



United States Department of the Interior

NATIONAL PARK SERVICE
ORGAN PIPE CACTUS NATIONAL MONUMENT

10 Organ Pipe Drive
Ajo, Arizona 85321



November 23, 2011

BLM Lower Sonoran Field Office
LS-SDNM RMP
Attn: Emily Garber-Filed Manager
221605 N 7th Ave
Phoenix, AZ 85027

Dear Emily Garber:

Thank you for providing an opportunity to the NPS to review the proposed document entitled: "Lower Sonoran and Sonoran Desert National Monument - Draft Resource Management Plan and Environmental Impact Statement" We commend your efforts and offer the following comments.

NPS concerns regarding the proposed actions in the draft document primarily pertain to the management of the BLM's Ajo Block. As you know the Ajo Block is immediately adjacent to Organ Pipe Cactus National Monument's (OPCNM) northern boundary. Border impacts from illegal traffic and interdiction efforts are far and away the most serious resource issue currently facing land management agencies in this area. They so occupy our time and attention that we suggest border impacts themselves are a topic worthy of inclusion as a planning issue and management concern throughout the document.

Border impacts affect access to areas, cause diverse and abundant damage to resources and infrastructure and greatly limit management effectiveness. This is particularly true of the Ajo Block. The Draft EIS does not substantively discuss border issues and their influence on management. The NPS views this draft EIS review as an opportunity to incorporate today's border challenges into the management process and we hope through this process to continue cooperating with BLM to develop comprehensive strategies regarding a collective response to these issues. These discussions are important not only to reduce adverse impacts on resources, but are critical in the continued efforts to save Sonoran pronghorn from extinction.

In the draft document Maps 2-4 c and d proposed to manage some of the Ajo Block to protect wilderness characteristics. Maps 2-5 b through e, propose the Ajo Block be classified as Land Use Authorizations Avoidance or Restricted. These are some of the most limiting classifications and we are concerned that such designations could affect adjacent lands. NPS wishes to work with BLM to discuss alternatives on how management of the Ajo Block can help address serious issues affecting all agencies in the region, so as to minimize impacts to designated wilderness as well as threatened and endangered species. Pressing issues include Sonoran pronghorn habitat, lesser long nosed bat habitat, homeland security, and ongoing border impacts to natural and cultural resources.

The NPS currently advocates for an expansion of OPCNM to include a portion of the BLM Ajo Block. NPS acquisition of such a parcel could help alleviate a number of issues within OPCNM

that are shared by numerous other agencies. These issues regard access limitations, critical housing shortages, a safer environment for staff and families away from the border, reduced commuting time, and others. Part of the Ajo Block is adjacent to utilities and infrastructure in Why, AZ and expanding OPCNM to include this area would greatly reduce the cost of infrastructure development and facilitate a means to address access issues described below. The NPS is concerned that the proposed Land Use Authorizations would preclude further development of needed infrastructure should the BLM continue to manage the Ajo Block under its current configuration.

The Armenta Road (aka: 59.4 Road) on OPCNM for example, currently serves as an important access road for NPS and Custom and Border Protection's (CBP) along a narrow travel corridor through designated wilderness. Since the escalation of border issues throughout the region this road has deteriorated greatly, experiencing severe entrenchment. Armenta Road was originally a two-track across the desert to access ranching infrastructure, and was never engineered to sustain the current levels of traffic. The ability to rebuild the road on the monument is limited by the wilderness boundary and soils unsuitable for road construction. Furthermore the condition of Armenta Road is impacting hydrological processes; having adverse impacts on the soils and vegetation. The next nearest available area to construct an access road is on the Ajo Block and if such a road were to be constructed, it could be properly engineered to mitigate impacts to natural and cultural resources.

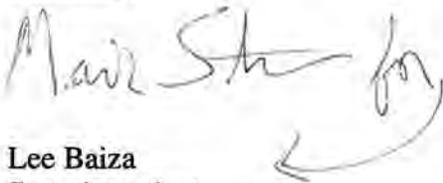
Consequently, there is a need for all agencies to consider the potential benefits of road construction on the Ajo Block to facilitate improved access and reduce CBP response time to BLM lands, the western portions of Organ Pipe Cactus National Monument (OPCNM), and the eastern areas of Cabeza Prieta National Wildlife Refuge. Such a road could greatly enhance CBP effectiveness at interdicting illegal traffic which in turn would have numerous benefits to national security, threatened and endangered species, and wilderness.

Fence breaks and associated maintenance and repair issues along with trespass livestock issues in wilderness and along unfenced portions of State Route 85 regularly occur in relation to the Ajo Block. The NPS currently spends considerable effort, numerous times a year, repairing fences in order to keep livestock out. Despite these efforts, the NPS continues to respond to trespass livestock issues. The draft document needs to fully consider the implications of continued livestock grazing in the Ajo Block within the framework today's border environment.

The NPS remains supportive of the BLM and its efforts to develop and adopt a management plan for the Lower Sonoran and Sonoran Desert National Monument properties. We are especially interested in better understanding how the BLM proposes to address the concerns we identify above. We are hopeful that such a plan would ultimately include a comprehensive consideration of border issues as they exist throughout the region.

Please feel free to contact OPCNM should you have questions or require further clarification.

Sincerely,



Lee Baiza
Superintendent

