOR, DISTRICT 14

CAPITOL COMPLEX, SENATE BUILDING
1700 WEST WASHINGTON
PHOENIX, ARIZONA 85007-2890
(602) 925-5855
TOLL FREE 1-800-352-8404
FAX (602) 417-3150

E-MAIL ggriffin@azleg.gov



Arizona State Senate

COMMITTEES:

WATER, LAND USE & RURAL DEVELOPMENT
CHAIR

COMMERCE & ENERGY, VICE-CHAIR

BORDER SECURITY, FEDERALISM & STATES
SOVEREIGNTY

NATURAL RESOURCES & TRANSPORTATION

VETERANS & MILITARY AFFAIRS

May 15, 2013

To Whom It May Concern:

I appreciate the opportunity to address the Bureau of Land Management on the subject of the San Pedro Riparian National Conservation Area Resource Management Plan. Thank you for providing the public with this opportunity to provide feedback.

Federal conservation efforts almost always come at the expense of both private property rights and jobs. When the San Pedro Conservation Area was first proposed, many, including me, warned that it was only a matter of time before the federal government and environmental groups used the Conservation Area as justification to shut down growth and development in Cochise County. We have seen that warning fulfilled in the last year as the BLM and environmental groups sued the State of Arizona to prevent a residential and commercial development from being constructed in Sierra Vista—**outside of the Conservation Area, I might add.**

With these facts in mind, I would like to go on record requiring that the BLM, as it develops its Resource Management Plan for the Conservation Area, consult and coordinate with:

- Local, private landowners
- Local ranchers and farmers
- The local natural resource conservation districts, including the Hereford NRCD
- Local governments, including the City of Sierra Vista and Cochise County
- The State, including the Department of Water Resources
- Local and state elected officials (including me)
- Other interested and relevant parties

I want to point out to the BLM, as it moves forward in this process, that it will certainly be under extensive pressure from environmental groups to follow their agenda and their orders.

SPRNCA
May 15, 2013
Page 2

Let me remind the Bureau of this fact: **environmental groups represent an agenda – they do not represent the people**. Who represents the people? Those who are elected by the people. **Do not confuse loud, wealthy, and powerful environmental groups with those who matter most – the people who live here, and the elected officials who represent them.**

We can have a healthy river, a healthy environment and growth at the same time. Previous studies show that the major use of the water in the upper San Pedro River was the phreatophytes (river vegetation). Proper land management is necessary. Not managing or using the land is not a good plan. Cattle need to be put back on the land. They eat the grasses, fertilize and cultivate the soil. That creates ground cover and grasses that hold water when it rains and recharges the aquifer.

Local and private property owners can manage lands better for conservation than bureaucrats that have an agenda. Customs, cultures and the local economies need to be taken into consideration when management plans are addressed and the multiple uses of those lands are necessary.

Thank you.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Gail Griffin".

Gail Griffin
State Senator
District 14

THIS IS FOR PUBLIC DISCLOSURE

ATTN: Amy Markstein

FROM:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Comments on new management plan for the SPRCA

The four grandfathered grazing allotments should remain active because:

1. The recovery of the Babocomari Allotment in the riparian area over the last 28 years is well documented. Every goal of the riparian study team is evident in the Babocomari riparian area. Immediately following this email I will forward photographs taken in September of 2013 of the allotment, also transects and a photo record are available at the NRCS office in Douglas. I would like this to become part of the record.
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.
3. The Babocomari River could be an excellent area to study grazing on riparian habitat because part is grazed and part is not grazed.
4. The lease holders were given the commitment by the BLM and Arizona State Land Department that their leases and all the terms of their leases would be permanently excepted by the BLM.

Things that should change:

1. A science based adaptive management plan should be adopted.
2. A partnership should be developed between ranchers, the BLM and environmental groups to oversee the health of the allotments. The very successful La Cieniga plan should be used as a model.
3. A biological plan with clear cut goals for riparian corridors should be adopted.

4. The plan should be left open to allow for therapeutic grazing on the non-allotted areas of the SPRCA.
5. It should be recognized that lack of water is the biggest threat to the SPRCA. Brush management and land acquisition like the Nature Conservancy has done should be encouraged.

Attn: Amy Markstein, BLM Tucson Field Office

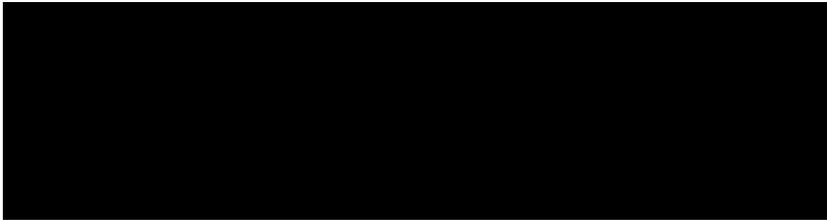
3201 East Universal Way, Tucson, AZ 85756

To whom it may concern:

I am strongly in favor of continued grazing in the SPRCA allotments. The allotment holder's have demonstrated extreme care when it comes to grazing, by rotating pastures on a regular basis, and restoring thousands of acres on north side of the ranch. I have been going to that ranch for at least 20 years and have never seen so much grass. I have never seen the water in the Babocomari as high as it is now. I have seen water in areas around the ranch that I have never seen before, such as the natural spring that popped up just a couple hundred yards south of the ranch house. This happened shortly after the upper pasture was restored. The 26 years of documented improvements should be adequate enough reason for continued study and research of the riparian area.

I oppose any Federal action that will reduce the current usage by the allotment holder. Brookline Ranch has been a model for the area when it comes to range restoration/stewardship.

Respectfully



Introduction

This document is a response and comments for the San Pedro Riparian National Conservation Area (SPRNCA) Resource Management Plan (RMP) scoping effort. My comments pertain to cultural resources only, as this is my area of expertise.

As background, while working for the BLM, I participated in the original planning effort for the SPRNCA and began my research in the area at that time (1986). Consequently, I have a considerable interest in and knowledge of the area, having worked from Winkelman to Palominas, with a most intensive focus within the SPRNCA itself. Additionally, for decades my work has focused on the O'odham, Apache, and non-Apache protohistoric and historic groups who made the San Pedro home, along with the Spanish colonial presence. As a result of my research in this area I have seen the full range of cultural resources present, and have come to appreciate how truly unique they are. I have also seen how substantially these cultural resources have been impacted by human and natural factors since the SPRNCA was established, which opened an area to the public that was once privately held (with restricted access).

With this perspective, my comments will be heavily weighted toward the protohistoric and historic resources, but information and issues presented are intended as examples of larger processes underway within the SPRNCA. The historic resources in the SPNCA are incredibly important and unique, relating to Doc Holliday, Wyatt Earp, the Clanton Brothers, as well as to the important historical figures of the periods on which I focus my study: Father Eusebio Francisco Kino, Marcos de Niza, Vázquez de Coronado, and so many others. Below I relate several discrete topics, laying out each issue, and then I suggest solutions or mitigation measures. There is considerable overlap in issues as well as in their realistic solutions.

1. Enforcement, Implementation, and Promotion

The current management plan may be satisfactory, as written, but it has not been adequately evaluated or effectively implemented. Many of the policies are not being enforced nor are recommendations being implemented. 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.

Considerable resources are being funneled toward preparation of a new RMP when the recommendations, guidelines, and policies laid out in existing management documents have not been implemented. (The specifics relating to these issues are discussed below with respect to cultural resources.) Substantial fiscal and human resources will be wasted on this RMP revision process unless the BLM specifically analyzes how these policies will be implemented in the future and why they have not been put into practice in the past. The scoping process should highlight problems and concerns as well as missed opportunities.

Solutions or Mitigation:

- Because the BLM is reevaluating the current management plan, an Environmental Impact Statement (EIS) is needed rather than an Environmental Assessment (EA). This will allow a full analysis as to why the existing policies are not being followed, whether they realistically

can be followed, and what changes need to be made. Already, it is clear from the educational meetings that in some instances the BLM does not comprehending the scope of the issues. This results in a less than optimal evaluation process, which can lead to errors in analysis.

- To remedy this it would be useful for the BLM to establish a panel of experts who will work with the BLM on the details. It will be critical to have knowledgeable scientists/archaeologists who are most familiar with the SPRNCA to participate in the implementation plan (IP) where site-specific issues are addressed.
- While staffing and budgets may not be directly addressable in the RMP or IP process, available resources can be better directed, used more intelligently, and more effectively applied to the unique requirements of the SPRNCA. There may not be more money, but the money that is available can be use more wisely. It may not be possible to add Staff, but those that are employed should focus their efforts more judiciously.
- BLM efforts can be facilitated by cooperative agreements and relationships with professionals and the public. There is a vast store of knowledge and energy that is not being tapped and is, in fact, being discouraged.
- Comprehensive understanding based on knowledge from both inside and outside the BLM will lead to more effective, successful, and efficient management.
- The BLM is encouraged to maintain the web-based scoping tool past the RMP effort to assist in the implementation phase, not just the planning phase.

2. Consult Knowledgeable Experts

During the BLM orientation talks at the Sierra Vista educational meeting, the specialists' presentations contained errors and out-of-date information. Lack of up-to-date information will make it difficult for the BLM to evaluate and manage the resources. For example, the BLM representative stated that no "pre-submission" Apache sites are known from SPRNCA, specifically: "knowledge of Apache cultural sites prior to their submission is lacking in the archaeological record" (Amy Sobeich). Yet, in a recent report to the BLM regarding the SPRNCA, Seymour (2011a) reported three new sites that produced Apache evidence within the SPRNCA, one of which is collapsing into an deep arroyo and being degraded by sheet-wash erosion (as stated in the report). Also one of the earliest known (A.D. 1300s and 1400s) Apache sites in the Southwest overlooks the SPRNCA and another early site (A.D. 1300) is just a valley way (Seymour 2008, 2011b, 2011c, 2012, 2013), indicating that more early Apache sites lie undiscovered in the SPRNCA due to lack of survey by professionals with a proven ability to find these elusive resources.

Another example is that the specialist presenting on the prehistory and history, Bill Doelle, did not express knowledge of the extensive work conducted within the SPRNCA on the Sobaipuri. Given the updated web page for his company states that no work has been done on the Sobaipuri since Di Peso (www.archaeologysouthwest.org/what-we-do/investigations/sobaipuri/), I wonder if the BLM is fully aware of the amount of new knowledge on this group. Are the BLM and their chosen experts aware of the work that has been conducted in the area? During my 28 years of research on the Sobaipuri, Apache (and related groups), and on Spanish colonial history I have produced dozens of refereed journal articles and books on the Sobaipuri alone. Yet these sources of knowledge do not seem to be valued in the current management and assessment processes. We have recently found five new (previously unrecorded) Sobaipuri sites in an area previously surveyed by Archaeology Southwest, demonstrating that not all research is comparable and not all surveyors have similar ability to identify sites of this period.

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.

Solutions or Mitigations:

- The BLM would benefit from hiring as consultants experts who have extensive knowledge of the area to assist in this process.
- The BLM should empanel a group of advisors with a broad range of knowledge of the cultural resources on the SPRNCA, both known sites and those that are likely to exist but have not been located.
- The BLM should promote research, actively disseminate the information research develops, and encourage educational efforts.

3. Regular Reevaluation of Resources

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. To many federal agencies, this means that the information potential of cultural resources must be reevaluated every few years (Butler 1987). Moreover, managers must be aware of the range of resources and their information value relative to current knowledge. The value of resources to indigenous peoples must also be considered as part of this process.

Solutions or Mitigations:

- Promote and encourage research.
- Prepare National Register of Historic Places (NRHP) nominations for individual sites, for themes, for districts, and for the SPRNCA as a whole (see below).
- Evaluate damage to sites and prepare damage assessments with recommendations.
- Prepare several comprehensive historic contexts for the area, each one specific to the area (not a canned version cribbed from a contractor's report). These should be brought up to date using the substantial knowledge of each period gained over the last several decades.
- Classify all known sites with respect to NRHP criteria.
- Fulfill the BLM's Section 110 responsibility (see below), or given the lack of funding, encourage professional researchers and amateurs to assess and evaluate resources.
- Because the BLM cannot afford to conduct or fund research they need to encourage research by others. This can be accomplished by expediting the permit process for qualified researchers. Evaluation and management procedures relating to permittees needs to keep pace with new knowledge gains so that appropriate research is encouraged.
- Policies that direct staff to encourage public participation are the first step. It seems that BLM personnel sometimes see this kind of research and participation as an imposition, an unwanted addition to their work load, or as an inappropriate use of public lands rather than a resource that could be of great use to the BLM staff.

4. Section 110 Requirements

BLM is required under Section 110.a.2.A of the National Historic Preservation Act to know the range of resources under its jurisdiction (identify or inventory them) so that these can be evaluated, nominated to the NRHP, and protected. BLM, for whatever reason, is not currently fulfilling these requirements.

Solutions or Mitigations:

- While the BLM may have no money for complete inventory and evaluation, the BLM can be assisted in this task by qualified researchers. Yet, contrary to guidance provided in the original SPRNCA management plan, research is not currently encouraged or promoted, and is in fact discouraged. Beyond basic identification for management and evaluation, knowledge about the range, number, and integrity of sites will assist the BLM in fulfilling its management mandates. This knowledge will also provide something of value for the public, including trails, interpretation, and knowledge about the past.

5. Informed Decision Making and Knowledgeable Managers/Specialists

The SPRNCA encompasses perhaps the richest record of cultural resources in southern Arizona, if not the state as a whole. Proximity of the area to a major population center and internet publicity regarding some of the most important and unique resources (e.g., Santa Cruz de Terrenate presidio, Charleston, Contention City, Drew's Station, 17th century Kino visitation sites) means that these cultural properties are under unusual levels of threat. Responses and priorities of managers and specialist are not commensurate with the high quality, rarity, and importance of resources in this area.

A good example is that hunters recently drove across the site, partially excavated by Di Peso (AZ EE:8:15), driving through the fence gap and over O'odham housing. The gate near the main road is routinely left open during hunting season. Also a recent tour to this site by the Arizona State Museum drove over features (north of the existing fence) while I was working there and they got stuck and, when revving the engine, gouged the site, damaging resources near the edge of the landform. BLM oversight of such activities would ensure that third parties are not damaging resources while conducting recreational and educational efforts.

Solutions or Mitigations:

- Management should encourage staff to go into the field, visit field offices, and personally inspect, record, and evaluate cultural resources.
- The BLM should hire or relocate an archaeologist for the Sierra Vista office to oversee SPRNCA and the Cienega NCA. Absence of an archaeologist in the local area has thwarted educational efforts, stymied the once thriving Site Stewards program, and inadvertently allowed damage to sites through vandalism, unchecked border patrol activities, unmonitored public visitations, and conflicts between natural, recreational, and cultural priorities.
- The considerable time and money required for a Tucson office employee to visit the SPRNCA appears to result in insufficient direct oversight of the cultural resources. It is imperative that an archaeologist be on the ground, evaluating and assessing sites and their impacts.
- The archaeologist assigned should meet Secretary of Interior guidelines so they understand and appreciate resources, the long-term effects, and the larger issues of relevance. This

person should have the appropriate education, experience, and ethic to manage these lands and their resources for the long term.

- Hunting, recreational, and educational activity should be monitored on a regular basis on sites near roads to ensure that the sites do not continue to be damaged.

6. Rebalancing Recreation/Education with Other Resources Values

Some 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. This evaluation must include researchers familiar with the nature of their unique information content. Each is a unique resource. The presidio is the best preserved in Spanish North America and the only well preserved presidio in southern Arizona. Santa Cruz del Pitaitutgam (AZ EE:8:15) is important because Di Peso excavated there, it was the first site to be connected to the Sobaipuri, it was visited by Fathers Gilg and Kino, and it shows evidence of being occupied when Marcos de Niza came through the area and intermittently into the turn of the late 19th or early 20th century, much later than scholars have thought. It also shows previously unknown evidence of Archaic and Hohokam occupations, which have not been systematically documented.

For some of these sites, the information content was believed to have been adequately investigated to allow for unmonitored visitation. Recent research and investigations have shown that these two sites have much more remaining information content than thought and that they are increasingly subject to erosion and looting as well as damage from foot traffic, equestrian, and educational activities. These sites need targeted research plans designed in concert with archaeologists and historians who have worked on these sites to plan for their future. This work needs to be conducted by researchers who have a real interest in the sites and their information content and an understanding of the nature of the impacts.

At Santa Cruz de Terrenate, erosion of adobe walls is on-going in more areas than those on which mud is added each year. In some instances the walls will be completely gone in a few decades. These walls need to be evaluated and measures taken to halt erosion while at the same time maintaining the integrity of cultural deposits for future research and further generations. The same may be said for several other important historical sites in the area including but not limited to Charleston, Contention City, and Drew's Station.

Solutions or Mitigations:

- BLM archaeologists need to actively manage these resources to stop damage (see below).
- The research potential of these sites needs to be reevaluated before they are opened to the public or before additional public outreach activities are allowed.
- Allow and encourage research by qualified professionals on these sites to minimize the impacts of public visitation, to bring knowledge up to date while preserving most of each site, and to salvage and protect key information before it is lost.

7. Actively Manage: Stopping Damage

“No action” is not an appropriate plan of action for managers of the SPRNCA. It is acknowledged that managers are overworked and subject to resource restrictions, and that staff are

stretched to the limit. Yet, it is BLM policies and actions in many cases, and human causes in other instances, that are contributing to the active destruction of cultural resources. This should not be ignored, as it sometimes has been. The no-action policies of the BLM assume that nature will and should take its course. Yet, BLM action (and inaction) have set a course in motion that is actively destroying sites, degrading the integrity of resources, and leading to a reduction in the information content of precious sites that uniquely document our cultural heritage.

For example, by continuing to allow grazing, that is, by ignoring and failing to enforce existing grazing restrictions, sites are being actively and irreparably damaged. Features are being destroyed by cattle trampling sites, kicking rocks out of place, and creating trails. Lack of grass cover contributes to sheet-wash erosion, with sites being literally washed away. Erosion as a result of grazing, roads, and impromptu and established trails are creating gullying, which in turn creates arroyos, some three-stories deep, which result in enormous chunks of adjoining land collapsing into the arroyo. Sites near and on the margins of these gullies and arroyos are being destroyed each time it rains.

Indifference and, occasionally, resentment toward legitimate research, volunteer programs, and educational activities has resulted in damage to sites, loss of important data, limitations on visits by indigenous descendants, and other undesirable outcomes. This also means that the most knowledgeable volunteer researchers are not present and available to assist with monitoring sites, addressing problems, and notifying authorizes of issues.

Other consequences include disintegration of the Site Stewards program in the area and the closing of the local chapter of the Arizona Archaeological Society. Both of these organizations were instrumental in helping manage these resources, keeping an eye on sites, and noticing changes in condition.

Solutions or Mitigations:

- Recognize that many of the current impacts to cultural resources are human caused and BLM facilitated and are not entirely natural, despite being caused by natural processes.
- Consult with the Soil Conservation Service to determine what measures might be effective in slowing erosion.
- Seed areas where sheet-wash erosion is increasing.
- Actively pursue cattle and trespassers within SPRNCA on a regular basis.
- Actively manage resources rather than assuming a passive stance.
- Conduct condition assessments on all sites being effected by serve erosion and damage, using local experts to quickly focus on sites immediately at risk.
- Fund excavations and other data recovery activities for those sites that are actively degrading.
- The presence of volunteers and researchers in the SPRNCA has in the recent past been positive. They are often the first to report range fires, groups of illegal migrants, ATV trespass, fence-cutting activity, hunter vehicle traffic across sites, Border Patrol ATV damage to fragile archaeological sites, looting, metal detecting, trash accumulation, trail initiation problems, and cattle trespass, as local law enforcement and rangers can attest. Encourage the presence of interested members of the public and professionals to assist BLM in its mandates.
- Further benefits of volunteer and research work undertaken include workshops for Site Stewards, classes for Friends of the San Pedro River docents, and training for volunteers including Americorp students. Public outreach is facilitated with resulting tours, lectures, and professional and public presentations and publications as well as establishing and

maintaining a productive and positive relationship with Native Americans from the San Xavier District, the Tohono O'odham Nation, the Four Southern Tribes and various Apache tribes. These activities should be encouraged and facilitated.

- Complete stabilization work.
- Fund scientific studies.

8. Active Management: Encourage and Fund Research

The existing management plan states that sites within SPRNCA should be managed for the scientific use allocation to preserve scientific values and other cultural resource values. Yet, this guidance has rarely been followed. Within the 28 year period since the inception of SPRNCA there have only been about five years where research was actively advocated and encouraged. It was during this period that I undertook my most intensive studies.

Work on Sobaipuri sites has shown that information gleaned from careful excavation is essential to understanding this period and this group (Seymour 2011a, 2011b, 2014). Inferences derived solely from surface data have proven misleading about the quality, size, integrity, information content, character, and age of these near-surface sites. At the same time, these are a limited resource--only so many Sobaipuri sites exist--so it is always necessary to balance information to be obtained with preservation.

Yet, the problem is not this simple because these near-surface sites are eroding at a rapid rate, with contents of houses and work areas washing into arroyos to be lost forever. Cattle trampling and public visitation result in rocks being kicked out of place with the consequence that feature outlines are obliterated. Unauthorized collecting, metal detecting, migrants producing trails and encampments, and pursuit by Border Patrol, including with ATVs, are just some of the many processes that are contributing to the erasure of these sites (see below). These site components are so close to the surface and the evidence is so fragile that any impact to their integrity is serious. Ignoring these on-going impacts is not a viable option. Importantly, descendant populations welcome the new knowledge about their ancestors provided by this work, in part because it provides an alternate and enhanced narrative to that provided by documentary sources alone.

Thus, management of these resources should take all of these factors into account and allow investigations only by highly-qualified archaeologists who understand the implications while taking past work fully into account, as is the scholarly standard. Past work by students has proven problematic (including preservation archaeologists who have not reported on their work, have left site stakes, pinflags and trash on sites, and have staked sites with inappropriate materials that caused substantial damage to features, as reported in Seymour 2011a).

In many instances, resources need active management so that they do not continue to degrade at such a rapid rate. Many historic trails simply disappear if not tended. Adobe walls actively erode away.

These resources are far too important to allow them to gradually degrade. Even a couple of years ago, the suggestion that there is evidence for the ancestral Apache in the American Southwest in the A.D. 1300s would have been met with skepticism. Similar disbelief has adhered to the idea that the Sobaipuri-O'odham lived in planned villages, repeatedly rebuilt in the same location, and began their unique adaptation along the rivers of southern Arizona perhaps as early as the A.D. 1200s (Seymour 2011c, 20122013). Research conducted on SPRNCA has contributed a great deal of this information which is now being incorporated into new reconstructions of history and empowering indigenous descendants.

These new findings and many more are critically important to descendant groups, especially the O'odham whose ancestors occupied the San Pedro, including an important settlement segment

within the SPRNCA (Seymour 2010, 2014). New understandings of these groups mean that the end of prehistory must be rewritten. New understandings from Santa Cruz de Terrenate presidio present an entirely new perspective on the Spanish occupancy of SPRNCA and this portion of the American Southwest. This research is also relevant to understanding of the Marcos de Niza and Vasquez de Coronado expeditions, as well as later expeditions.

Solutions or Mitigations:

- SPRNCA/BLM still has not fulfilled key aspects of its previous management plan.
- New knowledge helps the BLM manage, assists descendant peoples, and fulfills legal requirements under cultural resource laws (as discussed elsewhere herein).
- These goals can be facilitated by reevaluating the permit review process, so as to promote research by qualified professionals.
- Active management of these resources is impeded by the lack of a BLM archaeologist in the Sierra Vista Office.
- Manage sites eligible for scientific use by allocation, to preserve scientific values and other cultural resource values.
- Volunteers and researchers should be encouraged to assist. Helpful activities include assisting in slowing erosion, recording sites, planting grass, reporting cattle trespasses, interfacing with border patrol, and so on.
- Process research permits in a timely manner.
- Process report comments and acceptances in a timely manner.
- Communicate more effectively with those outside the BLM.

9. Active Management: Preserve and Promote Scientific and Sociocultural Values at Significant Sites

The existing SPRNCA management plan includes guidance that the BLM should complete protection measures to preserve scientific and sociocultural values at significant sites, such as stabilization, fencing, and data recovery. Yet, only a small fraction of sites receive any attention, despite reports about on-going and significant damage to other sites. For example, mudding on some standing walls occurs annually at Santa Cruz de Terrenate presidio, yet many other walls are eroding at a rapid rate. These too need to be stabilized before all trace of them is gone. At the current rate they will completely disappear in 50 years or less. This means that the outlines of many of the officer's apartments against the west wall and the settler's structures outside the presidio walls will be erased in a few decades.

Active and carefully considered management practices would also better balance the tradeoffs between natural and cultural resources, especially when a cultural resource is so rare as the Santa Cruz de Terrenate presidio. For example, while it is generally desirable to leave vegetation in its natural state, intrusive grasses and noxious weeds tend to be controlled. In a similar way, tree roots are harmful to fragile presidio walls. These should be cut so as not to break the walls apart.

Sobaipuri, Hohokam, and Archaic period features underlying the presidio are being damaged by horse and vehicle traffic. When it rains the underlying cultural deposits become soft. These impacts can be easily mitigated with little cost.

Looting by metal detecting is an on-going occurrence with looters holes regularly visible at a number of sites, including, but not limited to, Santa Cruz de Terrenate presidio and AZ EE:8:284.

The BLM maintains a road that cuts across the railroad tracks to access the heart of the SPRNCA. Bar ditches and other erosion and water control features are maintained. Yet, the

construction and maintenance of these modern features are eroding the heart of one of the most historically important and largest Sobaipuri sites in the SPRNCA (AZ EE:4:25). Erosion caused specifically by this road, its maintenance, and its erosion control features are channeling erosion gullies into this critically important site that relates to Father Kino, taking out the heart of the site and dozens of features.

Another example, the northernmost Sobaipuri site in SPRNCA (AZ EE:4:38) is continually subjected to looting. I have monitored this looting over the years. It seems to be coming from nearby residents, whose houses are situated within walking distance of the site. This may be the latest occupied settlement of Quiburi, noted in Spanish documents from the 1780s.

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 sites of all periods.

The Border patrol has been riding ATVs on one of the most historically important Sobaipuri sites in the SPRNCA (AZ EE:8:283), a site that is critically important to indigenous peoples. Once house walls are overridden, they become invisible as rocks are dislodged. The only way these houses can be seen is by their rock outlines. Active management can curtail this activity by educating these agents to avoid crucial areas.

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. This includes cattle kicking rocks out of place on fragile Sobaipuri sites, creating trails through these sites and displacing features and artifacts, thereby, in some cases, completely destroying the integrity of the sites.

By now, with the anti-grazing policy, the grass was supposed to have grown back. Instead, sheet-wash erosion is severe. Sites continue to wash across the surface into two and three-storey deep arroyos. Chunks of sites, including features with Apache artifacts and Sobaipuri burials, are falling off into arroyos (AZ EE:4:9). Artifacts from rare Sobaipuri houses and features are washing down slope into arroyos and away from the site before being adequately recorded (AZ EE:30, AZ EE:37). Erosion is so severe that a site on which only 10 features were visible 20 years ago now has more than a hundred exposed (AZ EE:4:25). Information is being rapidly lost, to the degree that at this rate some of these sites will be destroyed in another 20 years. These sites must be actively managed with a balance of research and measures to halt and reverse erosive processes. Again, it is human processes and activities that initiated these erosional processes and they continue to exacerbate them. Therefore, it is appropriate to take measures to curtail these processes rather than let “nature take its course.” It is time to make the decision to disallow grazing permanently on the SPRNCA. This is one of the most important things this new plan should include. A final decision needs to be made, through this planning process. There is strong evidence that grazing damages sites in the variety of ways outlined above.

Diagnostic sherds and projectile points are being looted off sites. These are critical for evaluating and dating sites and for understanding O’odham and Apache history. No action is not an option, partly because this entails enforcement of Federal law. Research can be undertaken to collect vital information off these sites before their information content disappears. Moreover, while researchers are discouraged from metal detecting, there are recent and repeated metal detector holes by vandals in many of these sites. This suggests that rare artifacts have been looted from these sites without adequate study.

These are but a few of the relevant problems and concerns, included here to provide tangible evidence of the need to actively manage and preserve and promote their scientific and sociocultural values.

Solutions:

- Enforce the no-grazing policy and disallow grazing permanently on the SPRNCA.
- Seed grass in areas where sites are located and erosion is severe.
- Record these sites or let them be recorded by volunteers.
- Allow collection and perhaps even excavation of sites in these high risk and currently affected areas.
- Encourage researchers to focus on these threatened sites.
- Fund curation of rare artifacts that can be collected in a controlled manner from surface contexts.

10. Continue to Manage SPRNCA as Unique Area

The SPRNCA is a unique area which is why it was designated an NCA. The fact that “riparian” occurs in the name highlights the unique aspects of this designation. 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.

Solutions or Mitigations:

- Keep the SPRNCA as an area that encompasses the unique resources along the riparian strip. Do not add parcels from surrounding areas as suggested during the education meeting.

11. Indigenous Access

Allow independent visitation by tribal entities and indigenous people and their informed specialists. In some cases allow them vehicle access along existing roads so that the elderly can get to their ancestor’s sites.

12. Allow educational opportunities with Support from BLM

Volunteers and researchers should be encouraged to share their appreciation and knowledge of the SPRNCA with the public, in ways that are consistent with professional standards and ethics, and in line with BLM policies.

Solutions or Mitigations:

- Train employees in the FLPMA (Federal Land Policy and Management Act) regarding the multiple-use concept for these public lands and educate them with regard to public interface.
- These resources within the SPRNCA are the people’s resources, and they need to be managed for multiple uses, which includes scientific research and education. Encourage video productions and encourage scientific research.
- Make policies easier for individuals and organizations to educate the public and descendant communities.

13. National Register Nomination

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.

It will also be useful to re-evaluate the small fund of money held by Cultural Resources and to seek outside funding from a greater range of sources to preserve, interpret, and study the incredibly rich record in this area. Rather than using this existing pot of money to reconstruct a late historic wooden corral and stock pens at Fairbank (last year) and rather than focusing all available funding on a couple of sites (especially Fairbank to the exclusion of other sites), these funds could be used more effectively on critically threatened sites. Funds could be used to work on halting erosion, investigate issues of importance to descendant tribes, dating sites, curating collections of materials that are rapidly disappearing (Spanish period beads, metal artifacts), and so on.

Solutions or Mitigations:

- Prepare a long-term plan for usage of the small amounts of money available. Rather than using momentum to determine where the money is spent. Consider the larger issues, a wider range of sites, and the value of and threats to a greater diversity of sites.
- Seek outside funding for protection, stabilization, and study of a wider range of resources.
- Begin preparing or support and fund the preparation of NRHP evaluations and nominations for a series of time and group specific districts.

References Cited

- Butler, William B.
 1987 Significance and Other Frustrations in the CRM Process. *American Antiquity* 52(4):820-829.
 2008 Desplado or Athapaskan Heartland: A Methodological Perspective on Ancestral Apache Landscape Use in the Safford Area. Chapter 5 in *Crossroads of the Southwest: Culture, Ethnicity, and Migration in Arizona's Safford Basin*, pp. 121-162, edited by David E. Purcell, Cambridge Scholars Press, New York.
 2010 Archaeological Insights into the 1698 Victory of the Sobaipuri O'odham over the Enemies of the Sonoran Province. *Old Pueblo Archaeology Center Bulletin* 64:1-11.
 2011a *Data Recovery on Sobaipuri and Spanish Colonial Sites along the Middle and Lower San Pedro River on Bureau of Land Management Lands*. Report submitted to the Bureau of Land Management in fulfillment of Permit No. AZ-000455. On file at the Bureau of Land Management and Arizona State Museum, Tucson.
 2011b *Where the Earth and Sky Are Sewn Together: Sobaipuri-O'odham Contexts of Contact and Colonialism*. University of Utah Press, Salt Lake City.
 2011c Dating the Sobaipuri: A Case Study in Chronology Building and Archaeological Interpretation. *Old Pueblo Archaeology Bulletin* 67:1-13.

- 2012 Isolating a Pre-Differentiation Athapaskan Assemblage in the Southern Southwest: The Cerro Rojo Complex. In *From the Land of Ever Winter: Athapaskan Migrations from the Subarctic to the American Southwest*, edited by Deni J. Seymour, pp. 90-123. University of Utah Press, Salt Lake City.
- 2013 Apache Platform Cave-Cache Encampments: Implications for Mobility Strategies and the Earliest Athabascans. *Journal of Field Archaeology* 38(2):161-172.
- 2014 A Fateful Day in 1698: The Remarkable Sobaipuri-O'odham Victory over the Apaches and Their Allies. University of Utah Press, Salt Lake City.



TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

(no subject)

1 message

Fri, Sep 27, 2013 at 10:22 AM

To: [REDACTED]
blm_az_tfo_sprnca_rmp@blm.gov

Attn: Amy Markstien

BLM Tucson Field Office

3201 E. Universal Way

Tucson, AZ. 85756

To Whom it may concern

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. 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.

Prior to any changes in the San Pedro Riparian National Resource Management plan, the peer reviewed study of the *Synthesis of Upper Verde River Research and Monitoring* by Daniel G. Neary, Alvin L. Medina, and John N. Rinne should become a basis for a genuine scientific assessment of the Babocomari River as it relates to cattle grazing.

We helped the Hayhurst family move to their ranch on the Bobocomari river in the mid 1980's. Since then they have done extensive range work on the ranch. The differences between now and then are dramatic in terms of the current lush vegetation, and natural, clear, fresh, flowing water in the river on their land. Our lands are in good hands when families like theirs are taking care of our public interest.

Sincerely

[REDACTED] (public disclosure)

Email: [REDACTED]

phone: [REDACTED]

9/30/13

DEPARTMENT OF THE INTERIOR Mail - (no subject)



TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

About the San Pedro River... please include my comment below

1 message

[REDACTED]

Tue, Sep 10, 2013 at 9:31 AM

To: blm_az_tfo_sprnca_rmp@blm.gov

I LOVE THE SAN PEDRO RIVER. What other area provides open water, nature in all its forms, and quiet, easy access?

BLM should promote the highest possible protection and restoration to all of the riparian habitats essential to all of our

natural wildlife. 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.

Thank you

[REDACTED]



Markstein, Amy <amarkstein@blm.gov>

aloha.....SPRNCA.

1 message

[REDACTED]
To: amarkstein@blm.gov

Thu, Sep 19, 2013 at 1:37 PM

Aloha Amy, I am writing to you in the hopes of securing the ongoing protection of the SPRNCA in south eastern Arizona.

As a worldwide traveler I discovered the SPRNCA about 6 years ago and was absolutely amazed at the biodiversity it offers.

An avid birder i visit the area at least 3-4 times a year for about a week each time for spring and fall migration and in the summer and winter for humming birds and birds of prey respectively.

It is absolutely one of the best birding spots in the whole of the US and because of its location within the migration flyway truly of global importance.

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.

I thank you for your attention to this.

Mahalo,

[REDACTED]
[REDACTED]
Office [REDACTED]
Cell [REDACTED]
Fax [REDACTED]
email: [REDACTED]
[REDACTED]



TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

Babocomari public disclosure

1 message

[REDACTED]
To: blm_az_tfo_sprnca_rmp@blm.gov

Fri, Sep 27, 2013 at 9:43 AM

To whom it may concern:

September 27, 2013

As former Arizonians who had families that cattle ranched in southeastern Arizona, we feel strongly that you should continue to facilitate current conservation livestock grazing. Grazing is one of the most productive uses of the land in the San Pedro Riparian National Resource Areas.

Let Arizona be a leader in allowing cattle grazing to continue and let the allotments in the SPRCA remain active.

Respectfully,

[REDACTED]

phone [REDACTED]



TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

comment on an information source

1 message

Tue, Sep 24, 2013 at 6:00 PM

To: "BLM scoping comments (Attn: Amy Markstein)" <blm_az_tfo_sprnca_rmp@blm.gov>

Cc: "fspr (Robert Weissler)" <fsprdirector@sanpedroriver.org>, "Water Sentinels (Sierra Club AZ) Steve Pawlowski" <steve.pawlowski@sierraclub.org>

Name: [REDACTED]

Address: [REDACTED]

email: [REDACTED]

Comment on a source of data on the San Pedro River, of which some of your planners may not be aware:

For about 2 1/2 years, the Sierra Club Water Sentinels program has had a San Pedro River project. At several times during the year, volunteers visit 5 places on the river (basically upstream from each of the bridges crossing the river in the SPRNCA) and do Water Quality Testing.

This testing includes taking a sample which is checked for *e.coli*, and using meters to check: water temperature, pH, conductivity, and particulate matter (if I remember correctly). There are also qualitative observations on such things as flood evidence, water color, fish presence, channel blockage, etc.

Except for the *e.coli* results, the records of these data currently only exist on the paper forms on which they were recorded. These forms are kept by the AZ director of the Water Sentinel program, Steve Pawlowski (steve.pawlowski@sierraclub.org , 602-254-9330).

Another program by one team involves monthly checks on the water levels in 14 test wells in the Curry Draw (Murray Springs Clovis site) area. These results are all passed on to Ben Lomeli, who has them. (We also make occasional comments on surface water.)

Some of your staff are aware of the existence of these data, but I know at least one staff member (Jeff Sims) who was interested in certain measurements, but was unaware of their existence until I told him.

[REDACTED]
(writing as an individual, although I am a member of the Friends of the San Pedro River, and volunteer with the Sierra Club Water Sentinels)

... a message from: [REDACTED]
Home Address : [REDACTED]
Phone at this address: [REDACTED] (call this first)(voice mail)
cell (sometimes turned on)(no messages): [REDACTED]
(Note that this is a new cell number, as of 7/12/12)
e-mail (checked at least weekly, typically 3x/wk):
[REDACTED]

NOTE that mail to Hotmail will get sent to "junk mail", unless your address is on my safe list (which it should be, if I sent this to you).



TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

Comments on the San Pedro Riparian National Resource Management Plan

1 message

Fri, Sep 27, 2013 at 9:36 AM

[REDACTED]
To: blm_az_tfo_sprnca_rmp@blm.gov

Attn: Amy Markstein

BLM Tucson Field Office

3201 E Universal Way

Tucson, Az. 85756

I am in favor of any active grazing allotments in the SPRCA . Conservation and water enhancement work has been done by the allotment holders. Range science for the past 26 years; clearly show that native grass benefits from managed livestock grazing. Allotment holders want to improve grazing management practices to increase the quality of their herd. Allotment holders know if they lose the ability to use the allotment or the forage decreases, then it will have a negative effect on the land and an economic effect as well. Any federal action to reduce local agricultural production will negatively affect the local economy, state economy and the United States reliance on food sources outside of our country. We are headed to a 3rd world country status as we produce less and less for ourselves as well as for the world.

The law establishing the San Pedro Riparian National Resource Area states that grazing is to be one of the productive uses of the area and to continue.

Respectfully,

Request confidentiality as to address, phone number and e-mail address

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

Comments to BLM on San Pedro Riparian NCA Resource Management Plan scoping

1 message

Wed, Sep 18, 2013 at 2:52 PM

Reply-To: [REDACTED]
To: blm_az_tfo_sprnca_rmp@blm.gov
Cc: info@sanpedroriver.org, brownchristie1@gmail.com

Ms. Amy Markstein
Resource Management Plan Coordinator
Bureau of Land Management
3201 E. Universal Way
Tucson, AZ 85656

To: Ms. Markstein and Bureau of Land Management Tucson Field Office Staff
Subject: Friends of the San Pedro River input on SPRNCA RMP scoping

As a resident of Sierra Vista, I would like to offer my input to your efforts to develop a Resource Management Plan (RMP) for the San Pedro Riparian National Conservation Area (SPRNCA). The SPRNCA is a federally protected riparian area and all future plans should maintain its beauty and integrity as a place for birders, hikers and educational training. Except for existing roads, there should continue to be a full ban on OHVs. The presence of OHV destroys the natural ambience of the area and degrades the environment. Water is a necessity for the river and the purchase or designation of additional land should be pursued to protect the SPRNCA from development and groundwater depletion. Surface water could be slowed for recharge and restoration of native grassland and vegetation and rainwater harvesting techniques should be implemented. Cattle grazing should remain off limits in the SPRNCA and stay on private or state land.

[REDACTED]



TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

Comments to BLM on San Pedro Riparian NCA Resource Management Plan scoping

1 message

Thu, Sep 26, 2013 at 8:31 PM

Reply-To: [REDACTED]
To: blm_az_tfo_sprnca_rmp@blm.gov
Cc: info@sanpedroriver.org, [REDACTED]

Ms. Amy Markstein
Resource Management Plan Coordinator
Bureau of Land Management
3201 E. Universal Way
Tucson, AZ 85656

To: Ms. Markstein and Bureau of Land Management Tucson Field Office Staff
Subject: Friends of the San Pedro River input on SPRNCA RMP scoping

When deciding the future management of the beautiful San Pedro Riparian National Conservation Area, I suggest that the Bureau of Land Management seriously consider approving the No Action Alternative as a viable action. Deciding to take no action IS an action. Conservation is of the utmost importance. In a time of uncertainty about the future, the Bureau of Land Management needs to take a step back and consider how their actions will affect the land into the future. Choosing to protect and conserve is always the right decision.

Thank you for hearing my words, I trust that you will do what is right for the land.

Sincerely,
[REDACTED]



TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

Comments to BLM on San Pedro Riparian NCA Resource Management Plan scoping

1 message

Thu, Sep 26, 2013 at 9:43 AM

Reply-To: [REDACTED]

To: blm_az_tfo_sprnca_rmp@blm.gov

Cc: info@sanpedroriver.org, [REDACTED]

Ms. Amy Markstein
Resource Management Plan Coordinator
Bureau of Land Management
3201 E. Universal Way
Tucson, AZ 85656

To: Ms. Markstein and Bureau of Land Management Tucson Field Office Staff
Subject: Friends of the San Pedro River input on SPRNCA RMP scoping

As a resident of Tucson, The plan should aggressively protect the River and it's sources, including the surrounding habitat. Conserving this treasure will provide economic as well as recreational benefits, and is the right thing to do for ourselves and generations to follow.

Sincerely,
[REDACTED]
[REDACTED]



Comments to BLM on San Pedro Riparian NCA Resource Management Plan scoping

1 message

Tue, Sep 17, 2013 at 8:33 PM

Reply-To: [REDACTED]

To: blm_az_tfo_sprnca_rmp@blm.gov

Cc: info@sanpedroriver.org, [REDACTED]

Ms. Amy Markstein
Resource Management Plan Coordinator
Bureau of Land Management
3201 E. Universal Way
Tucson, AZ 85656

To: Ms. Markstein and Bureau of Land Management Tucson Field Office Staff
Subject: Friends of the San Pedro River input on SPRNCA RMP scoping

As a resident of Benson, Although I have not lived very nearby, I have been interested in the Upper San Pedro and the San Pedro Riparian National Conservation Area for years, probably beginning in the early 90's. In the late 90's I moved to the Lower San Pedro and can easily walk to the riverbed from my house. My wishes for the preservation of the river and riparian area and therefore not only for its sake but also because it affects the lower stretches. If I had my way the river area within the current BLM boundaries would be enhanced for water and wildlife values, and the area would be extended because the river really should be treated as a whole. It is the entire river that is so important to birds and other wildlife.

Unfortunately the option of increasing the boundaries is not up for discussion, but I would strengthen SPRNCA for water and wildlife values through the RMP. It is also important to me to increase access to the area. Children, in particular, need to have a chance to enjoy nature.

I would mention the following specific points.

1. It is obviously important to maintain the water in the river. The water is largely gone from the lower San Pedro, and it is a sad place except for those few spots that maintain perennial flow. The wildlife density is much higher. I can assume that you appreciate the connection between ground and surface water, and the fact that wells can dewater a river fairly easily. The San Pedro doesn't need to have housing developments nearby or more alfalfa fields. We really can grow either of those anywhere. But to maintain the river so as to maintain the flyway from Central and South America we really need water in the river. 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.
2. I am somewhat informed about the lawsuit against the big housing development in Sierra Vista and am thrilled that the BLM is on the "side of the angels." I absolutely believe that there is a federal water right that should be defended, and would hope that this lawsuit would be replicated as feasible elsewhere.
3. I have mentioned wildlife repeatedly. 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.
4. Please also do add camping facilities as well as some nice picnic areas. It would have been lovely to have been able to spend the night camping there on several occasions in the past.
5. Finally, the cultural matters. 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.

Thank you for considering my opinions.





Markstein, Amy <amarkstein@blm.gov>

Conserving the natural beauty of the SPNCA

1 message

[Redacted]

Thu, Sep 26, 2013 at 12:51 PM

To: amarkstein@blm.gov

I have just learned of the BLM plan to change the status of the San Pedro River area. This is to allow for cattle grazing which ruins natural habitat and allows for the land to be used for private gain, which when it also damages the land and natural riparian areas is not a smart or efficient management plan for a public area, it is non sustainable !. Also the damaging effects of off road vehicles and their use when combined with the noise and damage to the land it also causes, is not conservation, that's for sure. I've been spending winters in Cochise County for the past several years and enjoy bird watching hiking and the peace and beauty of the San Pedro River Conservation area.. That is why I came [here.to](#) this natural conservation area I and my wife are firmly opposed to any changes to this unique and beautiful place, my wife and I spend \$1000 to \$4,000 a month in your area each winter and any changes to the land status will guarantee that we will not return to the river conservation area; as it will no longer be a conservation area... There are plenty of places for cattle and off-road vehicles, but only a few where wildlife and humans alike have a place to enjoy their lives in peace,... these places are so few! Let this area remain as a wild place with peace and beauty for all!

Yours in Conservation;

[Redacted]



TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

FW: <No Subject>

1 message

[REDACTED]
To: blm_az_tfo_sprnca_rmp@blm.gov

Tue, Sep 24, 2013 at 6:34 PM

Please attach these photos to my emailed comment.

Thanks,

[REDACTED]

3 attachments

20130917_140358.jpg
2751K



20130917_150115.jpg
4235K



20130917_150101.jpg
3809K

9/25/13

DEPARTMENT OF THE INTERIOR Mail - FW: <No Subject>



TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

Input for the Development of the SPRNCA RMP

1 message

Tue, Sep 24, 2013 at 5:41 PM

To: "blm_AZ_TFO_SPRNCA_RMP@blm.gov" <blm_az_tfo_sprnca_rmp@blm.gov>

Ms. Markstein:

I have been a resident of Sierra Vista for the last 30 years. During that period, I have worked for the Army at Fort Huachuca, raised a family and utilized the San Pedro River for recreation and the sustainment of my spirit. I would like to offer these comments for consideration as the BLM develops the Resource Management Plan (RMP) for the San Pedro Riparian National Conservation Area (SPRNCA).

1. Do not relax restrictions on use of the SPRNCA. I attended and participated in the effort that designated the SPRNCA in the late 1980s. I saw first hand the special interest groups that emerged to fight the protection of the area. I am sure they will come forth again pursuing their own monetary gain at the expense of the public interest. I am especially interested in the continuation of these restrictions:

- 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. This will allow the cottonwood gallery to reach maturity, to be replaced eventually by a walnut-willow forest with wide marshy areas (cienegas). Achieving this climax state will help alleviate water issues and provide critical habitat.
- Hunting restrictions should continue and be expanded. Current restrictions on the use of firearms for all purposes but hunting in limited areas should continue.
- Restrictions barring the use of any motor vehicle anywhere in the SPRNCA should continue, with no exceptions except for BLM administrative purposes.
- Strict enforcement of resource conservation laws, natural and cultural, should continue.

I also believe that new measures are called for to successfully manage the SPRNCA.

- The BLM should cooperate in limited test plots for upland mesquite removal.
- The BLM should resist any future initiative to remove the cottonwoods from the SPRNCA.
- Cultural resources should be protected in the SPRNCA. The BLM has done little in recent years to inventory, patrol and preserve the cultural resources in the area. As a result, vandalism, theft and erosion are having significant impact. I think the RMP should take active notice of the unique prehistoric, protohistoric and historic resources in the area and outline a plan through which these resources are inventoried, checked periodically and mitigation measures identified when problems are discovered. In the near term, sites such as Brunckow's Cabin, Terrenate, Quiburi, the Hereford School and the Clanton Ranch are in need of immediate preservative steps.
- The BLM should actively encourage archeological and historical research, granting permits to professionals. This is the best way to identify areas needing attention as well as increasing our knowledge of the history of the SPRNCA.
- Steps should be taken to increase law enforcement presence in the SPRNCA. It has been distressing to watch the reduction in BLM law enforcement staffing over the years, especially as it effects their ability to police the back country areas. The BLM should consider these steps to overcome this problem:
 - Develop an inventory of threatened sites. At least patrol these sites regularly.
 - Foster the use of volunteers, such as the now moribund local chapter of the Arizona Site Stewards.

- Work with the Border Patrol to leverage what they see in the back country (they have no personnel shortage!).
- The BLM should work with the Border Patrol to reduce the impact the Border Patrol has on sensitive areas. I have seen Border Patrol ATV tracks going through archeological sites. I am sure that if the BLM reached out to the Border Patrol to help them understand where critical areas are and how to avoid damage, the Border Patrol would cooperate.
- It is not unusual during hunting season to hear gun shots in the SPRNCA. I always worry when I hear hunters but don't see them. My assumption is that if I can't see them, they can't see me. 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.
- I would like to see more recreational facilities within the SPRNCA. I would recommend the following:
 - Improvements to Fairbank:
 - 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.
 - A primitive, front country campground should be added somewhere that it can be reached by road for tent camping. What a boon this would be for local youth organizations. It could be open by reservation only. One suggested location would be north along In Balance Ranch Road.
 - An "Immigrant Trail" hiking route should be created from the Border to St. David marking the 49er immigrant trail along the River. This trail is partially in place now, but this would create a destination hike" of interest to local historians, hikers and also the Mormon community in the area.
 - Interpretive signs are needed at the Clanton Ranch and Brunckow's Cabin.
 - 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.

Finally, I would like to go on record thanking the BLM for taking legal action to protect its water rights for the SPRNCA. The sad truth is that it is easy to see that the only time local government has taken the water issue seriously is when they have been forced to in order to protect Fort Huachuca. As a 30 year employee of the Fort, I share their concern. However, the way to protect the Fort is not to ignore court orders and continue to allow wildcat subdivisions and massive new developments. The BLM must continue to act vigorously to protect the SPRNCA's water rights. The current lawsuit should not be settled as it is apparent that the BLM's case is undeniable. While I support recharge initiatives, I worry that some sort of agreement based on promises or unproven science will end up leaving the San Pedro high and dry, literally.

[REDACTED]

[REDACTED]



Markstein, Amy <amarkstein@blm.gov>

Management Plan/San Pedro National Conservation Area

1 message

[Redacted]

Tue, Sep 17, 2013 at 12:27 PM

To: amarkstein@blm.gov

Hello Amy,

Six months of the year I live in Bisbee, Arizona. The San Pedro River is about 20 minutes or less from my house. One reason I purchased the house, ten years ago, is its proximity to the San Pedro River.

As an active user of SPRNCA, one important way I use the area is birding. As a long time birder it is clear to me that many folks, both local, like me, and tourist, use the San Pedro because of the rich diversity of bird life, especially during migratory periods. Another way I use SPRNCA is walking/hiking. Four years ago I had a knee replaced. The trails are ideal because they are safe and flat plus the trail lengths are varied. On these walks I've observed birds, deer and bobcat. Sometimes I walk to where the Clovis people lived near the San Pedro, where I learn about archeological history. When I have visitors from out of state I always take them to SPRNCA, to share the amazing ecosystem that is so different from other portions of the high desert. I cannot imagine off road vehicles having access that would damage the area or interfere with some of the uses I've mention. Plus there is much documentation concerning the destruction by cattle grazing in riparian areas.

The events at the San Pedro House I frequent, especially some including native plants sales or water harvesting workshops, both ideal ways to learn about this 'jewel,' SPRNCA, in the high desert.

As BLM completes its first review of the Management Plan for the SPRNCA, I hope BLM will continue to manage for its present use and take in consideration the ways in which I use the area under the present management.

Respectfully,

[Redacted]

[Redacted]

"If future generations are to remember us with gratitude rather than contempt, we must leave them more than the miracles of technology. We must leave them a glimpse of the world as it was in the beginning, not just after we got through with it."

President Lyndon B. Johnson



Markstein, Amy <amarkstein@blm.gov>

review of the Management Plan for the San Pedro Conservation Area

1 message

[REDACTED]

Wed, Sep 18, 2013 at 4:32 PM

To: amarkstein@blm.gov

Amy

I am so very concerned that additional uses for the San Pedro Riparian Conservation Area may be considered - that is; cattle grazing and off-road vehicles.

I love this area!

I'm a nature lover, avid birder and a volunteer for The Important Bird Area along the San Pedro.

Birding in this area brings birders from all over the world and brings a great deal of money into our community.

Such practices would diminish the value we gain from the area. It is a very special area for so many people who like and need to get away from the rat race of everyday life.

Please let me know if there will be a public meeting concerning this issue.

[REDACTED]

[REDACTED]

[REDACTED]



TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

RMP Scoping Comments

1 message

[REDACTED]

Tue, Sep 10, 2013 at 8:40 PM

To: blm_az_tfo_sprnca_rmp@blm.gov

Please do not allow livestock grazing to resume or expand in the SPRNCA. In fact, try and expand the areas that aren't grazed.

[REDACTED]



Markstein, Amy <amarkstein@blm.gov>

San Pedro Conservation Area SPRNCA

1 message

Wed, Sep 18, 2013 at 7:32 AM

[REDACTED]
To: "amarkstein@blm.gov" <amarkstein@blm.gov>

I am a bird watcher and enjoy the peace and serenity of the San Pedro area. It is a fabulous place to observe birds as they make their annual migrations. I bring friends to the area all the time. Cattle grazing would greatly put pressure on the water resources that the birds are so dependent on. 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.

Please preserve this area for all citizens to enjoy and keep this unique place intact.

Sincerely,

[REDACTED]

Sent from my iPad



Markstein, Amy <amarkstein@blm.gov>

San Pedro National Conservation Area Management Plan

1 message

[REDACTED]
To: amarkstein@blm.gov

Sat, Sep 21, 2013 at 2:55 PM

Dear Ms. Markstein, I am a 35-year resident of Bisbee and a frequent hiker in our beautiful desert areas, including along the San Pedro. I am concerned about the possibility of uses such as cattle grazing and off-road vehicle use in the NPRSCA, either of which would most likely damage the land, the vegetation and the fauna which I enjoy so much. 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, including the third graders I accompany most years for a very educational field trip. Please relay these comments to the BLM. I think the NPRSCA should continue to be managed for present uses only. Thank you.

[REDACTED]



Markstein, Amy <amarkstein@blm.gov>

San Pedro National Conservation Area- Recreation

1 message

[Redacted]

Wed, Sep 11, 2013 at 6:49 PM

To: "amarkstein@blm.gov" <amarkstein@blm.gov>

Dear Ms. Markstein,

I understand that the recreational aspect of the Plan that BLM is considering for the SPRNCA is looking at the possibility of off the road vehicle use and I would like to offer my comments.

I use the area near the San Pedro House almost everyday and volunteer at the Bookstore, in the demonstration garden, and by helping with bird walks. 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. A recent example of the effects of vehicle use was the death of an Ornate Box Turtle that was run over on de Valle Road near the San Pedro House. I had seen an Ornate Box Turtle near the area on de Valle Road just north of Garden Wash, where a large puddle often forms, repeatedly over the last few years. This road is closed to all vehicles except BLM vehicles and researchers operating with permission from BLM.

Consequently, when I found the Turtle crushed I was surprised because there is very little traffic on the road and those using the road would be on the lookout for wildlife.

However, from tracks I have recently observed in Garden Wash, I can tell that off road vehicles have been using the area by the turning ratio of the tracks. The site host gate area has been open and I suspect that is where they are entering. Moreover, recreational vehicles would have run over the horned toad I saw recently who was behind some grass on the road going west along the Wash.

Moreover, I believe that the speed of off road vehicles would be a danger to people walking on the paths. It would be like putting motorbikes on the sidewalks and that the noise of the vehicles would scare wildlife and ruin the outings of others.

Finally, I have recreational property in the Midwest where off road vehicles have repeatedly trespassed and gone so far as to flag trails on the property.

In conclusion, I don't believe off road users could be careful enough not to destroy wildlife and wildlife habitat and my experience with them is that being careful is not a priority with them.

Sincerely,

[Redacted signature]



TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

San Pedro Riparian Area Plan

1 message

Sun, Sep 15, 2013 at 3:18 PM

[REDACTED]
To: "blm_az_tfo_sprnca_rmp@blm.gov" <blm_az_tfo_sprnca_rmp@blm.gov>

Name: [REDACTED]

Phone: [REDACTED]

Address: [REDACTED]

City: [REDACTED]

State: [REDACTED]

Zip Code: [REDACTED]

Attn: Amy Markstein

Comments:

My husband and I love to bird watch and hike along the San Pedro river. We love the peace and wilderness feeling there. In a desert environment with rare wild rivers we feel blessed to have one so near us.

Therefore, when we heard of the BLM developing plans for this riparian area we would like to state our opinion that the plans should address:

1. Restriction or denial of access to ATV's and private vehicles.
2. Water usage plans for Sierra Vista that allow the river to keep flowing.

Thank you.



TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

San Pedro Riparian area

1 message

Sun, Sep 15, 2013 at 5:02 PM

Reply-To: [REDACTED]

To: "blm_az_tfo_sprnca_rmp@blm.gov" <blm_az_tfo_sprnca_rmp@blm.gov>

Attention:

Amy Markstein

I understand your organization is taking comments in order to update the BLM's plans for the San Pedro Riparian Area in Southeast Arizona.

My family has enjoyed hiking, birding and just visiting the Riparian area in our rural area of Arizona.. We live in Bisbee, Arizona.

This rural pristine area is such a wonderful site to have as a local resource..

In your plans, please ensure that ATVs and other Off Road Vehicles are NOT allowed to enter the off the road settings.

In 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. It's continual flow must be assured in the future.

Sincerely,

[REDACTED]



Markstein, Amy <amarkstein@blm.gov>

San Pedro Riparian NCA

1 message

Fri, Sep 20, 2013 at 7:20 AM

To: "amarkstein@blm.gov" <amarkstein@blm.gov>

Dear Ms. Markstein:

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. Opening the area to grazing or ATV use would be disastrous for the river and the wildlife it supports.

I'm a birder. I have traveled to Sierra Vista about 5 times in the last three years, primarily to look at birds and other wildlife. My last visit was in July, and the area was filled with varied buntings, Botteri's sparrow, blue grosbeaks, and other critters that favor dry scrub terrain. Additionally, there were abundant butterflies, moths, and other insects. Because of the rain that was starting in July, there were many flowering cacti and wildflowers.

It is not hard to see that increased homebuilding in Sierra Vista, going east to the river, will greatly alter that unprotected landscape. Habitat will be lost as housing developments are put up. Because of this projected habitat loss, the San Pedro NCA becomes all the more critical for preserving wild life habitat in the area.

The [San Pedro Riparian NCA](#) is a great economic asset for southern Arizona. When I come down with two friends, we use the airport, rent a car at times, use motels, restaurants, make contributions to San Pedro House, buy groceries, gas, etc. We participate in the SV birding festival. So do many other folks interested in being out in nature.

I hope the BLM will take these positives into account in making management decisions about the San Pedro.

Sincerely,

A large black rectangular redaction box covering the signature area.

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Markstein, Amy <amarkstein@blm.gov>

San Pedro River Conservation Area Management Plan

1 message

[REDACTED]
To: amarkstein@blm.gov

Tue, Sep 24, 2013 at 4:18 PM

To: Amy Markstein
Bureau of Land Management

Re: San Pedro River Management Plan

From: [REDACTED]

I would like for the record to include my opposition to opening the San Pedro Conservation Area to cattle grazing and off-road vehicles. I am a frequent visitor to various segments of the San Pedro River in Cochise County. The land and stream bank is so fragile, I fear it cannot withstand encroachment from motorized vehicles and cattle.

Along with other Cochise County residents, I favor leaving the San Pedro to those on foot, particularly birders who are a significant enhancement to the Cochise County economy.

Thank you for your consideration,

[REDACTED]



Markstein, Amy <amarkstein@blm.gov>

san pedro river uses

1 message

Fri, Sep 27, 2013 at 4:07 PM

Reply-To: [REDACTED]
To: "amarkstein@blm.gov" <amarkstein@blm.gov>

I am opposed to expanding the uses of the San Pedro National Conservation Area to include offroad vehicles and grazing.

This is an important birding area that attracts nature lovers from all over the world. It is one of the few riparian areas in this arid southern part of the state, a place to enjoy lush trees and wildlife. My family goes there almost weekly, all year, to bird, walk and just sit under big trees. Grazing would bring biting flies; ATVs would be an incredible disturbance. Besides, there are already plenty of places around here for those who wish to participate in noisy, motorized recreation.

Please try to limit the San Pedro uses to what is currently allowed. Don't ruin this resource. Thank you.

[REDACTED]



Markstein, Amy <amarkstein@blm.gov>

San Pedro River

1 message

[REDACTED]
To: amarkstein@blm.gov

Tue, Sep 17, 2013 at 8:15 PM

I hear that a review of the San Pedro River and it's uses are planned. I represent the Muleteam, a large hiking group in Bisbee when I object to any plans of cattle grazing or off-road vehicle use. We go to the San Pedro River for it's peace and natural wildlife and would not want those qualities eroded by more uses. Please continue to protect the special unspoiled beauty of the river.

Thank you.

[REDACTED]



Markstein, Amy <amarkstein@blm.gov>

San Pedro

1 message

Wed, Sep 18, 2013 at 12:27 PM

[REDACTED]
To: "amarkstein@blm.gov" <amarkstein@blm.gov>

We volunteer at the gardens at the San Pedro House in the winter when we are there and also enjoy hiking through that area. 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.

[REDACTED]



TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

Scoping comment on issue 2

1 message

Tue, Sep 24, 2013 at 5:28 PM

To: "BLM scoping comments (Attn: Amy Markstein)" <blm_az_tfo_sprnca_rmp@blm.gov>

Cc: "fspr (Robert Weissler)" <fsprdirector@sanpedroriver.org>

Name: [REDACTED]

Phone: [REDACTED]

Address: [REDACTED]

email: [REDACTED]

Comment on what BLM land should be included in the plan:

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 channellization might migrate into the SPRNCA.)

Such non-SPRNCA lands will, of course, have fewer restrictions on uses (e.g. grazing, vehicle use, etc). However plans might include watershed improvements on these lands, such as gabions or basins to slow down flood waters, restricting access to banks of washes, or encouraging healthy changes in vegetation .

Don't be myopic in what the Plan covers!

Jayne Knoche

(writing as an individual, although I am a member of the Friends of the San Pedro River, and volunteer with the Sierra Club Water Sentinels)

... a message from: [REDACTED]

Home Address : [REDACTED]

Phone at this address: [REDACTED] (call this first)(voice mail)

cell (sometimes turned on)(no messages): [REDACTED]

(Note that this is a new cell number, as of 7/12/12)

e-mail (checked at least weekly, typically 3x/wk):

k [REDACTED]

NOTE that mail to Hotmail will get sent to "junk mail", unless your address is on my safe list (which it should be, if I sent this to you).



TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

scoping comment, issues 5&8

1 message

Tue, Sep 24, 2013 at 5:06 PM

To: "BLM scoping comments (Attn: Amy Markstein)" <blm_az_tfo_sprnca_rmp@blm.gov>

Cc: "fspr (Robert Weissler)" <fsprdirector@sanpedroriver.org>

Name: [REDACTED] Phone: [REDACTED]
Address: [REDACTED]
email: [REDACTED]

Comment on recreation, including cultural/paleontological resources:

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 can't 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.

Jayne Knoche

(writing as an individual, although I am a member of the Friends of the San Pedro River, and volunteer with the Sierra Club Water Sentinels)

... a message from: [REDACTED]
Home Address : [REDACTED]
Phone at this address: [REDACTED] (call this first)(voice mail)
cell (sometimes turned on)(no messages): [REDACTED]
(Note that this is a new cell number, as of 7/12/12)
e-mail (checked at least weekly, typically 3x/wk): [REDACTED]

9/25/13

DEPARTMENT OF THE INTERIOR Mail - scoping comment, issues 5&8



NOTE that mail to Hotmail will get sent to "junk mail", unless your address is on my safe list (which it should be, if I sent this to you).



Markstein, Amy <amarkstein@blm.gov>

SPNCA Management Plan Review

1 message

Fri, Sep 20, 2013 at 7:19 AM

[REDACTED]
To: "amarkstein@blm.gov" <amarkstein@blm.gov>

Dear Ms. Markstein,

I am a 30-year resident of Sierra Vista who hikes and bird watches along the San Pedro River on a regular basis. As you know, this is a unique corridor for birds and other wildlife. It is a national jewel which, unfortunately, is already endangered by diminishing water levels. Any changes in management that would allow "other" uses, like cattle grazing or off-road vehicles would surely further damage the natural landscape and habitat for numerous bird and animal species. I also believe it would have a negative impact on ecotourism in Sierra Vista, especially on weekends, with birders opting to visit other more nature-oriented riparian areas in SE Arizona. I certainly would be turned off and not wish to hike or bird with noisy off-road vehicles present and cattle would most certainly degrade the habitat for many bird species.

I urge you not to change the management of the SPNCA in the manner described above.

Thank you for your time,

[REDACTED]



Markstein, Amy <amarkstein@blm.gov>

SPNCA protection

1 message

[REDACTED]
To: amarkstein@blm.gov

Fri, Sep 20, 2013 at 7:53 AM

My wife and I are regular, year around users of the SPNCA for hiking, birdwatching ,nature study ,and quiet relaxation. We are strongly opposed to the reintroduction of cattle into the area, and definitely are opposed to permitting us on ATVs and any other motorized vehicles within the SPNCA. Both would contribute to erosion, damage or destroy vegetation which is and has helped control erosion and stabilize the river course. The is an Important Bird Area, and the above mentioned activities would surely degrade that designation.

Sincerely,

[REDACTED]



Markstein, Amy <amarkstein@blm.gov>

SPRNCA (San Pedro National Conservation Area) Uses

1 message

[REDACTED]
To: amarkstein@blm.gov

Wed, Sep 18, 2013 at 2:26 AM

Hello:

I am a regular user and fan of the SPRNCA, I hike, bird, walk my dog and love the precious unique area that is the San Pedro National Conservation Area.

I feel expansion of users of this area would be devastating to the natural beauty and pristine nature of this very fragile area. I especially object to cows grazing and the use of ATV's as these would both upset the wetlands along the river. I would ask that there be continued support to the area as it is currently regulated.

Thank-you

[REDACTED]

--
[REDACTED]
[REDACTED]
[REDACTED]



TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

SPRNCA Scoping Comment

1 message

[REDACTED]
To: blm_az_tfo_sprnca_rmp@blm.gov

Thu, Sep 19, 2013 at 9:37 AM

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.

[REDACTED]



TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

SPRNCA Scoping Comment

1 message

Wed, Sep 25, 2013 at 3:17 PM

[REDACTED]
To: blm_az_tfo_sprnca_rmp@blm.gov

Dear Ms. Markstein

Archeology Southwest welcomes the opportunity to provide scoping comments regarding the San Pedro Riparian National conservation Area (SPRNCA) Resource Management Plan (RMP). Based in Tucson for three decades, Archaeology Southwest has practiced a holistic, conservation-based approach to exploring the places of the past. We call this **Preservation Archaeology**. By exploring what makes a place special, sharing this knowledge in innovative ways, and enacting flexible site protection strategies, we foster meaningful connections to the past and respectfully safeguard its irreplaceable resources. Our comments are directed specifically to the wealth of cultural resources found in the SPRNCA and their management.

Few areas in the Southwest can compare with the SPRNCA in the richness and breadth of cultural resources under BLM's stewardship. Beginning with the most significant Paleoindian sites in North America at Murray Springs and Lehner sites, up through the early Euro-American settlement period, the SPRNCA includes a near complete record of human settlement in the region. Possibly unequalled in the Southwest if not the United States for the time depth represented in one management unit, the SPRNCA provides not only a record of the past for future research but many opportunities for people today to experience and learn about the past. It is our position that the cultural resources within SPRNCA are of equal significance to the ecological resources and should be acknowledged as such in the Resource Management Plan. In particular we encourage the BLM to consider the following:

1. A goal to provide 100% inventory of the SPRNCA for cultural resources and that the inventory efforts should seeks to identify a baseline condition for each site. The size of the management area suggests to us that this is a reasonable goal. We believe that well-qualified volunteer expertise exists to assist in this effort.
2. 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. It is our vision that such a plan would provide the visitor with the opportunity to tour the entire spectrum of history from Paleoindian through early Arizona history. Such a plan should develop a historical context for each of the key time periods and identify key sites/resources that can help interpret and provide a visitor experience that reflects this historical context.
3. A goal that all priority sites/areas in the SPRNCA shall receive at least annual monitoring. We again emphasize the sizable volunteer pool that can be organized to assist. To date BLM has not fully explored opportunities to engage this volunteer effort.

In closing, it is our experience that the cultural resources receive benign protection largely as a result of the restrictive uses imposed on the SPRNCA to date. We strongly support continued use limitations, particularly on motorized access and livestock grazing. Expansion of these uses from the current situation will result in greater impacts to cultural resources. The enabling legislation is clear in requiring that the SPRNCA be managed to protect cultural resources. It is our position that this mandate provides a higher standard than the mandate

required of all federal agencies to evaluate historic resources to assess potential adverse effects on cultural resources as a result of a federal undertaking and to seek ways to avoid, minimize and mitigate these effects. Any and all uses that are not currently authorized as part of the SPRNCA management require consideration of this higher standard of protection provided by the enabling legislation.

We appreciate the opportunity to provide comments and we look forward to our continued participation in the planning process.

[Redacted]

Archaeology Southwest

Exploring and protecting the places of our past

[Redacted]

www.archaeologysouthwest.org



Markstein, Amy <amarkstein@blm.gov>

SPRNCA

1 message

Wed, Sep 18, 2013 at 6:25 AM

To: amarkstein@blm.gov

I own a home in Cochise County and twice weekly take advantage of the incredible landscape of the San Pedro drainage area. I am a member of the hiking group the Muleteam from Bisbee, Az who hike from Terenate in the Fairbanks area to the Hereford bridge. The area is heavily used by birdwatchers from all over the world and is unique in the Chihuahuan desert. The area is already under pressure due to the scarceness of water, allowing cattle grazing in a desert and off road vehicle will only accelerate the aridity of such a unique environment.

I urge you to keep the present status of the SPRNCA in effect.

Regards.



TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

SPRNCA

1 message

Fri, Sep 27, 2013 at 11:56 PM

[REDACTED]
To: blm_az_tfo_sprnca_rmp@blm.gov

Thank you for holding the informative meetings & WONDERFUL staff.

To begin, please:

*Prohibit OHV use in washes & riparian areas.

*Consider water quality, watershed condition, bank conditions and shearing when considering the biological impacts from grazing.

This natural national treasure needs to be EXPANDED & kept clean & intact for ALL beings, NOT JUST A FEW humans for grazing or OHV entertainment.

I moved here from Ventura, CA BECAUSE of the unique natural resources of the Upper San Pedro River Valley. The San Pedro River (SPR) at its heart is a refuge for diverse wildlife and represents the LAST, BEST riparian habitat in Arizona.

WE CANNOT AFFORD TO DAMAGE or LOOSE THIS PRECIOUS GEM.

The riparian ecosystem of the SPR is vital to the survival of millions of migratory & resident birds & other wildlife...this is & MUST CONTINUE TO BE THEIR SAFE HAVEN. As a local resident, the SPRNCA is an INCREDIBLE recreational & educational resource, right in the backyard of Sierra Vista, Bisbee, Tombstone & other local communities. The SPRNCA is a PRICELESS & IRREPLACEABLE asset to the local community 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 MUST be reflected in the management alternatives that the BLM analyzes.

Please promote ABOVE ALL ELSE the protection of the cottonwood/willow gallery forest, mesquite bosques, & other sensitive riparian habitats essential to birds, other wildlife & rectoration of upland grasslands.

Thank you for your consideration; may you be guided by the wisdom of the AGES.

PEACE.



TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

SPRNCS Scoping

1 message

[Redacted]
To: blm_az_tfo_sprnca_rmp@blm.gov

Wed, Sep 18, 2013 at 7:53 AM

To whom it may concern,

I've been very impressed with the BLM's management of the San Pedro Riparian National Conservation Area since its establishment in the late 1980s. The SPRNCA's ecological, cultural, and recreational value are such that I consider it a national treasure. I don't know of any more rich and healthy lowland cottonwood-willow riparian area in the southwest.

I strongly encourage the BLM to continue all of the key management features adopted with the establishment of the area;

NO livestock grazing – the well documented (article published in Conservation Biology) recovery of the area in terms of avian and plant abundance and diversity since the removal of livestock speaks for itself.

NO off road vehicle use – this has been proven to be an ecological disaster in many places and is simply obnoxious

NO sand and gravel mining

Thank you for protecting the SPRNCA.

Naturally,

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]



Markstein, Amy <amarkstein@blm.gov>

The Life of the San Pedro River

1 message

Fri, Sep 27, 2013 at 10:51 AM

To: "amarkstein@blm.gov" <amarkstein@blm.gov>

Cc: [REDACTED]

Dear Ms. Markstein,

My name is Gretchen Michaels and my husband and I live half the year in Arizona quite close to the San Pedro River. I walk my dog along its' banks a couple of times each week. I have been doing so for eight years now, and our family is now looking to purchase a home here, in large part due to the few remaining places like the San Pedro Conservation Area. I have been contacted about what I feel is a foolish plan to quite possibly destroy this River as I know it.

I understand that the Arizona Dept. of Water Resources is ignoring Federal water rights granted to The BLM, and by doing so, critical damage would certainly happen to this still somewhat pristine area. Surface water and ground water levels cannot support the thousands of proposed new homes. Let the Bureau of Land Management do "their job of Managing our Lands"not some short-sighted state department that is solely interested in the current moment.

Thank you,

[REDACTED]



Markstein, Amy <amarkstein@blm.gov>

The San Pedro River

1 message

Fri, Sep 27, 2013 at 10:29 AM

To: amarkstein@blm.gov

Cc: [REDACTED]

Dear Ms. Markstein,

I am a part-time resident of Bisbee, AZ. During my six months yearly in Arizona I spend a good deal of time hiking along the San Pedro River, and I have a number of friends who volunteer at the San Pedro House. Over the last eight years I have gained a growing respect for and understanding of just how important this river is to the surrounding community as well as the entire state of Arizona. It is one of, if not the only "real river" in the entire state.

Thus I am extremely concerned with what I see as a reckless move to very likely destroy this gem that is one of the prime reasons myself and many more visitors like me come to the state. The irresponsible move to build more unnecessary homes in Sierra Vista at the expense of this river's life is unbelievably short-sighted and irrational. The inclusion of livestock grazing is another move that only benefits the very few and easily could penalize countless thousands of river walkers. I have personally witnessed the harm just a "few errant cattle" can do in a short period of time, on a hike along the river nearby the San Pedro House. Similarly, the idea to possibly open up the areas to off-road vehicles and similar destructive recreational activities is another that might benefit the few to the detriment of the masses who come to this river for its' quiet beauty, and wildlife.

In short, this seems like just one more completely "boneheaded" approach to forever alter a national gem and state treasure for "the quick-buck" that will be offset in no time by fewer tourist dollars. Please allow real science and far-sighted logic to prevail in this matter.

[REDACTED]



TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

Thoughts on RMP

1 message

Mon, Sep 16, 2013 at 6:53 PM

[REDACTED]
To: blm_az_tfo_sprnca_rmp@blm.gov

Following are points that I feel are important and should be considered in your RMP process.

Water Quality and Quantity:

- Pursue legal rights to base flow.
- Build retention basins and encourage others to do the same
- Ensure that recharge water from the SV EOP is contaminant free.

Hunting:

- Define areas where hunting is allowed and post with signs.
- Do not allow hunting within ½ mile of any maintained trail or facility used by the public.
- Do not expand the currently allowed hunting areas.

Firearms and recreational shooting

- Do not allow any shooting except in designated hunting areas during hunting season.
- Do not allow, plinking, "soft shooting", paintballing, etc.
- Post "NO GUNS ALLOWED" signs where they will be seen.

Grazing, mining, energy, and other land-use conflicts:

- Do not expand grazing acreage.
- Do not allow mining or fracking because of heavy water use and possible water contamination.
- If power generation devices are placed, put them where they will not be seen or heard.

Cultural Resources Protection:

- Divert the water from the EOP that is currently seeping into Murray Springs.
- Increase police presence in areas of cultural heritage sites, such as the Presidio and Fairbank Cemetery.
- Encourage archaeological research within the SPRNCA.

Endangered species and critical habitat:

- Protect the habitat of the Water Umbrel, Willow Flycatcher, Yellow-billed Cuckoo and Mexican Garter Snake.
- Protect habitat that may attract wildlife in the future, such as Jaguar, Ocelot, etc.

Habitat restoration:

- Remove non-native plants and animals such as Bullfrogs, Tamarisk and Mesquite (above the flood plain).

Land acquisition:

Work with land-owners and other organizations to expand the boundaries of the SPRNCA,
Offer assistance to abutting land-owners who wish to bequeath or sell their land to BLM.

Mechanized vehicular access and transportation:

Work with Border Patrol to determine where and when they should patrol within SPRNCA.
Allow motorized wheelchairs to be used on designated trails.
Offer transportation of handicapped individuals to sites otherwise unavailable to them.

Wilderness designation and Wild & Scenic Rivers:

Apply for this designation to give added protection and recognition to SPRNCA.

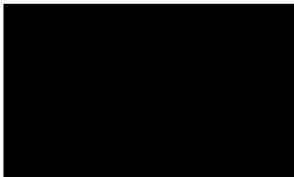
Law Enforcement:

Assign additional law enforcement personnel to ensure that rules are followed and site integrity is maintained.

Miscellaneous:

Use prison labor to maintain trails and clean-up after illegals.
Set up a camping/RV location near a parking area, with picnic tables and grills.
Allow smoking only in designated areas.

Sincerely,





Markstein, Amy <amarkstein@blm.gov>

Use of SPRNCA

1 message

[REDACTED]

Fri, Sep 20, 2013 at 6:01 AM

To: amarkstein@blm.gov

I live in New York City. At least twice a year I spend a week in the Sierra Vista-Bisbee area birding and hiking. I understand that there is now under consideration a plan to allow grazing and four-wheelers in the protected area. I am strongly against this plan since to do so would greatly alter the natural beauty of the area, and would surely reduce the numbers and the diversity of birds and plants in the area. I would be disappointed should this negative impact happen, both for the wildlife there and also for me, since then I would no longer be interested in going there to bird and hike (and to spend money). -- [REDACTED]

**Scoping Comments for the U.S. Department of Interior
Bureau of Land Management – Arizona
San Pedro Riparian National Conservation Resource
Management (SPRNCA) Plan ending September 30, 2013**

These Scoping Comments identify and provide specific solutions for urgently needed remediation of longstanding and potentially devastating problems resulting from the consistent non-management of the San Pedro Riparian National Conservation Resource (SPRNCA). Oversight of this area has been the responsibility of the Bureau of Land Management (BLM). Based on physical evidence, public record and other documents it is clear that land conditions particularly at the northern end have deteriorated from the preceding decades under BLM custodianship.

For several decades my family and I have attempted to work with BLM in Southeastern Arizona specifically along the northern interface of the San Pedro Riparian National Conservation Resource Area (SPRNCA). We have property boundaries in common. We have over the years met numerous individuals in different capacities with the intention of establishing working relationships. Our efforts have been largely unrewarded and at times attacked.

It is clear from both recorded and empirical evidence that the management of these particular lands leaves much to be improved upon. The condition of the St. David Cienega, a Research Natural Area, is in critical condition as it has gone from a 350 acre functioning system to roughly 60 acres in desperate need of immediate informed action. Appendix 12 (page 368) of Bureau of Land Management Final Environmental Impact Statement 1989 inventoried the Water Sources on Acquired Lands. There were at time of acquisition four (4) functioning, good usable water sources. At this present point in time 2 are non-useable, 1 has recent work for endangered species transplant purposes and the 4th has not been maintained. In fact, the essential berms surrounding this 4th, main source spring, known as Two Cienega Spring were breached in several places by BLM personnel. This disappearance of surface water, historically present and utilized by the entire lentic ecosystem on a migration corridor has had grievously devastating impacts on wildlife, grassland health and watershed health.

The entire northern end of the SPRNCA, uplands included, once supported abundant and varied wildlife. There is little sign of its existence in the uplands now as animals have been forced to concentrate along the San Pedro River and the pockets of artesian surface water.

Upland erosion and down cutting since acquisition has accelerated unchecked. Formerly a viable functioning part of the watershed, these lands have been dramatically dewatered and destabilized. There are ever increasing fissures which are not only treacherous, but also contribute to the dewatering of the land surface.

Gas pipeline and rail road easements have not been maintained by their respective owners. These have impacted surface flows and left unattended have also exacerbated erosion and access issues.

*These lands within the SPRNCA have been approached by the BLM from the perspective of 'hands off', let it return to its natural state; however, there is no returning to its 'natural' state. The landscape is dynamic. There has been no attempt to actively manage, to work for the health and function of this very large and critical area. The end result is painfully and poignantly clear to anyone who understands the land, has witnessed the decimation of richness and can read the evidence present. The **ONLY** ray of hope for this land has come from the National Riparian Service Team (NRST). Without belaboring the point – it is imperative for the region and its inhabitants that this team be kept active and integrated for the oversight, collaboration, cooperation and success of the management process. (Additional insight and information on this point is available upon request).*

The Bureau of Land Management requires re-education on the exact nature of their function. Over time there have been political and conceptual shifts both within the agency and the educational systems that provide the "expertise" to manage public lands. Agendas have developed that are not compatible with land health or real life. Prejudices such as 'cattle are bad' or 'this person is that' have been put forth as truths and impressionable volunteers have been poisoned by these biased perspectives. This disconnect must be rectified for a balanced informed view from which to base activity.

New rotating personnel need to be oriented to area resources and to the historical management practices. These 'jewels' as areas are not for the exclusive play of BLM or special interests. Management is required that it is pragmatic, resourceful and beneficial to the land and inhabitants.

Since it is abundantly clear that management of the kind used since BLM acquisition is woefully inadequate it will be useful here to enumerate some action items. Utilization and incorporation of these tools (as well as others that may be put forth) needs to be undertaken with conscious, holistic oversight and integration of multiple functions in mind. Inaction is not an option.

Historical, previously utilized, management tools and access:

- 1- Fire – re-institute the use of fire to manage brush encroachment and grassland health.*
- 2- Fencing – functional fencing that address ground truth e.g. Wildlife, grazing animals, people, horse access. Grant money misspent (e.g. Welded square tubular steel fencing see attached photos) is an affront to every citizen who has seen and experienced the impracticability of it.*
- 3- Access – maintain the established routes of trails and roads as well as additional access points for educational experience and observation.*
- 4- 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.*
- 5- Brush abatement – through the use of multiple tools; mechanical, herbicide, fire, animal grazing for grassland improvement and soil fertility.*

Other considerations:

- 6- All interfacing agencies (e.g. Fish & Game etc.) must respect enumerated constitutional rights. No political leaning shall infringe on established rights and freedoms.*
- 7- Public oversight and public partnership on management strategies with power to influence a change and re-direct action if a management option is not working.*

- 8- *Remain sensitive to and incorporate the Visual Resource Perspective with each management option.*
- 9- *Transparency of agency and approach (e.g. re-education to agency function and orientation of rotating personnel). Availability and organization of record archives, coordinate and exercise discretion on any research or grant initiatives.*
- 10- *Field work and implementation of useful, practical, sustainable land management/habitat improvement skills. (More information available.)*
- 11- *Active and continuing collaboration with NRST.*

ATTACHMENTS:

- *Appendix 12 of the Bureau of Land Management Final Environmental Impact Statement 1989.*
- *Upland erosion pictures*
- *Fencing pictures*
- *Map of springs*

Respectfully,

██████████
██████████

██████████
████████████████████

SPRNCA RMP Scoping Comments

REF: Hunting

I am aware that BLM does not have the authority to control/manage hunting issues within the SPRNCA, but I would like to suggest the following points for possible negotiations with Arizona Fish and Game to further restrict hunting within the SPRNCA:

1. 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 Game's concern for the overall health of the species is resolved.
2. 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.

In my eight years of hiking in the SPRNCA, I have not seen a great number of hunters so implementing a moratorium would not directly impact that many individuals, but would make it safer for a much greater number of people doing other forms of recreation in the SPRNCA.

██████████

██████████

SPRNCA RMP Scoping Comments

REF: Grazing

1. I walked with the National Riparian Service Team last year for most of the reaches on the San Pedro River. They often commented on the cottonwood trees as an important indicator for the overall health of the river. On the reach north of St. David, they also noted the number of new cottonwoods trying to establish themselves, but being thwarted by cattle repeatedly chewing off the primary stems, thus preventing them from becoming trees. 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.
2. For the past two years I have walked Curry Draw during the Nature Conservancy Wet-Dry Survey. Two years ago there were lots of signs of cattle being illegally present within the Draw. This past year there were no signs of cattle being present, and the change was dramatic. There were now new Cottonwoods six to eight feet tall and no pollution of the stream from cattle taking a dump. This is just additional anecdotal information to support the statement above.
3. 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. I am aware that BLM is unlikely to have funding for such a project, but I do believe that concerned local NGOs could raise the funds for a demonstration.

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SPRNCA RMP Scoping Comments

REF: RMP Study Area

We all know that the three major issues for the SPRNCA are water, water, and water. 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.

I would further suggest that some BLM parcels that are adjacent, but outside the San Pedro River watershed also be included. I am particularly concerned about the possible restarting of mining operations in and around Bisbee. These mining operations require huge volumes of water, and some of this water would come from the San Pedro watershed. BLM owns parcels that are directly adjacent to the potential mining sites, so I don't think it is out of the question to include them.

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SPRNCA RMP Scoping Comments

REF: Law Enforcement

I appreciate that BLM funding is currently rather bleak and will be into the near future, but I would still like the RMP to address the current inadequacies in the level of law enforcement within the SPRNCA. It is fine to develop a wonderful RMP with wonderful ideas, but it soon becomes somewhat useless if the public doesn't have at least a perceived awareness of some level of enforcement.

I have hiked the SPRNCA for the past eight years and I rarely see any law enforcement. When I am leading docent walks, I tell people that the BLM officers don't openly patrol, but rather hide and observe. Unfortunately, I feel my nose getting longer as I say this, knowing there is rarely any law enforcement within a hundred miles.

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SPRNCA RMP Scoping Comments

REF: Volunteers

I would like to have the RMP address the better use of NGOs and volunteers to achieve certain goals that might not otherwise be attainable, given BLM's funding and staffing constraints.

Some areas that might be considered include:

- Seeking grants for projects that BLM cannot apply for, including such things as a grant to upgrade the solar energy system at the San Pedro House or doing wetlands restoration near the Hereford Bridge Trailhead.
- Using volunteers to do ongoing studies, such as monitoring sections of the San Pedro River, as verbally suggested by the National Riparian Service Team, or monitoring motion cameras along animal trails.
- Upgrading the current FSPR volunteer effort to help with trash removal and trail maintenance.

██████████

██████████

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September 26, 2013

Advance Copy via Electronic Mail to:
blm_az_tfo_sprnca_rmp@blm.gov

With original via US Postal Service to:

BLM Tucson Field Office
ATTN: Ms. Amy Markstein
Bureau of Land Management
3201 East Universal Way
Tucson, Arizona 85756

Re: *San Pedro Riparian National Conservation Area Resource Management Plan*

Ladies and Gentlemen,

Thank you for the opportunity to participate in the public scoping phase for the San Pedro Riparian National Conservation Area (SPRNCA) Resource Management Plan (RMP). For many years, our firm has represented the St. David Irrigation District ("the District") in connection with its water rights. The District has asked us to submit comments to the RMP on its behalf.

At this stage in the RMP process and due to the fact that it is difficult to ascertain what particular outcomes may happen, the District has no comments other than the fact that it recognizes the criteria that BLM states that it will follow in developing the RMP. Included in this criteria is the recognition of all valid property and water rights.

The District manages the delivery of irrigation water for landowners in the St. David area. Since the late 1870s and early 1880s, when settlers arrived in St. David, water was diverted from the San Pedro River to be beneficially used for agricultural purposes and the people's survival. The landowners who settled the area later formed the District in the early 1900s in order to efficiently manage the water diversion and distribution system. Documentation evidencing these historic water rights includes but is not limited to Registered Surface Water Claim 36-46185 and Statement of Claimant Nos. 39-6593 and 39-6594. During the past century, the District has had occasion to divert the entire surface flow of the river in order to fulfill its historic right. This

can be a regular occurrence, particularly when there are low flows. The diversion dam and the related diversion ditches and canals that were used in the 1800s still exist and are actively managed and maintained by the District. They are an integral part of the District's water rights.

When constructed in the 1800s by the settling pioneers, the District was authorized to create ditch and pipeline easements pursuant to the Desert Lands Act of July 26, 1866 ("the 1866 Act") (43 U.S.C. 661). The easements conferred by the 1866 Act remain in full force and effect. The right-of-way for federally-authorized irrigation ditches that existed as of 1905 and earlier was the actual ditch plus 50 feet on either side (*see* 43 U.S.C. 946-949, ". . . to the extent of the ground occupied by the water of any reservoir and of any canals and laterals and fifty feet on either side of the marginal limits thereof . . ."). Accordingly, the District claims a 100-foot easement along all of its irrigation ditches, pipelines and facilities, including those that might be located within SPRNCA.

To use and maintain its water rights, the District must have continual access to its diversionary system, including those portions that lie within SPRNCA, for maintenance, repair and in some cases, replacement work. Activities include but are not limited to the use of heavy machinery and equipment within its 100-foot right-of-way in order to maintain and repair the diversionary system; the removal of vegetation in the diversionary system right-of-way; the cleaning of the ditches of branches, silt, vegetation and other buildup that might be obstructing the flow of water to District landowners; rebuilding of the dam and ditch embankments; and such other maintenance and repair activities as the District deems necessary. Additionally, the District may at some point in the future replace the existing ditch system with an above-ground or underground pipeline.

The District supports the BLM's commitment to honor existing property and water rights as it determines how it will implement the RMP, and asks that a recognition of the District's right-of-way and access for the use, maintenance and repair of its diversionary works within SPRNC will be noted in the written plans. The District will object to any restrictions upon its rights.

Please add our name and address to any mailing lists that the BLM is generating for notices about future RMP developments and meetings. We appreciate the opportunity to participate in the public scoping process.

Sincerely,

BROWN & BROWN LAW OFFICES, P.C.

David A. Brown

cc: St. David Irrigation District

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Amy Markstein, Asst. Planner
Bureau of Land Management
Tucson Field Office
3201 East Universal Way
Tucson, AZ 85756

Dear Amy,

Thank you for the opportunity to comment on the San Pedro Riparian National Conservation Area RMP. I appreciate the effort all of you have made to provide educational information about the many resources of the SPRNCA. I am a life-long resident of the San Pedro Valley and have spent much time riding and hiking in and around the river. I have observed the changes that have taken place since the SPRNCA was established and have studied the historical events that changed the river and surrounding watershed dramatically. I participated in the early wet-dry river monitoring efforts, riding from Fairbank to the north boundary of the SPRNCA many times, and still take part in the surveys when I can.

The San Pedro River basin is so changed from what existed prehistorically, or even 150 years ago, that what has been lost is immeasurable and cannot be restored. It may be possible for the river to regain some measure of its former self, however, and it is unrealistic to set objectives for maintaining the animal and plant species at their current populations, or for the increase of certain species, until it is understood what the potential is for the river to regain normal function, and what that change will look like. When the Mormon Battalion got to the San Pedro River, Captain Cook wrote something to the effect that, "This river is six feet deep and narrow enough to step across, and in an hour we could catch as many fish as we could eat." They drove their wagons down the valley, something that would be impossible today because the grasslands have been converted to thickets cut by arroyos. Where there was once topsoil in the uplands, rocks armor the ground. I believe there is potential for the river itself to return to a slower, marshier waterway if human water use and/or climate change do not dry it up. I don't hold out much hope for the uplands to be restored substantially without a tremendous amount of effort and expense.

With the proliferation of beaver and the continued deposition of sediments from the uplands, the riverbed will rise. Someday it may once again overflow the current incised channel in places during flooding. The cottonwood galleries may decrease as beaver ponds and marshy areas return. So may the tamarisk, hopefully, if control measures can be implemented. Mesquite probably increased after the introduction of domestic livestock and the subsequent decrease in fine fuel and fire. It may decline if subsurface water levels rise and create conditions more favorable to sacaton. These changes will not benefit all the species that currently call the river home. Some that are rare, threatened or endangered may decrease. 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.

The whitethorn, creosote and tarbush community that dominates so much of the uplands does not produce great hydrologic conditions. I believe the uplands need fire. Grazing does not control brush unless you graze goats intensively. There is not sufficient fine fuel to carry the fires that would be necessary to tip the balance between grassland and shrubland. The soils, in their depleted condition, may not support grassland in many places, and any disturbance could cause an increase in invasive species such as Lehmann lovegrass. Never-the-less, mechanical brush control and seeding in some areas where soils are favorable might make a significant difference and there are some examples in the area. Such drastic measures would not result in long-term change without the appropriate management of livestock and the reintroduction of fire to maintain the treated areas. This would be intensive and expensive but, if successful, it could improve hydrologic conditions. Construction of loose rock dams to retain runoff would be less expensive and could utilize the help of volunteers to implement.

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 ought to be because many times I have ridden the river from Fairbank to St. David and seen cow tracks much of the way. There may be places where winter grazing would not be harmful but once cows are in the river it is difficult to control where they go. Fences are hard to maintain and the cows' owners cannot always keep them where they belong. In my 11 years as a range and watershed specialist, I saw only improvement in riparian areas where grazing had been excluded. With this improvement, however, comes an increase in fine fuel that leads to fire, and as a piece of the ecosystem now largely removed, fire is unavoidable in the progression toward more natural and functional conditions.

The lack of fire since the SPRNCA was established has resulted in a buildup of fuels that will result in more intense fire activity when it does occur so although grazing has been largely removed, a natural balance does not yet exist. With the historic reports and other evidence that Native Americans set fires at certain times of the year, fires must have been frequent and widespread. Whether these man-caused fires can be considered "natural" is irrelevant from the standpoint of the adaptations made by the ecosystems affected by them for thousands of years.

The river and the species that depend on it cannot exist disconnected from the uplands. The washes that flow to the river not only carry water to it but they are important travel routes for species that need to be able to move back and forth between the river and the mountains in order to maintain genetic diversity and to adjust to changing climatic conditions. It would be of great benefit for the BLM to take measures to block up lands along major drainageways and, where possible, connect these corridors to the river. I support the inclusion of the existing scattered BLM parcels in the planning area. 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.

Just as the river ecosystem cannot function properly without all its pieces, it cannot survive without the engagement of communities. Facilities and trails in the SPRNCA should support a range of appropriate recreational and educational uses that will contribute to an appreciation for the area and sense of stewardship among local residents. The north end of the SPRNCA is one area that seems to lack attention and has poor access. The road to Land Corral is poorly maintained and nearly impassable for horse trailers. There seems to be little awareness or appreciation in the community of St. David for the importance and significance of the river. Building greater awareness and stewardship in communities near the SPRNCA may have the effect of also promoting better management of the San Pedro River outside the SPRNCA.

One indicator of the lack of concern or awareness for the river is the use of motorized vehicles in the riverbed which has increased significantly outside the SPRNCA and occurs inside also. I do not feel increased motorized access is necessary or appropriate in the SPRNCA. Like cows, once people have motorized access to sensitive areas they are difficult to control and much damage can be done in a short amount of time.

From the standpoint of population growth, development, water use and conservation, a coalition approach to the management of the watershed could be the only thing that will save the San Pedro in the long run. I would support the initiation of such an effort, or the combining of the current watershed groups into a larger coalition. 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. I support such actions and I believe they are important to the future of the SPRNCA.

I look forward to working with you in the development of this plan and hope that I can participate in focus group discussions. I would be interested in any focus groups you might establish so time will be the limiting factor for me.

Best regards,



September 27, 2013



Amy Markstein
BLM Tucson Field Office
3201 E. Universal Way
Tucson, AZ 85756

Re: Scoping Comments for San Pedro Riparian National Conservation Area (SPRNCA) Resource Management Plan (RMP)

Dear Amy:

I wish to provide scoping comments for consideration during the development of the SPRNCA RMP. As background, I enjoy visiting the SPRNCA to hike or mountain bike various portions of the San Pedro Trail. It is one of my favorite destinations during the cooler months. I have also enjoyed visiting the Fairbank picnic site with other hikers as it is a great venue to stage a hike and potluck picnic luncheon. In my view, the SPRNCA is truly a great asset for a wide variety of outdoor enthusiasts.

I have attended most of the education and scoping forums that were conducted in recent months. These forums were very informative and helpful. As an avid hiker and recreational user, I have a great interest in the SPRNCA's recreational values and settings. Thus, I will focus my comments mainly on recreation, trails, and public access. While there has been great progress over the years in developing recreational opportunities in the SPRNCA, I believe that the RMP should consider options to improve public enjoyment of the area. By improving opportunities for public enjoyment, the BLM can help foster broader and stronger community support and appreciation for the SPRNCA.

My comments and suggestions are as follows:

1. Trails. I strongly support the San Pedro Trail system and recommend its role and importance be highlighted in the RMP. It serves as a backbone for visitors to enjoy hiking and exploring various portions of the SPRNCA. I believe it should receive priority attention for continued maintenance and development. However, I would like to offer some ideas for enhancing trail opportunities.

- 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.

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. I see that the existing SPRNCA RMP includes in the Preferred Alternative a planned action to develop a trail along the Babocomari River using the old railroad grade. I believe this action should again be considered as the new RMP is developed.

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. I believe that ultimately the City of Sierra Vista will extend their multi-use path trail system to the EOP which would further enhance the benefit of this proposed connector trail.

d. Rail-to-Trail Conversion within the SPRNCA. I 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.

2. Campgrounds. I believe the BLM should consider developing one or more campgrounds within the SPRNCA to better accommodate visitors from outside the area. A developed campground could also provide a family friendly setting to help introduce youth to outdoor activities, including a camping venue for Boy and Girl Scout troops. I enjoy car camping at various locations in Arizona where hiking trails are located and I believe a developed campground would be very compatible with the recreational attractions within the SPRNCA. It should be noted that the existing SPRNCA RMP includes a planned action to develop a campground in the area around the San Pedro House. I believe that action should be considered again in this new RMP.

3. Back Country Byways. I believe the BLM should consider providing opportunities for the public to access interior portions of the SPRNCA via back country byways. As an example, visitors to the Gila Box Riparian National Conservation Area are able to enjoy touring the Black Hills Back Country Byway which is located in the uplands above the NCA. In the existing SPRNCA RMP, the Preferred Alternative includes a planned action to rebuild the San Rafael del Valle road to use as a motorized interpretive route. I believe that action should be considered again in this new RMP.

See map at enclosure 4 to view a conceptual route for this action. It would open up additional areas for hiking, birding, picnicking, etc. and would enhance visitor enjoyment of the area. 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). While this road is more primitive, it offers great views of the area and provides visitors a more remote experience for exploring the back country east of the riparian zone. It also offers improved opportunities for loop hikes in conjunction with the San Pedro Trail. I recommend this route be considered for designation as a back country byway or motorized interpretive route in the new RMP.

4. Planning Area. I understand that BLM is considering whether to expand the planning area beyond the SPRNCA boundary where it makes sense. 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, I 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). See SPRNCA map section at enclosure 6. The reasons for this are twofold. One, there is good recreation potential for designating a multi-use trail system east of the SPRNCA for mountain bikes and off-highway vehicles (OHVs). This could provide some benefits in dispersing mountain bike and OHV use away from the riparian area. Secondly, there is an existing informal target shooting area on BLM land just east of the SPRNCA boundary and north of the Charleston Lead Mine. By including this BLM land in the planning area, BLM could consider designating an appropriate location for target shooting (where it is done now or possibly a more suitable location) outside of the SPRNCA boundary. I expect that target shooting will be prohibited within the SPRNCA, so having an appropriate location outside of the SPRNCA boundary could mitigate concerns over loss of this recreational use.

5. Firearms Restrictions. As a longtime resident of southern Arizona, I have seen the growing impact of illegal drug and human smuggling on public lands in the border zone. While hiking on public lands here, it is not uncommon to encounter illegal smuggling activities. Due to the risks of hiking in the border zone, I and other hikers believe it is necessary to carry firearms for personal protection as allowed by Federal and State of Arizona gun laws. I mention this because in my view, the current firearm restrictions in the SPRNCA are outdated and do not comply with Federal and State of Arizona gun laws with respect to the right to carry and possess firearms on public lands. I am not challenging the restriction on discharge of firearms, but rather the restriction on the right to carry and possess firearms within the SPRNCA. 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.

Thank you for the opportunity to provide these comments. I look forward to participating in further phases of the RMP as the process moves forward.

Sincerely,

//signed//



Enclosures:

1. Map - Fairbank to Schieffelin Monument Trail
2. Map - Fairbank to Babocomari River Trail
3. Map - EOP to Murray Springs Trail
4. Map - San Rafael del Valle Road
5. Map - SPRNCA East Road
6. SPRNCA Map Section



Comments to BLM on San Pedro Riparian NCA Resource Management Plan scoping

1 message

Mon, Sep 16, 2013 at 5:18 PM

Reply-To: [REDACTED]

To: blm_az_tfo_sprnca_rmp@blm.gov

Cc: info@sanpedroriver.org, [REDACTED]

Ms. Amy Markstein
Resource Management Plan Coordinator
Bureau of Land Management
3201 E. Universal Way
Tucson, AZ 85656

To: Ms. Markstein and Bureau of Land Management Tucson Field Office Staff
Subject: Friends of the San Pedro River input on SPRNCA RMP scoping

As a resident of Hereford, I would like to offer my input to your efforts to develop a Resource Management Plan (RMP) for the San Pedro Riparian National Conservation Area (SPRNCA). I feel that the SPRNCA is a national treasure that should be preserved and protected so that our children and their children can enjoy its many natural and cultural resources.

I would like to suggest these specific points for your consideration as you develop the RMP:

1. 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.
2. The RMP should recommend that BLM managers coordinate with other local Government officials to encourage water conservation, recharge of water and reduced pumping of the aquifer.
3. The BLM should continue to pursue legal protection for the water rights that accrue to the SPRNCA.
4. The RMP should recognize and encourage the designation and protection of habitat for rare and endangered species.
5. 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.
6. Cultural resource 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.



Restoring and Maintaining the Sustainable Yield of the Regional Aquifer

HOW IT CAN BE DONE BY 2014

Restoring and maintaining the sustainable yield of the regional aquifer (the Sierra Vista Subwatershed) (**as mandated - see Atch. 1**) demands more be done to eliminate annual deficits that have been occurring over the years, and to begin reducing the accumulated deficit.

- Annual deficits result from consuming more from the regional aquifer annually than is returned to it by a combination of natural and man induced means.
- Annual deficits are cumulative - to exceed 70,000 acre feet (2002 through 2011),
- Including about a 5100 acre feet (**af**) deficit for CY 2011 (Other years shown at **Atch. 3**)

Twelve Sierra Vista Storm Water Management Facilities built since 1985, including six along the Buffalo Soldier Trail (**BST**) boundary with the Fort (**SV-1, -2, -5, -7, -8, & -11 details at Atch. 3**):

- Built basically as 100-year storm water management facilities (**Details at Atch. 1**)
- Drain pipes up to 4 ft in diameter and crest overflows to accommodate extreme 100-year events
- Five major City facilities are monitored (**Details at Atch. 3**)
- None have detained any storm water, because of the huge size of the drain pipes
- Storm water detention, beyond a storm event, is needed for optimizing annual recharge

Six similar facilities interior to the Fort, including (**FH-4, -6, -7, & -8 & other detail at Atch. 3**).

Retrofitting existing 100-year Storm Water Management Facilities to enable them to concurrently function as Detention Basins (Details at Atch. 1, 2 & 2a) would contribute significantly to eliminating annual deficit pumping by as early as 2014:

- **Install adjustable drain structures** to facilitate enhanced recharge during lesser events
 - Achieve up to **340 acre feet** or more additional annual recharge in City basins
 - Achieve up to **590 acre feet** or more additional annual recharge in Fort basins
 - **Potential cost - as little as \$2000 to \$5000 per facility (and/or use of various potential construction resources including Corps of Engineers and/or Guard & Reserve construction battalions as training projects, and/or potential local contractor pro-bono and in-kind resources at little to no cost)**
 - A rudimentary example is shown at **Atch. 2**
 - More universal **Hybrid Versions** are shown at **Atch. 2a**
- **All future basin facilities, including those that must also function as 100-year storm water management facilities, should be constructed with this feature**

If the USPP agrees with a re-calculation of the estimated ground water pumping ‘**rural wells factor**’ that is currently being used in annual **321 Reports to Congress (Details at Atch. 1)**, the currently estimated **5100 acre feet deficit for 2011 would be reduced by about 2500 acre feet** (as briefed to Senator McCain on 21 Aug 2012) **to a 2600 af deficit.**

Retrofitting the existing 100-year Storm Water Management Facilities, along with other in progress funded projects (**Atch. 4**) and increasing conservation efforts could restore the sustainable yield by 2014. Re-calculation of that “**rural wells factor**” would also be applied to the accumulated deficits, which in turn would reduce that figure from about 70,000 acre feet to around 45,000 acre feet.



- Attachments:
1. Background and Rationale
 2. Detention Basin Adjustable Drain Structure (Example)
 - 2a. Hybrid Version Detention Basin Adjustable Drain Structure
 3. Statistics on Facility Recharge & Annual Deficits
 4. Summary Details

Attachment 1. **Background and Rationale**

Restoring and maintaining the sustainable yield of the regional aquifer (the Sierra Vista Sub-watershed) by **and after 30 September 2011, as mandated** by Section 321 of the 2004 National Defense Authorization Act (NDAA) **as a result of a lawsuit filed against the Fort by the SW Center for Biological Diversity (SWCBD, but now just the CBD), demands pursuit of all practical means to mitigate deficit pumping** in the watershed, where **deficit pumping** is defined as the cumulative effect of removing more from the regional aquifer annually by nature and ground water pumping than is returned to it by a combination of natural and various man induced means. That deficit has been documented in acre feet annually (**afa**) in **annual 321 Reports to Congress**, where one acre foot is 325,851 gallons of water, and is currently estimated to be about 5100 acre feet for CY 2011. This has brought the accumulated deficits since 2002 to over 70,000 acre feet through 2011 (**accumulation details shown at the end of Atch. 3 below** with some 2010 revisions). Numerous WaterWise, WaterSense and other water conservation efforts by the Fort, the City, the County and area residents have all contributed to minimizing the annual deficits over the years and will continue to do so. **However, as is well known, water conservation alone cannot resolve this issue.**

Future efforts such as the very efficient Tribute Wastewater Treatment Facility (**WTF**), where no evaporation occurs as is the case at the Sierra Vista Environmental Operation Park (**EOP**), will initially produce treated effluent (from currently available sewage) for watering the Sierra Vista PDS Golf course. This will reduce the need for pumping about 450 afa from the aquifer that is currently needed for watering the Golf Course. Three planned WTF expansions (Phase II, III, and IV) and use of injection wells to return treated effluent to the aquifer will mitigate much of the deficit generated by future development **and put Tribute on a path to being a net-zero water use development. This should be a goal of all new development; in part by constructing various water use mitigation credit accrual projects that would benefit the river and Fort** (see Atch. 4 for examples of deficit mitigation and sustainability projects).

Another important element of deficit pumping mitigation is enhanced storm water recharge through employment of **Detention Basins** constructed in ephemeral channels (washes) in the regional aquifer Sierra Vista Sub-watershed. Twelve storm water management facilities have been constructed in Sierra Vista area washes since 1985. Nine of the 12 facilities (see "**Facility Recharge**" statistics at Atch. 3 below) are located on Detention Basin sites included on a list of forty recommended for the entire watershed in the **Stantec April 2006 'Cochise County Flood Control/ Urban Recharge Plan'** (all forty locations are west of the river, and most are west of Moson Rd).

Six of these nine **Sierra Vista facilities are located** along Buffalo Soldier Trail (**BST**) **on the Fort (Stantec labeled SV-1, -2, -5, -7, -8, & -11)** along the Fort Huachuca perimeter. Their dam crest overflows and large multiple drain pipe features are readily visible on the right when driving south and southeast along **BST** between Busby Drive and Cherokee Avenue. And four other such facilities (**FH-4, -6, -7, & -8**) have been constructed to date in other washes in the interior of the Fort at **Stantec** designated sites. Most if not all of the Fort Huachuca and Sierra Vista facilities were constructed as 100-year storm water management facilities with 1 to 3 drain pipes per facility, some as large as 3 to 4 feet in diameter. **They quickly drain the facilities, and in fact preclude any storm water detention and enhanced infiltration beyond usual storm events because of the large drain pipe sizes.**

Five of the Sierra Vista facilities and five Fort Huachuca facilities are being monitored (**See Atch. 3**) and reported on in annual 321 Reports to Congress. They show significant recharge beyond what would be expected in the original channels due generally to the nature of some widened and leveled basin floors. And that recharge constitutes the total of the Detention basin recharge that is being reported in the 321 Reports. Monitoring detail also shows that the levels of the water in these basins have not reached the height of the top of their largest drain pipes during the monitoring periods, and will probably seldom do so short of a 100-year event. This essentially precludes any significant detention of storm water flow; i.e., at the peak of the event, water is flowing out of the facility at the same rate as it is flowing into the facility and rapidly decreases as inflow decreases, and ceases flowing quickly as the event winds down.

Allowing water to back up in a **Detention Basin** facility during a storm event and releasing it over an extended period of time as controlled by the size of a drain mechanism, as required by Arizona Revised Statute, is essential to achieving enhanced recharge during the period of time that it is being drained.

Most if not all of the facilities have concrete crest overflow structures to safely handle 100-year type events when and if needed. **These facilities could be easily and very economically retrofitted to concurrently function as Detention Basins by constructing and appropriately sizing adjustable drain mechanism structures to both restrict the rate of outflow during storm events** (to cause the water to safely back up in the basin) **and control the rate of release of water that builds up in a basin during a rain storm.** To optimize the recharge, the drain mechanisms would be adjusted to drain a basin over a locally determined period of time, for example within 24 to 48 or more hours, after water flowing into the basin ceases to cause the water level to rise any further or stops flowing into the top of a hybrid facility drain structure (**Atch. 2a**). **The longer the Detention Basin drain period, the greater the recharge!**

At **Attachment 2 below is a photo and description of a rudimentary Detention Basin adjustable drain structure** that has been in existence for about 80 years (built by the Civilian Conservation Corps (CCC) during the early 1930's) on the Ladd Ranch east of the river, south of Highway 92. A version of this simple but very effective adjustable drain structure or other potential innovative adjustable drain mechanism could be used to adapt (retrofit) the local area 100-year storm management facilities to concurrently function as **Detention Basins** to facilitate enhanced recharge of the aquifer during and after all rain storm events.

Attachment 2a below presents a couple of innovative **Hybrid Version Detention Basin Adjustable Drain Structure** designs that would enable adjustment for optimized **Detention Basin** enhanced recharge/percolation over a range of relatively normal events, **while concurrently and safely managing the 100-year and unpredicted lesser events by functioning as originally designed without human intervention.** This may employ a vertical/leaning pipe as shown on Page 1 of the attachment or a vertical/sloping concrete drain box, as shown on Page 2 of the attachment, covering one or more drain pipe structures that permit up to maximum outflow rate of the existing drain pipe(s) to deter breaching the dam crest or spillway, when and if that might tend to occur even as can happen configured as the facilities are today. It is estimated that this could be accomplished at a potential cost of about \$2000 to \$5000 per facility using, for example, one to two cubic yards of concrete for a single adjustable drain pipe structure, or at potentially little to no cost if Corps of Engineers or Guard or Reserve resources were used. **Or it might be developer funded or constructed as a development water use mitigation credit accrual project** (See **Atch. 4** for other examples).

Retrofitting the City's 12 existing 100-Year storm water management facilities **to concurrently function as Detention Basins** to produce enhanced recharge during and after normal and smaller storm events would increase mitigation of the annual deficits by up to an estimated **340 afa** or more. And potentially up to a total of **930 afa** or more would be realized if 6 similar storm water management facilities located on the Fort Huachuca interior were also retrofitted (**see statistics at Attachment 3 below**).

There is concern by some sources that the Stantec estimates for average enhanced recharge may not normally be realized at some locations. If current (or future) available monitoring data reflects less than optimal average recharge due to post event detention for particular **Detention Basin** locations, consideration should be given to installing injection or dry wells in the respective basins to bring their average performance up to what is projected in the Stantec Plan (**Atch. 3**) for the particular locations.

Some will argue "that is not allowed by Statute" as prohibited 'appropriation' of water. To the contrary, it can be argued that where Statute allows construction of a **Detention Basin** facilities with specific height and basin capacity constraints that are met for a particular Stantec recommended facility, if the recharge capacity turns out to be less than predicted due to percolation characteristics of the soil, one should be allowed to compensate for the condition by use of injection wells. If some agency should take issue with that interpretation, the USPP or other concerned agency should work with our Legislators to revise the Statute as may be necessary to allow this interpretation.

Attachment 2: Detention Basin Adjustable Drain Structure

This is a view of the adjustable drain structure for one of two very large **Detention Basins on the Ladd Ranch that were built circa 1933 by the FDR depression era Civilian Conservation Corps (CCC)**. While it is not known just when this photo was taken, it still looked like this on 19 July 2012 during a visit to the site with Jack Ladd who is shown in this photo. The dams, one about 500 feet long and the other about 1000 feet long, are about 16 to 20 feet high to the overflow spillways which have never been breached in Jack Ladd's memory, because of the full or near full capacity configuration of the respective drain pipe structures over the time period of his recollection.

The 30 inch drain pipe with a cross section area of about 4.9 square feet is capable of draining at a rate of about 1.11 cubic yards per second (~225 gals/sec at ~7.48 gals/cubic foot). The concrete adjustable drain structure is designed to enable a very basic method of controlling the drain rate. Metal slots (~2 inch by ~2 inch) imbedded along the approximately 60 degree angled portions of the concrete structure (the left side slot is visible in the above view) are used for easily **sliding in** (from the top) a series of approximately 4 foot 4 inch lengths of 2 x 4, 2 x 6 and/or 2 x 8 **wood or metal elements** to enable essentially completely closing off the flow if filled in completely, or to size it to any desired dimension to control the basin water volume release rate (see **Atch. 2a below for a more explicit example of sliding in the wood or metal elements**). An opening equivalent to two 4 foot sections of 2 x 8 (~7.5 inch) wood sections (~15 inches or 1.25 feet wide by 4 feet long) = ~5 square feet, the approximate equivalent of the 4.9 square feet area of the pipe cross section, enables the pipe to flow at full capacity. So any opening smaller than 1.25 feet (15 inches) will restrict the flow through the pipe. **No expensive complex valve assemblies and all the flexibility needed to optimize any size storm event recharge.**

By way of an example, applying the above detail, this size pipe (30 inch diameter) can drain a basin of approximately 59.4 acre feet capacity (~19.4 million gallons) in 24 hours at ~225 gals/sec. If we were to adjust the opening of the adjustable drain structure to the size of a single 4 foot 2 x 8 board (~7.5 inches wide instead of 15 inches wide) it would take about 2 days to drain the entire 59.4 acre feet of water. Or if you were to merely adjust the opening to 5 inches instead of 15 inches, it would take about 3 days to drain the entire 59.4 acre feet of water, with the respective actions potentially doubling and tripling the enhanced recharge per storm event.

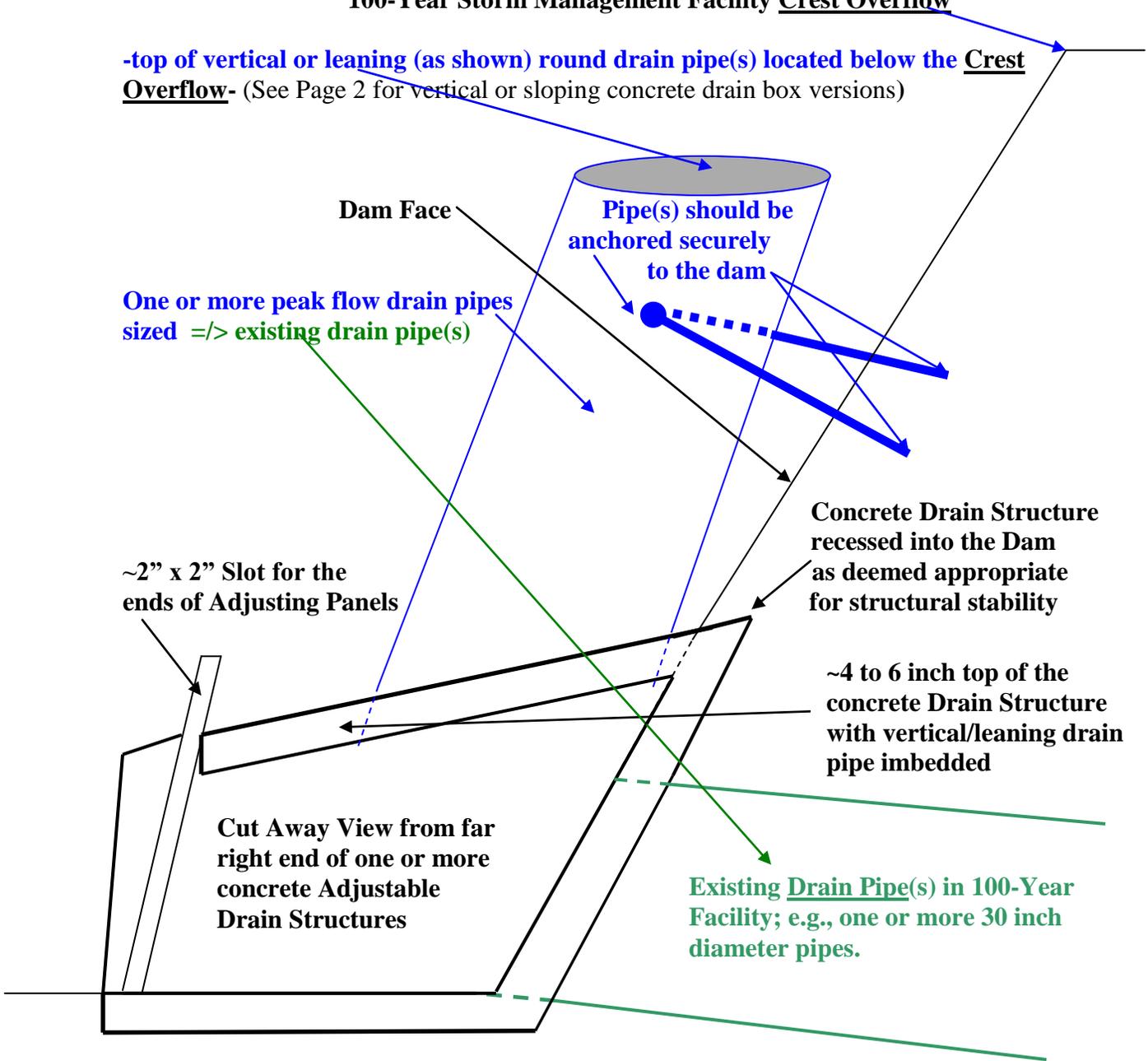
Attachment 2a:

**HYBRID VERSION DETENTION BASIN DRAIN SIZING
ADJUSTABLE DRAIN STRUCTURE (Page 1 of 3)**

Enables adjustment of Detention Basin drain rates to optimize enhanced infiltration/percolation for normal/nominal events, while concurrently accommodating storm flow rates equal to the original design capacity for all greater events including a 100-Year event. All options can include safety gratings over the water inlets. The total height of the structure can be optimized, for example, up to about 5 feet or so for a 6 foot dam depending on the layout of the basin floor.

100-Year Storm Management Facility Crest Overflow

-top of vertical or leaning (as shown) round drain pipe(s) located below the Crest Overflow- (See Page 2 for vertical or sloping concrete drain box versions)



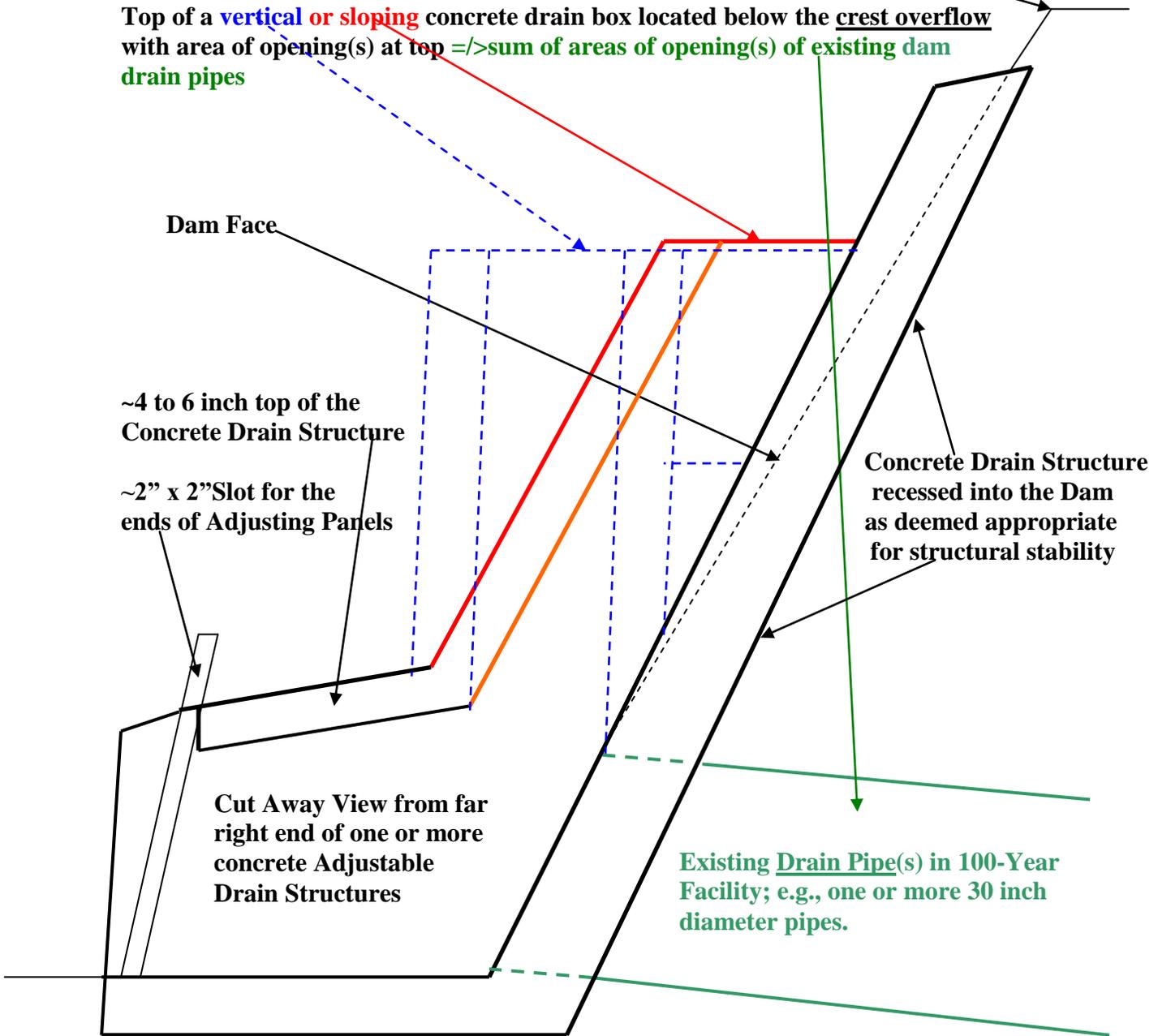
Attachment 2a:

**HYBRID VERSION DETENTION BASIN DRAIN SIZING
ADJUSTABLE DRAIN STRUCTURE (Page 2 of 3)**

**Vertical or Sloping Concrete Drain Box Version
built across one or more Adjustable Drain Structures**

100-Year Storm Management Facility Crest Overflow

Top of a **vertical or sloping** concrete drain box located below the crest overflow with area of opening(s) at top \Rightarrow sum of areas of opening(s) of existing dam drain pipes



Attachment 2a:

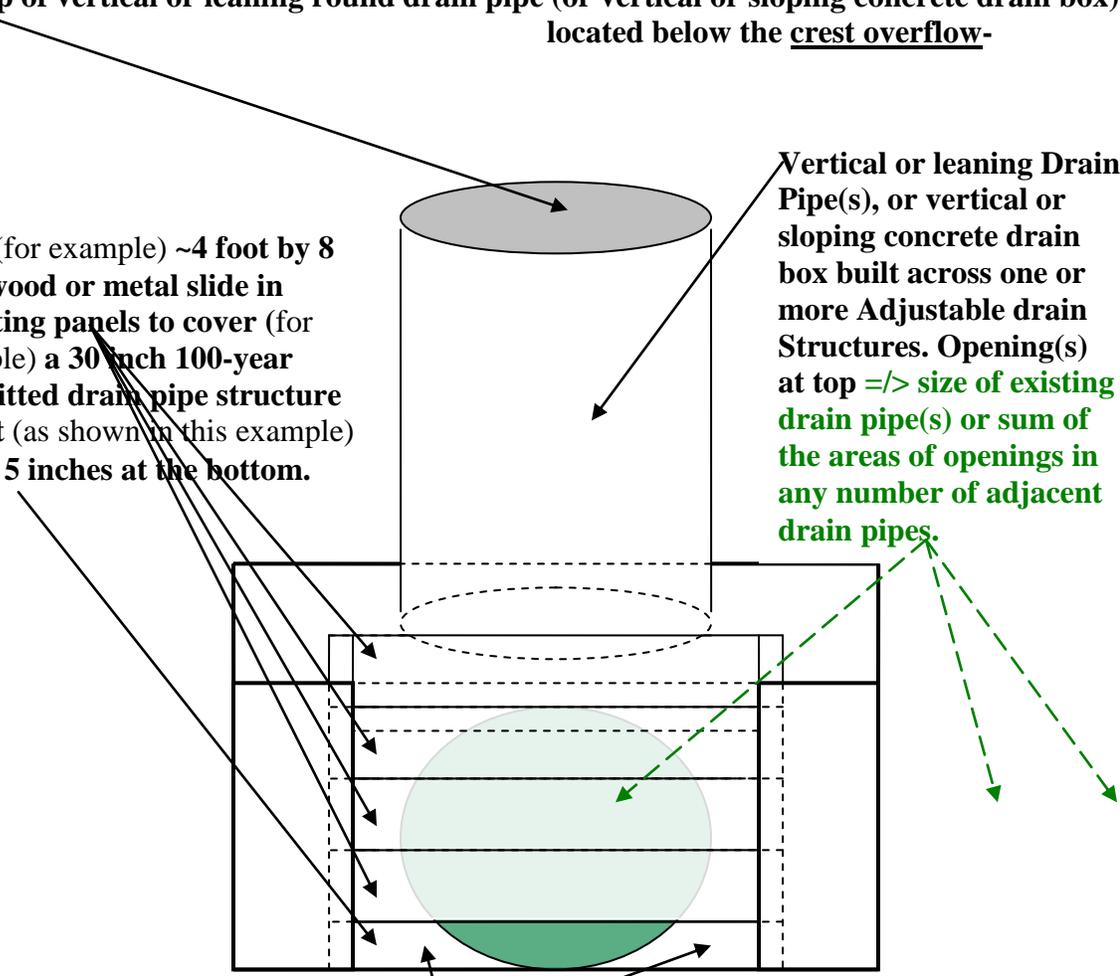
**HYBRID VERSION DETENTION BASIN DRAIN SIZING
ADJUSTABLE DRAIN STRUCTURE (Page 3 of 3)**

-----100-Year Storm Management Facility Crest Overflow-----

-top of vertical or leaning round drain pipe (or vertical or sloping concrete drain box)
located below the crest overflow-

Four (for example) ~4 foot by 8 inch wood or metal slide in adjusting panels to cover (for example) a 30 inch 100-year retrofitted drain pipe structure except (as shown in this example) about 5 inches at the bottom.

Vertical or leaning Drain Pipe(s), or vertical or sloping concrete drain box built across one or more Adjustable drain Structures. Opening(s) at top => size of existing drain pipe(s) or sum of the areas of openings in any number of adjacent drain pipes.



Functioning as a Detention Basin, this opening of ~ 4 feet by 5 inches will enable this facility to drain (for example) ~60 acre feet in 3 days. Or if it is re-adjusted from a 5 inch to a 15 inch opening, it will drain that 60 acre feet in one day, the max capacity of the 30 inch drain pipe.

For a 100-year or lesser storm event, the round drain pipe or concrete drain box feeding into the top of the area of (for example) a single 30 inch drain pipe facility will enable the facility to handle up to ~1.11 cubic yards per second (~225 gallons per second) of storm flow. Any excess, should that occur, will flow safely over the crest or a spillway as all facilities should be designed for. And a three (for example) 30 inch adjacent Drain Structure facility would allow a flow rate up to ~675 gallons per second during a storm event.

Attachment 3. Statistics on Facility Recharge & Annual Deficits:

In acre feet annually (afa)

City	Stantec Estimates		<* 5 Facilities Monitored by USDA ARS		
	Pg 64	Pg 66		4 SV	*Total
<u>Facilities</u>	<u>(Ksat=2 ft/day)</u>	<u>(-ETo)</u>		# <u>Grasslands</u>	<u>w/Rostron</u>
SV-1 * #	15	7	2007	96.56	105.44
SV-2	72	43	2008	114.74	123.95
SV-5 * #	19	6	2009	19.44	23.52
SV-7 * #	12	6	2010	<u>165.63</u>	<u>184.53</u>
SV-8	18	12	Total	396.37	437.44
SV-9	87	74	Average:	99.09 afa	109.36 afa
SV-11* #	16	6	The above recharge is essentially due to enhanced infiltration		
SV-15	25	20	due to expanded basin floor areas in most cases; i.e., not due to		
Rostron*	<u>26</u>	<u>22</u>	detention , because data shows water levels never reached		
Total	290 afa	196 afa	the top of the largest drain pipes during these years.		

Fort Facilities
(*5 Monitored by USGS)

Greely Catch*	+?	+?
Stormwater One*	+?	+?
FH-4	172	159
FH-6*(Exp)	84	74
FH-7*	309	278
FH-8*	<u>25</u>	19/530+? afa
Total	590+? afa	

GOAL>

Increased Recharge w/Adjustable Drain Structures

<u>Other SV Facilities</u>	<u>City Estimates</u>
FB-1	10 afa
FS-3	15 afa
SVM-1	<u>25 afa</u>
Other SV Facilities Total	50 afa
Stantec SV Facilities	290 afa
	SV 340 afa
	FH 590+? afa
Average Increased Recharge: 930+? afa	

'Detention basin recharge' as reported by ARS, USGS & Co.

	SV (ARS)		FH (USGS)		County	From 321 Rpts	Annual Deficits	
	*5 Facilities	*5 Facilities	*5 Facilities	*5 Facilities			In acre feet (af)	2010
	af	+	af	+	af	=	af	af
2002	140	Rev to 239	vs 190	n/r	Rev to 379	vs 330	-9900	2002 -11700
2003	180	vs n/r	34 vs n/r	n/r	Rev to 214	vs n/r	n/r	2003 -9700 est
2004	290		27	n/r	Rev to 317	vs 320	-3500	2004 -7700
2005	80		49	n/r	Rev to 129	vs 130	-4400	2005 -7800
2006	130		184	n/r	Rev to 314	vs 310	-5200	2006 -6140
2007	105.44		164	30	Rev to 299	vs 330	-5300	2007 -6240
2008	123.95		106	30	Rev to 260	vs 267	-4400	2008 -5240
2009	23.52		16	30	Rev to 70	vs 235	-6100	2009 -6100
2010	<u>184.53</u>		<u>232</u>	<u>30</u>	<u>447</u>	<u>447</u>	-4600	2010 -4600
Average :	139.72		116.78	13.33	269.83			

NOTE: n/r = originally 'not reported' **Cumulative Deficit: 43,400 af 65,220 af**
(Blue figures above are 321 Report revisions made in 2010)

7 SV & 1 FH Basins not being monitored or reported: SV-2, SV-8, SV-9, SV-15, FB-1, FS-3, SVM-1, & FH-4

Attachment 4. Summary Details:

Currently on the Table:

If the USPP agrees with re-calculation of the estimated ground water pumping '**rural wells factor**' that has been being used in annual 321 Reports to Congress over the years, the currently estimated around **5100 acre feet deficit for 2011** (not shown in above Statistics) **would be reduced by about 2500 acre feet** (as briefed locally to Senator McCain on 21 Aug 2012) to around a **2600 acre feet deficit for 2011**. That **2500 acre feet 'rural wells correction factor'** re-calculation would also be applied to the accumulated deficits, which would reduce that figure from about 70,000 acre feet (including ~5100 af for 2011) to around 45,000 acre feet, if a study currently in progress validates that **2500 acre feet 'rural wells correction factor'**.

Ongoing and planned near term projects (and ever increasing conservation efforts), plus retrofitting the 12 Sierra Vista 100-year storm management facilities and 4 to 6 similar Fort facilities **can eliminate that 2600 acre feet deficit in a very short time as follows:**

- ~440 afa - Jan 2013 **EOP Clarifier Project**
- ~250 afa - In progress **Turquoise Valley Golf Course** conversion to eliminate about 500 acre feet annual (afa) ground water pumping and net about a 250 afa recharge
- ~200 afa - 2013/14 **Fort processing of Huachuca City sewage & recharge** on the east range
- ~500 afa - 2013/14 **Palominas Recharge Project** (formerly the Mansker Project)
- ~300 afa - 2013 & 14 **WaterWise and Cochise Water Project** water conservation efforts (estimated)
- ~340 afa - 2013/14 **Detention Basing Drain Sizing retrofit of 12 City facilities** (recommended)
- ~590 afa - 2013/14 **Detention Basing Drain Sizing retrofit of 4 to 6 Fort facilities** (recommended)

Total = 2620 afa deficit mitigation by 2014

Those projects over the next two years (by 2014) would eliminate the approximate 2600 afa deficit, as potentially exists today.

And if rural water use re-calculation is determined to be some value less than 2500 acre feet, the following projects along with some up to potentially 100 Detention Basins or more in key locations on both sides of the river (including on BLM land) can be constructed to begin mitigating the recalculation delta, along with deficits generated by future development, and expand mitigation of the accumulated deficit to help maintain the sustainable yield of the aquifer.

Planned/Potential Deficit Mitigation and Sustainability Projects

~150 afa – Annually **WaterWise and Cochise Water Project** water conservation efforts.

~284 afa – 2015/16? Extension of Avenida Escuela as a Charleston Wash 100-year Storm Water Management/Detention Basin Facility Dam - a potential milestone deficit mitigation/sustainability facility - and a **prime example of potential projects that could be funded and/or done totally or in part by developers** at many priority Detention Basin locations in the Sierra Vista Sub-watershed **to accrue Net-zero water use mitigation credits** for their development(s). **With creative thinking and innovation, the goal of all development can be Net-zero water use through this process.** And the Detention Basin options are relatively unlimited. The documented options include some 26 of 40 potential locations identified in the 2006 Stantec Plan that don't yet have water management facilities located on them or currently planned. However, all of the 40 locations are west of the river and mostly west of Moson Road. The options could be expanded to include primary locations in some 11 major washes on the east side of the river plus in some major tributaries. And on both sides of the river, the options could be expanded to include additional locations upstream and/or downstream of the primary locations. And Detention Basins could be built on BLM land at some 15 locations on the west side of the river and at some 11 locations on the east side of the river. **So the options for mitigating deficits and/or maintaining the sustainable yield of the aquifer and for accruing Net-zero water use mitigation credits by developers are relatively unlimited, all through managing our own natural resource – storm water runoff. And no need for expensive, risky, and unreliable CAP water or a desalination source in Mexico, etc.**

~175 afa – 2017/18 Tribute Phase I WTF would eliminate about 450 afa of ground water pumping to water the PDS Golf Course and **net about 175 afa recharge.** However, it may be delayed due to delay in getting the Tribute development started. **But it's the only other near term project that's on the table until the Riverstone Project is defined and funded.**

~600 to 800 afa - 2023/35 Tribute Phases II, III, and IV WTF expansions to help mitigate deficits generated as **Tribute** development evolves **to put the project on track to being a Net-zero water use development.**

~350 afa - 2025/30 Sierra Vista 'Section 36' Wastewater Reclamation Facility (WRF), which could essentially be a shovel ready project that would eliminate ground water pumping for watering Sierra Vista City ball field sports complexes and produce aquifer recharge that **could be started well before its currently projected 2025/30 time frame, as funds can be made available.**

~200 to 2600 afa for reuse and/or recharge - 2025/30 **Bella Vista Properties WRF** to help mitigate potential deficits generated by future development of the area north of Charleston Road and mostly east of Cochise College and Buena High School (**potentially a Tribute like WTF facility**).

Retrofitting the twelve City facilities and four to six Fort facilities to concurrently function as Detention Basins is a place to start now.



TFO_SPRNCA_RMP, BLM_AZ <blm_az_tfo_sprnca_rmp@blm.gov>

Re: Thank you for your participation

1 message

Sun, Sep 22, 2013 at 8:33 PM

[REDACTED]
To: "TFO_SPRNCA_RMP, BLM_AZ" <blm_az_tfo_sprnca_rmp@blm.gov>
Cc: "Lomeli, Ben" <blomeli@blm.gov>

It's amazing how the USPP and partner agencies can talk about the need to protect the SPRNCA in a timely manner and not give any serious attention in their strategic planning to the employment of true Detention Basins using our own natural resource (effective storm water management) to restore and maintain the sustainable yield of the regional aquifer as mandated some 10 years ago in the Fall of 2003 in Section 321 of the 2004 National Defense Authorization Act (NDAA).

Attached is the latest version of a paper on how that can be economically achieved by 2014 with cooperation and collaboration among partner agencies.

If you have any questions, or want more detail, please let me know.

[REDACTED]

----- Original Message -----

From: TFO_SPRNCA_RMP, BLM_AZ

To: undisclosed-recipients:

Sent: Monday, September 16, 2013 6:11 PM

Subject: Thank you for your participation

Hello:

Thank you to everyone who participated in the Educational Forums and Scoping Meetings over the past two months! The Educational Forums provided a rich background on the broad array of resource issues that will be addressed in the Resource Management Plan. We welcomed more than 100 participants over the five forum series, and heard from 21 experts on the topics of Water and Riparian Resources, Watershed and Rangeland Management, Wildlife and Special Status Species, Cultural and Paleontological Resources, Recreation, and Socioeconomic issues. We also hosted open scoping meetings in Tucson, Benson, and Sierra Vista. Videos of every educational forum presentation are available on the [Tumblr website](#). All presentations can be [downloaded here](#).

Please remember that the official scoping period ends on **September 27, 2013**. Make sure to get your comments in by then to ensure they will be considered in the scoping report. You can submit by email, fax, or mail ([more info here](#)).

What's Next?

We will be taking a short break from public engagements until after the scoping period ends. We anticipate the draft issues around the middle of October. At that time we will begin reaching out again to convene "Issue Groups" to further explore the issues outlined in the scoping report. The issue groups will be open to anyone who wishes to participate. The work of the issue groups will inform the development of the management alternatives for the Draft Resource Management Plan/Draft Environmental Impact Statement. To ensure you receive information about the Issue Groups, please make sure you are on our mailing list (send an email to: blm_az_tfo_sprnca_rmp@blm.gov with your name and contact information)

We at the BLM are looking forward to the next phase of the San Pedro Riparian National Conservation Area Resource Management Plan development. As always, please feel free to contact us with any questions, suggestions or comments (amarkstein@blm.gov or blm_az_tfo_sprnca_rmp@blm.gov).

Regards,

The BLM Planning Team

--

Amy Markstein
Assistant Planner--SPRNCA RMP
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3201 E. Universal Way
Tucson, AZ 85756
amarkstein@blm.gov
520-258-7231

More information at:
[BLM e-Planning SPRNCA](#)
[Tumblr](#)
[Facebook](#)



USPP Restore & Maintain the Sustainable Yield R14b.doc
700K

Submission for 2013 RMP for SPRNCA - ATTACHMENT

Observations of site, **BLM property on river** - GPS Coordinates: LAT 31.852, LONG -110.209

PROPERTY LINE MARKER AT EDGE OF BLM: "GPS LAND SURVEY, 1999, R.L.S. 28737"

Issues for this location ("*BLM Location*"):

- Desiccation cracks



- Signs of grazing



- Soil and bank erosion.



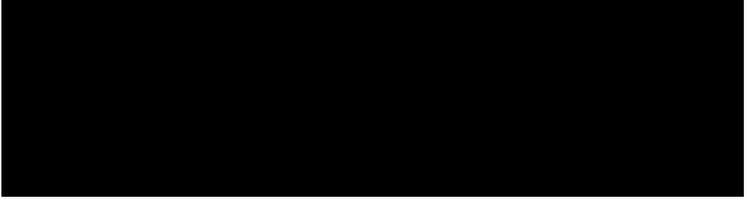
Suggestion:

- Re-vegetate the area and prohibit grazing.

SPRNCA:

To preserve SPRNCA I think the following should be done:

- Get a handle on groundwater pumping all along the river.
- Prohibit grazing on or near SPRNCA or the river.
- 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.



September 2, 2013

BLM Tucson Field Office
ATTN: Amy Markstein
3201 E. Universal Way
Tucson, AZ 85756

Dear Amy,

Public Comments on San Pedro Riparian National Resource Management Plan

At a time when we should be encouraging wise use of resources, we seem to be driven by fringe groups to remove resources from all uses other than eyeballing. Range Management is a major study and research area across most of the West with excellent results being shown to date in a number of locations. We have ranchers in the San Pedro Riparian Area who aspire to and actually implement excellent practices and rangeland improvements; ranchers with leased allotments who should be encouraged and rewarded for success.

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"?

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 and downstream lands.

You have good examples such as the Babocomari allotment; examples for further study and research along the San Pedro and replication; examples which could become case studies for private and public lands along the river.

I frankly do not understand how the removal of the allotments comport with your overall mission as an agency. Are you working with the Fish and Wildlife Service or another agency in regard to the grazing, since their mission is much more conservative in approach?

Having spent 35 years working in and managing National Parks, I have considerable experience working with BLM, USFS and USFWS and am confused by consideration of allotment removals.

Please reconsider your thought processes in regard to these allotments. BLM has an opportunity to take advantage of positive range management **and research along the San Pedro; don't let this become a difficult and unnecessary negative** along this beautiful river.

Thank you for your consideration and understanding.

[REDACTED]