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Lower Sonoran- Sonoran Desert Resource Management Plan
Phoenix District – Bureau of Land Management
21605 North 7th Ave
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November 22, 2011

RE: Comments on the Sonoran Desert National Monument Draft Resource Management Plan and Draft Environmental Impact Statement

I submit the following comments as a past Pacific Biodiversity Institute Board Member, participant in SDNM field surveys, WWP Advisory Board Member, and Biology Professor with primary interest in the management of natural resources.

During PBI field surveys I observed and quantified the impacts of livestock grazing on monument objectives. The presence and frequency of plant species were noted, as well as the presence of bare ground, cattle feces, and cattle carcasses.

BLM appears to be using portions of the data reported by PBI to support conclusions opposite those reached and reported after analysis of ALL the data by PBI staff. BLM has stated instead that grazing is not having an adverse effect on small saguaros. There is no SDNM data to support that conclusion and it goes against other scientific reports that have studied effects of cattle grazing on cactus recruitment. I have observed and photographed cactus recruitment within a sanctuary near La Paz, BCS, Mexico. Within that sanctuary ground cover was complete and cactus recruitment abundant; fence line photos show bare ground and the scarcity of cactus where cattle were present.

PBI studies found that the vegetation composition in areas in close proximity to livestock waters was highly altered, as were soil structures. The influence of livestock was widespread; few of the regions PBI surveyed in the study area were without some indication of adverse impacts of livestock.

BLM relied on qualitative assessments to reach conclusions opposite those of PBI. It appears that BLM was unsatisfied with PBI's conclusions and unwilling to take the necessary actions to remove livestock from the monument. Instead BLM has created an entirely new method of manipulating PBI data to reach its desired conclusions.

It is obvious with even a brief visit to the SDNM that grazing is not sustainable with any level of resource protection. The number of livestock carcasses observed is evidence of improper management, insufficient forage, or both. The preferred alternative to remove livestock grazing from the Conley allotment is a positive step, but the only alternative that appropriately reflects the scientific findings of PBI is the alternative that permanently retires all livestock grazing allotments on the SDNM.

Instead of relying on the best available science, the agency has manipulated PBI's comprehensive data and ignored report conclusions to support its agenda. PBI's raw data has been re-analyzed by someone outside PBI's scientific team and cited in the document as the work of PBI. These citations are inappropriate and need to be removed, with the source of the data analysis identified. References are made to the "Pacific Biodiversity Institute Saguaro Study", although PBI never conducted such work.

The DRMP/DEIS document needs to remove all inappropriate references to PBI.

The conclusion of the DRMP/DEIS that livestock grazing is compatible with the protection of monument objectives is contrary to PBI's scientific research findings. Throughout reports published by PBI on the SDNM strong associations of livestock grazing with negative impacts on the natural communities were made.

PBI's numerous studies and analyses of ecological condition on the SDNM support only the alternative that eliminates livestock grazing on the SDNM.

Please consider the above comments prior to finalizing management plans for the SDNM.

Sincerely,

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