

Appendix 2 – Public Scoping Comments

Public scoping for this RMPA/EA was initiated with the publication of a Notice of Intent in the *Federal Register* on March 26, 2020 (Vol. 89, No. 59, 17095). The 30-day public scoping period ended on April 27, 2020.

For privacy, emails or letters from individuals not representing themselves as from an organization, we have redacted the individuals email address, mailing address, and phone number. For organizations, we are providing the comment email or letter in their entirety.

Some commenters sent duplicate comments to the BLM (i.e. commenter sent comments via email and electronically through ePlanning). Where duplicated comments were identical, they are not included in this Appendix.

Some organizations also provided copies of literature or references cited in their letters. These attachments are available upon request and are not included in this Appendix.

[EXTERNAL] Please protect the Sonoran Desert National Monument -- It's your MISSION!

[REDACTED]
Wed 4/22/2020 4:50 PM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

Hello,

In 2007, during the George W. Bush administration, the manager of the Sonoran Desert National Monument [determined](#) that livestock grazing was **incompatible** with protecting the scenic, recreational, and wildlife resources of the monument.

It's clear that livestock don't belong in the Sonoran Desert National Monument. But once again, the BLM is trying to expand livestock grazing in the monument.

I urge the agency to prioritize the protection of wildlife – including the Sonoran desert tortoise and Sonoran pronghorn – over livestock industry profits. That is your mission, after all!

Thanks for listening,

[REDACTED]

[EXTERNAL] Sonoran Desert National Monument

Denise Boggs <denise@conservationcongress-ca.org>

Wed 4/22/2020 7:05 PM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

Only Alternative B, the "No Grazing" alternative, complies with the BLM's requirements to protect the natural resources found in the monument.

Livestock grazing is not compatible with protecting

- Functioning desert ecosystems;
- Diversity of plant and animal species;
- Saguaro cactus forest;
- Scientific analysis of plant species and climates in past eras;
- Vegetation communities;
- Wildlife; and
- Archeological and historic sites.

Denise Boggs, Director

Conservation Congress

www.conservationcongress-ca.org

Beware the beast man, for he is the Devil's pawn. Alone among God's primates, he kills for sport or lust or greed. Yea, he will murder his brother to possess his brother's land. Let him not breed in great numbers, for he will make a desert of his home and yours.

~ Planet of the Apes (1968)

[EXTERNAL] Cows do not belong in National monuments

Wed 4/22/2020 6:35 PM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

With 4% wildlife living in the wild, 96% of animals are animal agriculture and ranching, long term drought for decades, habitat loss, human population growth, climate challenges like lack of water, pollution of air, soil, water, 6th mass extinction, and more, there is no good reason to allow cattle grazing in parks.

Please stop allowing and do what is right for nature, which humans and non-humans need to survive. Current pandemic is an opportunity to reassert kinder, gentler ways of land use. Our lives depend on healthy choices.

Thank you for your consideration, compassion and empathy.

Sent from Samsung Galaxy smartphone.

[EXTERNAL] Sonoran Desert National Monument

Wed 4/22/2020 7:07 PM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

Happy Earth Day! Thanks for considering my comment.

In light of ongoing drought and climate change impacts, eliminating grazing from the entire monument is the only responsible and legal choice.

Only Alternative B, the "No Grazing" alternative, complies with the BLM's requirements to protect the natural resources found in the monument.

Natural resources like saguaro cactus and a diversity of plant and animal species are important to me and my family. Archeological and historic sites are important to everyone.

Please protect the Monument and the irreplaceable resources it contains. I urge you to select Alternative B.

Thanks so very much,



Tucson, AZ

[EXTERNAL] Sonoran desert

[REDACTED]

Wed 4/22/2020 5:50 PM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

Please do not let livestock compromise the health of the Sonoran Desert National Monument. The public relies on you to prioritize the protection of the landscape and sensitive animals such as the Sonoran pronghorn and desert tortoise.

It's not appropriate for a business to operate on public land.

Thank you

[REDACTED]

[EXTERNAL] Protect the Sonoran Desert National Monument

Wed 4/22/2020 7:56 PM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

Livestock doesnâ€™t belong in the Sonoran Desert National Monument and I expect your agency to prioritize the protection of wildlife â€” like the Sonoran desert tortoise and Sonoran pronghorn â€” over livestock industry profits.

The desert is just beginning to recover from over a century of livestock grazing industry abuses and the land must be allowed to continue to heal. The Monument, located on the ancestral lands of the Oâ€™odham, Yavapai Apache, Cocopah, and Hohokam people, is treasured for its cultural resources, and these should be protected from grazing abuses.

[EXTERNAL] Sonoran Desert National Monument

Wed 4/22/2020 5:12 PM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

Dear Folks at BLM:

Please rethink the grazing permits which allow cattle on desert lands. This is counter to what cattle grazing should be. Cows eat grass, and when the land is classified as desert, very little, if any, grass grows - requiring use of limited water, or permitting destruction of plants thriving in desert.

It is important, for you as Land Managers, to demonstrate your expertise in managing lands as they are equipped to be managed. It is counterintuitive to graze any livestock in any desert, in the same way it would be to sell fishing licenses, or to attempt to grow aquatic plants in lands ill-equipped to support such.

We know, from personal experience, how destructive livestock can be to land, with the areas supporting such needing to be closely monitored. We have also witnessed a lack of oversight due to declining budgets, and reduced manpower. It therefore seems logical to find alternative, more appropriate sites for grazing.

Thank you for reconsidering this action.



[EXTERNAL] Cattle do not belong in the Sonoran Desert National Monument
Wed 4/22/2020 5:35 PM**To:** PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

Lower Sonoran Desert is a fragile place and damage lasts a long time. It also also extremely low amounts of forage per acre. Allowing such extensive damage caused by cattle grazing for absurdly low amounts of production is just plain stupid and should not be considered on public lands, and especially not on the Sonoran Desert National Monument. It causes extensive problems for recreational users as well. There are innumerable issues such as more fences, reduced hunting opportunities, less wildlife production, problems with flies, smelly campsites, mooing cows, cow shit, dust pits, erosion, killing of iconic plants such as saguaros and others, annoying gates, dead wildlife, destruction of archaeological sites, among many other degradations.

Please do not allow cattle grazing on the Sonoran Desert National Monument. I support Alternative B, no cattle grazing.


Tucson, AZ

=====



[EXTERNAL] Sonoran Desert

[REDACTED]

Wed 4/22/2020 5:10 PM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

Do not allow grazing on this land, by allowing grazing you are forsaking the Sonoran Desert Tortoise and the Sonoran Pronghorn. Why are you going backwards. The BLM has much for which to answer.

[REDACTED]

Sandy Hook, CT

Sent from my iPad

[EXTERNAL] Sonoran Desert National Monument

[REDACTED]

Wed 4/22/2020 6:08 PM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

We urge BLM to implement Alternative B

Livestock grazing is not compatible with protecting:

- Functioning desert ecosystems;
- Diversity of plant and animal species;
- Saguaro cactus forest;
- Scientific analysis of plant species and climates in past eras;
- Vegetation communities;
- Wildlife; and
- Archeological and historic sites.

[REDACTED]

[EXTERNAL] Fwd: TAKE ACTION: Help protect the Sonoran Desert National Monument

[REDACTED]
Wed 4/22/2020 5:48 PM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

i do not favor your proposal at all at blm. please see my full comments below. i heard about this from western watersheds and i am appalled. i tried to origianllky send my comments to you but evidently it did not go through so i am sending it again.

----- Forwarded message -----

From: **Erik Molvar** <emolvar@westernwatersheds.org>

Date: Wed, Apr 22, 2020 at 12:40 PM

Subject: Re: TAKE ACTION: Help protect the Sonoran Desert National Monument

To: [REDACTED]

Hi [REDACTED]

Make sure you put the BLM's email in your "To" field; you accidentally send your comment to WWP, rather than to BLM.

Erik Molvar
Executive Director
Western Watersheds Project
319 South 6th Street
Laramie WY 82070
(307) 399-7910

...
P.O. Box 1770
Hailey, ID 83333

On Apr 22, 2020, at 10:38 AM, [REDACTED] wrote:

BLM_AZ_PDO_SDNMGrazing@blm.gov

public ommeng on this attack on the land owned by 330,000,000 americans.

robber baron grazer profiteers want to use all our national land for their own profigteering,. they dont own this land. we do.

i am not in favor of any of this turning over of ur land to these grazing profiteers and miners etc. i am in favor oa preserving nature and respecting the wild nature that exists there. i like the wild horses, and the wildlife that need this land to sustain their populations. get the rotten robber baron cattle profiuters off our national land., this comment ius for this issue. [REDACTED] [REDACTED]

On Wed, Apr 22, 2020 at 12:31 PM Western Watersheds Project

<wwp@westernwatersheds.org> wrote:

[View this email in your browser](#)

TAKE ACTION! Help Protect the Sonoran Desert National Monument

Photo, BLM Courtesy Flickr Creative Commons

When President Clinton established the Sonoran Desert National Monument in 2001, the [proclamation](#) was explicit about how the Bureau of Land Management (BLM) should manage livestock: Parts of [the monument](#) would be permanently closed to livestock, and grazing should be permitted in the remaining areas unless the agency could demonstrate that grazing was *compatible* with resource protection.

In 2007, the Monument Manager [determined](#) that livestock grazing was incompatible with protecting the scenic, recreational, and wildlife resources of the monument, but in 2012 the BLM approved a Resource Management Plan that allowed grazing to continue in sensitive areas of the monument. WWP and the Sierra Club – Grand Canyon Chapter, represented by Advocates for the West, sued the BLM in 2013 over their unwise decision to put cows in the desert, and we won. The court ordered them to reconsider their bad plan to continue grazing on some parts of the monument.

Now, unfortunately, it seems the BLM's "reconsideration" has led them [once again](#) to try to expand livestock grazing on these arid lands instead of doing their job and protecting the Monument by announcing a scoping period for a new plan. It's irresponsible, unscientific, and unlawful.

You can help support healthy, livestock-free desert ecosystems by [submitting comments](#) by April 27, 2020.

Contact the BLM and let them know that livestock don't belong in the Sonoran Desert National Monument and that you expect the agency to prioritize the protection of wildlife – like the Sonoran desert tortoise and Sonoran pronghorn – over livestock industry profits.

The desert is just beginning to recover from over a century of livestock grazing industry abuses and the land must be allowed to continue to heal. The Monument, located on the ancestral lands of the O'Odham, Yavapai Apache, Cocopah, and Hohokam people, is treasured for its cultural resources, and these should be protected from grazing abuses.

Let BLM know that livestock grazing is not compatible with protecting:

- Functioning desert ecosystems;
- Diversity of plant and animal species;
- Saguaro cactus forest;
- Scientific analysis of plant species and climates in past eras;
- Vegetation communities;
- Wildlife; and
- Archeological and historic sites.

You can email your thoughts, recommendations, and comments to BLM_AZ_PDO_SDNMGrazing@blm.gov or submit them [online here](#). Tell the BLM that only Alternative B, the "No Grazing" alternative, complies with the BLM's requirements to protect the natural resources found in the monument.

Let them know that in light of ongoing drought and climate change impacts, eliminating grazing from the entire monument is the only responsible and legal choice.

Your voice matters! Please contact cyndi@westernwatersheds.org with any questions.

☐☐☐

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Western Watersheds Project is a West-wide regional conservation organization working to protect and restore western watersheds and wildlife. Consider joining Western Watersheds Project yourself, or enrolling a friend with a gift membership. Joining is easy at WWP's secure online membership page.

Be sure to visit the WWP web site at <http://www.westernwatersheds.org>.

Our mailing address is:

Western Watersheds Project
126 S Main St, Ste B2
PO Box 1770
Hailey, ID 83333

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[EXTERNAL] No grazing in the Sonoran Desert National Monument

Wed 4/22/2020 5:55 PM

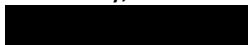
To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

Dear BLM:

The scientific evidence is clear: livestock grazing is detrimental to Sonoran Desert ecosystems. National Monuments belong to the people of the USA and should be managed according to solid ecological principles. Livestock should NOT be allowed within this Monument. As an ecologist in the US Southwest for over 30 years, I have personally witnessed the short-term and long-term damage that livestock have caused on these sensitive arid and semiarid ecosystems. The time period for recovery, once livestock are removed, is long. I urge you to follow the science and keep the livestock off of these lands.

Thank you.

Sincerely,



Phoenix AZ 85041

Figure 1 - Planning Area

Submission Successful
Your Submission ID is: SDNM_SCOP-1-500091163

Names & Addresses

[REDACTED]

Agency: Public Web Page

Comments

Comment 1

ID:

Comment

Title:

Comments on changes of grazing regulations

I support only Alternative B, the "No Grazing" alternative, since this is the only alternative that complies with the BLM's requirements to protect the natural resources found in the monument.

In light of ongoing drought and climate change impacts, eliminating grazing from the entire monument is the only responsible and legal choice.

Livestock don't belong in the Sonoran Desert National Monument. The desert is just beginning to recover from over a century of livestock grazing industry abuses and the land must be allowed to continue to heal. The Monument, located on the ancestral lands of the O'Odham, Yavapai Apache, Cocopah, and Hohokam people, is treasured for its cultural resources, and these should be protected from grazing abuses.

Livestock grazing is not compatible with protecting:

- Comment:
- Functioning desert ecosystems;
 - Diversity of plant and animal species;
 - Saguaro cactus forest;
 - Scientific analysis of plant species and climates in past eras;
 - Vegetation communities;
 - Wildlife; and
 - Archeological and historic sites.

I expect the BLM to prioritize the protection of wildlife – like the Sonoran desert tortoise and Sonoran pronghorn – over livestock industry profits.

Thank you for your consideration of these comments.

Submission Classification

Response Type:	Front Office Submission Form
Delivery Type:	Front Office Submission Form
Receipt Date:	04/22/2020
Status:	ACTIVE

Agreements

Yes - Withhold personally identifying information from future publications on this project?

No - Please include me on the mailing list for this project?

Original Submission Files

Figure 1 - Planning Area

Submission Successful
Your Submission ID is: SDNM_SCOP-1-500091162

Names & Addresses

Email Address:

Day Phone:

Agency: Public Web Page

Comments

Comment 1
ID:

As a botanist I know how much damage unregulated and excess cattle can do in an ecosystem. Cattle should not be allowed in our beautiful public lands. Cattle ranchers are people that raise cattle for profit in their own ranches. Crucial words: in their ranches. Please remove cattle from this fragile ecosystem. Whether you know it or not it is being impoverished day by day. Remove cattle from it. Thank you

Submission Classification

Response Type: Front Office Submission Form

Delivery Type: Front Office Submission Form

Receipt Date: 04/22/2020

Status: ACTIVE

Agreements

No - Withhold personally identifying information from future publications on this project?

No - Please include me on the mailing list for this project?

Original Submission Files

Figure 1 - Planning Area

Submission Successful
Your Submission ID is: SDNM_SCOP-1-500091156

Names & Addresses

[REDACTED]

Agency: Public Web Page

Comments

Comment ₁
ID:

Comment
Title: Alternative B: No Grazing

The BLM is charged with protecting the wildlife, ecosystem health, and cultural resources of the Sonoran Desert
Comment: National Monument. Since studies have proven that livestock grazing is incompatible with this mission, grazing should not be allowed. Alternative B: No Grazing is the only legal (and ethical) alternative.

Submission Classification

Response Type: Front Office Submission Form
Delivery Type: Front Office Submission Form
Receipt Date: 04/22/2020
Status: ACTIVE

Agreements

No - Withhold personally identifying information from future publications on this project?
No - Please include me on the mailing list for this project?

Original Submission Files

[EXTERNAL] DOI-BLM-AZ-P040-2020-0001-EA (Sonoran Desert National Monument Resource Management Plan Amendment/Environmental Assessment)

Ed Larue <ed.larue@verizon.net>

Wed 4/22/2020 8:54 PM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

 1 attachments (231 KB)

Sonoran Desert National Monument.4-22-2020.pdf;

Dear Mr. Whitbeck,

Please find attached formal comments on the above-referenced project from the Desert Tortoise Council.

Thanks!

Ed



DESERT TORTOISE COUNCIL

4654 East Avenue S #257B

Palmdale, California 93552

www.deserttortoise.org

eac@deserttortoise.org

Via email only

22 April 2020

Doug Whitbeck, Range Management Specialist
Bureau of Land Management, Lower Sonoran Field Office
21605 N 7th Avenue
Phoenix, Arizona 85027
BLM_AZ_PDO_SDNMGrazing@blm.gov

RE: DOI-BLM-AZ-P040-2020-0001-EA (Sonoran Desert National Monument Resource Management Plan Amendment/Environmental Assessment)

Dear Mr. Whitbeck,

The Desert Tortoise Council (Council) is a non-profit organization comprised of hundreds of professionals and laypersons who share a common concern for wild desert tortoises and a commitment to advancing the public's understanding of desert tortoise species. Established in 1975 to promote conservation of tortoises in the deserts of the southwestern United States and Mexico, the Council routinely provides information and other forms of assistance to individuals, organizations, and management and regulatory agencies on matters potentially affecting desert tortoises within their geographic ranges.

We appreciate this opportunity to provide comments on the above-referenced project. Given the location of the Sonoran Desert National Monument (SDNM) planning area in habitats occupied by Morafka's desert tortoise (*Gopherus morafkai*) (synonymous with "Sonoran desert tortoise"), our comments pertain to the need for increased study of the Sonoran desert tortoise population densities and considerations of the effect of grazing on this species in the Bureau of Land Management's (BLM's) scoping process.

BLM Proposed Action: The BLM has opened comment on the scoping process for implementation of the Sonoran Desert National Monument, which will be located southwest of the city of Phoenix. The intent of this process is to review the concerns about and impacts of grazing on the SDNM. These concerns will be considered in the evaluation of the proposed action and reasonable alternatives. We appreciate that BLM's policy is to involve the public in this process.

Scoping Comments: The SDNM is located in prime habitat for *Gopherus morafkai*, which is a BLM sensitive species and classified as a “species of greatest conservation need” by the state of Arizona. During the scoping process, we ask for detailed analysis to be performed on the effect of the proposed actions on Sonoran desert tortoise populations and their habitats. And in the outlining of the proposed action and its alternatives, we ask that the options limit or exclude grazing in the areas most relevant to tortoises. Scientific literature continues to suggest that livestock grazing has a detrimental impact on tortoises, including direct mortality, reduction of forage opportunities, soil compaction, etc. (Allison and McLuckie 2018; USFWS 2018).

Issues and Recommendations: As the BLM reviews grazing and management options for the SDNM, we ask them to focus on the following items.

(1) Focus on Managing Lands for Livestock Grazing – Under 43 Code of Federal Regulation (CFR) 4180.1, BLM is directed to ensure that the following conditions of rangeland health exist:

- (a) Watersheds are in, or are making significant progress toward, properly functioning physical condition, including their upland, riparian-wetland, and aquatic components; soil and plant conditions support infiltration, soil moisture storage, and the release of water that are in balance with climate and landform and maintain or improve water quality, water quantity, and timing and duration of flow.
- (b) Ecological processes, including the hydrologic cycle, nutrient cycle, and energy flow, are maintained, or there is significant progress toward their attainment, in order to support healthy biotic populations and communities.
- (c) Water quality complies with State water quality standards and achieves, or is making significant progress toward achieving, established BLM management objectives such as meeting wildlife needs.
- (d) Habitats are, or are making significant progress toward being, restored or maintained for Federal threatened and endangered species, Federal Proposed, Federal candidate and other special status species.

Of these, (a), (b), and (d) apply to desert tortoises.

BLM in Arizona has developed Arizona Standards for Rangeland Health. We interpret the *Arizona Standards for Rangeland Health and Guidelines for Grazing Administration's* (BLM 1997, herein “Standards and Guidelines”) as protecting habitats on which tortoises rely, as follows:

Standard 3: Desired Resource Conditions

Desired Resource Conditions – Productive and diverse upland and riparian-wetland plant communities of native species exist and are maintained.

Criteria for meeting Standard 3:

Desired plant community objectives will be developed to assure that soil conditions and ecosystem function described in Standards 1 and 2 are met. They detail a site-specific plant community, which when obtained, will assure rangeland health, State water quality standards, and *habitat for endangered, threatened, and sensitive species* [emphasis added], as the Mojave desert tortoise is threatened and the Sonoran desert tortoise is a BLM sensitive species. Thus, desired plant community objectives will be used as an indicator of ecosystem function and rangeland health.

Guidelines:

3-2. Conservation of Federal threatened or endangered, proposed, candidate, and other special status species is promoted by the maintenance or restoration of their habitats.

It is necessary for BLM to identify and evaluate specific attributes of the environment that are needed by tortoises for their survival, growth, reproduction, and recruitment, as required under 43 CFR 4180.1(d). For example, desert tortoises forage on native herbaceous vegetation and need plant species with a high water and protein content, but low potassium content (Ofstedal et al. 2002). Therefore, including these in the evaluation of rangeland health is important.

In general, when given a choice between foraging on native annual herbaceous or woody plant species, cattle select herbaceous plants. We note that BLM issues grazing permits for ephemeral forage in certain allotments during some years. We conclude that it should be important to BLM to determine the species diversity and abundance of native annual herbaceous plants to accurately assess rangeland health for both tortoises and livestock. We request that an assessment of plant species diversity and abundance for native and non-native annual herbaceous plants be added to the methodology for determining rangeland health to comply with 43 CFR 4180.1(d).

Sonoran Desert Tortoise Candidate Conservation Agreement: The Arizona BLM is signatory to the Sonoran Desert Tortoise Candidate Conservation Agreement (USFWS et al. 2015). One of the protective measures is to “Ensure adequate forage remains for SDT (Sonoran desert tortoise) following ephemeral use periods.” The agreement has several other measures related to grazing and other land use and management activities. For example, we request that BLM explain in their proposed and alternative actions how Desired Plant Community, Desired Future Condition, invasive plant management, and maintenance or restoration of habitat connectivity (USFWS et al. 2015) are incorporated in the Standards. Through the range health evaluation procedures, BLM should specify how it is ensuring that there is adequate forage quantity and nutritional quality for the Sonoran desert tortoise so that growth, reproduction, and recruitment will occur for this species.

We appreciate this opportunity to provide input and trust that our comments will help protect tortoises during any authorized project activities. Herein, we ask that the Desert Tortoise Council be identified as an Affected Interest for this and all other BLM projects that may affect species of desert tortoises, and that any subsequent environmental documentation for this particular action is provided to us at the contact information listed above.

Regards,



Edward L. LaRue, Jr., M.S.

Desert Tortoise Council, Ecosystems Advisory Committee, Chairperson

Literature Cited

Allison LJ, McLuckie AM. Population trends in Mojave Desert tortoises (*Gopherus agassizii*). *Herpetological Conservation and Biology*. 2018 Aug 1;13(2):433-52.

[BLM] Bureau of Land Management. 1997. Arizona standards for rangeland health and guidelines for grazing administration. Dated April 28, 1997.

Oftedal, O., S. Hillard, and D. Morafka. 2002. Selective Spring Foraging by Juvenile Desert Tortoises (*Gopherus agassizii*) in the Mojave Desert: Evidence of an Adaptive Nutritional Strategy. *Chelonian Conservation and Biology* 2002; 4(2):341-352.

[USFWS] U. S. Fish and Wildlife Service. 2015. Candidate Conservation Agreement for the Sonoran Desert Tortoise (*Gopherus morafkai*) in Arizona, Phoenix AZ.

[USFWS] U.S. Fish and Wildlife Service. 2018. Range-wide Monitoring of the Mojave Desert Tortoise (*Gopherus agassizii*): 2017 Annual Reporting. Report by the Desert Tortoise Recovery Office, U.S. Fish and Wildlife Service, Reno, Nevada.

[EXTERNAL] Livestock Grazing Sonora Monument

[REDACTED]

Wed 4/22/2020 9:02 PM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

Please do not even think of allowing grazing on the monument. Let the land to finish healing! Thank You

[REDACTED] life member wild sheep foundation——

Sent from my iPhone

Figure 1 - Planning Area

Submission Successful
Your Submission ID is: SDNM_SCOP-1-500091347

Names & Addresses

[Redacted]
[Redacted]
[Redacted]
Email Address: [Redacted]
Day Phone: [Redacted]
Agency: [Redacted] Public Web Page

Comments

Comment 1
ID:

Comment Title: Biologist with comments

As someone who has often been to the Sonoran Desert Monument, I write to object to permitting cattle on the monument. The only alternative that I support is the No Grazing alternative. Your job is to protect the wildlife and scenic beauty of the place, not to enrich cattle owners. Please do not permit cattle grazing anywhere on the monument but especially on those portions that were set aside long ago for wildlife and recreation.

Submission Classification

Response Type: Front Office Submission Form
Delivery Type: Front Office Submission Form
Receipt Date: 04/22/2020
Status: ACTIVE

Agreements

No - Withhold personally identifying information from future publications on this project?
Yes - Please include me on the mailing list for this project?

Original Submission Files

Figure 1 - Planning Area

Submission Successful
Your Submission ID is: SDNM_SCOP-1-500091172

Names & Addresses

[REDACTED]
[REDACTED]
[REDACTED]
Email Address: [REDACTED]
Fax Number: [REDACTED]
Agency: [REDACTED] Public Web Page

Comments

Comment ₁
ID:

Comment
Title: Sonoran Desert National Monument

The desert is just beginning to recover from over a century of livestock grazing industry abuses and the land must be allowed to continue to heal. The Monument, located on the ancestral lands of the O'Odham, Yavapai Apache, Cocopah, and Hohokam people, is treasured for its cultural resources, and these should be protected from grazing abuses.

Comment: In 2007, the Monument Manager determined that livestock grazing was incompatible with protecting the scenic, recreational, and wildlife resources of the monument, but in 2012 the BLM approved a Resource Management Plan that allowed grazing to continue in sensitive areas of the monument. WWP and allies sued the BLM in 2013 over their unwise decision to put cows in the desert, and we won.

Now, unfortunately, it seems the BLM's "reconsideration" has led them once again to try to expand livestock grazing on these arid lands.

Submission Classification

Response Type: Front Office Submission Form
Delivery Type: Front Office Submission Form
Receipt Date: 04/22/2020
Status: ACTIVE

Agreements

No - Withhold personally identifying information from future publications on this project?

Yes - Please include me on the mailing list for this project?

Original Submission Files

Figure 1 - Planning Area

Submission Successful
Your Submission ID is: SDNM_SCOP-1-500091171

Names & Addresses

[REDACTED]
[REDACTED]
[REDACTED]

Email Address:

Day Phone:

Agency: Public Web Page

Organization/Group: TAKE ACTION 4 HORSES Position: GET CATTLE/SHEEP OFF AMERICANS LAND !

Comments

Comment 1

ID:

Comment

Title: NO CATTLE/SHEEP GRAZING SONORAN DESERT COMMENTS ON SONORAN DESERT

ONLY- only Alternative B, the "No Grazing" alternative, complies with the BLM's requirements to protect the natural resources found in the monument.

Comment: Eliminate ALL grazing from the entire monument. STOP DESTROYING OUR WEST WITH CATTLE AND SHEEP
THEY ARE INVASIVE SPECIES! CATTLE & sheep grazing destroy the entire ecosystem. Make cattle/ sheep
ranchers stop mooching off taxpayers and get their own land if they want to graze cattle and sheep ! I also demand
they be held responsible for all the damage they have done and that BLM employees be fired who allow cattle
ranchers / sheep ranchers to destroy our public lands, monuments. parks and forests.

Submission Classification

Response Type:

Front Office Submission Form

Delivery Type:

Front Office Submission Form

Receipt Date:

04/22/2020

Status:

ACTIVE

Agreements

No - Withhold personally identifying information from future publications on this project?

Yes - Please include me on the mailing list for this project?

Original Submission Files

Figure 1 - Planning Area

Submission Successful
Your Submission ID is: SDNM_SCOP-1-500091350

Names & Addresses

[REDACTED]
[REDACTED]
[REDACTED]
Email Address: [REDACTED]
Agency: [REDACTED] Public Web Page

Comments

Comment 1
ID:

Comment Title: Sonoran Desert National Monument comment

I favor alternative B as the ONLY one which will protect the Sonoran Desert Nat'l Monument natural resources.

Comment: Grazing, especially in this time of extended drought, is harmful to all of the values that BLM is charged to protect.
The is a national monument....not a feedlot.

Submission Classification

Response Type: Front Office Submission Form
Delivery Type: Front Office Submission Form
Receipt Date: 04/22/2020
Status: ACTIVE

Agreements

No - Withhold personally identifying information from future publications on this project?
Yes - Please include me on the mailing list for this project?

Original Submission Files

Figure 1 - Planning Area

Submission Successful
Your Submission ID is: SDNM_SCOP-1-500091353

Names & Addresses

[REDACTED]

Agency: Public Web Page

Comments

Comment 1

ID:

Comment

Title: Grazing in Sonoran Desert National Monument

Livestock don't belong in the Sonoran Desert National Monument! The desert is just beginning to recover from over a century of livestock grazing industry abuses and the land must be allowed to continue to heal.

Due to the ongoing drought and climate change impacts, Alternative B which would eliminate grazing from the entire monument, is the only responsible and legal choice because it complies with the BLM's requirement to protect the natural resources found in this monument.

I expect the agency to prioritize the protection of wildlife – like the Sonoran desert tortoise and Sonoran pronghorn – over livestock industry profits.

Submission Classification

Response Type:	Front Office Submission Form
Delivery Type:	Front Office Submission Form
Receipt Date:	04/22/2020
Status:	ACTIVE

Agreements

Yes - Withhold personally identifying information from future publications on this project?

No - Please include me on the mailing list for this project?

Original Submission Files

[EXTERNAL] No Grazing in the Monument



Thu 4/23/2020 12:13 AM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

I'm smitten with the sonoran ecosystem and want to see native plants and animals and awesome saguaros when I visit, not cows.

How can we protect cultural resources from the trampling of cows?

This monument is inspiring wildlife, gorgeous plants, fascinating history and a diverse and fully functioning ecosystems, not a cow's supper.

Thanks.

[EXTERNAL] Comments

Thu 4/23/2020 2:28 AM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

BLM,

Alternative B is the only honest choice. The arid west, especially the Sonoran Desert ecosystem, especially the Sonoran Desert National Monument. ANY grazing by introduced domestic livestock would severely impact the fragile soils, wildlife, the public's enjoyment, archaeological sites and vegetation. It would be more cost effective to have it ungrazed as well, considering it takes five times as much money to administer it than what we get back in criminally low grazing fees.

Do the right thing. Choose Alternative B - NO GRAZING.



[EXTERNAL] Grazing on the Sonoran Desert National Monument

[REDACTED]

Thu 4/23/2020 1:19 AM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

The short answer is absolutely no. These are very dry, highly erodible lands that will take decades to recover, if ever. Domestic livestock have no place in that environment then or now. The long term climate model shows that general area will continue to get much drier and every effort needs to be made to protect what little is left. There is no data to support allowing domestic livestock to use any of that area.

[REDACTED]

[EXTERNAL] Mgmt Plan Comments

Thu 4/23/2020 12:34 AM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

I wish to respectfully submit comments on your management plan alternatives.

Alternative B, the No grazing alternative, is the only one that complies with BLMs requirements to protect the natural, cultural, and historic resources found in this monument.

I have a significant level of experience in regards to public land management, having worked for over 30 years for BLM in five western states, and 15 years at grand staircase Escalante national Monument - nine years as a manager there. The mission of the national conservation lands should not be compromised during a shift in any administration. Hold firm to mission. Over my career I observed many managers hold firm to mission through both Democratic and Republican administrations.

Livestock grazing is incompatible with the conservation purposes of this national monument, and causes adverse impacts to Sonoran desert tortoises and other native wildlife species. It also harms sensitive soils and vegetation, and increases the risk for the colonization and spread of invasive weeds that may change fire ecology in harmful ways.

This is not the time to kowtow to local counties or even the highest levels of an administration that does not respect science. Hold firm. Protect the national conservation lands for the American people, for now and for future generations. Hold firm.

Sent from CZ's iPhone; please embrace the typos

Figure 1 - Planning Area

Submission Successful
Your Submission ID is: SDNM_SCOP-1-500091373

Names & Addresses

[REDACTED]
[REDACTED]
[REDACTED]

Email Address:

Day Phone:

Agency: Public Web Page

Organization/Group: Andean Tapir Fund Position: Wildlife Ecologist

Comments

Comment 1

ID:

Comment

Title: Protect Sonoran Desert National Monument

Please do not allow livestock grazing in this national monument. I am an ecologist and have done studies in the Sonoran desert. It is replete with highly arid adapted plants and animals that complement one another but the cattle and sheep foisted upon this beautiful ecosystem only wreck this finely balanced marvel. Be true to earlier life respecting evaluations and opt for the alternative that eliminates the blind tradition of livestock grazing here where it is clearly incompatible. I would be pleased to send you my study upon request. Happy Earth Day!

Submission Classification

Response Type: Front Office Submission Form

Delivery Type: Front Office Submission Form

Receipt Date: 04/23/2020

Status: ACTIVE

Agreements

No - Withhold personally identifying information from future publications on this project?

Yes - Please include me on the mailing list for this project?

Original Submission Files

[EXTERNAL] Sonoran Desert National Monument

Thu 4/23/2020 8:03 AM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

Livestock don't belong in the Sonoran Desert National Monument.

As the BLM has determined, livestock grazing is incompatible with protecting the scenic, recreational, and wildlife resources of the monument.

I expect the agency to prioritize the protection of wildlife – and protection of the scenic and recreational resources – over livestock industry profits.

Alternative B, the “No Grazing” alternative, complies with the BLM’s requirements to protect the natural resources found in the monument.



Figure 1 - Planning Area

Submission Successful
Your Submission ID is: SDNM_SCOP-1-500091374

Names & Addresses

[Redacted]
[Redacted]
[Redacted]
Email Address: [Redacted]
Day Phone: [Redacted]
Agency: [Redacted] Public Web Page

Comments

Comment 1
ID:

Comment Title: Grazing is incompatible with protecting natural resources

I'm an Arizona native who grew up in the Sonoran Desert. I've read the proposed management plan amendment and EA and it's clear that only Alternative B complies with BLM's own requirements to protect the desert ecosystem, including plant and animal species, archaeological sites, and the saguaro forest.

Comment: Allowing grazing to resume inside the national monument would turn back the clock and render the monument essentially useless. BLM determined in 2007 that grazing is incompatible with proper management of the cultural and natural resources protected by the monument proclamation, and the fundamental facts that led to that proper determination have not changed.

[Redacted]
[Redacted]

Submission Classification

Response Type: Front Office Submission Form
Delivery Type: Front Office Submission Form
Receipt Date: 04/23/2020
Status: ACTIVE

Agreements

Yes - Withhold personally identifying information from future publications on this project?

Yes - Please include me on the mailing list for this project?

Original Submission Files



April 23, 2020

Mr. Doug Whitbeck
Range Management Specialist
Bureau of Land Management, Lower Sonoran Field Office
21605 N. 7th Avenue
Phoenix, Arizona 85027

Submitted online via BLM_AZ_PDO_SDNMGrazing@blm.gov

Re: Land Health Evaluation and Grazing Compatibility Analysis for Sonoran Desert National Monument's Resource Management Plan Grazing Amendment

Dear Mr. Whitbeck:

The Arizona Game and Fish Department (Department) has accepted formal Cooperating Agency (CA) status on the Environmental Assessment (EA) for the Sonoran Desert National Monument's (SDNM's) amendment to the Resource Management Plan (RMP) regarding grazing on allotments north of Interstate-8 within the monument. The Department understands that, consistent with Presidential Proclamation 7397 which designated the SDNM, grazing is only allowed to continue on Federal lands north of Interstate-8 to the extent that it is determined compatible with the protection of the objects identified in the proclamation.

Arizona Revised Statute (ARS) §17-102 codifies state ownership of wildlife. The Department, by and through the Arizona Game and Fish Commission, has public trust responsibility and primary authority to manage and regulate the take of wildlife within the state of Arizona irrespective of land ownership, excepting those wildlife existing on tribal trust-status lands. In addition, the Department manages threatened and endangered species through Section 6 authorities and the Department's 10(a)1(A) permit. It is the mission of the Department to conserve Arizona's diverse fish and wildlife resources and manage for safe, compatible outdoor recreation opportunities for current and future generations.

The Department provides the following comments and recommendations regarding the SDNM's Grazing Compatibility Analysis (GCA) and Updated Land Health Evaluation (LHE):

Land Health Evaluation

- Update the Environmental Review Tool (ERT) report and verify species distributions have not changed. The Department recommends ERT reports be generated within the last 6 months. Include the report Project ID # in the citation (i.e., HGIS - XXXXX).
- In the LHE Section 5.2, it is unclear in the document what the indicators used to determine BLM's land health objectives are. The Department recommends clarifying and

azgfd.gov | 928.342.0091

YUMA OFFICE: 9140 E. 28TH ST., YUMA AZ 85365

**GOVERNOR: DOUGLAS A. DUCEY COMMISSIONERS: CHAIRMAN, ERIC S. SPARKS, TUCSON | KURT R. DAVIS, PHOENIX | LELAND S. "BILL" BRAKE, ELGIN
JAMES E. GOUGHNOUR, PAYSON | TODD G. GEILER, PRESCOTT DIRECTOR: TY E. GRAY DEPUTY DIRECTOR: TOM P. FINLEY**

summarizing for the reader what the indicators used to determine BLM's land health objectives are specific to Arizona's Standards for Rangeland Health and how they are used to assure standards are being met. While the indicators, standards, and guidelines are discussed in depth in Appendix B to the GCA, a summary of those that are applicable to the LHE within the document itself would be helpful.

- Provide the source(s) for the wildlife movement corridor data presented in map 4.

Grazing Compatibility Analysis

- Provide the scientific name the first time a species is mentioned.
- The Department recently submitted comments regarding the Proposed Revision of BLM's Grazing Regulations (Title 43 Code of Federal Regulations Part 4100 - Grazing Administration Exclusive of Alaska). Those comments are also applicable to the referenced National Environmental Policy Act (NEPA) implementation actions regarding adjustments to livestock grazing management in Chapter 5.0. From that letter:

"The Department supports establishment of an adaptive management framework with management thresholds (triggers) that are both proactive and implementable to ensure BLM can preserve and maintain a thriving natural ecological balance... In many instances, the monitoring frequency is not sufficient to ensure timely implementation of management actions to address impending resource degradation. Proactive triggers that can be implemented quickly to address exceedance of the appropriate management level are essential to prevent degradation of the range, as well as other negative impacts to wildlife. The framework incorporates appropriately targeted, data driven, adaptive management that allows for adjustments to the appropriate management levels based on long-term changes in forage availability and trend changes in vegetation, soil, and riparian condition due to climate change, succession of vegetation communities, and other factors."

Thank you for the opportunity to comment on the Land Health Evaluation and Grazing Compatibility Analysis. If you have any questions or require any further information please contact Tyler Williford at Twilliford@azgfd.gov or (928) 341-4047.

Sincerely,



Michael Sumner
Regional Supervisor, Yuma

cc: Clay Crowder, Habitat, Evaluation, and Lands Branch Chief
Ginger Ritter, Project Evaluation Program Manager

AGFD # M20-03261434

[EXTERNAL] re graing in Sonoran Desert

Thu 4/23/2020 8:07 AM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

Livestock don't belong in the Sonoran Desert National Monument and that you expect the agency to prioritize the protection of wildlife – like the Sonoran desert tortoise and Sonoran pronghorn – over livestock industry profits.

The desert is just beginning to recover from over a century of livestock grazing industry abuses and the land must be allowed to continue to heal. The Monument, located on the ancestral lands of the O'Odham, Yavapai Apache, Cocopah, and Hohokam people, is treasured for its cultural resources, and these should be protected from grazing abuses.

Let BLM know that livestock grazing is not compatible with protecting:

- Functioning desert ecosystems;
- Diversity of plant and animal species;
- Saguaro cactus forest;
- Scientific analysis of plant species and climates in past eras;
- Vegetation communities;
- Wildlife; and
- Archeological and historic sites.



This is my first book and best seller. It is a how to book and covers just about everything i know.

Daily OM course – Discover How Your Animal is Your Healer and Teacher [hp .s://dailyom.com/cgi-bin/courses/courseoverview.cgi?cid=746](http://dailyom.com/cgi-bin/courses/courseoverview.cgi?cid=746)



[EXTERNAL] No cows



Fri 4/24/2020 3:50 PM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

Protect our wild lands

[EXTERNAL] No cows



Fri 4/24/2020 3:50 PM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

livestock grazing is not compatible with protecting:

- Functioning desert ecosystems;
- Diversity of plant and animal species;
- Saguaro cactus forest;
- Scientific analysis of plant species and climates in past eras;
- Vegetation communities;
- Wildlife; and
- Archeological and historic sites.

Protect our wild lands

[EXTERNAL] Wildlife



Sat 4/25/2020 2:56 PM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

Respect our American wildlife!!

[EXTERNAL] Sonoran Desert National Monument

Sat 4/25/2020 8:00 PM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

Livestock doesn't belong in the Sonoran Desert National Monument! I expect the agency to prioritize the protection of wildlife – like the Sonoran desert tortoise and Sonoran pronghorn – over livestock industry profits. THIS IS YOUR ACTUAL JOB.

Only Alternative B, the “No Grazing” alternative, complies with the BLM's requirements to protect the natural resources found in the monument. In light of ongoing drought and climate change impacts, **eliminating grazing from the entire monument is the only responsible and LEGAL choice. You have already been sued and lost over this issue.** Please stop wasting OUR money, and do your job.

The desert is just beginning to recover from over a century of livestock grazing industry abuses and the land must be allowed to continue to heal. The Monument, located on the ancestral lands of the O'Odham, Yavapai Apache, Cocopah, and Hohokam people, is treasured for its cultural resources, and these should be protected from grazing abuses.

Livestock grazing is not compatible with protecting:

- Functioning desert ecosystems;
- Diversity of plant and animal species;
- Saguaro cactus forest;
- Scientific analysis of plant species and climates in past eras;
- Vegetation communities;
- Wildlife; and
- Archeological and historic sites.

Thank you for acting on the only responsible and LEGAL choice.



[EXTERNAL] Sonoran Desert National Monument

Sat 4/25/2020 6:05 AM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

Dear BLM,

I am writing to urge you to select Alternative B (the no grazing alternative) for the Sonoran Desert National Monument. Livestock grazing is just no compatible with the desert. It is extremely destructive to vegetation, native wildlife, and archeological and historic sites.

Sincerely,



[EXTERNAL] My SDNM livestock grazing scoping comments

Sun 4/26/2020 3:31 PM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

April 26, 2020

RE: **My Sonoran Desert National Monument livestock grazing scoping comments**

Dear BLM officials:

Please accept, carefully review, and include in the relevant NEPA project file my following comments on the above-referenced matter.

By way of brief background, I have visited the Sonoran Desert National Monument (SDNM) and I deeply care about its proper management and protection.

As you know, the SDNM's natural resources face increasingly serious environmental threats. These threats include prolonged droughts from climate change, spread of invasive plants that increase natural fine fuel loads and thereby change fire ecology in potentially catastrophic ways, and increasing public visitation that may cause associated enforcement problems with widespread target shooting, poaching, vandalism of cultural sites, and off-road route proliferation.

As you also know, on January 17, 2001, the SDNM was designated by Presidential Proclamation 7397. BLM was entrusted with the solemn legal duty to manage the SDNM consistent with this Proclamation 7397, and to ensure protection of the named objects. In addition, Proclamation 7397 overtly states that "...grazing on Federal lands north of Interstate 8 shall be allowed to continue **only to the extent** that the Bureau of Land Management determines that **grazing is compatible** with the **paramount purpose of protecting the objects** identified in this proclamation (emphasis added)." The "objects" identified in the Proclamation for protection are:

Functioning desert ecosystems;
Diversity of plant and animal species;
Saguaro cactus forest;

Scientific analysis of plant species and climates in past eras;
Vegetation communities;
Wildlife; and
Archeological and historic sites.

In 2007, the BLM SDNM Monument Manager **properly determined** that livestock grazing was **incompatible** with protecting these specified "objects" and other scenic, recreational, and wildlife resources on the SDNM. However, because BLM appallingly tends to put ranchers' interests above the law and science, BLM approved a Resource Management Plan that allowed grazing to continue in sensitive areas of the SDNM. Environmental groups then sued to challenge these improper plan decisions, and won.

On March 31, 2016, the U.S. District Court accurately ruled that BLM was arbitrary and did not provide adequate explanations for determining livestock grazing compatibility on the SDNM in the 2012 Resource Management Plan/Record of Decision. On May 6, 2016, the Court ordered BLM to complete a new Land Health Evaluation (LHE) and grazing compatibility determination and incorporate those decisions into the 2012 Resource Management Plan by September 30, 2020.

Since this ruling, the BLM developed a new LHE. There was apparently a previous comment period on this new LHE, but I do not recall receiving any public notice of that comment opportunity, despite my longstanding interest in BLM NEPA matters in Arizona and other western states. With this new LHE in hand, BLM is now proceeding with a possible resource management plan amendment/environmental assessment (RMPA/EA). This would presumably respond to the Court ruling and evaluate whether any allotments north of Interstate-8 (I-8) within the SDNM would be 'available' or 'unavailable' for livestock grazing, and whether any changes are needed to Animal Unit Months (AUMs) and/or management actions. The Planning Area consists of about 252,460 acres of public land managed by the BLM within the SDNM north of I-8.

As you know, the "heart" of the NEPA EA process is the objective identification and detailed analysis of a reasonable range of alternatives to meet the purpose and need for action. In this specific SDNM case, the purpose and need for action is to respond to the Court order and determine whether any of the existing livestock grazing related management decisions conflict with the Proclamation or "object" protection, and, if so, how those decisions should properly be cancelled,

reversed, or revised. The EA alternatives must therefore be consistent with the intent of Proclamation 7397 and protection of the specified "objects" therein. BLM does not have discretion to consider approving livestock grazing or any other authorized use that could potentially conflict with the intent of Proclamation 7397 or potentially harm one or more of the specified "objects." Indeed, if the science shows that livestock grazing is harmful, then BLM is unable to legally continue that authorized use. Moreover, BLM has other legal or policy requirements to follow, such as to ensure protection of Endangered Species Act listed or other so-called "special status" species like the Sonoran desert tortoise and Sonoran pronghorn. Livestock obviously feed on many of the same native plants that these tortoises, pronghorn, and other wildlife species need to eat to survive. So this competition must be recognized, and SDNM wildlife species given the benefit of any management doubt. Plus cattle may get supplemental hay if the natural forage is not sufficient, but wildlife must rely solely on the natural forage to live.

As previously noted, the SDNM is facing increasing environmental threats and stresses. Without even adding livestock grazing to the mix, these threats and stresses will pose huge management challenges for BLM, an agency that is chronically short on adequate funding and staff. Will BLM be able to be proactive and effective in addressing these challenges, or (more likely) will BLM remain largely reactive and ineffective as many SDNM resources and species decline? How can BLM make future vegetation monitoring and management commitments when it does not know what its future funding and staffing levels may be, nor what other higher management priorities may emerge that alter workload? Will BLM change its past pattern of biased deference to ranching interests that led to the court order, or (more likely) will BLM again try to manipulate the science or low-ball the adverse impacts from grazing? Will BLM admit that what it says on paper about thorough and frequent rangeland monitoring and keeping grazing under vegetation utilization limits is often false or misleading in terms of the actual management reality out on the ground? Will BLM acknowledge that its standards and guidelines grazing program is largely a gutless "pass/fail"

evaluation process where almost all grazing allotments get "passing" grades? Will BLM continue to slow-walk responding to FOIA requests relating to the public seeking information on grazing management and administration? How can the public trust BLM when it consistently ignores or gives short shrift to livestock grazing related resource conflicts and impacts?

The SDNM lands have already suffered from more than a century of domestic livestock grazing. This has already had major adverse impacts on soils, native vegetation, and wildlife. This has also contributed to the colonization and spread of invasive non-native plant species, and the widespread loss of crucial biological soil crusts. Some of these adverse ecological changes can be reversed through enlightened management and long healing times, while other changes are likely irreversible. But the worst outcome would be to continue to allow the livestock grazing and other land uses that cumulatively caused these adverse ecological changes over time. I do not believe that BLM's new LHE does an honest or comprehensive job in addressing these changes.

In looking at each of the SDNM "objects" listed again below, I believe that domestic livestock grazing conflicts with the Proclamation's obligation on BLM to ensure their protection, and therefore **such grazing is not "compatible"**:

- . Functioning desert ecosystems;
- . Diversity of plant and animal species;
- . Saguaro cactus forest;
- . Scientific analysis of plant species and climates in past eras;
- . Vegetation communities;
- . Wildlife; and
- . Archeological and historic sites.

In the forthcoming EA, for each alternative, BLM must analyze how livestock grazing may affect each of these "objects" and whether those effects are consistent with their protection under the Proclamation. A "no grazing" alternative must be fairly analyzed, as I believe that this alternative would best follow the Proclamation and other relevant laws,

regulations, and policies, along with the related scientific information. BLM must somehow overcome its tendency toward cowardice and political expediency, and find the courage to actually follow the law and science. The SDNM lands belong to all Americans, and these lands must be properly managed and protected in the broad national interest.

Please place me on the mailing list and let me know when this EA is available for public review and comment.

Thank you very much for your consideration.

Sincerely,

[REDACTED]

[REDACTED]

cc: Interested parties

[EXTERNAL] Sonoran Desert National Monument - No Grazing

[REDACTED]

Mon 4/27/2020 4:53 AM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

Dear BLM Staff,

I wanted to submit my opinion that the BLM should not allow grazing in the Sonoran Desert National Monument. The BLM should prioritize the protection of wildlife and not even consider the idea of opening up that area for grazing again. I am against all grazing on public lands and will continue to follow this issue.

Thanks,

[REDACTED]

--

[REDACTED]

Figure 1 - Planning Area

Submission Successful
Your Submission ID is: SDNM_SCOP-1-500091877

Names & Addresses

[Redacted Name and Address]

Email Address:

Agency: Public Web Page

Comments

Comment 1
ID:

Comment Title: Only Alternative B complies with the law

Only Alternative B, the "No Grazing" alternative, complies with the BLM's requirements to protect the natural resources found in the monument. Livestock don't belong ANYWHERE in the Sonoran Desert National Monument. I expect the agency to prioritize the protection of wildlife – like the Sonoran desert tortoise and Sonoran pronghorn – over livestock industry profits.

The desert is just beginning to recover from over a century of livestock grazing industry abuses and the land must be allowed to continue to heal. The Monument, located on the ancestral lands of the O'Odham, Yavapai Apache, Cocopah, and Hohokam people, is treasured for its cultural resources, and these should be protected from grazing abuses.

Comment:

Livestock grazing is not compatible with protecting functioning desert ecosystems, diversity of plant and animal species, saguaro cactus forest, scientific analysis of plant species and climates in past eras, vegetation communities, wildlife, and archeological and historic sites. Nothing has changed since 2007 when the Monument Manager determined that livestock grazing was incompatible with protecting the scenic, recreational, and wildlife resources of the monument.

In light of ongoing drought and climate change impacts, eliminating grazing from the entire monument is the only responsible and legal choice.

Submission Classification

Response Type: Front Office Submission Form
Delivery Type: Front Office Submission Form
Receipt Date: 04/25/2020
Status: ACTIVE

Agreements

No - Withhold personally identifying information from future publications on this project?
Yes - Please include me on the mailing list for this project?

Original Submission Files

Figure 1 - Planning Area

Submission Successful
Your Submission ID is: SDNM_SCOP-1-500091880

Names & Addresses

[REDACTED]
[REDACTED]
[REDACTED]
Email Address: [REDACTED]
Day Phone: [REDACTED]
Evening Phone: [REDACTED]
Fax Number: [REDACTED]
Agency: [REDACTED] Public Web Page

Comments

Comment 1
ID:

Comment Title: western watersheds project

The desert is just beginning to recover from over a century of livestock grazing industry abuses and the land must be allowed to continue to heal. The Monument, located on the ancestral lands of the O'Odham, Yavapai Apache, Cocopah, and Hohokam people, is treasured for its cultural resources, and these should be protected from grazing abuses.

Let BLM know that livestock grazing is not compatible with protecting:

- Comment:
- Functioning desert ecosystems;
Diversity of plant and animal species;
Saguaro cactus forest;
Scientific analysis of plant species and climates in past eras;
Vegetation communities;
Wildlife; and
Archeological and historic sites.

Submission Classification

Response Type: Front Office Submission Form
Delivery Type: Front Office Submission Form
Receipt Date: 04/25/2020
Status: ACTIVE

Agreements

Yes - Withhold personally identifying information from future publications on this project?
No - Please include me on the mailing list for this project?

Original Submission Files

Figure 1 - Planning Area

Submission Successful
Your Submission ID is: SDNM_SCOP-1-500091934

Names & Addresses

[REDACTED]

[REDACTED]

Email Address:

Day Phone:

Agency: Public Web Page

Comments

Comment ID: 1

Comment Title: No Grazing is the only way to protect our beautiful monument

Hello-

Comment: Only Alternative B, the "No Grazing" alternative, complies with the BLM's requirements to protect the natural resources found in the monument.

Submission Classification

Response Type: Front Office Submission Form

Delivery Type: Front Office Submission Form

Receipt Date: 04/26/2020

Status: ACTIVE

Agreements

No - Withhold personally identifying information from future publications on this project?

Yes - Please include me on the mailing list for this project?

Original Submission Files

[EXTERNAL] Sonoran Desert National Cattle Monument

Mon 4/27/2020 7:28 AM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

To whom it concerns,

The Sonoran Desert National Monument must Not have cows. That arid land was never the place for large ungulates whether introduced by man or nature. There is no where near enough water to support cows which means they must be artificially watered which means they must have a support system that the surrounding natural world does not have. The consequence of that is oversized bovine wreaking havoc on the delicate balances of wildlife, both plants and animals, in a saguaro forest. This is unconscionable.

Obey the laws by which the Sonoran Desert National Monument was founded.

Keep cows OUT.



Figure 1 - Planning Area

Submission Successful
Your Submission ID is: SDNM_SCOP-1-500091984

Names & Addresses

Email Address:

Day Phone:

Agency: Public Web Page

Comments

Comment 1

ID:

Comment Title: SDNM RMP Amendment/EA

On page 7 of your Draft Livestock Grazing Compatibility Analysis it shows the authorized AUMs on the individual grazing allotments in question prior to 2012. However, these numbers are of limited value because they are just paper numbers. On page 21 there is a discussion of the actual recent use, but it lumps all of the allotments together. This is also of limited value for making an assessment. Please provide the actual use by livestock of each individual allotment during the last 10 years, and whether the grazing was ephemeral or yearlong. And if it was yearlong, please indicate if rotational grazing was practiced.

Much is made of the importance of livestock waters in the analysis. On page 21 it states that grazing "as historically authorized" is not compatible with the Monument's objectives. And it adds that "adjustments" to grazing management would have to be made to continue legal grazing on the Monument. These adjustments would undoubtedly involve the construction of new fences and livestock watering sites. And they would almost certainly be paid for with tax dollars, probably Environmental Quality Incentives Program (EQIP) grants. Why should the public have to pay to keep a relative handful of cattle out on the desert when it would cost us nothing to eliminate grazing on the Monument?

Furthermore, the analysis states that mule deer are the primary game animal in the study area. The diets of cattle and mule deer usually have minor overlap, as cattle prefer to graze herbaceous plants and deer prefer to browse woody plants. But cattle are forced to eat brush on desert grazing allotments in the Southwest due to the lack of herbaceous vegetation. In fact, research has shown that grasses never comprise more than 50% of the forage consumed by cattle in the desert Southwest (Rosiere 1975). Subsequently, cattle compete with desert mule deer for browse forage on arid allotments. Research has also shown that this competition increases during the hot summers and droughts (Krausman 1996), especially in the xeroriparian corridors (dry washes) preferred by desert mule deer. The increased use of browse by cattle during these times also negatively affects the deer habitat component of cover. The bottom line is that new livestock waters, like the ones that would have to be built to maintain grazing on this part of the Monument, would facilitate desert mule deer habitat degradation by helping to keep cattle on the land during dry times.

Krausman, P. R. 1996. Rangeland Wildlife. The Society for Range Management, Denver, CO.

Rosiere, R.E., R.F. Beck, and J.D. Wallace. 1975. Cattle Diets on Semidesert Grassland: Botanical Composition. Journal of Range Management 28(2):89-93.

Submission Classification

Response Type: Front Office Submission Form
 Delivery Type: Front Office Submission Form
 Receipt Date: 04/27/2020
 Status: ACTIVE

Agreements

No - Withhold personally identifying information from future publications on this project?

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Original Submission Files

[EXTERNAL] Sonoran Desert National Monument

Mon 4/27/2020 8:55 AM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

[Livestock don't belong in the Sonoran Desert National Monument and I expect the agency to prioritize the protection of wildlife – like the Sonoran desert tortoise and Sonoran pronghorn – over livestock industry profits.](#)

[The desert is just beginning to recover from over a century of livestock grazing industry abuses and the land must be allowed to continue to heal. The Monument, located on the ancestral lands of the O'Odham, Yavapai Apache, Cocopah, and Hohokam people, is treasured for its cultural resources, and these should be protected from grazing abuses.](#)

[Livestock grazing is not compatible with protecting:](#)

- [Functioning desert ecosystems;](#)
- [Diversity of plant and animal species;](#)
- [Saguaro cactus forest;](#)
- [Scientific analysis of plant species and climates in past eras;](#)
- [Vegetation communities;](#)
- [Wildlife; and](#)
- [Archeological and historic sites.](#)

• [Hundreds of species across the West are in danger of extinction, primarily because of livestock production. No other human activity in the West is as responsible for the decline or loss of species as is livestock production. Growing and selling livestock benefits large landholders. Most western ranches do NOT depend exclusively on livestock for their income. Growing and selling livestock is usually a break-even enterprise at best. Ranching and associated activities provide very few jobs. Furthermore, most ranch operations, except the very biggest are not highly profitable.](#)

[Federally managed lands—owned by all Americans—total 623 million acres, or more than 25 percent of the U.S. land base. But the most widespread commercial use of western public lands is livestock production. Nearly ALL public lands that have any forage potential for livestock are leased for grazing. This includes 90 percent of BLM lands, 69 percent of USFS lands and a surprising number of wildlife refuges and national parks. This land—our public land—is frequently managed as if it were a private feedlot rather than the common heritage of ALL Americans.](#)

[It baffles me no end that in a desert region cattle ranchers are even attempting to raise cattle. Cattle are not native to the desert, were transported from mild climates with the ability to raise grass abundantly. In Ireland when a pasture is rejuvenated, it takes 21 days. In the desert in America it takes 21 years, if it grows at all. It is an oxymoron to be insisting that cattle survive in the desert.](#)



Figure 1 - Planning Area

Submission Successful
Your Submission ID is: SDNM_SCOP-1-500091994

Names & Addresses

[Redacted]
 Email Address: [Redacted]
 Agency: Public Web Page

[Redacted]
 Email Address: [Redacted]
 Agency: Public Web Page

Comments

Comment 1

ID:

Comment Title: No to Livestock Grazing in Sonoran Desert National Monument

Title:

Dear BLM,

I am writing you to say that I disagree with any program that allows livestock grazing in the Sonoran Desert National Monument. Livestock don't belong in the Sonoran Desert National Monument I expect the agency to prioritize the protection of wildlife – like the Sonoran desert tortoise and Sonoran pronghorn – over livestock industry profits.

Land needs time to heal following decade upon decade of abuse. The desert is just beginning to recover from over a century of abuses wrought by livestock grazing industry and the land must be allowed to continue to heal. Furthermore, the Monument, located on the ancestral lands of the O'Odham, Yavapai Apache, Cocopah, and Hohokam people is treasured for its cultural resources, and these should be protected from grazing abuses.

I know that numerous and credible studies conclude that livestock grazing is not compatible with protecting:

- Comment:
- Functioning desert ecosystems;
 - Diversity of plant and animal species;
 - Saguaro cactus forest;
 - Scientific analysis of plant species and climates in past eras;
 - Vegetation communities;
 - Wildlife;
 - Archeological and historic sites
 - Soil health.

For these reasons, only Alternative B, the "No Grazing" alternative, complies with the BLM's own requirements to protect the natural resources found in the monument. Given ongoing and likely multiplying drought and climate change impacts, eliminating grazing from the entire monument is the only responsible and legal choice.

Comment 2

ID:

Comment: Dear BLM,

I am writing you to say that I disagree with any program that allows livestock grazing in the Sonoran Desert National Monument. Livestock don't belong in the Sonoran Desert National Monument I expect the agency to prioritize the protection of wildlife – like the Sonoran desert tortoise and Sonoran pronghorn – over livestock industry profits.

Land needs time to heal following decade upon decade of abuse. The desert is just beginning to recover from over a century of abuses wrought by livestock grazing industry and the land must be allowed to continue to heal. Furthermore, the Monument, located on the ancestral lands of the O'Odham, Yavapai Apache, Cocopah, and Hohokam people is treasured for its cultural resources, and these should be protected from grazing abuses.

I know that numerous credible studies conclude that livestock grazing is not compatible with protecting:

- -Functioning desert ecosystems;
- Diversity of plant and animal species;
- Saguaro cactus forest;
- Scientific analysis of plant species and climates in past eras;

- Vegetation communities;
- Wildlife;
- Archeological and historic sites
- Soil health.

For these reasons, only Alternative B, the “No Grazing” alternative, complies with the BLM’s own requirements to protect the natural resources found in the monument. Given ongoing and likely multiplying drought and climate change impacts, eliminating grazing from the entire monument is the only responsible and legal choice.

Comment ID: 3

Comment Title: No to Livestock Grazing in Sonoran Desert National Monument

Dear BLM,

I am writing you to say that I disagree with any program that allows livestock grazing in the Sonoran Desert National Monument. Livestock don’t belong in the Sonoran Desert National Monument I expect the agency to prioritize the protection of wildlife – like the Sonoran desert tortoise and Sonoran pronghorn – over livestock industry profits.

Land needs time to heal following decade upon decade of abuse. The desert is just beginning to recover from over a century of abuses wrought by livestock grazing industry and the land must be allowed to continue to heal. Furthermore, the Monument, located on the ancestral lands of the O’Odham, Yavapai Apache, Cocopah, and Hohokam people is treasured for its cultural resources, and these should be protected from grazing abuses.

I know that numerous credible studies conclude that livestock grazing is not compatible with protecting:

- -Functioning desert ecosystems;
- Diversity of plant and animal species;
- Saguaro cactus forest;
- Scientific analysis of plant species and climates in past eras;
- Vegetation communities;
- Wildlife;
- Archeological and historic sites
- Soil health.

Comment:

For these reasons, only Alternative B, the “No Grazing” alternative, complies with the BLM’s own requirements to protect the natural resources found in the monument. Given ongoing and likely multiplying drought and climate change impacts, eliminating grazing from the entire monument is the only responsible and legal choice.

Thank you,



Submission Classification

Response Type:	Front Office Submission Form
Delivery Type:	Front Office Submission Form
Receipt Date:	04/27/2020
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Agreements

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Original Submission Files

[EXTERNAL] Sonoran Desert National Monument Grazing

[REDACTED]

Mon 4/27/2020 1:44 PM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

Dear BLM Land managers,

In regards to Sonoran Desert NM Grazing, as a biologist and ecologist, I have seen many places in Arizona where grazing has been successfully managed, primarily large landscape grasslands above 3500 ft like Las Cienegas NCA. The low desert of the Sonoran Desert NM can NOT sustain any level of grazing and retain its resiliency. Few tracks of desert are protected from grazing in AZ making the SDNM a model for desert protection. With Grazing also come disturbance in the form of trampling of delicate soils and plants, roads to maintain fencing and water improvement projects involving heavy equipment. All these result in erosion issues and loss of topsoil as you well know from the majority of lands you manage, these impacts add up to \$'s.

The only sensible option is Alternative B, the "No Grazing" alternative!

[REDACTED]

[REDACTED]

Figure 1 - Planning Area

Submission Successful
Your Submission ID is: SDNM_SCOP-1-500092383

Names & Addresses

Katie Meehan
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Day Phone: 1303-225-4634
Agency: Public Web Page
Organization/Group: The Wilderness Society Position: Policy and Planning Specialist

Comments

Comment ID: 1
Comment Title: The Wilderness Society comments on SDNM RMPA
Comment: Hello - attached are our comments for the Sonoran Desert National Monument Resource Management Plan Amendment. Thank you and please let us know if you have any questions.
Attachment: [SDNM grazing RMPA 4.27.20.pdf](#)

Submission Classification

Response Type: Front Office Submission Form
Delivery Type: Front Office Submission Form
Receipt Date: 04/27/2020
Status: ACTIVE

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Original Submission Files

April 27, 2020

Doug Whitbeck, Range Management Specialist
Bureau of Land Management, Lower Sonoran Field Office
Blm_az_pdo_sdnmgrazing@blm.gov

Re: Sonoran Desert National Monument Resource Management Plan Amendment

Mr. Whitbeck,

Thank you for considering our comments on the Sonoran Desert National Monument Resource Management Plan Amendment (RMPA) Draft Livestock Grazing Compatibility Analysis. As mentioned throughout our previous comments on the Sonoran Desert National Monument Resource Management Planning process, the most important aspect of this plan amendment is ensuring that the objects that the Monument was established to protect are conserved, protected and restored. While discretionary uses may be allowed to continue if compatible with that charge, BLM must limit or prohibit such uses if they are in conflict with the values that the areas were designated to protect. This includes closing the Monument to livestock grazing when this use is impacting Monument objects and values.

1. Protection of Monument resources, objects, and values must be the priority.

The Federal Land Policy and Management Act (FLPMA) requires BLM to manage public lands under multiple use principles unless an area has been designated by law for specific uses, in which case BLM must manage the land for those specific uses. 43 U.S.C. § 1732(a). In other words, BLM will manage national monuments not under the FLPMA multiple use mandate, but rather under the Proclamation that established the Sonoran Desert National Monument. This is expressly provided for in FLPMA itself:

The Secretary shall manage the public lands under the principles of multiple use and sustained yield, in accordance with the land use plans developed by him under section 1712 of this title when they are available, *except that where a tract of such public land has been dedicated to specific uses according to any other provisions of law it shall be managed in accordance with such law.*" FLPMA, 43 U.S.C. § 1732(a) (emphasis added).

Pursuant to the legal authority granted by Congress in the Antiquities Act of 1906 (16 U.S.C. §§ 431-433), the President designated the Sonoran Desert National Monument for the explicit purpose of protecting and preserving identified historic and scientific objects. Accordingly, the standard approach to multiple use management does not apply to this monument, and any effort to adopt such a management approach to the detriment of its natural and cultural objects and values would be in violation of the proclamation and the mandates of FLPMA. BLM must manage the Monument for the protection and preservation of its natural, cultural,

historic and scientific values, and only allow uses other than those needed for protection of monument objects when those uses do not conflict with the directives of the Proclamation.

The monument proclamation for Sonoran Desert National Monument is unique in its approach to livestock grazing, recognizing the longstanding use in the area, as well as the lack of compatibility in certain places. The proclamation also recognizes the benefit to the biological diversity within the monument by attributing the “especially striking” conditions of the Sand Tank Mountains area where “no livestock grazing has occurred for nearly 50 years.” It is paramount that the monument’s resources, objects, and values are prioritized for protection.

We disagree with the introductory statement that “[t]he existence of the physical monument objects such as the Sand Tank Mountains and the broad alluvial valleys are merely the landscape on which livestock grazing occurs and is unlikely to be adversely impacted.” See p. 1 of Draft Livestock Grazing Compatibility Analysis. Physical monument objects, including the quality of the landscape itself, are still monument resources, objects, and values, and must be accounted for in terms of potential impacts from livestock grazing.

2. Livestock grazing is not appropriate in all areas of the monument, particularly near water sources.

The Nature Conservancy’s 2005 study of the impacts of livestock grazing found that “continuous grazing in which livestock are maintained within fenced allotments yearlong is not a feasible grazing management strategy on Sonoran Desert public lands.” See Hall, J.A., S. Weinstein, and C.L. McIntyre. 2005. *The Impacts of Livestock Grazing in the Sonoran Desert: A Literature Review and Synthesis*. The Nature Conservancy in Arizona, Tucson. The results of The Nature Conservancy’s study points to the questionable grazing conditions across the Sonoran Desert ecosystem. Notably, the variable and low precipitation levels, frequent and extended drought, particularly sensitive resources in the region, and the lack of research on grazing impacts in the area, are all of concern. See Hall, J.A., S. Weinstein, and C.L. McIntyre. 2005. *The Impacts of Livestock Grazing in the Sonoran Desert: A Literature Review and Synthesis*. The Nature Conservancy in Arizona, Tucson.

We appreciate the Draft RMPA highlights impacts to monument resources is notable when resources are near water sources. The Draft RMPA appropriately states, “[l]ivestock grazing, a historically authorized, is unlikely to be compatible with many of the biological monument objects near livestock waters.” See p. 18 of Draft RMPA. In addition to protection of natural resources that must be given priority under the proclamation, there are many cultural resources that the agency must consider for protection from adverse impacts of grazing.

It is generally accepted that in water-stressed environments . . . livestock will congregate in those areas with predictable and consistent source of water . . . Archaeological research throughout the arid West has repeatedly demonstrated that prehistoric humans were also tethered to predictable water sources . . . It can therefore be postulated that those water sources conducive to livestock needs are the

same water sources utilized by prehistoric populations, and that copious evidence of human activities through all periods of time will be located in direct proximity to areas disturbed by modern livestock activities. Consequently, livestock activities have a much greater potential to adversely affect historic properties than most other ground-disturbing activities.

See Jerry Spangler 2007. Expert comments on Little Snake Draft Resource Management Plan 21.

We would like to see acknowledgement that livestock grazing is unlikely to be compatible with cultural resources and culturally significant objects, particularly near water sources. Class III inventories should be prioritized before making determinations of observed impacts. We are particularly concerned about the four noted locations within the Juan Bautista de Anza National Historic Trail corridor. See p. 19 of Draft Livestock Grazing Compatibility Analysis.

3. The grazing compatibility analysis should use indicators beyond the Standards for Rangeland Health.

We are disappointed to see the Draft RMPA continues to use Standards for Rangeland Health as the primary indicator for various monument objects, as opposed to “presence and protection,” which is used for archaeological and historic sites. See Table 1, p. 6 of Draft RMPA. The Draft RMPA states that “when Standards are achieved . . . the health of those objects are assured.” *Id.*

In evaluating whether grazing is “compatible” with **protecting** Monument objects, BLM should look to the existing use of the term in both the Wild and Scenic Rivers Act (16 U.S.C. § 1274(d)(1)) and the National Wildlife Refuge Administration Act, 16 U.S.C. § 668ee. The National Wildlife Refuge Administration Act requires management of refuges in accordance with the mission of the National Wildlife Refuge System: “to administer a national network of lands and waters for the conservation, management, and where appropriate, restoration of the fish, wildlife, and plant resources and their habitats within the United States. . . 16 U.S.C. § 668dd(3)(A). Further, “wildlife-dependent recreational use” of refuges are permissible only if the Secretary finds that such use is “compatible.” 16 U.S.C. §§ 668dd(3)(B) - 668dd(3)(D). The Act defines a “compatible use” as one that “will not materially interfere with or detract from the fulfillment of the mission of the System or the purposes of the refuge.” 16 U.S.C. § 668ee(1).

Similarly, the Wild and Scenic Rivers Act requires agencies to manage a designated river segment primarily to “protect and enhance” its outstanding river values. 16 U.S.C. § 1281(a). Courts have held that, because of this statutory mandate, the BLM violates the Wild and Scenic Rivers Act “without first finding that such grazing is compatible with the protection and enhancement” of the outstanding river values. *Oregon Natural Desert Ass’n v. Singleton*, 47 F.Supp.2d 1182, 1991 (D.Or. 1998). See also, *Oregon Natural Desert Ass’n v. Green*, 953 F.Supp. 1133 (D.Or. 1997). Accordingly, once grazing practices are found to negatively impact

outstanding river values, then maintaining grazing is “incompatible” and, in order to comply with the mandates of the statute, the BLM must consider ending grazing. *Id.* at 1144. Further, an alternative that “is plainly incompatible with protecting river values” cannot be considered a realistic or feasible alternative. *Oregon Natural Desert Ass’n v. Singleton*, 47 F.Supp.2d at 1195.

The significant difference between the Arizona Rangeland Health Standards and the proper evaluation of compatibility with protecting monument objects is highlighted by looking at Standards 1 and 3, identified as used in the compatibility analysis, which do not look at protection of the monument resources, but only at maintaining rangeland health.

Instead of using this specific indicator, designed for purposes other than measuring protection of monument resources, objects, and values, BLM should adopt the robust approach that was used in assessing grazing impacts in Cascade-Siskiyou National Monument.

Cascade-Siskiyou National Monument’s determination of compatibility analysis compared results from Livestock Impacts Studies to Rangeland Health Assessments to determine whether or not current livestock grazing practices were compatible with protecting monument resources, objects, and values. Agency staff measured four criteria to assess the compatibility with protection of monument objects. All four criteria needed to be achieved for current livestock use to be considered compatible with protecting the monument’s objects of biological interest:

- Meet the Rangeland Health Assessment Standards and Guidelines.
- Maintain and improve populations of native plants and animals because the proclamation emphasized their protection.
- Minimize moderate-to-severe livestock use in sites that occupy small portions of landscapes, like riparian areas, to protect these special habitats.
- The trends for recovery of ecological processes from historic grazing impacts must be similar in grazed and ungrazed areas.

See Determination of Compatibility of Current Livestock Grazing Practices with Protecting the Objects of Biological Interest in the Cascade-Siskiyou National Monument, available at: blm.gov/or/resources/recreation/csnm/files/CSNM_Determination_Proclamation.pdf for more information.

We recommend agency staff use these same criteria to assess compatibility with current grazing practices in Sonoran Desert National Monument.

Sincerely,

Katie Meehan, Policy and Planning Specialist
The Wilderness Society
303-225-4634
Katie_meehan@twc.org

Figure 1 - Planning Area

Submission Successful
Your Submission ID is: SDNM_SCOP-1-500092267

Names & Addresses

[REDACTED]
[REDACTED]
[REDACTED]
Email Address: [REDACTED]
Day Phone: [REDACTED]
Agency: [REDACTED] Public Web Page

Comments

Comment ID: 1
Comment Title: [REDACTED] comments
Comment: comment letter is attached
Attachment: [REDACTED] [.grazing EA scoping comments.pdf](#)

Submission Classification

Response Type: Front Office Submission Form
Delivery Type: Front Office Submission Form
Receipt Date: 04/27/2020
Status: ACTIVE

Agreements

Yes - Withhold personally identifying information from future publications on this project?
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Original Submission Files

27 April 2020

BLM, Sonoran Desert National Monument
21605 North 7th Avenue
Phoenix, AZ 85027

Re: DOI-BLM-AZ-P040-2020-0001-EA

To whom it may concern,

I am a wildlife biologist with extensive experience across the Sonoran Desert, including research within the Sonoran Desert National Monument. I write to comment on the scoping for DOI-BLM-AZ-P040-2020-0001-EA (Sonoran Desert National Monument Livestock Grazing – Resource Management Plan Amendment and Environmental Assessment). The following are issues that must be addressed in the Environmental Assessment.

Purpose of allowing livestock use to continue

The Sonoran Desert National Monument does not have the same multiple use mandate shared by most BLM lands. Land management, and thus any RMP amendment, and thus the EA, must focus primarily on activities that protect the objects for which the monument was established. This does not include impacts to livestock operators from changes in livestock management. As noted in the Proclamation establishing the monument, “The Secretary of the Interior shall manage the monument through the Bureau of Land Management, pursuant to applicable legal authorities, to implement the purposes of this proclamation.” As part of that implementation, “grazing on Federal lands north of Interstate 8 shall be allowed to continue only to the extent that the Bureau of Land Management determines that grazing is compatible with the paramount purpose of protecting the objects identified in this proclamation.”

Please clarify how the persistence of private livestock operations implements the purposes of the proclamation.

Justification for proposed livestock forage utilization levels

Two studies (Holechek et al. 1999, Holechek et al. 2005) were cited in the Grazing Compatibility Analysis to justify “utilization of annual forage production by livestock should be limited to 30-35 percent to prevent lasting damage to the forage resource, and to maximize livestock productivity and financial return.” Holechek et al. (1999) focused exclusively on the impacts various stocking levels had on livestock production. It included no data or citations from the Sonoran Desert. Holechek et al. (2005) also focused on maintaining economic livestock production. It did contain some general statements about positive impacts of livestock on wildlife, but did not include any studies from the Sonoran Desert. Nothing in these studies suggests that forage utilization by livestock will benefit the objects identified in the proclamation.

The Draft Livestock Grazing Compatibility Analysis includes analyses of each allotment stating percentages of the land that achieves or fails to achieve Standards 1 and 3. Among the common explanations given are “failing due to historical livestock grazing” or “historical livestock grazing is the

causal factor.” While it is not clear how the distinction was made between impacts of historical grazing and those of current grazing, the issue is that parts of almost every allotment is in poor condition, relative to the Land Health Evaluation standards. While continued grazing at lower utilization levels might reduce the level of new damage, how will that restore wildlife habitat and the other objects identified in the monument proclamation?

Impacts to saguaro recruitment

Appendix D in the Draft Livestock Grazing Compatibility Analysis states that areas near livestock waters have significantly fewer young saguaros. It also shows that about 75% of the population overall is comprised of saguaros greater than 80 years old. That unbalanced demographic is characteristic of a population that has had unnaturally low recruitment for a long time. It stands in sharp contrast to sites across Arizona which showed a large spike in recruitment during the 1970s (Drezner 2006).

A similar unbalanced demographic was seen historically in Saguaro National Park East, where the effects of grazing and destruction of nurse plants severely hindered the establishment of new saguaros until livestock were removed (Conver et al. 2017). A separate study found that renewed saguaro establishment on Tumamoc Hill, Saguaro National Park West, and Sabino Canyon corresponded with the removal of cattle from those areas (Pierson et al. 2013).

Please clarify how the persistence of livestock grazing in saguaro habitat will contribute to saguaro recruitment.

Impacts to Sonoran Desert tortoise

The life cycle of the Sonoran Desert tortoise *Gopherus morafkai* (formerly called *Gopherus agassizii*) is dependent upon rainfall and winter forage availability, such that female tortoises emerge from their hibernacula in the spring to forage on spring ephemerals and build up the energy reserves necessary for egg production (AIDTT 2000, Averill-Murray 2002).

The life cycle and patterns of activity of the desert tortoise are closely tied to rainfall and forage production. Female Sonoran Desert tortoises emerge earlier than males from their winter hibernacula in the spring, which may offer them early foraging opportunities that are important for building up energy reserves for egg production (AIDTT 2000). Both males and females are most active after the onset of the summer monsoons, and it is during this time that tortoises establish a positive moisture and energy balance by drinking water and feeding on dried and fresh forage and when most mating occurs (AIDTT 2000, Averill-Murray 2002). Hatchling survival and juvenile recruitment rates are presumed to be low for Sonoran Desert tortoises, though available data suggests these rates are greater than occur in Mojave Desert populations (Averill-Murray 2002). Hatchling emergence occurs in the spring or fall, when forage and water are more likely to be available. Because the life cycle and survival of the desert tortoise is so dependent upon the seasonal pulses of productivity characteristic of the Sonoran Desert, livestock grazing has the potential to directly and indirectly impact desert tortoise.

Where livestock and desert tortoise habitat overlap, livestock can cause direct impacts to juvenile and adult tortoises by trampling and crushing individuals (Grover and DeFalco 1995, Howland and Rorabaugh 2002). Indirect impacts of livestock grazing to desert tortoise are primarily due to potential competition for forage. Competition with livestock for forage has the potential to impact desert tortoise nutritional condition and water balance. Spring forage availability is associated with reproduction,

particularly egg development and hatchling emergence (Averill-Murray and Klug 2000). As a result, ephemeral grazing systems may be particularly detrimental to desert tortoise because their growth and reproduction depends on years of above average annual forage production (Grover and DeFalco 1995).

Long-term drought, a predicted outcome of climate change, can directly affect tortoises by limiting the availability of free-standing water for drinking, either through a decrease in frequency of precipitation events or a decrease in precipitation totals per event. Drought can indirectly affect tortoises through a reduction in biomass of forage and cover plant species used for food, thermoregulation, and protective cover (USFWS 2015). Research in the Maricopa Mountains showed a major population decline in the mid- to late-1980s due to extended drought (Averill-Murray et al. 2002). Thus, livestock impacts can be expected to increase with a changing climate through competition for the available forage and reduction of cover.

While the primary habitat for Sonoran Desert tortoises is found in rocky uplands and incised washes, they also use the flat valley floors. Surveys in Ironwood Forest National Monument found tortoises using BLM tortoise habitat classes 1, 2, 3, and 0 (Averill-Murray and Averill-Murray 2002, 2005). Livestock impacts on desert tortoise must be considered throughout the Sonoran Desert National Monument.

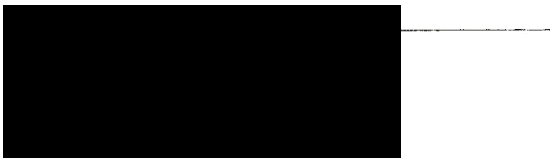
The Updated Land Health Evaluation states, "The goal of the BLM is to maintain stable and viable populations with no net loss of habitat in Category I and II habitats and to limit population declines to the extent possible in Category III habitats by mitigating impacts (BLM 2012)" (p. 19, lines 576-578). This may be an appropriate goal for BLM multiple use lands, but it is insufficient to meet the mandate of the Sonoran Desert National Monument proclamation since it accepts population declines.

Please clarify how the persistence of livestock grazing will maintain or improve the monument's desert tortoise population.

Conclusion

Please add me to your notification list for all future management actions regarding Sonoran Desert National Monument.

Sincerely,

A large black rectangular redaction box covering the signature area.A black rectangular redaction box covering the signature area.

Literature cited

[AIDTT] Arizona Interagency Desert Tortoise Team. 2000. Status of the Sonoran Population of the Desert Tortoise in Arizona: An Update. R.C. Averill-Murray (ed.). Arizona Interagency Desert Tortoise Team and Arizona Game and Fish Department, Phoenix.

Averill-Murray, R.C. 2002. Reproduction of *Gopherus agassizii* in the Sonoran Desert, Arizona. Chelonian Conservation and Biology 4:295–301.

Averill-Murray, A., and R.C. Averill-Murray. 2002. Distribution and Density of Desert Tortoises at Ironwood Forest National Monument, with Notes on Other Vertebrates. Nongame and Endangered Wildlife Program Technical Report 193. Arizona Game and Fish Department, Phoenix.

Averill-Murray, R.C. and Averill-Murray, A., 2005. Regional-scale estimation of density and habitat use of the desert tortoise (*Gopherus agassizii*) in Arizona. Journal of Herpetology, 39(1), pp.65-72.

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[EXTERNAL] Sonoran Desert National Monument Livestock Grazing Plan Amendment

Cyndi Tuell <cyndi@westernwatersheds.org>

Mon 4/27/2020 2:46 PM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

Cc: Sandy Bahr <sandy.bahr@sierraclub.org>; Greta Anderson <greta@westernwatersheds.org>; Jeremy Greenberg <jeremy@westernwatersheds.org>

 1 attachments (594 KB)

WWP_SC 2020 SDNM scoping comments.pdf;

Please see the attached comments submitted on behalf of Western Watersheds Project and the Sierra Club-Grand Canyon Chapter.

An annotated bibliography and select references will be sent in a separate email.

Please contact me if you have any questions regarding these comments or trouble with the attached files.

[Appendices.zip](#)

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**Western
Watersheds
Project**

Working to protect and restore Western Watersheds and Wildlife

Doug Whitbeck
Range Management Specialist
Bureau of Land Management, Lower Sonoran Field Office
21605 N. 7th Avenue
Phoenix, Arizona 85027

April 27, 2020

Sent via email this date to: BLM_AZ_PDO_SDNMgrazing@blm.gov

Re: Comments on the Sonoran Desert National Monument Livestock Grazing – Resource Management Plan Amendment and Environmental Assessment

The Sonoran Desert National Monument is a magnificent example of untrammeled Sonoran desert landscape. The area encompasses a functioning desert ecosystem with an extraordinary array of biological, scientific, and historic resources. The most biologically diverse of the North American deserts, the monument consists of distinct mountain ranges separated by wide valleys, and includes large saguaro cactus forest communities that provide excellent habitat for a wide range of wildlife species.

The monument's biological resources include a spectacular diversity of plant and animal species. The higher peaks include unique woodland assemblages, while the lower elevation lands offer one of the most structurally complex examples of palo verde/mixed cacti association in the Sonoran Desert. The dense stands of leguminous trees and cacti are dominated by saguaros, palo-verde trees, ironwood, prickly pear, and cholla. Important natural water holes, known as tinajas, exist throughout the monument. The endangered acuna pineapple cactus is also found in the monument.

The most striking aspect of the plant communities within the monument are the abundant saguaro cactus forests. The saguaro is a signature plant of the Sonoran Desert...

The diverse plant communities present in the monument support a wide variety of wildlife, including the endangered Sonoran pronghorn, a robust population of desert bighorn sheep, especially in the Maricopa Mountains area, and other mammalian species such as mule deer, javelina, mountain lion, gray fox, and bobcat. Bat species within the monument include the endangered lesser long-nosed bat, the California leaf-nosed bat, and the cave myotis. Over 200

species of birds are found in the monument, including 59 species known to nest in the Vekol Valley area. Numerous species of raptors and owls inhabit the monument, including the elf owl and the western screech owl. The monument also supports a diverse array of reptiles and amphibians, including the Sonoran desert tortoise and the red-backed whiptail. The Bureau of Land Management has designated approximately 25,000 acres of land in the Maricopa Mountains area as critical habitat for the desert tortoise. The Vekol Valley and Sand Tank Mountain areas contain especially diverse and robust populations of amphibians. During summer rainfall events, thousands of Sonoran green toads in the Vekol Valley can be heard moving around and calling out.

The monument also contains many significant archaeological and historic sites, including rock art sites, lithic quarries, and scattered artifacts. Vekol Wash is believed to have been an important prehistoric travel and trade corridor between the Hohokam and tribes located in what is now Mexico. Signs of large villages and permanent habitat sites occur throughout the area, and particularly along the bajadas of the Table Top Mountains. Occupants of these villages were the ancestors of today's O'odham, Quechan, Cocopah, Maricopa, and other tribes.

...by section 2 of the Act of June 8, 1906 (34 Stat. 225, 16 U.S.C. 431)...there are hereby set apart and reserved as the Sonoran Desert National Monument, for the purpose of protecting the objects identified above, all lands and interest in lands owned or controlled by the United States within the boundaries of the area described on the map entitled "Sonoran Desert National Monument" attached to and forming a part of this proclamation.

Dear Range Management Specialist Whitbeck, Manager White Bull, and Director Suazo,

The following comments are submitted on behalf of Western Watersheds Project with regard to the request for comments on the Sonoran Desert National Monument Livestock Grazing-Resource Management Plan Amendment and Environmental Assessment. We realize that the above quoted proclamation protecting the natural and cultural resources of found at the Sonoran Desert National Monument is included as part of this project record. However, we feel it is critical to remind all who read these comments about the purpose of the monument and to keep at the front of the minds of the decision-makers that the management of these lands is different than other BLM lands and deserving of a very high-level of consideration and protection.

Western Watersheds Project (WWP) and the Sierra Club – Grand Canyon Chapter (SCGCC) appreciates this opportunity to provide comments and first-hand information and data about the deleterious impacts of livestock grazing on the natural resources (“objects”) that should be protected on the Sonoran Desert National Monument. We agree with the Bureau of Land Management’s (BLM) determination that livestock grazing is ***not compatible*** with protecting the monument and its objects. Clearly, only Alternative B, the “no grazing” alternative, complies with the federal regulations the BLM is required to follow. We cannot fathom why, therefore, the BLM has chosen to propose the authorization of livestock within the monument. Our comments below reflect our concerns and we hope that the BLM will carefully consider these comments and reconsider the proposal to allow cows to once again destroy these protected lands.

WWP is a nonprofit organization dedicated to protecting and restoring western watersheds and wildlife through education, public policy initiatives, and legal advocacy. With over 15,000 members and supporters throughout the United States, including Arizona, WWP actively works to protect and improve upland and riparian areas, water quality, fisheries, wildlife, and other natural resources and ecological values. WWP's staff and members are concerned with the management of public lands throughout Arizona, including the Sonoran Desert National Monument (SDNM), managed by the Bureau of Land Management (BLM). We work throughout the West, advocating for watersheds, wildlife, and ecological integrity. The proposed livestock grazing amendment to the SDNM's Resource Management Plan (RMP) affects our interest in the health and integrity of the environments found in the SDNM. Our staff and members regularly visit the SDNM and enjoy the outstanding wildlife, wilderness, and recreational values the monument provides.

WWP and our staff have been active in pushing BLM staff to protect the SDNM from the negative impacts of livestock grazing for more than a decade. Indeed, it was our advocacy that forced the BLM to prepare the RMP that was later held to be in violation of federal environmental regulations due to inadequate analysis of the impacts of livestock grazing. Much more recently, WWP submitted comments in response to the BLM's request for comments on the 2019 Land Health Evaluation (LHE).¹

WWP is especially concerned with the impacts of livestock grazing on ecological integrity, wildlife, fisheries, and recreation. Across public lands and national forests in the West, grazing is ubiquitous, and it remains the only proposed commercial use of the monument. Unfortunately, BLM managers have repeatedly failed to adequately consider the environmental impacts of livestock grazing on monument objects. The BLM has repeatedly failed to consider whether the environmental costs of public lands grazing outweigh the insignificant economic benefits associated with the few livestock grazing permits associated with the SDNM. The U.S. Fish and Wildlife Service identified that livestock grazing was a direct threat most protected species in the southwest, including the Sonoran Desert pronghorn and the Sonoran Desert tortoise, which all occur on the SDNM.

Sierra Club is a national nonprofit organization of approximately 780,000 members dedicated to exploring, enjoying, and protecting the wild places of the earth; to practicing and promoting the responsible use of the earth's ecosystems and resources; to educating and enlisting humanity to protect and restore the quality of the natural and human environment; and to using all lawful means to carry out these objectives. The Sierra Club's Arizona Chapter, known as the Grand Canyon Chapter, has approximately 16,000 members, including members who live near and recreate in the Sonoran Desert National Monument. Sierra Club has long advocated for establishment and protection of the monument and its "objects," and has supported the elimination of livestock grazing on these sensitive Sonoran Desert lands.

¹ We note there are very few changes to the 2019 LHE in the March 2020 version released with this proposed action. We are again including our LHE comments as Appendix A and ask that those comments be fully incorporated as part of these comments. We are also attaching our prior comments, protests, and related civil litigation documents as Appendix B and ask that these be included in the project record, and reviewed by agency staff.

As a preliminary matter, we disagree with a fundamental theory the BLM has proffered regarding the impacts of livestock grazing viewed in light of the Arizona Rangeland Health Standards and Guidelines. Specifically, it is not true that “[w]hen Standards are achieved on plots that represent specific management objects, the health of those objects are assured” or that “if the Standards are being achieved...livestock grazing is compatible...”² These more than 20-year old Rangeland Health Standards (now referred to as Land Health Standards) are supposed to be measurable and attainable goals for the desired condition of biological resources and physical components/characteristics of desert ecosystems. It is critical the BLM remember that the Standards are a floor, not a ceiling, for range management and that the current analysis indicates that the health of monument objects is assured only in the absence of livestock grazing. It is especially important for management of the SDNM, which has a higher standard for protection of natural resources than other BLM managed lands.

As the BLM is aware, livestock grazing increases the severity of fires by promoting higher densities of trees and shrubs. Several decades of research and publications have verified that livestock grazing and fire suppression in the arid southwest is directly responsible for the uncharacteristically large and volatile wildfires that now threaten communities, forests, and deserts, including saguaro forests. Scientific research comparing grazed and ungrazed areas have documented that livestock grazing in the arid west negatively effects water quality and quantity, stream channel morphology, hydrologic function, soil stability, streambank vegetation, and aquatic and riparian wildlife - proving that livestock grazing is often an ecological catastrophe.³ Grazing on riparian plants reduces vegetative cover and exposes soil to erosion, which in combination with streambank trampling leads to increased erosion and turbidity.⁴ Grazing animals congregating in riparian areas feed on native tree and shrubs, disrupting their reproductive cycle and leading to destabilized streambanks,⁵ increased water temperatures, loss of hiding and breeding cover, and defecation and urination directly in the water. Reduced rainfall infiltration into soil⁶ and increased sediment loads combine to exacerbate riparian ecosystem decline and increase stream down-cutting.⁷

We have included an annotated bibliography as Appendix C. The research included in this bibliography (and sent as an attachment to these comments) addresses several issues of concern regarding the environmental impacts of livestock grazing in desert ecosystems that the BLM should consider as the analysis of this project proceeds.

The forthcoming environmental analysis should discuss the long history of livestock grazing in Arizona, identifying how many livestock were historically grazed, how many livestock have

² 2020 LHE at p. 6.

³ Belsky, A.J., A. Matzke, and S. Uselman. 1999. [Survey of Livestock Influences on Stream and Riparian Ecosystems in the Western United States](#). *Journal of Soil and Water Conservation* 54: 419-431.

⁴ Trimble, S.W., and A.C. Mendel. 1995. [The cow as a geomorphic agent - a critical review](#). *Geomorphology* 13(1995): 233-253

⁵ Patten, D.T. 1998. [Riparian ecosystems of Semi-Arid North America: Diversity and Human Impacts](#). *Wetlands* 18(4): 498-512.

⁶ Gifford, G.F., and R.H. Hawkins. 1978. [Hydrologic Impact of Grazing on Infiltration: A Critical Review](#). *Water Resources Research* 14(2): 305-313.

⁷ Obedzinski, R.A., C.G. Shaw, and D.G. Neary. 2001. [Declining woody vegetation in riparian ecosystems of the Western United States](#). *Journal of Applied Forestry*. 16(4): 169-181.

been grazed in the past two decades, and disclose the impacts of that livestock grazing. WWP has documented the long-lasting negative impacts livestock grazing has had on the SDNM and provides photo documentation of that impact as Appendix D. We anticipate that this information will be supplemental to the information the BLM has available and will help build a more accurate depiction of the devastating impacts of livestock grazing on the SDNM. The forthcoming environmental analysis should describe how livestock grazing has contributed to and continue to exacerbate altered fire regimes, invasive species, loss of species diversity, and degraded watersheds.

Importantly, the analysis must disclose underlying Indigenous land claims or address environmental justice issues. The history of livestock grazing in the West is inextricably linked to the conquest and displacement of Indigenous peoples.

“Beef’s move to the center of the American diet depended on bison hunters’ and ranchers’ ecological remaking of western lands with the support of the U.S. military. Further, this process produced a set of narratives that not only justified seizing American Indian lands, but also placed ranching at the heart of the story of the American West.” - from Red Meat Republic by Joshua Specht. (Princeton University Press 2019).

Cattle companies created proxy territorialism, carving up the landscape of Nations and cultures into one of barbed-wire and “resource use.” To the extent that ranchers today claim to have been on a particular piece of land for generations and therewith claim some “rights” to those lands, their sense of propriety should be contextualized with who was displaced when they originally staked those claims. Environmental justice considerations should be thoroughly discussed. We strongly encourage the BLM to include a more accurate, and less romanticized, version of the history of livestock grazing in the southwest than we have traditionally been provided.

Below, we provide specific recommendations and concerns regarding the BLM’s proposal to allow livestock on the SDNM.

I. Climate Change and Drought

The National Environmental Policy Act (NEPA) expressly calls on agencies to provide for intergenerational equity, stating that it is intended to “fulfill the responsibilities of each generation as trustee of the environment for succeeding generations.”⁸ This is particularly relevant with respect to climate change, given its long-lasting impacts.

As the BLM is aware, a severe drought has gripped the American Southwest since 2000. New research indicates this drought is as bad as or worse than long-lasting droughts in the region over the past 1,200 years, and climate change is a likely contributor. While the term megadrought has no strict definition, it is generally considered to be a severe dry period persisting for several decades or longer. Many climate researchers and hydrologists have long thought that a

⁸ 42 U.S.C. 4331(b)(1).

southwestern megadrought was highly likely. A 2016 study put the probability of one occurring this century at 70 percent or higher.⁹

A recent study¹⁰ reconstructed drought conditions in the Southwest for every year back to 800 A.D., using tree growth as a proxy for soil moisture content. Examining nearly 1,600 tree-ring records, they found four periods of more than two decades each during which soil moisture content was far below the baseline for the entire 1,200 years, indicating severe drought conditions of lack of precipitation and increased dryness. One of these megadroughts, in the 13th century, lasted more than 90 years. The recent analysis shows that, as measured by soil moisture content, the current drought is more severe than three of the ancient ones. Only one in the late 1500s was worse, and only slightly so. Using 31 computer climate models, the researchers estimated that climate change contributed nearly half to the severity of the current drought. Put another way, without global warming the current drought would be only of moderate severity rather than one of the worst.

Fortunately, the BLM has acknowledged that Sonoran Desert rangelands are “marginal” for livestock use with the lowest average annual forage production compared to other range types in western U.S.¹¹ The BLM has further acknowledge that careful management is required to prevent the damaging impacts of livestock and notes that utilization should be limited to 30-35 percent which is “light to moderate.”¹² Unfortunately, the BLM has not determined or disclosed the amount of utilization that would harm the SDNM objects and Holecheck et al., 1999, upon which the BLM relies, is not specific to the Sonoran Desert. Nor does Holecheck et al. look at the effects of no grazing (or zero percent utilization), nor at the impacts of any grazing regime on lands protected by the Antiquities Act and how any level of livestock grazing may impact monument objects.

The BLM must include a thorough analysis of the impacts of livestock grazing on the environment *in light of the compounding impacts of climate change*. For example, given the likelihood of hotter and drier conditions in the Southwest, how will livestock grazing in the SDNM exacerbate the already alarming impacts associated with the impacts of climate change on game species, threatened and endangered species, or special status species? How will livestock grazing related fencing and infrastructure further fragment the landscape and how will this impact species already harmed by the rapid on-the-ground changes associated with climate change? How does climate change affect what the BLM considers suitable range for livestock?

Climate variability will exacerbate the impacts of livestock grazing on all resources in the SDNM via soil erosion, compaction, and dust generation; stream degradation; higher water temperatures and pollution; loss of habitat for fish, birds and amphibians; and

⁹ Ault, T.R., Mankin, J.S., Cook, B.I., Smerdon, J.E., 2016. *Relative impacts of mitigation, temperature, and precipitation on 21st-century megadrought risk in the American Southwest*. Science Advances, Vol. 2, no. 10, e1600873. October 5, 2016. <https://advances.sciencemag.org/content/2/10/e1600873.full>

¹⁰ Williams, A.P., Cook, E.R., Smerdon, J.E., Abatzoglou, J.T., Bolles, K., Baek, S.H., Badger, A.M., Livneh, B., 2020. *Large contribution from anthropogenic warming to an emerging North American megadrought*. Science, Vol. 368, Issue 6488, pp.314-318. Available at <https://science.sciencemag.org/content/368/6488/314/tab-pdf>, last accessed April 27, 2020.

¹¹ 2020 LHE at p. 2.

¹² *Id.*

desertification. Livestock grazing and trampling degrades soil fertility, stability and hydrology, and makes it vulnerable to wind erosion.¹³

II. Impacts to Desert Bighorn Sheep

BLM grazing allotments must also be considered when a determination of the risk of pathogen transmission to bighorn sheep is made. Bighorn sheep are listed as an Arizona Species of Greatest Conservation Need, a designation reflecting state wildlife officials' substantial concern for their persistence. Bighorn sheep are also considered a high priority for conservation by several area Tribes. The security of bighorn sheep populations on the SDNM cannot be guaranteed even where ecosystem integrity is high, demonstrating why a fine filter approach to bighorn sheep conservation is necessary.

Known threats to bighorn sheep populations on the SDNM include livestock pathogens transmitted by livestock on public and private lands and displacement by recreational activities. The BLM must analyze the cumulative impacts of any domestic sheep or goat operations within the foray range of the bighorn sheep populations found within the SDNM and the impacts of ongoing and increasing recreation in conjunction with any proposed livestock grazing on bighorn sheep populations, activities that are known to significantly affect the species. Displacement and forage competition by the proposed livestock must be analyzed.

III. Impacts to the Sonoran Desert Tortoise

The Sonoran Desert tortoise is considered an “at risk” species associated with the semi-desert grasslands of the SDNM and Category I, II and III habitat is identified in the Monument. As the BLM is likely aware, on October 5, 2015, the U.S. Fish and Wildlife Service removed the Sonoran Desert tortoise from the Endangered Species Act candidate list, despite myriad risks to tortoise populations including climate change and livestock grazing. Nearby industrial activities are a risk to the tortoise that is unlikely to impact tortoise numbers in the SDNM directly, but will impact source and sink populations. Urbanization is likely to directly impact the tortoise because as urban areas increase in population size, the number of visitors to the SDNM from those urban areas also increases, which directly impact tortoise populations.

The BLM must analyze the direct impacts of proposed livestock grazing as well as the cumulative impacts, known and potential, that threaten the Sonoran Desert tortoise because the tortoise continues to be managed under a formal candidate conservation agreement. Please also detail the impacts of ephemeral grazing on the Sonoran Desert tortoise. As the BLM is aware, livestock compete with tortoises for food, especially in the spring. Stored fat from years with ample tortoise forage support tortoises in lean years. Ephemeral grazing permits cause direct competition between tortoises and livestock for food that is critical to tortoise survival.

¹³ Beschta, Robert L., Debra L. Donahue, Dominick A. DellaSala, Jonathan J. Rhodes, James R. Karr, Mary H. O'Brien, Thomas L. Fleischner, Cindy Deacon Williams. 2012. Adapting to Climate Change on Western Public Lands: Addressing the Ecological Effects of Domestic, Wild, and Feral Ungulates. Environmental Management, DOI 10.1007/s00267-012-9964-9 2012.
https://www.researchgate.net/publication/233418604_Adapting_to_Climate_Change_on_Western_Public_Lands_Addressing_the_Ecological_Effects_of_Domestic_Wild_and_Feral_Ungulates.

Additionally, we have attached a complaint (as Appendix E) filed in a lawsuit against the U.S. Fish and Wildlife Service for failure to list the Sonoran Desert tortoise under the Endangered Species Act and ask the BLM to include this information in the analysis of the alternatives for this project. As noted in the complaint, livestock grazing remains a significant and unaddressed threat to the tortoise, including in Wilderness areas, and the Candidate Conservation Agreement is insufficient to keep the tortoise from its rapid slide towards extinction. If the BLM authorizes livestock grazing in the SDNM, the tortoise will suffer significant negative impacts and this will result in a violation of the BLM's duty to protect monument objects. Further, the BLM must acknowledge that the outcome of this pending litigation may alter the BLM's responsibility to consult with the U.S. Fish and Wildlife Service regarding the impacts of the proposed project on this species.

IV. Recommendations

A. Use Accurate Assumptions for the Analysis

There are three key assumptions related to livestock grazing that the BLM must carefully consider as part of the amendment analysis. First, the BLM must accurately describe how Animal Unit Months (AUMs) are calculated. In the past, federal agencies generally use an estimated 1,000-pound cow to calculate AUMs. This is in error and does not reflect the current understanding of livestock weights. Second, the BLM must consider and disclose the impacts of the very important issue of trespass livestock. Third, the BLM should revise the language used regarding livestock infrastructure and the assumptions that this infrastructure is beneficial to wildlife.

1. AUM Calculations Must be Accurate

For calculating AUMs, wherein the animal unit is defined as one mature cow and her nursing calf, the BLM should use the well-known average livestock weight, which is in excess of 1,300 pounds.¹⁴

2. Trespass and Unauthorized Use Must be Analyzed

In light of the significant negative ecological and economic impacts of livestock grazing, we further ask the BLM to explicitly acknowledge that livestock grazing cannot be responsibly managed. There is ample evidence that livestock permittees are very often incapable of ensuring their livestock are maintained within the pasture or allotment they are supposed to be in and trespass or unauthorized use is rampant.¹⁵ Related to trespass or unauthorized livestock use, we ask the BLM to consider the following. In 2016, the Government Accounting Office (GAO) identified actions needed by federal agencies to improve the tracking and deterrence efforts for addressing trespass livestock, or unauthorized use.¹⁶ This 2016 GAO report found that the

¹⁴ See Appendix H Livestock Slaughter, USDA, National Agricultural Statistics Service, June 2019.

¹⁵ See Appendix F, 2016 GAO Report to the Committee on Natural Resources, House of Representatives: Unauthorized Grazing: Actions Needed to Improve Tracking and Deterrence Efforts. See also the January 13, 2020 complaint filed by the Center for Biological Diversity, attached as Appendix G, which documents trespass and unauthorized livestock grazing throughout National Forests.

¹⁶ See Appendix F.

frequency and extent of unauthorized livestock grazing on federally managed public lands is largely unknown because agencies “prefer to handle most incidents informally” with a phone call and these violations of law are not recorded. Yet despite this vast underreporting of livestock grazing violations the report indicates 1,500 incidents of unauthorized grazing where formal action was taken between 2010 and 2014, with more than 433 incidents reported on BLM managed lands and 36% of those incidents classified as willful or repeated willful, resulting in over \$441 thousand in unauthorized grazing bill charges.¹⁷ The BLM law enforcement database analyzed in the 2016 GAO report included 426 formally documented incidents, with 17 occurring in Arizona.¹⁸ With this information in mind, the BLM should, for this project, disclose the level of unauthorized grazing that has occurred on this allotment over the past 20 years, including incidents that were handled “informally,” including willful and non-willful incidents. The cumulative impact of unauthorized livestock grazing must be disclosed in the forthcoming EA and the analysis of any proposed livestock grazing impacts must account for the impacts associated with trespass livestock.

3. Appropriately Classify and Analyze the Impacts of Range Infrastructure

Third, we recommend the BLM abandon the assumption that range infrastructure is an “improvement” on the landscape, and stop identifying it as such. The assumption that range infrastructure is beneficial to wildlife must be revisited. The March 2020 LHE (at lines 738-741) indicates that “[n]o new range improvements have been installed since the 2012 RMP” but that they have been “more thoroughly inventoried for this analysis to show the management of grazing allotments.” The impacts to wildlife from abandoned fences, defunct waters, corrals, and non-functioning cattle guards can hardly be considered “improvements” and those impacts must be analyzed as part of the forthcoming EA.

These assumptions are critical for the impacts analysis in all alternatives, including Alternative B, which does not authorize livestock grazing but which would include ongoing trespass or unauthorized livestock grazing and known associated impacts.

B. Include an Economic Impacts Analysis

An accurate economic analysis must include the costs to the BLM (and therefore, the public) related to managing livestock permits and must disclose the amount of money lost to the grazing program as a result of extremely low grazing fees (just \$1.35 per AUM in 2019 and 2020) as compared to private and state land livestock grazing rates. This information should be disclosed and the public provided an opportunity to review and comment upon this important aspect of the proposed amendment to the RMP.

Specifically, for all proposed alternatives (including Alternative B - No Grazing), please disclose the maximum amount of grazing fees that could be collected (including for ephemeral grazing authorizations) and the estimated costs of administering those grazing permits. Please also disclose the estimated costs of livestock infrastructure necessary for the allotments to become active again and the sources of funding for that infrastructure, including fencing, wells, corrals,

¹⁷ *Id.* at 1, 57-58.

¹⁸ *Id.* at 55.

road construction or maintenance, piping, tank construction or maintenance, and any other infrastructure associated with livestock grazing on each allotment. We recommend that this information is disclosed monument-wide, by allotment, and by pasture. Included with this information should be a number of livestock (in addition to AUMs) so that the public may easily understand the cost-per-cow of livestock grazing on these federally protected public lands.

C.. Requested Disclosures in the EA

For all alternatives:

- Please identify which exact areas the BLM has determined are compatible with livestock grazing. This information is most useful to the public and interested persons via a map, as well as via a description.
- Please identify the maximum number of livestock that are compatible with each area identified as compatible with livestock grazing, including the AUMs, number of livestock, season of use, forage utilization.
- Please identify the amount needed and specific sources of funding for any and all monitoring of livestock use throughout the SDNM, including monitoring for trespass or unauthorized livestock use. The information on monitoring should include details on the regularity, timing, location, staffing capacity, public outreach and involvement, reporting metrics, and reporting format and regularity for monitoring. The March 2020 LHE indicates that since 2016 the BLM “was unable to collect utilization data on the SDNM portion of the SDNM Complex due to the absence of authorized grazing since 2015, [and] the expiration of the Conley permit.” Without utilization data or monitoring, especially for trespass or unauthorized use, the impacts of livestock grazing cannot be appropriately managed.
- Please identify a drought contingency plan for all alternatives which includes how and how often the BLM will monitor for drought, how permittees will be notified of changes to AUMs or permits due to changing precipitation conditions, how the public will be notified about these changes and conditions, and a specific method for the public to communicate their concerns about livestock grazing during periods of drought. The costs of any contingency plan and/or drought monitoring must be disclosed to the public.
- Please explain why the BLM is considering the impacts of livestock grazing to livestock operators. While this analysis might be an appropriate consideration on other BLM managed lands that are not protected by a monument designation, this concern should not be part of the considerations for a determination as to whether livestock grazing is a compatible use of the SDNM. The only consideration BLM should have regarding management of the SDNM is whether the objects identified as part of the proclamation designating the monument are being, or will be, protected.
- Please explain how (or whether) range infrastructure on the Conley allotment was used to determine a 2-mile radius of livestock impacts (two miles from water) if that infrastructure has not been used or functional since 2012?
- Please explain further why the BLM was unable to determine whether impacts to cultural resources were from livestock grazing or recreational use.¹⁹ However, if the cause of

¹⁹ See 2020 LHE at p. 2.

impacts are difficult to determine, we strongly recommend the BLM utilize the precautionary principle and protect the monument objects from all potential impacts because the loss of cultural resources is permanent.

- Please explicitly disclose which areas are considered for livestock grazing that are also located within designated Wilderness areas within the SDNM.
- Please further explain what is meant by “current grazing.” We see the explanation that “current grazing” is the maximum number of livestock or AUMs that could be authorized under the 2012 RMP. However, livestock have not been authorized to use the SDNM for a number of years. The BLM therefore used a probability analysis to say this is where the livestock would most likely be, and then looked at those spots and then determined that those spots, without livestock use now, are not damaged, and therefore the “current grazing” is not harming monument objects.²⁰ This does not make sense. To look at areas where livestock are not grazing does not in any way provide the BLM, or the public, with any information regarding the impacts of livestock grazing on the monument. Unfortunately, the BLM chose not to look at monitoring plots outside (but near) the SDNM where livestock are actually grazing. It appears the BLM did not in any way look at the actual impacts of “current grazing” in or near the monument.
- Please disclose in written text and on a map which current key areas overlap with the areas previously determined to be incompatible with livestock grazing use, including but not limited to areas on the Bighorn and Conley allotments.
- Please explain why the BLM has not considered the composition and abundance of annuals, which area a large part of the grazing regime but extremely important to desert wildlife.
- Please disclose all erosion studies and results.
- Please explain how the BLM has reconciled the results of livestock grazing impacts identified in Hall *et al.* (2005)²¹ with the proposed grazing regimes.
- Please identify which new publications, if any, have been added to the project record since 2012.
- Please disclose how the road closures on the Bighorn Allotment have impacted that area and whether road closures are a contributing factor to any failure to meet or ability to meet Standards.
- Please disclose any and all data related to the Sonoran Desert tortoise on the Maricopa Mountains plot.
- To the extent that this issue is not addressed above, please provide an inventory and economic impacts analysis of the livestock grazing infrastructure, including the state of repair/disrepair, functioning/non-functioning waters, and provide text and maps explaining the economic impacts and locations of all livestock grazing infrastructure.
- Please disclose how much ephemeral use has been authorized since 2012 and provide text and maps explaining the locations of such uses.

²⁰ 2020 LHE at p. 7.

²¹ Hall *et al.* (2005) is the BLM commissioned literature review of livestock grazing impacts on the plant and animal resources found within monument lands. The Nature Conservancy’s completed report revealed that livestock grazing has a generally deleterious impact on native vegetation, native wildlife, young cacti, and biological soils. Hall, et al. 2005. In 2005, the report concluded that “[a]s a result no currently described approach, including continuous grazing and each of the specialized grazing systems, is completely applicable to or appropriate for the Sonoran Desert ecosystem within the current formulations.”

- Please disclose whether the BLM or any other agency or non-governmental organization has any information regarding recovery monitoring on the allotments and pastures south of I-8.

Finally, we do not understand what this means (found at footnote 1, page 67 of the March 2020 LHE) and ask BLM to explain fully:

Based on the average perennially authorized or documented actual use AUMs, prorated by acres, between 2007 and 2018 excluding AUMs authorized for ephemeral use and for closed allotments and portions of allotments closed under the Proclamation within the SDNM south of I-8.

It appears the BLM has made a determination that livestock grazing is not a compatible use of the SDNM, but would still really like to use the monument for livestock grazing, and therefore has engaged in some creative math to “suggest that grazing can remain available” with modifications on the portions of the allotments that make up the SDNM Complex north of I-8 for “only” 4,232 AUMs. The confusing footnote is attached to this recommendation. We ask the BLM to please explain further.

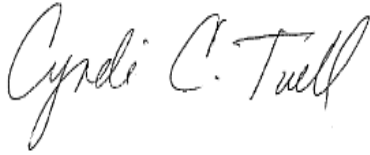
We do not agree that simply authorizing livestock grazing but not adding or redeveloping water sources, that livestock grazing will somehow become compatible with protecting monument objects in an arid landscape.

Conclusion

Western Watersheds Project and the Sierra Club – Grand Canyon Chapter strongly encourage the BLM to explicitly acknowledge that livestock grazing is not a compatible use of the SDNM and identify Alternative B as the only legally appropriate alternative. We further encourage the BLM to develop a robust environmental analysis that accurately describes and analyzes the actual impacts of livestock grazing to the protected lands found within the SDNM. Given the myriad significant negative impacts of livestock grazing and the importance of the SDNM, as well as the controversial nature of even considering authorizing livestock grazing on federally protected public lands, it is clear that an Environmental Impact Statement is necessary and the BLM cannot proceed via an Environmental Assessment.

We look forward to reviewing the next step in this NEPA process for this RMP amendment, which we anticipate will include at least a 90-day comment period.

Sincerely,

A handwritten signature in cursive script that reads "Cyndi C. Tuell".

Cyndi Tuell
Arizona and New Mexico Director
Western Watersheds Project

A handwritten signature in cursive script that reads "Sandy Bahr".

Sandy Bahr
Chapter Director
Sierra Club- Grand Canyon Chapter

Appendices

Appendix A WWP 2020 LHE comments

Appendix B WWP/SCGCC prior comments and civil litigation documents

Appendix C Annotated Bibliography (with select references included as attachments)

Appendix D WWP photos of SDNM 2008-2020

Appendix E SDT Complaint filed September 5, 2019

Appendix F GAO Unauthorized Grazing 2016

Appendix G CBD Complaint filed January 13, 2020

[EXTERNAL] Scoping comments for the Sonoran Desert National Monument (SDNM) Resource Management Plan Amendment/Environmental Assessment.

Chris Krupp <ckrupp@wildearthguardians.org>

Mon 4/27/2020 4:33 PM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

 2 attachments (108 KB)

Sonoran Desert NM RMP EA scoping comments.pdf; ATT00001.htm;

Dear Mr. Whitbeck, Attached are WildEarth Guardians' comments on the scope of the forthcoming Sonoran Desert National Monument (SDNM) Resource Management Plan Amendment/Environmental Assessment. The comments have also been submitted via E-Planning. Please contact me to confirm receipt of these comments. Thank you.

Public Lands Guardian

(206) 417-6363.

www.wildearthguardians.org





Submitted via e-planning

April 27, 2020

Doug Whitbeck
Range Management Specialist
Bureau of Land Management, Lower Sonoran Field Office
21605 N 7th Avenue
Phoenix, Arizona 85027
BLM_AZ_PDO_SDNMGrazing@blm.gov

Re: Scoping comments for the Sonoran Desert National Monument Resource Management Plan Amendment/Environmental Assessment

Dear Mr. Whitbeck:

WildEarth Guardians (Guardians) thanks you for the opportunity to submit these scoping comments regarding the Bureau of Land Management's (BLM) Sonoran Desert National Monument (SDNM) Resource Management Plan Amendment/Environmental Assessment. Guardians is a non-profit, public interest, education, and conservation organization whose mission is to protect and restore the wildlife, wild places, wild rivers, and health of the American West. Guardians has more than 220,000 members and activists across the United States. Guardians' members and staff use and enjoy the SDNM for various purposes, including, hiking and recreation, photography, quiet contemplation, and aesthetic appreciation. Guardians works to ensure the protection of species listed as endangered or threatened under the Endangered Species Act (ESA) across the West, including the Sonoran desert tortoise.

The SDNM faces many threats, including prolonged droughts from climate change, the growing spread of invasive plants that increase fuel loads for wildfire, and increases in vandalism of cultural sites and unpermitted/illegal off-highway vehicle (OHV) use. BLM is obligated to manage the SDNM consistent with the Antiquities Act and the presidential proclamation by which it was designated. That proclamation intended to limit livestock grazing on public lands within the monument in order to protect the monument's important scientific and cultural objects.. This is plain in the proclamation's language, which states that grazing on public lands north of I-8 "shall be allowed to continue only to the extent that the Bureau of Land Management determines that grazing is compatible with the paramount purpose of protecting the objects identified." Those identified objects include functioning desert ecosystems, a diversity of plant and animal species, a Saguaro cactus forest, archeological and historic sites, and the scientific analysis of plant species and climates in past eras.

Based on the proclamation language, in 2007, BLM's SDNM Monument Manager concluded that livestock grazing was incompatible with protecting the identified objects and other monument

resources. BLM nevertheless approved a Resource Management Plan (RMP) that permitted continued grazing in sensitive areas of the SDNM. A federal court ultimately determined the EIS prepared for the SDNM RMP did not adequately explain why livestock grazing was compatible with the monument and ordered the Bureau to complete a new Land Health Evaluation (LHE) and grazing compatibility determination and to then incorporate those decisions into the monument's Resource Management Plan. The new LHE was apparently prepared without public input. BLM is now relying on the LHE to support an Environmental Assessment (EA) to satisfy the federal court order.

In preparing the EA, BLM must identify and analyze a reasonable range of alternatives to the proposed action. Given the proclamation designating the SDNM, a "no grazing" alternative is clearly reasonable and must be the environmentally preferable alternative to any proposal that permits grazing north of I-8. All alternatives must comport with the SDNM proclamation that protection of the monument's identified objects is of paramount importance. BLM's discretion here is inherently limited; if scientific analysis determines that continued livestock grazing north of I-8 will harm the identified monument objects it cannot be authorized.

BLM must also ensure protection of ESA-listed species, such as the Sonoran desert tortoise. Impacts to special status species, such as the Sonoran pronghorn, must also be analyzed and mitigated. Livestock compete with these wildlife species for forage and the impacts of livestock "crowding out" wildlife for forage must be analyzed.

BLM must be realistic in its analysis of any proposed mitigation and monitoring. The Bureau is chronically understaffed and the recent pandemic promises even greater strain on future funding of BLM activities. Funding for mitigation and monitoring is often the first to be cut from a land management agency's budget in times of shortfall. Guardians advocates for no livestock grazing north of I-8 to protect the SDNM's important cultural and scientific objects, but if any grazing is proposed, it is imperative that it be conditioned on mitigation and meeting established benchmarks of mandatory vegetation/rangeland monitoring.

The historical impact of livestock grazing on SDNM lands must be discussed in the EA to provide context for the public and the decision-maker. Major adverse impacts caused by grazing to SDNM soils, native vegetation, and wildlife must be presented. Grazing's role in the spread of invasive plant species must also be discussed. Given the historical impacts of grazing, it will be very difficult to justify any amount of livestock grazing north of I-8 as compatible with protecting SDNM's scientific and cultural objects of importance.

Thank you for the opportunity to comment on the scope of the Sonoran Desert National Monument (SDNM) Resource Management Plan Amendment/Environmental Assessment. Please place Guardians on the mailing list to receive all notices and documents pertaining to the EA. Contact information is below.

Sincerely,

A handwritten signature in black ink, appearing to read "Christopher J. Krupp". The signature is written in a cursive, flowing style.

Chris Krupp

Public Lands Guardian
WildEarth Guardians
10015 Lake City Way #414
Seattle, WA 98125
ckrupp@wildearthguardians.org
(206) 417-6363

[EXTERNAL] COMMENTS: Sonoran Desert National Monument Resource Management Plan Amendment/Environmental Assessment

Joe Trudeau <JTrudeau@biologicaldiversity.org>

Mon 4/27/2020 4:53 PM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

 1 attachments (612 KB)

2020.04.27 NOI RMP Amendment SDNM [CBD comments].pdf;

April 27, 2020

Bureau of Land Management, Sonoran Desert National Monument
Edward J. Kender, Lower Sonoran Field Office Manager
21605 North 7th Avenue
Phoenix, Arizona 85027

Submitted electronically to BLM_AZ_PDO_SDNMGrazing@blm.gov

RE: Notice of Intent To Amend the Resource Management Plan for the Sonoran Desert National Monument, Arizona, and Prepare an Associated Environmental Assessment

Dear Bureau of Land Management,

The attached letter supplies the Bureau of Land Management (BLM) with the Center for Biological Diversity's comments on the March 26, 2020 Notice of Intent to prepare an Environmental Assessment and amend the Resource Management Plan for the Sonoran Desert National Monument. We appreciate the BLM posting the related Grazing Compatibility Analysis and Land Health Evaluation on the agency's e-planning website.^[1] This letter supplies comments on these related documents as well. Under NEPA regulations, BLM must consider comments that are timely received.^[2] The Notice of Intent states that comments should be submitted in writing by April 27, 2020, making these comments timely.

Thank you for considering our comments and supporting documents which will be sent in a subsequent email. We encourage the BLM to make a science-based decision and select Alternative B, and end livestock grazing on the Sonoran Desert National Monument. We look forward to future opportunities to engage on this project, and would like to be informed of any opportunities to comment, meet, or otherwise participate in the public process. Thank you for your service to our public lands.

Joe Trudeau | Southwest Conservation Advocate
CENTER for BIOLOGICAL DIVERSITY
jtrudeau@biologicaldiversity.org
(cell) 928-800-2472

^[1] <http://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=dispatchToPage¤tPageId=200008218>

^[2] 43 C.F.R. § 46.305(a)(1)



April 27, 2020

Bureau of Land Management, Sonoran Desert National Monument
Edward J. Kender, Lower Sonoran Field Office Manager
21605 North 7th Avenue
Phoenix, Arizona 85027

Submitted electronically to BLM_AZ_PDO_SDNMGrazing@blm.gov

RE: Notice of Intent To Amend the Resource Management Plan for the Sonoran Desert National Monument, Arizona, and Prepare an Associated Environmental Assessment

Dear Bureau of Land Management,

This letter supplies the Bureau of Land Management (BLM) with the Center for Biological Diversity's (the Center) comments on the March 26, 2020 Notice of Intent to prepare an Environmental Assessment and amend the Resource Management Plan for the Sonoran Desert National Monument (the Proposed Action). We appreciate the BLM posting the related Grazing Compatibility Analysis (GCA) and Land Health Evaluation (LHE) on the agency's e-planning website.¹ This letter supplies comments on these related documents as well. Under NEPA regulations, BLM must consider comments that are timely received.² The Notice of Intent states that comments should be submitted in writing by April 27, 2020, making these comments timely.

The Center has long advocated for protection of the objects identified in the Sonoran Desert National Monument Proclamation (SDNM), which include functioning desert ecosystems, a diversity of plant and animal species, wildlife, Saguaro cactus forest, scientific analysis of plant species and climates in past eras, vegetation communities, and archeological and historic sites.

The purpose of the BLMs proposed action is to “*consider the compatibility of livestock grazing with the monument objects for which the SDNM was established and amend the 2012 SDNM RMP/ROD.*”³ The Monument Proclamation states that “*grazing on Federal lands north of Interstate 8 shall be allowed to continue only to the extent that the Bureau of Land Management determines that grazing is compatible with the paramount purpose of protecting the objects identified in this proclamation.*” Furthermore, the BLM “*shall manage the public lands under principles of multiple use and sustained yield ... except that where a tract of such public land has been dedicated to specific uses according to any other provisions of law it shall be managed in accordance with such law.*”⁴

Based on the best available scientific information which we present in this letter, and considering that “*the national monument shall be the dominant reservation,*”⁵ the Center asserts that livestock grazing is fundamentally incompatible with the paramount purpose of protection of the Monuments objects.⁶ Therefore, we support the selection of Alternative B, the No Grazing Alternative for all allotments within the area under analysis.

¹ <https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=dispatchToPatternPage¤tPageId=200008218>

² 43 C.F.R. § 46.305(a)(1)

³ Scoping Overview at 3.

⁴ FLPMA, 43 U.S.C. § 1732 (a), bold emphasis added.

⁵ Monument Proclamation, at 4.

⁶ On January 17, 2001 the Sonoran Desert National Monument (SDNM) was designated by Presidential Proclamation 7397 and stated that “...grazing on Federal lands north of Interstate 8 shall be allowed to continue only to the extent that the Bureau of Land Management determines that grazing is compatible with the paramount purpose of protecting the objects identified in this proclamation.”

I. Relevant Issues for Analysis

The BLM’s Scoping Overview document⁷ identifies two preliminary issues for analysis:

1. Direct, indirect, and cumulative impacts from livestock grazing on monument objects, other resources, and allowable uses; and
2. Impacts to livestock operators.

The first issue is fairly broad and open-ended, and should be expanded into sub-categories. For example, the issue of grazing impacts on desert tortoise poses a substantially different set of concerns than grazing impacts on recreation driving. Lumping all “other resources and allowable uses” in with the protected objects of the Monument gives short shrift to the outstanding nature of the protected objects. We recommend separating out impacted objects from the resources and uses, as the level of scrutiny given to the former should be more than the latter.

The second issue seems contradictory to the purpose of the monument, which is not to support livestock operators. Nowhere in the Monument Proclamation are livestock operators identified as an object to be protected. In fact, quite the opposite is the case, as the monument established a requirement for permit retirement south of Interstate 8, and set a high bar for allowing grazing north of Interstate 8. Furthermore, as we described already, designation as a National Monument relieves the agency from considering the full range of multiple use considerations. According to the Multiple Use Sustained Yield Act, not all public land resources are likely to be available and suitable for use in every management area. The Act clearly establishes that “*some land will be used for less than all of the resources*” and that public lands are utilized in such a manner that does not impair the productivity of the land.⁸ For these reasons, and more, we recommend that the issue of impacts on operators be removed from further consideration.

We propose the following issues for analysis:

- The effects of livestock grazing on invasive plant introduction and spread.
- The effects of increased livestock use on the survival of desert tortoise.
- The indirect and cumulative effects of invasive plant occurrence on wildfire risk and probability.⁹
- The indirect and cumulative effects of livestock grazing and climate change on monument objects.
- The indirect and cumulative effects of livestock grazing operations (roads, water developments, fencing, and human pressure and associated impacts) on Monument objects.
- The dramatic reversal from the facts stated in the October 31, 2007 determination by BLM that “*livestock grazing is not compatible with the paramount purposes of protecting the objects of the monument and therefore the SDNM should be closed to livestock grazing.*”¹⁰

⁷ https://eplanning.blm.gov/epl-front-office/projects/nepa/1502599/20015327/250020468/Scoping_Overview.pdf

⁸ 16 U.S.C. § 531.

⁹ Recent research has linked cattle grazing to prevalence of cheatgrass and subsequent susceptibility to rangeland fires: Williamson, M.A., Fleishman, E., Mac Nally, R.C. et al. 2019. [Fire, livestock grazing, topography, and precipitation affect occurrence and prevalence of cheatgrass \(Bromus tectorum\) in the central Great Basin, USA](#). *Biological Invasions* 22: 663-668.

¹⁰ Sonoran Desert National Monument Briefing Paper for the State Director, dated Oct. 31, 2007.

II. The Proposed Action Requires an EIS

NEPA is designed to foster informed and transparent decision-making.^{11,12} It requires federal agencies to “[e]ncourage and facilitate public involvement in decisions which affect the quality of the human environment,”¹³ and to use high quality information because “[a]ccurate scientific analysis...and public scrutiny are essential to implementing NEPA.”¹⁴ To these ends, courts have held that environmental review documents must be written in plain, clear language and “supported by evidence that the agency has made the necessary environmental analyses.”¹⁵

NEPA outlines several requirements, including a purpose and need statement to provide the guideposts for the analysis of the proposed action, alternatives, and environmental effects.¹⁶ It is interesting that the BLM has provided a “preliminary” purpose and need. Does BLM intend on changing the project purpose and need between scoping and issuance of a Draft EA or EIS?

NEPA also requires federal agencies to “study, develop, and describe appropriate alternatives to recommend courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources.”¹⁷ As we have stated elsewhere in this letter, we support Alternative B, which would make all allotments within the SDNM north of I-8 unavailable for livestock grazing.

In evaluating the significance of the impacts of the proposed action, BLM must consider both the context of the action as well as the intensity. “NEPA requires that a federal agency consider every significant aspect of the environmental impact of a proposed action and inform the public that it has indeed considered environmental concerns in its decision making process.”¹⁸ This includes preparation of an environmental impact statement (EIS) for all “major Federal actions significantly affecting the quality of the human environment.”¹⁹ The several contexts in which the significance of an action must be analyzed include: “society as a whole (human, national), the affected region, the affected interests, and the locality.”²⁰ This requirement contrasts with the BLM’s decision to use the SDNM north of Interstate 8 as the resource screening analysis area.²¹ The SDNM is protected as part of a National Landscape Conservation System. Intensity refers to the severity of impact, and is determined by scrutinizing the ten factors described in 40 C.F.R. § 1508.27. The following intensity factors implicate the need for an EIS for the proposed action:

Intensity factor #3 is implicated in the BLMs proposed action. This factor states: “Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.”

The area under analysis is a National Monument containing protected objects identified in the Monument Proclamation, including wildlife, plants, and their habitats. The SDNM protects examples of habitats that are unique to Arizona, and as such the site is nationally significant. The area under analysis also contains some of the highest ranked category of Sonoran desert tortoise habitat in the southwest.

Intensity factor #4 is implicated in the BLMs proposed action. This factor states: *The degree to which the effects on the quality of the human environment are likely to be highly controversial.*

¹¹ 40 C.F.R. § 1500.1

¹² See also: *Robertson v. Methow Valley Citizens Council*, 490 U.S. 322, 349 (1989)

¹³ 40 C.F.R. § 1500.2(d)

¹⁴ 40 C.F.R. § 1500.1(b)

¹⁵ See, e.g., *Earth Island Inst. v. U.S. Forest Service*, 442 F.3d 1147, 1160 (9th Cir. 2006)

¹⁶ 40 C.F.R. § 1502.13

¹⁷ 42 U.S.C. § 4332(2)(E)

¹⁸ *Pit River Tribe v. U.S. Forest Serv.*, 469 F.3d 768, 781 (9th Cir. 2006).

¹⁹ 42 U.S.C. § 4332(2)(C)

²⁰ 40 C.F.R. § 1508.27.

²¹ Scoping Overview at 5.

A proposal is highly controversial, mandating preparation of an EIS, when (1) “*substantial questions are raised as to whether a project ... may cause significant degradation of some human environmental factor;*” or (2) there is “*a substantial dispute [about] the size, nature, or effect of the major Federal action.*” A substantial dispute exists “*when evidence, raised prior to the preparation of an EIS or FONSI, casts serious doubt upon the reasonableness of an agency’s conclusions.*” The burden is placed on the agency to “*come forward with a ‘well-reasoned explanation’ demonstrating why those responses disputing the EA’s conclusions ‘do not suffice to create a public controversy based on potential environmental consequences.’*”²² Further, where “*the environmental effects of a proposed action are highly uncertain or involve unique or unknown risks, an agency must prepare an EIS.*”²³

There is no land use more controversial than public lands livestock grazing in protected desert National Monuments. The GCA cites Holecheck et al (2005)²⁴ in supporting the proposed action. We would like to cite this technical report too: “*Conflict over management of public grazing lands in the western United States is becoming increasingly contentious; the land base there has shrunk due to rapid human population increase, urban sprawl, and changing social values.*”²⁵ Holecheck wrote that fifteen years ago, and the problem is even more pressing now. Livestock grazing is simply incompatible with the demands placed on protected areas like the SDNM. Numerous lawsuits have been filed over livestock grazing in protected areas, including the lawsuit that spurred the current analysis. The BLM is being sued over a proposal to expand livestock grazing in the San Pedro RNCA, and the Forest Service is being sued over livestock grazing on six National Forests in the southwest. Considerable controversy exists in the failure of the public lands management agencies to protect wildlife habitat and recreational areas from the effects of livestock grazing. We contend it is exceedingly controversial that the BLM continually approves grazing in spite of reams of published literature describing the deleterious impacts of livestock on numerous resources.

Intensity factor #8 is implicated in the BLMs proposed action. This factor states: “*The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural or historical resources.*”

The area under analysis is a National Monument containing protected objects identified in the Monument Proclamation, including archaeological and historic sites. In this letter we have supplied information supporting our assertion that those resources will be damaged from livestock use.

Intensity factor #10 is implicated in the BLMs proposed action. This factor states: “*Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.*”

As we have described elsewhere in this letter, livestock grazing is not compatible with protection of the Monuments objects. To approve livestock grazing as described in either Alternative A or C²⁶ would constitute an arbitrary and capricious decision, violating the Monument Proclamation, the National Environmental Policy Act, and requirements to utilize the best available scientific information.

²² 40 C.F.R. § 1508.27(b)(4), *Nat’l Parks & Conservation Ass’n. v. Babbitt*, 241 F.3d 722, 736 (9th Cir. 2001)

²³ *Ocean Advocates v. U.S. Army Corps of Engineers*, 402 F.3d 846, 870 (9th Cir. 2005) (citing 40 C.F.R. § 1508.27(b)(5)).

²⁴ Holecheck, J.L., T.T “Red” Baker, and J.C. Boren. 2005. Impacts of Controlled Grazing Versus Grazing Exclusion on Rangeland Ecosystems: What We Have Learned. Agricultural Experiment Station. Cooperative Extension Service. College of Agriculture and Home Economics. New Mexico State University. Range Improvement Task Force Report No.: 57.

²⁵ Holecheck et al (2005) at 2.

²⁶ Scoping Overview at 2.

III. The BLM Must Use the Best Available Scientific Information in Analyzing the Proposed Action

The Department of Interior has historically been committed to implementing a policy of using the best available scientific information for planning resource treatments, a principal foundation for protection of the Monuments objects. The DOI Policy for the Integrity of Scientific and Scholarly Activities posits as its central tenet at §3.4 Policy “*The Department... will not tolerate loss of integrity in the performance of scientific and scholarly activities or in the application of science and scholarship in decision making...*” This policy further requires that scientific findings and conclusions be made subject to public vetting, requiring the agency to “*Document the scientific and scholarly findings considered in decision making and ensure public access to that information and supporting data through established Departmental and Bureau procedures....*”²⁷

Federal law ensures that all agencies shall “*initiate and utilize ecological information in the planning and development of resource-oriented projects.*”²⁸ FLPMA directs the BLM to manage the public lands in a manner “*that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archaeological values.*”²⁹ Furthermore, the BLM is expected to preserve “*certain lands in their natural condition; that will provide food and habitat for fish and wildlife.*”³⁰ “*NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA.*”³¹

We are concerned that the BLM has not used the best available scientific information in the LHE and GCA. Here, we critique the information presented in those documents, and provide some additional information which we request is considered in any subsequent document prepared for this analysis. Certain documents cited here will be emailed to the project email address for entry into the public record.

The GCA provides a literature review which “*examined numerous studies of livestock grazing in arid environments,*” although a mere 13 studies were cited, many more than two decades old. The GCA falsely claims that “*few studies were specific to the Sonoran Desert.*”³² This may be true of the 13 studies consulted for the GCA, but there is a key source which the BLM did not consult, which was written specifically for use in applications like the current proposed action. That source is a comprehensive literature review completed in 2005 by The Nature Conservancy. The report, titled “*The Impacts of Livestock Grazing in the Sonoran Desert: A Literature Review and Synthesis,*”³³ was produced for the BLM at the BLM’s request. The report begins by stating the following:

“To better inform decision-making, the Bureau of Land Management’s (BLM) Phoenix Field Office requested The Nature Conservancy in Arizona (Conservancy) to conduct a review of the scientific literature regarding the state of knowledge of: (1) the impacts of domestic livestock grazing (primarily cattle) on natural and cultural resources in desert ecosystems, with a focus on the Sonoran Desert; (2) the implications of different grazing management strategies; and (3) Sonoran Desert plant community dynamics. Specifically with respect to impacts, the BLM asked the Conservancy to evaluate the literature relative to how livestock grazing in the Sonoran Desert affects:

- *composition, structure, and function of plant communities*

²⁷ The DOI Policy for the Integrity of Scientific and Scholarly Activities at § 3.4.C

²⁸ 42 U.S.C. § 4332(H)

²⁹ 43 U.S.C. § 1701(a)(8)

³⁰ *Ibid*

³¹ 40 C.F.R. § 1500.1(b)

³² Grazing Compatibility Analysis at 2.

³³ Hall, J.A., S. Weinstein, and C.L. McIntyre. 2005. The Impacts of Livestock Grazing in the Sonoran Desert: A Literature Review and Synthesis. The Nature Conservancy in Arizona, Tucson.

- *saguaro recruitment and survival*
- *other individual components of plant communities (such as rare plants)*
- *soils and biological soil crusts*
- *wildlife, including non-game species*
- *cultural sites.*³⁴

That statement alone warrants the attention of the BLM on the basis of the report providing a general review of grazing in the Sonoran desert at the eco-regional level. But in fact, the report had an even more focused purpose, expressed later in the document:

*“The Sonoran Desert National Monument (SDNM) was established by Presidential Proclamation in January 2001 (see Appendix A) and as such is a unit within BLM’s National Landscape Conservation System. The SDNM is managed by the BLM out of its Phoenix Field Office. Although the BLM may still permit multiple land uses on the SDNM (in other words, the monument is not a “strict” nature preserve), the monument designation sets a higher standard of land management and protection that the BLM must meet based on the terms and values articulated in the Proclamation. The BLM is challenged with managing the SDNM in a way that protects the numerous objects for which the monument was designated, which include significant regionally examples of Sonoran Desert biodiversity such as dense stands of saguaro (*Carnegiea gigantea*) and xeroriparian corridors that provide habitat to neotropical migratory birds and other wildlife. As per the Proclamation, livestock grazing will be eliminated in portions of grazing allotments on the SDNM that are located south of Interstate 8 when current permits expire. **The Proclamation also requires BLM to assess whether livestock grazing on areas north of Interstate 8 on the SDNM is a land use compatible with protection of the objects described in the Proclamation. The BLM has chosen to conduct this assessment as part of the resource management planning process for the SDNM.**”³⁵*

We find it astonishing (not to mention disappointing) that the BLM has not leaned heavily on the TNC report for informing the current proposed action, GCA, and LHE. The report compiled 260 pieces of relevant literature, and included input from a 23-member External Review Committee comprising representatives from U.S. Fish and Wildlife Service, U.S. Geological Survey, Jornada Experimental Range, University of Colorado, Audubon Research Ranch, Arizona Game and Fish Department, Prescott College, New Mexico State University, The Wild Utah Project, University of Arizona, Desert Botanical Garden, Colorado State University, U.S. Forest Service, Natural Resources Conservation Service, Organ Pipe Cactus National Monument, and the Desert Laboratory. The final report cited 143 pieces of literature on the subjects of grazing impacts to cultural sites, plants, saguaro cacti, soils, biological soil crusts, vegetation communities, and wildlife.

Further, Hall et al (2005) provided a review of grazing strategies, ultimately concluding that “*no currently described approach, including continuous grazing and each of the specialized grazing systems, is completely applicable to or appropriate for the Sonoran Desert ecosystem within their current formulations.*”³⁶ This starkly contrasts with the LHE’s claim that “*Grazing schemes, such as deferred grazing, rotational grazing and seasonal grazing, featuring appropriate stocking rates that limit the use of perennial species, can prevent livestock grazing from significantly affecting the diversity and reproductive capability of forage species.*”³⁷ The conclusion of the LHE, that allowing cattle to graze the SDNM under adjusted scenarios, is baffling considering the number of plots that did not meet standards due to livestock being the causal factor, and that there are relatively few cattle on the land currently. The design of the LHE, which uses plot measurements collected between 2018 and 2018, undervalues the impacts of livestock grazing which had been in decline for a decade by

³⁴ Hall et al, 2005, at ES.1.

³⁵ Hall et al, 2005, at 1.1 to 1.2, bold emphasis added.

³⁶ Hall et al, 2005, at ES.1.

³⁷ Land Health Evaluation at 67.

the time the measurements were taken. Therefore, the final scores and recommendations drawn are not fully representative of the impacts of cattle.

The BLMs decision to cite Holecheck et al (1999) as support for 35-40% forage utilization is a testament to the lack of a scientific underpinning to the GCA. In this study, Holecheck and colleagues review five grazing stocking rate studies from three desert locations: 1) the Desert Experimental Range in southwestern Utah, 2) the Santa Rita Experimental Range in southcentral Arizona, and 3) the Jornada Experimental Range and Chihuahuan Desert Rangeland Research Center in southcentral New Mexico. None of these study areas are comparable to the SDNM, and as such, they have no utility. First of all, the study from the Desert Experimental Range in southwestern Utah involved wintering sheep, so there is no basis for utilizing this information in evaluating cattle use of the SDNM. The studies from the Jornada and Santa Rita Experimental Ranges are equally poor comparisons to the SDNM, being dominated by perennial bunchgrass and woodland communities. As stated in Hall et al (2005), the Jornada Experimental Range in New Mexico is comprised of “*plant communities containing significant amounts of perennial grasses that constituted the primary forage base [and] As a result, we don’t view the findings as transferable to the Sonoran Desert in a meaningful way.*”³⁸ Holechecks seminal work, “Range Management: Principles and Practices,”³⁹ which expands on his basis for setting utilization guidelines, is equally as useless for the SDNM as no Sonoran Desert sites are included.

The GCA cites Holecheck et al (2005)⁴⁰ as support for the proposed action. This technical paper, which was not subject to peer review, describes twenty studies comparing controlled grazing to grazing exclusion. None of these studies took place in the Sonoran Desert, and none were more recent than 1998. Most of the studies took place in prairies, coniferous forests, and grasslands which bear no resemblance to the SDNM. Two studies were from the Jornada Range Chihuahuan Desert, which we have already shown are not relevant or comparable. One study took place in the Utah/Arizona Mojave desert: Jeffries and Klopatek (1987).⁴¹ This study occurred in blackbrush vegetation communities at nearly 5,000 feet elevation, so again, this study is not comparable. However, it is worth noting that in that study the authors stated that the ungrazed “*relic site had significantly more herbaceous vegetation cover (composed primarily of perennial grasses) and total cover than all other sites. The relic site also had significantly more shrub and cryptogamic cover than the heavily grazed and recovery sites.*”⁴² Consistent with these findings, Holecheck et al (2005) conclude their review by admitting that “*Although claims have been made that intensive grazing can be beneficial to rangeland soils, over 30 studies are consistent in showing that grazing even at light to moderate intensities adversely impacts soils by increasing compaction, reducing infiltration, and increasing erosion.*”⁴³

As part of using the Best Available Scientific Information, the BLM must accurately describe the baseline conditions in the project area. “*In analyzing the affected environment, NEPA requires the agency to set forth the baseline conditions.*”⁴⁴ “*The concept of a baseline against which to compare predictions of the effects of the proposed action and reasonable alternatives is critical to the NEPA process...Once a project begins, the pre-project environment becomes a thing of the past and evaluation of the project’s effect becomes simply impossible.*”⁴⁵ “[W]ithout [baseline] data, an agency cannot carefully consider information about significant

³⁸ Hall et al, 2005, at E.16.

³⁹ Holecheck, J.L., R.D. Pieper, and C.H. Herbel. 2004b. Range Management: Principles and Practices. 5th edition. Pearson Prentice Hall, New Jersey. 607 p.

⁴⁰ Holecheck, J.L., T.T. “Red” Baker, and J.C. Boren. 2005. Impacts of Controlled Grazing Versus Grazing Exclusion on Rangeland Ecosystems: What We Have Learned. Agricultural Experiment Station. Cooperative Extension Service. College of Agriculture and Home Economics. New Mexico State University. Range Improvement Task Force Report No.: 57.

⁴¹ Jeffries, D.L., and J.M. Klopatek. 1987. Effects of grazing on the vegetation of the blackbrush association. *Journal of Range Management* 40(5): 390-392.

⁴² Jeffries & Klopatek (1987) at 390.

⁴³ Holecheck et al (2005) at 30.

⁴⁴ Western Watersheds Project v. Forest Service, 552 F.Supp.2d 1113, 1126 (D. Nev. 2008)

⁴⁵ Northern Plains v. Surf. Transp. Brd., 668 F.3d 1067, 1083 (9th Cir. 2011)

*environment impacts. Thus, the agency fails to consider an important aspect of the problem, resulting in an arbitrary and capricious decision.*⁴⁶

NEPA also requires federal agencies to take a “hard look” at the environmental consequences of proposed actions, including their direct, indirect, and cumulative effects.^{47,48} Direct effects are caused by the action and occur at the same time and place as the proposed project.⁴⁹ Indirect effects are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable.⁵⁰ Both types of impacts include “effects on natural resources and on the components, structures, and functioning of affected ecosystems,” as well as “aesthetic, historic, cultural, economic, social or health [effects].”⁵¹ The BLM must consider all direct, indirect, and cumulative environmental impacts of the proposed action, including the interactions between livestock grazing, climate change, invasive vegetation, and fire.⁵² The GCA fails to address the likely effects of climate change on Monument objects. The GCA states that “Climate has a profound influence on Sonoran Desert plant communities. Changes in plant species composition, density, and age structure may result from abnormally high seasonal precipitation or from periodic drought, obscuring or exacerbating impacts from human activities such as livestock grazing (Martin & 49 Turner 1977; Robinett 1992; Turner 1990).”⁵³ This brief assessment does not address the ability of the SDNM to adapt to a changing climate, including the movement of species north in latitude and up in elevation in response to warming temperatures, or the threats posed by expanding populations of invasive grasses which fuel wildfires. It also cites outdated literature.

Identification of cumulative impacts must be robust, and this can only be done if the Best Available Scientific Information is used to inform the analysis. The NEPA obligation to consider cumulative impacts extends to all “past,” “present,” and “reasonably foreseeable” future impacts.⁵⁴ Past cumulative effects analyses have violated NEPA because they failed to provide “adequate data of the time, place, and scale” and did not explain in detail “how different project plans and harvest methods affected the environment.”⁵⁵ When considering the effects of past actions as part of a cumulative effects analysis, the Responsible Official must analyze the effects in accordance with 40 CFR 1508.7 and in accordance with relevant guidance issued by the Council on Environmental Quality.⁵⁶

Hall et al (2005) provide a thorough review of grazing impacts to wildlife which occur at SDNM. In fact, their report states that “To limit the scope of our analysis and focus on the most relevant topics of concern to the Bureau of Land Management (BLM), for individual species impacts we narrowed our evaluation of the effects of livestock grazing (primarily cattle grazing) to those species that are present on or in the vicinity of the Sonoran Desert National Monument (SDNM).”⁵⁷ This synthesis is clearly the best scientific literature available, and must be used in the preparation of any subsequent documents and analyses.

⁴⁶ *Ibis* at 10850

⁴⁷ *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 348 (1989)

⁴⁸ 42 U.S.C. § 4332(2)(C); 40 C.F.R. §§ 1502.16, 1508.7, 1508.8

⁴⁹ 40 C.F.R. § 1508.8(a)

⁵⁰ 40 C.F.R. § 1508.8(b)

⁵¹ *Ibid*

⁵² 40 C.F.R. §§ 1502.16, 1508.8, 1508.25(c)

⁵³ *Grazing Compatibility Analysis* at 2.

⁵⁴ *Oregon Natural Resources Council Fund v. Brong*, 492 F.3d 1120, 1133 (9th Cir. 2007); *Lands Council v. Powell*, 395 F.3d 1019, 1028 (9th Cir.2005)

⁵⁵ *Ibid*

⁵⁶ 43 C.F.R. § 46.115; and see “The Council on Environmental Quality Guidance Memorandum on Consideration of Past Actions in Cumulative Effects Analysis” dated June 24, 2005, or any superseding Council on Environmental Quality guidance.

⁵⁷ Hall et al, 2005, at 2.2.

IV. SDNM is Irreplaceable Core Habitat for the Sonoran Desert Tortoise

The Sonoran desert tortoise is an extremely vulnerable species that heavily relies on the SDNM. As a listed object, the species must be protected from stressors and threats, including livestock grazing. The SDNM north of Interstate 8 contains more than 150,000 acres of Category 1 habitat, and approximately 20,000 acres of Category 2 habitat. The habitat on SDNM provides the largest high quality essential habitat on public lands in the species range.

The species is currently classified as a Tier 1b “Species of Greatest Conservation Need” by the Arizona Game and Fish Department. Additionally, the U.S. Fish and Wildlife Service has found that “*listing the Sonoran population of the desert tortoise is warranted*,” but, due to inter-agency issues, listing has been delayed and the species was stripped of its status as a “candidate” species, leaving its status to be determined by the courts. Regardless of the official current designation for this species, numerous scientific studies support the conclusion that it faces significant threats to survival within the state of Arizona, including within the SDNM if grazing is allowed.

Due to the status of this species in Arizona, as well as the historical and current interest in studying Southwest tortoises, there are numerous academic and scientific materials addressing the unique habitat needs for the Sonoran desert tortoise and the threats they face. Below, we have attempted to summarize many of these studies and sources. Tortoises generally prefer to live on rocky hillsides or outcrops, including preferentially on south-facing or northwest-facing slopes.^{58,59,60} However, Bridges (2012) documented tortoises using alluvial fans and washes, so these areas should also be considered when determining management of tortoise habitat. Movement within and between habitats has been less well documented. However, research has determined that males generally have larger home ranges.⁶¹ Additionally, while males are more active foragers in the summer months, females are more likely to spend time foraging in the winter and spring, before laying a clutch.

The relatively long maturity period for tortoises, as well as their small clutch sizes, requires high adult survival for a population to remain viable. Given that adults typically have long lifetimes, changes in population size due to decreases in juvenile populations may take many years to manifest themselves. It also means that population fragmentation and disruption that has occurred in the relatively recent past may not yet have exacted a toll on populations within Arizona. However, significant decreases in population in successive years have been documented and are most likely associated with low precipitation or forage resources due to drought.

Desert tortoise is a hibernating species. Bridges (2012) observed that abundance and availability of shelter sites is a key determining factor in the number of tortoises that a habitat is able to support. They are most active from mid-summer to early fall, while tending to be in burrows or undertaking relatively less movement throughout the rest of the year.⁶² However, it is important to note that more recent studies have demonstrated that tortoises, especially females, do utilize plants, water sources, and sunlight during the winter months more than expected, demonstrating that year-round protection of habitat is of high importance.⁶³

⁵⁸ Germano, D.J., et al. 1994. Range and habitats of the desert tortoise. *Biology of North American Tortoises. National Biology Survey Technical Report Series, Fish and Wildlife Research* 13: 73-84.

⁵⁹ Bailey, S.J. 1992. Hibernacula use and home range of the desert tortoise (*Gopherus agassizii*) in the San Pedro Valley, Arizona

⁶⁰ Bridges, A. 2012. Sonoran Desert Tortoise (*Gopherus morafkai*) Growth and Juvenile Habitat Selection at a Long-term Study Site in Central Arizona, USA. Diss. Arizona State University.

⁶¹ Averill-Murray, R.C., and C.M. Klug. 2000. Monitoring and ecology of Sonoran Desert tortoises in Arizona. Arizona Game and Fish Department.

⁶² Martin, B.E. 1995. Ecology of the desert tortoise (*Gopherus agassizii*) in a desert-grassland community in southern Arizona.

⁶³ Sullivan, B. K., Averill-Murray, R., Sullivan, K. O., Sullivan, J. R., Sullivan, E. A., & Riedle, J. D. (2014). Winter Activity of the Sonoran Desert Tortoise (*Gopherus morafkai*) in Central Arizona. *Chelonian Conservation and Biology*, 13(1), 114-119. Concluding that “it would be prudent to take measures to minimize potential impacts to tortoises during development projects in winter, especially given the likelihood of slow movement and a concentration of individuals in low areas where water collects.”

It is well known that human development and activities have a generally negative effect on native species. For the desert tortoise, this is especially true, due to its reliance on heavily used desert environments, its relatively slow movement, the length of time before maturity is reached, and its low reproductive capacity. Edwards et al. (2004⁶⁴) found that additional problems presented by human development for this species are the barriers that have been created to gene flow between distinct populations of tortoises. The findings of this study showed that this absence of gene flow, which was an important aspect of the tortoise's evolution, has had the effect of isolating reproducing individuals of this species, increasing the risk that any one population could succumb to disease or other threats.

Of course, the desert tortoise faces many other threats, including “*habitat loss and degradation from urban and agricultural development and roads, wildfires associated with invasion by non-native grasses and forbs, illegal collection, and genetic contamination of wild populations by escaped or released captives.*”⁶⁵ According to the Arizona Game and Fish Department, fire and grazing are the most important issues that need to be addressed for proper management of this species.⁶⁶ Esque et al. (2003⁶⁷) found that tortoise mortality was evident after desert grassland fires in Arizona, indicating that fire was indeed a cause of direct and potentially indirect mortality in desert tortoises. However, within this same study, researchers found evidence of numerous live tortoises, meaning that fire did not completely disrupt habitats and that these animals can recover naturally from natural disturbances such as fire. While studies focused on the interactions between livestock and tortoises have primarily been undertaken with the Mojave desert tortoise populations, there is no indication that the long-term, negative impacts on tortoise survival and viability from livestock grazing are any different in the Sonoran population. One of the key impacts on tortoises from livestock is competition for food sources, as desert tortoises graze daily during their active season, primarily on grasses (Bridges 2012). Another key way that livestock threaten tortoises is by crushing, or direct mortality. Livestock also promote the spread of non-native invasive plants that contribute to unnatural fire regimes, which also affects tortoises.

A further threat to the desert tortoise is increased presence of humans within its habitat, especially when that activity involves off-road vehicles or pets, such as dogs. Off-road vehicle use has increased dramatically in the last few decades, which has resulted in greater use of these vehicles off forest roads and in delicate habitat areas. Because tortoises are slow moving, they are unable to move out of the way of oncoming vehicles, making them particularly vulnerable to roads, motorized trails, and off-road use within their habitat and corridors between populations. Capture, harassment, and shooting of desert tortoise have all been documented in Arizona. Even if these activities do not cause direct mortality, they create stress and negative physiological effects that can decrease survival and reproduction.

⁶⁴ Edwards, Taylor, et al. "Implications of anthropogenic landscape change on inter-population movements of the desert tortoise (*Gopherus agassizii*)."*Conservation Genetics* 5.4 (2004): 485-499

⁶⁵ Management Plan for the Sonoran Desert Population of the Desert Tortoise in Arizona, AZ Interagency Desert Tortoise Team (Dec. 1996) at 17, available at http://www.azgfd.gov/w_c/documents/AIDTT1996.pdf.

⁶⁶ Id. at 22. Noting that “grazing by cattle and sheep may result in long-term vegetation changes, disturbance of cryptobiotic crusts, elevated soil erosion and compaction, and reduced infiltration rates.” (citations omitted) Habitat degradation has also been found to be highest near water sources, where livestock are most likely to congregate. Livestock grazing was shown to be a factor in both direct and indirect mortality of tortoises in areas where it occurs.

⁶⁷ Esque, Todd C., et al. "Effects of desert wildfires on desert tortoise (*Gopherus agassizii*) and other small vertebrates." *The Southwestern Naturalist* 48.1 (2003): 103-111.

V. Archeological and Historic Sites

Archeological and historic sites are Monument objects that must be protected. The project area is located in a region rich with cultural sites spanning millennia of human habitation. In the modern era, plant communities within the project area are valued by Native Americans, and tribes may be actively using the area for ceremonial purposes. The Center is not aware of any scientific evidence that supports the notion that livestock grazing is compatible with the protection of these sites. The BLM's own analyses confirm that livestock have significant adverse effects on cultural resources. For example, the Final EIS prepared for the Bodie-Coleville planning units concluded:

*"Livestock use impacts on cultural resources include: displacement (vertical and horizontal) and breakage of artifacts, and the mixing of depositional associations through trampling; destruction or enhanced deterioration of structures and features through rubbing; and an acceleration of natural erosional processes. Plants valued by Native American traditionalists could be trampled or consumed by livestock, adversely affecting plant availability at some location. ... Cultural resources are non-renewable, and impacts of livestock use on cultural resources are cumulative."*⁶⁸

Additional adverse effects from grazing include soil compaction, toppling of architectural features, creation of movement corridors, and degradation of springs and streams, all or most of which are themselves cultural resources from the perspective of tribal cultural representatives and others.

The term "archeological and historic sites" inclusively refers to all places, objects, and associated traditions that constitute essential links between the past and the present. Fragile, irreplaceable, and generally nonrenewable, cultural resources are recognized using various terms of reference in many U.S. Federal laws, regulations, and policies, including but not limited to *historic properties* (NHPA); human remains, *cultural items* and cultural patrimony (NAGPRA), *archaeological resources* (ARPA), *sacred sites* (E.O. 13007), and elements of the human environment (NEPA).

Archeological and historic sites define and orient the people of the United States and our national character, while also providing senses of orientation, place, belonging, and distinctiveness to America's innumerable constituent communities. The existence of Archeological and historic sites, as well as their settings, locations, materials, workmanship, feelings, and associations, can and do have profound significances for people and groups. Individuals and communities rely upon, utilize, ascribe meanings to, and derive benefits from archeological and historic sites on the basis one or more of their manifold values: aesthetic, economic, educational, historical, inspirational, political, scientific, social, spiritual, etc.

For no sector of the United States are the values of archeological and historic sites greater or more potent or persistent than they are for federally recognized American Indian people and tribes. In evaluating the suitability of grazing on the SDNM, the BLM must reflect consideration of the interests and preferences of the tribes having documented and ongoing historical and cultural connections to Monument and the surrounding area. This is true, first and foremost, because of the U.S. Government's judicially enforceable trust responsibility for the welfare of tribes and tribal citizens. The protection of archeological and historic sites is necessary because cultural resource laws, regulations, policies, and court decisions that are directly relevant to the SDNMF and because of the long and virtually unbroken history of BLM management decisions that have had and are having unmistakably adverse effects on these resources and, thereby, on the tribes and the tribal and nontribal communities that rely upon cultural resources.

⁶⁸ Bodie-Coleville EIS 1982:4-92. For additional BLM recognitions of significant adverse on cultural resources due to grazing, see Haas, D. 2006. "Summary of Livestock Grazing Impacts on Archaeological Sites Located on BLM-Administered Lands in Colorado, A Study of Cultural Resource Assessments for Grazing Permits from Fiscal Years 1998 to 2003." Bureau of Land Management, Colorado State Office, Denver.

Federal authorities that specifically and directly require continuing compliance, consultation, consideration and protection efforts by the BLM include:

*The National Historic Preservation Act*⁶⁹ requires federal agencies to take into account the effects of their undertakings on historic properties. NHPA's Section 101 (d)(6)(A) affirms that properties of religious and cultural significance to Indian tribes may be eligible for listing in the National Register of Historic Places. NHPA's Section 106 regulations⁷⁰ require agency consultations throughout the Section 106 process with any Indian tribe that attaches religious and cultural significance to historic properties that may be affected by the agency's undertakings. In order to comply with section 106 the BLM must “*take into account the effect of [any] undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register [of Historic Places].*”⁷¹ Federal courts have described section 106 as a “*stop, look, and listen provision that requires each federal agency to consider the effects of its programs*” on historic properties and cultural resources.⁷²

It would be a clear violation of Section 106 of the National Historic Preservation Act to allow livestock grazing in any area currently not grazed without a cultural inventory of the area and identification of potential sites for listing on the historic register. BLM is obligated to “*consult, coordinate, and cooperate with relevant State, local, and tribal governments and other bureaus and Federal agencies concerning the environmental effects of any Federal action within the jurisdictions or related to the interests of these entities.*”⁷³

If such an inventory has been conducted, any subsequent NEPA document must disclose the results of the inventory, and analyze the impacts to the resources identified therein.

For any undertaking, all federal agencies must: (1) “*make a reasonable and good faith effort...to identify historic properties within the area of potential effects,*” “*which may include background research, consultation, oral history interviews, sample field investigation, and field survey;*” (2) determine whether identified properties are eligible for listing on the National Register of Historic Places; (3) assess the effects of the undertaking on any eligible properties; and (4) avoid, minimize, or mitigate any adverse effects.⁷⁴

BLM’s Manual 8110.21 identifies three types of surveys that may be used to satisfy the agency’s duty to make a reasonable and good faith effort to identify historic properties:

Class I – existing information inventory

Class II – probabilistic field survey

Class III –intensive field survey⁷⁵

Each is designed to provide specific kinds of cultural resource information for various planning and resource management needs. The most frequently employed method of inventory is a class III survey carried out for specific projects to enable BLM to comply with Section 106 before making decisions about proposed land and resource uses. The inventory step is a critical prerequisite to the remainder of the section 106 process: “[i]t is simply impossible for an agency to take into account the effects of its undertaking on historic properties if it does not even know what those historic properties are in the first place.”⁷⁶ An intensive, class III field survey

⁶⁹ 16 U.S.C. Section 470f

⁷⁰ 36 CFR Part 800

⁷¹ 54 U.S.C. § 306108

⁷² *Mont. Wilderness Ass’n v. Connell (MWA)*, 725 F.3d 988, 1005 (9th Cir. 2013)

⁷³ 43 C.F.R. § 46.155 (emphasis added)

⁷⁴ 36 C.F.R. §§ 800.1(a), 800.4(b), 800.5, 800.6, 800.8(c)(1)(v) & (c)(4)

⁷⁵ BLM Manual 8110.21A-C

⁷⁶ 65 Fed. Reg. 77,698, 77,715 (Dec. 12, 2000 Advisory Council on Historic Preservation describing inventory requirements)

“is most useful when it is necessary to know precisely what historic properties exist in a given area,” such as with vegetation management decisions.⁷⁷

Conducting class III surveys is necessary to ensure BLM has a complete inventory of cultural resources and historic properties and can accurately assess the impacts of grazing and associated vehicle use⁷⁸ on historic sites. If BLM does not know where cultural resources are located, it cannot possibly locate habitat management actions in such a way as to minimize impacts to those resources, as required under Executive Orders 11644 and 11989 and 43 C.F.R. § 8342.1

The National Environmental Policy Act requires an environmental impact statement (EIS) for any proposed federal action that may significantly affect the quality of the human environment. The NEPA statute does not specifically refer to Indian tribes, but Council on Environmental Quality regulations⁷⁹ require agencies to (1) contact Indian tribes early in the planning process and provide tribes opportunities to consult and participate in EIS preparation; (2) enable tribes to participate as cooperating agencies with federal agencies in NEPA reviews; and (3) “recognize the interrelated cultural, social, occupational, historical, or economic factors that may amplify the natural and physical environmental effects of the proposed agency action.”

The American Indian Religious Freedom Act (AIRFA) commits the federal government “to protect and preserve for American Indians their inherent right of freedom to believe, express, and exercise the traditional religions of the American Indian ... including, but not limited to, access to sites, use and possession of sacred objects, and the freedom to worship through ceremonials and traditional rites.”

The Native American Graves Protection and Repatriation Act (NAGPRA), Section 3(c) requires federal agencies to consult with Tribes prior to the intentional removal or excavation of Native American human remains and other cultural items from federal lands.

Executive Order 12898, Environmental Justice in Minority and Low-Income Populations, requires federal agencies to make environmental justice part of its mission by identifying and addressing “disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.”

Executive Order 13007, Indian Sacred Sites, applies to all federally owned lands except Indian trust lands (that is, reservations). It requires the BLM and other agencies that manage federal lands to (1) accommodate access to and ceremonial use of Indian sacred sites by Indian religious practitioners; and (2) avoid adversely affecting the physical integrity of such sites.

Executive Order 13175, Consultation and Coordination with Tribal Governments requires consultation with Indian Tribal Governments in “formulating or implementing policies that have tribal implications” and aims in part “to strengthen the United States’ government-to-government relationships with Indian tribes.” Consultation processes must embody the unique relationship between the U.S. and the Indian tribe(s).

⁷⁷ BLM Manual 8110.21(C)

⁷⁸ Direct impacts of vehicular travel to cultural resources are well documented and commonsensical. When vehicles drive over historic features, those features are degraded if not outright destroyed. Even for sites wholly under the ground, vehicular travel can have a direct impact through soil compaction. Particularly given the well-documented, adverse impacts of motorized use on cultural resources, it is vitally important that BLM minimize or eliminate the use of vehicles and machinery to achieve habitat improvement objectives. For example, see Hedquist, S.L., L.A. Ellison, and A. Laurenzi. 2014. [Public Lands and Cultural Resource Protection: A Case Study of Unauthorized Damage to Archaeological Sites on the Tonto National Forest, Arizona](#). *Advances in Archaeological Practice* 2(4): 298-310 (a study finding unauthorized damage occurring more frequently at sites accessible by motorized vehicle), and Hartley, D.A., Thomson, J.L., Morton, P. and Schlenker-Goodrich, E. 2003. [Ecological Effects of a Transportation Network on Wildlife: A Spatial Analysis of the Upper Missouri River Breaks National Monument](#). The Wilderness Society, Washington DC, 1-27, (“Transportation access . . . increases vandalism, theft, and damage to archaeological and cultural sites.”).

⁷⁹ 1501.2(d)(1) and 1501.7(a)(1) and see <https://ceq.doe.gov/nepa/regs/ej/justice.pdf>

Thank you for considering our comments representing the concerns and wishes of our 1.7 million members and online activists. We encourage the BLM to make a science-based decision and select Alternative B, and end livestock grazing on the SDNM permanently. We look forward to future opportunities to engage on this project, and would like to be informed of any opportunities to comment, meet, or otherwise participate in the public process. Thank you for your service to our public lands.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Trudeau", followed by a long horizontal line.

Joe Trudeau
Southwest Conservation Advocate
Center for Biological Diversity
PO Box 1013, Prescott, AZ 86302
jtrudeau@biologicaldiversity.org
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[EXTERNAL] Notice of Intent to Amend the Resource Management Plan for the Sonoran Desert National Monument, Arizona, and Prepare an Associated Environmental Assessment

jwelch@archaeologysouthwest.org <jwelch@archaeologysouthwest.org>

Mon 4/27/2020 5:37 PM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

Cc: 'William Doelle' <wdoelle@archaeologysouthwest.org>

April 27, 2020

Bureau of Land Management, Sonoran Desert National Monument

Edward J. Kender, Lower Sonoran Field Office Manager

21605 North 7th Avenue

Phoenix, Arizona 85027

Submitted electronically via BLM_AZ_PDO_SDNMGrazing@blm.gov

Dear Bureau of Land Management:

Thank you for the opportunity to provide Archaeology Southwest's (ASW) comments on the March 26, 2020 Notice of Intent to prepare an Environmental Assessment and amend the Resource Management Plan for the Sonoran Desert National Monument (Proposed Action).

Archaeology Southwest is a Tucson-based membership organization dedicated to the preservation, enjoyment, and investigation of heritage places of the American Southwest. Archaeology Southwest's mission mandates collaborations with tribes, private partners, and federal, local, and state governments to explore and protect the places of the past. This mandate, together with our ethical obligations as cultural resource researchers and stewards, rivets our attention to cultural resource issues in public land and resource management.

Cultural resources refer to places, objects, and traditions created in the past and valued in the present. Fragile, generally irreplaceable and nonrenewable, and too often subject to damage and abuse, cultural resources are vital bonds among human generations and between humans and landscapes. Although "cultural resources" is not explicitly defined in U.S. federal statutes or regulations, innumerable laws, policies, and customary practices affirm the high significance of cultural resources as venerable and veritable sources of national identity and of senses of orientation, place, belonging, and distinctiveness

for America's diverse and inspiring constituent communities. ^[1] The existence of cultural resources—as well as their settings, locations, materials, workmanship, feelings, and associations—have profound significance and day-to-day implications for individuals and communities who derive benefits from cultural resources' diverse values: aesthetic, economic, educational, energy, historical, inspirational,

political, scientific, social, spiritual, etc. Government land management too often neglects legal and practical mandates to consider cultural resources on par and in conjunction with biophysical aspects of the environment. The two are indivisible and merit similar levels of consideration in planning and implementing government actions. [2] Close consultation with communities affected by government land management, especially interested tribes, complements scientific research as essential bases for management plans and actions.

FLPMA directs the BLM to manage the public lands in a manner "that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archaeological values." The Sonoran Desert National Monument (SDNM) was established by Presidential Proclamation in 2001. The Proclamation allows BLM to permit multiple land uses on the SDNM, but monument designation requires BLM to protect the numerous objects for which the monument was created. The Proclamation directs BLM to eliminate livestock grazing from grazing allotments located south of Interstate 8 as those permits expire and to assess whether livestock grazing on areas north of Interstate 8 are compatible with protection of the objects described in the Proclamation.

The purpose of the Proposed Action is to "consider the compatibility of livestock grazing with the monument objects for which the SDNM was established and amend the 2012 SDNM RMP/ROD." The Monument Proclamation states that "grazing on Federal lands north of Interstate 8 shall be allowed to continue only to the extent that the Bureau of Land Management determines that grazing is compatible with the paramount purpose of protecting the objects identified in this proclamation." That Proclamation also states, that the BLM "shall manage the public lands under principles of multiple use and sustained yield ... except that where a tract of such public land has been dedicated to specific uses according to any other provisions of law it shall be managed in accordance with such law."

Grazing constitutes a significant adverse effect on cultural resources, including cultural resources present in SDNM. BLM must use federal laws and scientific evidence to consider the effects of grazing on cultural resources. Scientific research on the effects of livestock on cultural resources is limited, but all available evidence indicates that livestock can and do cause damage to most types of cultural resource sites. Livestock grazing also alters vegetation, soils, and drainage conditions, usually for the

worse and always to the detriment of cultural landscapes. [3] Some cultural landscapes within and adjacent to SPRNCA are probably eligible for inclusion in the National Register of Historic Places, a truth almost certain to emerge from the envisioned ethnographic and ethnohistoric studies. BLM reports also confirm that livestock and livestock permit programs have significant adverse effects on cultural resources. For example, the Final EIS prepared for the Bodie-Coleville planning units concluded:

Livestock use impacts on cultural resources include: displacement (vertical and horizontal) and breakage of artifacts, and the mixing of depositional associations through trampling; destruction or enhanced deterioration of structures and features through rubbing; and an acceleration of natural erosional processes. Plants valued by Native American traditionalists could be trampled or consumed by livestock, adversely affecting plant availability at some locations. For purposes of analysis it is assumed that the impacts of livestock use are distributed in proportion to the actual distribution of livestock, with the most intensive impacts occurring at livestock use concentration areas. Cultural Resources located on lands having erosional or other types of watershed deterioration problems attributed to livestock use impacts are assumed to receive high impacts. Cultural resources are non-renewable, and impacts of livestock use on cultural resources are cumulative (Bodie-Coleville EIS 1982:4-92). [4]

Additional adverse effects from grazing include soil compaction, toppling of architectural features, creation of movement corridors, and degradation of springs and streams, all or most of which are themselves cultural resources from the perspective of tribal cultural representatives and others.

Anderson's recent research on links between grazing and cultural resources includes data and conclusions relevant to SPRNCA management planning.^[5] Anderson assessed cattle grazing effects on 47 cultural resource sites located on diverse grazing allotments on two national forest ranger districts. Fieldwork at each cultural resource site included documentation of artifacts and features and assessment of six interrelated variables: (1) the density of cattle excrement; (2) the depth and length of cattle trails; (3) the depth and extent of cattle wallows at sites with surface water; (4) the condition of all riparian areas or springs associated with the sites; (5) the condition of fences established to exclude livestock from sites; (6) the types and levels of livestock effects on artifacts and features. Less than nine percent of the sites assessed (4 of 47) showed low or no signs of adverse effects from grazing. Sites associated with riparian areas and surface water had the greatest and most diverse adverse effects.

No studies available to Archaeology Southwest argue that livestock grazing of any kind conserves, protects or enhances cultural resources. Additional research, including high-resolution baseline studies followed by monitoring of artifacts and features in sites subjected to grazing at various levels of intensity, could contribute more science. Such studies must be required by BLM if any further consideration is given to allowing continued grazing in SDNM. If BLM continues to plan for livestock grazing then it must also assess the costs and landscape, site, and hydrologic consequences of the management treatments necessary to protect SDNM cultural resources and other values and objects identified in the SDNM Proclamation.

Available scientific information indicates that livestock grazing is fundamentally incompatible with the primary purpose of the Monument. ASW advises BLM to select Alternative B, the No Grazing Alternative, for all allotments within the area under analysis.

Thank you for the opportunity to comment.
John

J.R. Welch, PhD, RPA 10227
Director
Landscape and Site Preservation Program
Archaeology Southwest
300 N. Ash Alley
Tucson, AZ 85701
520.991.1739
JRWelch@archaeologysouthwest.org
<https://www.archaeologysouthwest.org/>

^[1] Definitions for some types of cultural resources are available in the *Electronic Code of Federal Regulations*, notably *historic properties* (at [36 CFR 800](#)); *human remains, cultural items, and cultural patrimony* (at [43 CFR 10](#)), *archaeological resources* ([43 CFR 7](#)). *Sacred sites* is defined in [Executive Order 13007](#). The regulations implementing the *National Environmental Policy Act* ([40 CFR 1500](#)) affirm cultural resources as elements of the human environment that require focal consideration in the adoption and execution of Federal Government decisions.

^[2] The BLM (2004, [Manual Section 8110 – Identifying and Evaluating Cultural Resources](#)) defines a cultural resource as “a definite location of human activity, occupation, or use identifiable through field inventory (survey), historical documentation, or oral evidence. The term includes archaeological, historic, or architectural sites, structures, or places with important public

and scientific uses, and may include definite locations (sites or places) of traditional cultural or religious importance to specified social and/or cultural groups.”

[3] Horne, S., and McFarland, J. 1993. “Issue Paper: Impacts of Livestock Grazing on Cultural Resources.” On file, Los Padres National Forest, 6755 Hollister Avenue Suite 150 Goleta, CA 93117; Lyons, K. 2008. Livestock Impact on Archaeological Heritage in Canyon Del Muerto. University of Leicester, School of Archaeology and Ancient History. Todd, L.C., Burnett, P.C., Burger, O., and Rapson, D.J. 2003. Assessing Grazing Impacts on the Upper Greybull: A Conceptual and Methodological Framework. Laboratory of Human Paleoecology, Colorado State University, Ft. Collins, Colorado.

[4] For additional BLM recognitions of significant adverse on cultural resources due to grazing, see Haas, D. 2006. “Summary of Livestock Grazing Impacts on Archaeological Sites Located on BLM-Administered Lands in Colorado, A Study of Cultural Resource Assessments for Grazing Permits from Fiscal Years 1998 to 2003.” Bureau of Land Management, Colorado State Office, Denver.

[5] Anderson, S.R. 2007. Assessing Cattle Grazing Impacts on Archaeological Sites in the Humboldt-Toiyabe National Forest. Paper Submitted in Partial Fulfillment of Requirements for the MA in Anthropology, Northern Arizona University.

Figure 1 - Planning Area

Submission Successful
Your Submission ID is: SDNM_SCOP-1-500092489

Names & Addresses

[Redacted]
 Email Address: [Redacted]
 Agency: Public Web Page

Comments

Comment 1
 ID:

Comment Title: My scoping comments

I wish to submit the following scoping comments relating to livestock grazing in the Sonoran Desert National Monument (SDNM). I do not believe that continued livestock grazing in the SDNM would be compatible with protection of the objects described in the SDNM Presidential Proclamation. I therefore question whether the BLM even properly has any discretion to continue approving such grazing. Protecting objects in the SDNM is of paramount importance, and grazing obviously harms those objects. Cattle compete with tortoises and other wildlife species for limited available forage. Cattle compact and trample soils, change run off patterns, and prevent recovery of biological soil crusts. Cattle require artificial water sources that may subsidize ravens, coyotes, and other predators of tortoise hatchlings and other vulnerable wildlife. Managing livestock related structures and moving cattle may disturb wildlife and require frequent motorized access into remote SDNM areas. Cattle contribute to the expansion of harmful invasive plant species. Prolonged droughts from climate change will make these grazing impacts even worse as native plants and wildlife struggle to barely survive. Most BLM lands in the West are available for and used for

Comment: livestock grazing; there is no need to jeopardize the SDNM's objects for this commercial purpose. The NEPA analysis should fairly evaluate stopping all SDNM livestock grazing. The plan should be revised to make the current allotments unavailable for grazing. BLM should support the legislation in Congress to allow for willing seller acquisition of grazing permits by conservation groups for non-use. This would be a good solution to help ranchers while upholding SDNM object protection. If BLM cannot take its Antiquities Act responsibilities seriously, nor have the ability to distinguish monument from public domain land management, then perhaps the National Park Service should become responsible for these Monument lands. BLM needs to stop its pattern of overt favoritism to ranchers and instead start representing the larger public interest. Otherwise, BLM will continue its reputation as the "Bureau of Livestock and Mining" and lose even more of its already low credibility with most Americans. We face increasingly serious environmental threats, and status quo management is no longer adequate or appropriate. BLM needs to change or get out of the way. Thanks for your consideration.

Submission Classification

Response Type: Front Office Submission Form
 Delivery Type: Front Office Submission Form
 Receipt Date: 04/27/2020
 Status: ACTIVE

Agreements

No - Withhold personally identifying information from future publications on this project?
 Yes - Please include me on the mailing list for this project?

Original Submission Files

Figure 1 - Planning Area

Submission Successful
Your Submission ID is: SDNM_SCOP-1-500092527

Names & Addresses



Agency: Public Web Page

Comments

Comment ID: 1

Comment Title: Alternative B

Please restrict grazing on this beautiful monument.

Comment: Alternative B is the only alternative that complies with the guidelines.

please do the right thing...

Submission Classification

Response Type: Front Office Submission Form

Delivery Type: Front Office Submission Form

Receipt Date: 04/27/2020

Status: ACTIVE

Agreements

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Figure 1 - Planning Area

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Names & Addresses

Email Address:

Fax Number:

Agency: Public Web Page

Comments

Comment 1

ID:

Comment Title: BLM should reduce livestock grazing within SDNM

Comment: To whom it may concern:

I am writing to support Alternative B of the future RMP amendment for the Sonoran Desert National Monument (SDNM). Federal law clearly states that the SDNM should be managed for physical, ecological, and cultural values, not extractive use. Sec. 302 of the FLPMA states that BLM's multiple use mandate shall not apply "where a tract of such public land has been dedicated to specific uses according to any other provisions of law," and that instead it shall be managed primarily under the guidance of said law. Additionally, Sec. 2001 of the Omnibus Public Lands Management Act establishes the SDNM as part of the National Landscape Conservation System and provides that it should be managed in a way "that protects the values for which the components of the system were designated." Presidential Proclamation 7397, which established the monument, directs that it be managed "for the purpose of protecting the objects identified above" and includes among those objects "functioning desert ecosystems," "saguaro cactus forests," "packrat middens," "diverse plant communities," "a wide variety of wildlife," "significant archaeological and historic sites," and more. Notably, commercial cattle ranches are not among the objects identified for protection.

More specifically to grazing, BLM Manual 6100, which directs the management of units of the NLCS, declares the livestock grazing with NLCS units may occur only "to the extent consistent with the designating legislation or proclamation and other applicable law" and "will be implemented in a manner that protects the values for which NLCS units were designated." Most importantly, Proclamation 7397 provides "that grazing on Federal lands north of Interstate 8 shall be allowed to continue only to the extent that the Bureau of Land Management determines that grazing is compatible with the paramount purpose of protecting the objects identified in this proclamation." Thus, legal authority clearly establishes that grazing may occur only where it does not jeopardize the physical, ecological, and cultural values of the SDNM.

BLM's proposed Alternatives A and C are inconsistent with the purposes for which the monument was established and will be directly harmful to the environmental values of the SDNM. The BLM's own draft Grazing Compatibility Analysis states that "the conclusion that overgrazing arid rangelands substantially damages soils; alters the density, structure, and composition of desert vegetation types; and affects ecosystem function is not controversial." An extensive body of scientific evidence has established that grazing in desert landscapes causes erosion, spreads invasive species, reduces biodiversity, competes with native wildlife for forage, and is extremely harmful to the larger ecosystem. Indeed, BLM itself wrote in a 2007 briefing on grazing in the SDNM that "livestock grazing is not compatible with the paramount purposes of protecting the objects of the monument and therefore the SDNM should be closed to livestock grazing." That analysis determined that livestock grazing in the monument would damage the delicate arid ecosystem and that 8-13% of the monument could never meet range health standards while grazing continued. Scientific evidence and BLM's own analysis from both 2007 and from the drafts released this March concede that grazing would damage the values, such as a "functioning desert ecosystem," for which the SDNM was established. Meanwhile, BLM has provided no analysis for how grazing would support or be compatible with the purposes for which the monument is legally required to be managed.

Despite this compelling evidence that grazing is incompatible with the values of the SDNM, BLM is proposing not only to maintain current grazing levels but to increase them. Alternative A would involve no change in grazing levels, while Alternative C would open the Conley allotment to grazing -- an allotment which the BLM has said is especially dry and rarely produces enough forage to provide any substantial livestock grazing. BLM has not provided any evidence for how increasing grazing in the monument would support the legal management requirements. If the BLM were to select Alternative C as the final action, it would inevitably expose itself to legal vulnerability and be forced to spend taxpayer dollars defending its actions. Likely, its Record of Decision would be overturned, and the agency would be forced to go through the analysis process a third time.

BLM should therefore identify Alternative B as the Proposed Action. Alternative B would end grazing in the SDNM. Only Alternative B protects the values for which the monument was established. It would help restore the health of the Sonoran Desert ecosystem, open more forage to livestock, provide a better experience to visitors, and save money in both potential legal fees and in the money the Federal Government loses on grazing. By selecting Alternative B, BLM would protect the Sonoran Desert National Monument for current and future generations.

Thank you,



Submission Classification

Response Type:	Front Office Submission Form
Delivery Type:	Front Office Submission Form
Receipt Date:	04/27/2020
Status:	ACTIVE

Agreements

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Original Submission Files

Figure 1 - Planning Area

Submission Successful
Your Submission ID is: SDNM_SCOP-1-500092569

Names & Addresses

[REDACTED]
[REDACTED]
[REDACTED]
Email Address: [REDACTED]
Fax Number: [REDACTED]
Agency: [REDACTED] Public Web Page

Comments

Comment 1
ID:

Comment Title: No more cattle grazing! ALT B

Livestock don't belong in the Sonoran Desert National Monument . Priorities at this time should be to protect wildlife such as the Sonoran desert tortoise and Sonoran pronghorn and restore the natural vegetation.

The desert is just beginning to recover from over a century of livestock grazing industry abuses and the land must be allowed to continue to heal. The Monument, located on the ancestral lands of the O'Odham, Yavapai Apache, Cocopah, and Hohokam people, is treasured for its cultural resources, and these should be protected from grazing abuses.

Livestock grazing is not compatible with protecting:

Comment:

- Functioning desert ecosystems;
- Diversity of plant and animal species;
- Saguaro cactus forest;
- Scientific analysis of plant species and climates in past eras;
- Vegetation communities;
- Wildlife; and
- Archeological and historic sites

Reign in your cattlemen and do your jobs.

Submission Classification

Response Type: Front Office Submission Form
Delivery Type: Front Office Submission Form
Receipt Date: 04/27/2020
Status: ACTIVE

Agreements

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Yes - Please include me on the mailing list for this project?

Original Submission Files

[EXTERNAL] Sonoran Desert National Monument

Mon 4/27/2020 6:38 PM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

Dear BLM,

I'm writing as an Arizonan to let you know that I support Alternative B, the "No Grazing" alternative, with regard to the Sonoran Desert National Monument - it complies with the BLM's requirements to protect the natural resources found in the monument.

As the Southwest continues to be on the frontlines of a changing climate - with worsening droughts predicted by scientists - grazing should not be a priority on public lands. Please do not expand grazing on the monument. It is a cultural, natural, and ecological treasure that is too valuable to be sacrificed for short term gain.

Additionally, climate change and biodiversity loss are the root cause of the current pandemic, and if we do not readjust our relationship to treating ecosystems as commodities, we will continue down the path of destroying what sustains us. 70% of emerging infectious disease are of zoonotic origin - and the more we rob the library of life, the more we push, the more we will continue to feel the dramatic blowbacks of pandemics such as the current one. The [science on this is crystal clear](#), and the BLM would do well to consider it broadly when mulling over any decision that involves further disruption of what little unfragmented ecosystems we have left.

Thanks for your consideration,



[EXTERNAL] Sonoran Desert Natl Monument

Mon 4/27/2020 7:23 PM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

KEEP CATTLE OUT!!

I write to state unequivocally that livestock do NOT belong in the Sonoran Desert National Monument! I urge and expect the agency to prioritize protection of wildlife – like the Sonoran desert tortoise and Sonoran pronghorn – over livestock industry profits.

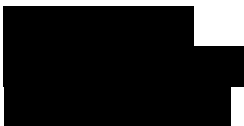
This desert is just beginning to recover from over a century of livestock grazing industry abuses and the land must be allowed to continue to heal.

The Monument, located on the ancestral lands of the O'odham, Yavapai Apache, Cocopah, and Hohokam people, is treasured for its cultural resources, and these should be protected from grazing abuses as well as the NATURAL HABITATS.

NOTE — livestock grazing is not compatible with protecting:

- Functioning desert ecosystems;
- Diversity of plant and animal species;
- Saguaro cactus forest;
- Scientific analysis of plant species and climates in past eras;
- Vegetation communities;
- Wildlife; and
- Archeological and historic sites.

NO CATTLE!!! NO RANCHING!!



Sent from my iPhone

[EXTERNAL] Comments on the Proposal to Resume Livestock Grazing

Mon 4/27/2020 8:18 PM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

Please do not resume livestock grazing on the Sonoran Desert National Monument lands.

Livestock grazing is incompatible with protecting the scenic, recreational, and wildlife resources of the monument. The desert is just beginning to recover from over a century of livestock grazing industry abuses and the land must be allowed to continue to heal. The Monument, located on the ancestral lands of the O'Odham, Yavapai Apache, Cocopah, and Hohokam people, is treasured for its cultural resources, and these should be protected from grazing abuses.

Thank you for the opportunity to comment on this proposal.



[EXTERNAL] Fwd: Sonoran Desert National Monument

Cyndi Tuell <cyndi@westernwatersheds.org>

Tue 4/28/2020 6:36 AM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

----- Forwarded message -----

From: [REDACTED]

Date: Mon, Apr 27, 2020 at 8:12 PM

Subject: Sonoran Desert National Monument

To: SDNMGrazing@blm.gov <SDNMGrazing@blm.gov>

Hello BLM,

I am writing to let you know I believe livestock don't belong in the Sonoran Desert National Monument and that I expect the agency to prioritize the protection of wildlife – like the Sonoran desert tortoise and Sonoran pronghorn – over livestock industry profits.

Alternative B, the “No Grazing” alternative, complies with the BLM’s requirements to protect the natural resources found in the monument. Due to ongoing droughts and continued climate change the responsible and legal choice to eliminate grazing from the Sonoran Desert National Monument.

Thank you for your time!

[REDACTED]

[EXTERNAL] public comments

Tue 4/28/2020 12:29 PM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

Please make my comments part of the record on your reconsideration of grazing on the Sonoran Desert National Monument.

This monument was established to protect natural resources and recreational experiences, not to continue the multiple abuse policies of BLM that includes subsidizing the grazing of cattle at the expense of publicly owned resources.

I have visited and hiked public lands, especially in the Sonoran Desert for decades. Wherever there are cows, and where there are they are usually there at too great a number for the feed available, I have seen the devastating impact to the desert firsthand. Cows do not belong on deserts, they are grassland animal. They do not belong on public lands if they economically have to be supported by the typical low fees their owners are charged.

Only Alternative B, the "No Grazing" alternative, complies with the BLM's requirements to protect the natural resources found in the monument.

With ongoing drought and climate change impacts, eliminating grazing from the entire monument is the only responsible and legal choice.

Please make the right choice this time so you won't have to go back to court.

Thank you.



[EXTERNAL] Notice of Intent To Amend the Resource Management Plan for the Sonoran Desert National Monument, Arizona, and Prepare an Associated Environmental Assessment

Gary Macfarlane <gmacfarlane@wildernesswatch.org>

Thu 4/30/2020 3:47 PM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

 1 attachments (137 KB)

Sonoran Desert Monument comment..pdf;

Please see attached.

--

 President

Gary Macfarlane

Secretary

p: [208.882.9755]208.882.9755

w: www.wildernesswatch.org

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April 30, 2020

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Moscow, ID 83843

Doug Whitbeck
Range Management Specialist
Bureau of Land Management
Lower Sonoran Field Office
21605 N. 7th Avenue
Phoenix, Arizona 85027

Sent via email to: blm_az_pdo_sdnmgazing@blm.gov

RE: Notice of Intent To Amend the Resource Management Plan for the Sonoran Desert National Monument, Arizona, and Prepare an Associated Environmental Assessment

Dear Range Management Specialist Whitbeck:

We are writing on the scoping letter for the Notice of Intent To Amend the Resource Management Plan for the Sonoran Desert National Monument, Arizona, and Prepare an Associated Environmental Assessment. Wilderness Watch is a national wilderness conservation organization focused on the protection of all units of the National Wilderness Preservation System, including the North and South Maricopa Mountains Wildernesses. Our work is guided by the visionary 1964 Wilderness Act (16 U.S.C. 1131- 1136).

We did not receive an announcement for this plan amendment and only learned about it after the 30-day scoping period had expired. That is why we are sending this letter now. Please add Wilderness Watch to the mailing list to receive the draft NEPA document for public comment.

We looked over the materials on the website and noticed that the scoping letter mentions only that the RMP amendment would occur in Wilderness, but there is no discussion of Wilderness as an issue to be addressed in the NEPA document or plan amendment. This is a problem. The EA should consider the following questions and points:

- How much grazing takes place in Wilderness? Are the assumptions about livestock use and distribution (no more than 2 miles beyond water) field checked with regard to Wilderness?

- Do livestock use patterns in terms of numbers and geography grazed in Wilderness vary from year to year as the result of ephemeral water or forage?
- Does BLM have long-term range trend and use data on the Wildernesses?
- What are the impacts of grazing on wildlife, vegetation, and other attributes of the two Wildernesses within the plan amendment area?
- What nonconforming activities or uses (for example, motorized vehicles or range structures) are in Wilderness and what is the history and location of those activities? Do they vary from year to year?
- Similar to the above, are new developments or activities like motorized use being proposed in the Wildernesses under any alternative?
- Are the Wildernesses actually suitable for grazing? Please consider an alternative that ends grazing in Wilderness and other sensitive areas.
- Could allotment boundaries be modified to exclude Wilderness? We ask this question because the background materials suggest that over half of the amendment area has little or no probability for livestock grazing. The small scale of the maps in the background materials and the lack of wilderness boundaries on those maps make it difficult to provide specific comments at this stage. Thus, we ask that adequate maps be provided in the draft NEPA document and plan amendment.

Given the ephemeral nature of the forage that varies widely from year to year in this desert environment, we seriously question whether any livestock grazing is appropriate. That is an even more important issue because the national monument proclamation states “that grazing on Federal lands north of Interstate 8 shall be allowed to continue only to the extent that the Bureau of Land Management determines that grazing is compatible with the paramount purpose of protecting the objects identified in this proclamation.”

The Livestock Use Probability Map document states, “In general, livestock do not travel more than 2 miles from water on flat terrain and no more than 1 mile in rough terrain (Smith et al. 1986).” Class 5 areas are where livestock are not likely to be found because they are distant from water. The Land Health Evaluation, in a convoluted statement, acknowledges that livestock grazing is not compatible. It states:

Additionally, the majority (54.6%) of the SDNM Complex is mapped as livestock use probability Class 5 where it is unlikely that substantial livestock grazing has or would occur. Without the redevelopment and/or addition of new water sources, grazing is likely to remain compatible with monument objects in these areas.

In other words, the only reason that BLM finds grazing is compatible in those areas is because grazing doesn’t occur or only rarely occurs. As noted above, that is hardly a justification for compatibility. In fact, it is justification for incompatibility of grazing. Further, BLM data do show resource damage in areas that are routinely grazed in the Monument. Therefore, it would seem the best course is to end grazing in the entire Monument.

Please keep us updated on this proposal.

Sincerely,

A handwritten signature in black ink, reading "Gary Macfarlane". The signature is written in a cursive style with a large, stylized "G" and "M".

Gary Macfarlane
Board Member

[EXTERNAL] Livestock



Fri 5/1/2020 4:17 PM

To: PDO_SDNMGrazing, BLM_AZ <BLM_AZ_PDO_SDNMGrazing@blm.gov>

Respect our lands and wildlife, time to make changes, time to end other interests other than wildlife and our monuments!!!

Thank you