

**From:** Lower Sonoran RMP  
**Subject:** Attn LS-SDNM RMP

From: [REDACTED]  
 Sent: Wednesday, November 23, 2011 12:33:36 PM  
 To: BLM\_AZ\_LSFO\_SDNM\_RMP  
 Subject: Attn LS-SDNM RMP  
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 November 22, 2011

Bureau of Land Management  
 Phoenix District Office  
 21605 N. 7<sup>th</sup> Avenue  
 Phoenix, AZ 85027

**RE: Comments regarding the Lower Sonoran and Sonoran Desert National Monument Draft RMP/EIS**

I request that the BLM planners consider the following issues/questions as they create the final RMP:

**Tracts with Wilderness Characteristics**

**The agency preferred alternative fails to adequately protect tracts known to possess wilderness attributes.** This contradicts statements in the Executive Summary which indicate that not only do previously surveyed lands harboring wilderness character still exist within the planning area, more acres now warrant inclusion in this category (page *li*). **More areas and total acreage should be managed to conserve wilderness features.**

- a. The preferred alternative will conserve only a small fraction of non-Monument areas confirmed to possess wilderness characteristics. On-the-ground surveys conducted by the Arizona Wilderness Coalition identified approximately 270,000 acres warranting protection until a Congressional decision can be made. The preferred alternative proposes to conserve only a portion of the ground-truthed eligible tracts, a total of 55,000 acres. Lands with wilderness character are a swiftly vanishing national resource. Those located near major metropolitan regions are even rarer. Please create a plan that will protect this valuable resource and develop guidelines to safeguard them until full assessment regarding suitability for Congressional wilderness designation is possible.
- b. The SDNM preferred alternative omits Margies peak and Butterfield Stage wilderness units that clearly warrant inclusion in tracts afforded added protection pending Congressional action.

**The preferred alternative proposes some land use protection levels without adequate knowledge of on-the-ground conditions.**

The Sand Tank Mountains have never been surveyed for wilderness characteristics by the BLM. The status of these lands is uncertain, but these areas have a high probability of harboring large tracts with wilderness attributes. Please take the simple and reasonable steps to ensure adequate protection of this region until the agency can make an informed decision regarding status.

**2.12.2 (page 216) Adaptive Management**

The draft plan describes what is meant by adaptive management and recommends, but does not mandate, a commitment to employ adaptive management principles. In Appendix H (page 1223) a similar lukewarm promise is made regarding best management practices. That means **a comprehensive and strategically-focused control system for the plan is lacking. This is a serious oversight because it asks the public to endorse a plan that provides virtually no insight into its projected function.** More information needs to be provided and, most important, forethought and planning needs to go into the mechanisms to implement, monitor and when necessary, modify the RMP as necessary to ensure the conservation of BLM resources for public use now and in the future. A plan without a management structure that allows cumulative impacts to be recognized, provides a broad-scale capacity to assess conditions and track management activities to confirm their success or reveal failure, will be crippled before it is approved. This oversight puts the RMP into immediate jeopardy of devolving to an uncoordinated hodgepodge of quasi-independent sub-plans.

- a. Please establish an overarching formal information management system to allow for systematic and integrated oversight to direct implementation of the future RMP. Detail who is responsible for what and on what schedule.
- b. Augment plans to conduct inventories by developing a needs priority to focus limited agency resources where they are most needed and creating timelines. Use to best advantages non-agency information inputs into the inventory databases. **Simply inviting public participation in twenty-six words literally buried in Chapter 2 (page 217) is not sufficient due diligence.**

I suggest the following:

Agency permitted activities - (agency approved collecting, scientific studies, wildlife census efforts, archaeological investigations, etc.) – request/require that a condition of agency approval to conduct these activities is the stipulation that a report will be given to BLM when work concludes or, if very long-term in scope, activity reports will be presented to the agency on a periodic basis. This information can then become part of the information inventory for land managers. Request that the agency manager receives copies of any publications that result from the permitted activities. To give an example, regarding paleontological resources you might request to know what was found (and taken), the location, and other information of interest (discovery of nearby vertebrate fossils of value, evidence of other excavation efforts, vandalism, etc.).

Special interest group activities - enlist help from organizations known to be active in the area to conduct inventories, assess conditions, or report conditions and problems. This could be groups such as the Arizona Archaeological Society, Off-road user groups, rockhounds and recreational prospectors, Sierra Club, Arizona Wilderness Coalition, etc.

Employ BLM volunteers whenever possible – solicit reports from agency-trained citizen volunteers (trail monitors, site stewards, etc.) working in the area.

Basically, adopt the stance that (1) any activity undertaken on BLM lands is an opportunity to gather management information (2) the BLM will need to be creative in management efforts as both agency personnel and funds will almost certainly be limited for the foreseeable future.

- c. Integrate plans to standardize data collection, create computerized databases that preserve raw data and all metadata, and allow for public input and review of the data or results into the plan objectives. This draft does not even recognize that we are in the computer age and the public has vast resources of social networks available to them. Managers should seek to exploit this potential for fast updates and citizen

participation by establishing a web-based system for public information inputs to management or the data system. **This could be as simple as establishing a Facebook page.**

**Route designation is a key process and is not adequately described** in the draft. I request that the BLM take immediate actions to eliminate extraneous routes, designate authorized routes with adequate signage, restrict vehicular travel to agency-designated routes, close user-created routes and take steps to discourage future unauthorized route creation.

**Wildlife migration corridors are not adequate** in the preferred alternative. Please adopt the specifications detailed in Alternative D.

While the BLM must accommodate a multiple use mandate, an additional charge to the agency is to ensure resources conservation for their use by future generations. Open space, roadless areas, and unspoiled lands are vanishing resources and undoubtedly will be even rarer and more valuable in the future. Over the RMP projected lifetime, the planning area will be placed under tremendous pressure as regional human populations and development explode. Safeguarding a large region that includes opportunities for solitude, camping, off road vehicle use, etc., near an urban center will be a magnificent gift to future generations. Given the confluence of forces competing to use these lands, an inevitable expansion of citizens in the region seeking recreation opportunities and the fact that some aspects of these lands cannot be replaced if destroyed, **resource conservation must be established as the ultimate management priority by which all RMP activity components are assessed.** Such a priority would not necessarily preclude any use of the land, it would only ensure that these important resources are enjoyed in a sustainable fashion.

Thank you for making an exceptional effort to accommodate public input into the planning process.

