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From: Lower Sonoran RMP
Subject: SDNM Plan Comments

From: [REDACTED]
Sent: Wednesday, November 23, 2011 3:10:27 PM
To: BLM_AZ_LSFO_SDNM_RMP
Subject: SDNM Plan Comments
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22 November 2011

To Bureau of Land Management, Phoenix District, Lower Sonoran Field Office

Dear Emily Garber,
Rich Hanson,
Angelia S. Bullets,
James G. Kenna,
and staff:

Thank you for your planning effort on behalf of Sonoran Desert National Monument. The planning documents are enormous, and though I dearly wish that you had presented the SDNM plan separately from the Lower Gila plan, I have learned from and enjoyed the many pages that I have been able to read.

As one of many who worked to create the monument, I have long dreamed that its management plan will look generations into the future, and I see elements of that in your alternatives, though not all of them are in your preferred alternative. In general, Alternative D is the more conservative, desirable approach. Looking back to 1998-2001, it was magical time, and I doubt that such a grand monument could be created today. It will be legacy that the many residents and visitors to central Arizona are growing to appreciate. To my mind, a sustainable, forward-looking management plan for SDNM will:

1. Retire all grazing. Although grazing is a legitimate commerce on some public lands, it is no longer appropriate here.

Livestock disturb fragile desert soil crusts and consume the few forbs that help anchor the soil and provide food for other species. Livestock requires fences that inhibit wildlife. Wildlife is a primary purpose of the monument. Your plan to allow grazing during productive times limits the public's ability to enjoy seasonal wildflowers, for those are precisely the times you propose to let cattle eat the flowers, leaves and all. Those "green-up" times are ecologically crucial, when the vegetation and seed bank restore themselves, when seeds and plants lay a store of food for all levels of the ecological chain, from ants to hawks, from cottontails to mountain lions.

A general formula for wildlife management is that a single mature cow eats as much as seven mule deer (1.0 AUM vs 0.15), ten white-tailed deer (1.0 vs 0.1), or eight pronghorn (1.0 vs 0.12), or who knows

how many javelina or other foragers. Wildlife was a primary purpose for creation of the monument. As a visitor I come to the monument to see wildlife, not to see cows.

A 1996 study by J.L Holechek showed that some desert ranges have taken 25 years to improve from mid-fair to high-good after removal of livestock. A 1996 study by S.S. Rosenstock showed that an arid land shrub-grassland required 25-30 years to return to pre-grazing condition after removal of grazing. Recovery of small mammals, and in turn birds, reptiles, and invertebrates, is an additional goal.

Further, of the many reports and studies questioning the sustainability of grazing on Sonoran Desert lands, perhaps the most telling is the 1991 GAO report to Congress, "BLM's Hot Desert Grazing Program Merits Reconsideration" (GAO/RCED-92-12, Desert Grazing), which pointed out that desert grazing "risks long-term environmental damage while not generating grazing fee revenues sufficient to provide for adequate management" (pp. 2-3), and "Some damaged lands may take decades to recover if they recover at all" (p. 3). Since that report was written, conditions in Sonoran Desert NM have deteriorated and the region has endured a prolonged drought and elevated temperatures, further limiting range productivity and recovery.

Because of a number of factors, forage productivity of the Sonoran Desert is low and predicted to decrease. From what I read, utilization rates in desert ecosystems receiving less than 12" of rain a year should at most be grazed a 25% of the yearly growth, meaning that 75% is left standing; monument lands have be grazed far beyond that standard. And, from what I've seen and from reading your analysis of the health of the land, the land has been degraded too much already.

Again looking at the 1991 GAO report, grazing in SDNM likely has negligible economic benefit to the region. At that time, under better grazing conditions, "The 33 ranches in the Lower Gila North area of Arizona contributed an estimated 0.32 percent to the total value of livestock and livestock products sold in Yuma, Maricopa, and Yavapai counties" (p. 47). There are reasons that ranches and leases in both Lower Gila North and South have been abandoned. And I'm betting that the economic advantages of retiring grazing – tourism, hunting, environment -- far surpass those of grazing in SDNM, though I didn't see that information in the management report.

Ephemeral grazing on degraded Sonoran Desert lands is exactly the wrong way to nurture recovery. Desert ecosystems need many years to recover. And that recovery may only happen during rare years of above-normal rainfall and without grazing. Ephemeral grazing – allowing grazing during those rare abundant rainfall years --- will inhibit and doom the ability to recover at all.

Let it heal. No more cows here.

2. Increase Wilderness area by adding acres to your existing areas. A new Sand Tank Mountains Wilderness is a logical and wise option. Wilderness is a sound way to protect land and to forestall requests for incompatible land uses.

Additionally, special management areas can be effectively used to protect, restore, or conserve certain resources, such as Vekol Valley grasslands or tortoise habitats. And how about taking care of the Vekol Valley toads and frogs?!

By the same token, BLM needs to develop a plan that accommodates campers who need tables and fire grates. The day may come when visitation exceeds our predictions and we campers can't just pitch a tent or park the truck anywhere. The agency needs to monitor, set thresholds, design campgrounds, and begin to budget for them. I think this is what you intend in section 4.17. We have seen what growing valley populations have meant in the Ussery Mountains, White Mountains, and certainly South Mountain.

I worry that the plan doesn't look far enough into the future. Considering our state's and the West's growing population, I expected to see more talk about groundwater, viewsheds, usage, resources monitoring and thresholds, special regulation triggers, buffer areas on BLM lands, and recovery plans, as well as staffing goals, budget needs, and performance objectives.

3. Protect regional air quality by ending grazing, off-roading, ATVs, abandoning unneeded trails and roads, ending driving in washes in the monument, and limiting other activities that disturb soil crust or raise dust. Both Maricopa and Pinal counties face federal issues with air quality.

Concerning a haboob that rolled through the Phoenix area earlier this year, one newspaper reported, "Pinal County's degraded bowl is the likely contributor. Name your poison: vast acreages of tilled land, grazed desert, feedlots, land cleared for subdivisions, silty washes and river bottoms, dirt roads, ATV trails, sand-and-gravel operations." "The storm rolled over vast stretches of public lands managed by the state Land Department and the Bureau of Land management. They are riddled with wildcat trails and roads and leases for grazing, though this spring there was not enough forage for cattle." "Monson, of the USGS, said land management is key. Overgrazing not only removes vegetation that keeps dust from blowing, it also breaks the desert's natural crust, the one defense left when the vegetation is gone." page 12, col 4. (From *Arizona Daily Star*, September 25, 2011. "Swirling dust is our destiny," by Tom Beal. Pages A1, 12.)

4. Highlight alternatives to driving. Special closures for off-road vehicles have been necessary in recent years, and may be again in the future. I support the road closures you have proposed, and I encourage you to retain the ability to make additional closures as needed to protect resources and the public.

Promote hiking, bicycling, and horseback riding. Eventually, you may need to develop trails near heavily used areas. Saguaro National Park-- East may be a model to follow.

And, as technology advances and visitor needs changes, accommodations may be needed (e.g. road turnouts) for side-by-side, open-seat vehicles that are less polluting and quieter. Mom and Pop don't walk as well as they used to and they promise to not go racin' across the creosote flats. The plan needs backbone, but it also needs a bit of flexibility as the times change.

5. Disallow target shooting. Licensed hunting is a legitimate activity within the monument, but there must be other places outside of the monument suitable for target shooting. The general public needs to be able to visit an area in relative safety, not wondering who might be plinking over the next hill or bend in the road. Suitable sites should be available in other BLM Lower Gila or private lands, especially for the rapid-fire and long-range arms currently available.

6. Complete the monument. Add Sentinel Plain, as originally proposed, preferably as a Wilderness Area.

7. Build an office, maintenance yard, and a visitor center adjacent to the monument, such as in Gila Bend, Casa Grande, Mobile, or maybe Buckeye, or even within the monument, perhaps along Highway 238. BLM needs a much greater presence both in the monument and the neighboring communities. Currently staff commutes at considerable expense of fuel and time – every minute on a freeway is one less minute

spent in the monument. I have heard that staff may not want to live in Gila Bend or Casa Grande, but we need to ask what's best for the monument and for visitors.

BLM is capable of fine visitor centers; witness the two for Escalante-Grand Staircase NM.

8. Acquire private inholdings. The public deserves the full use of the monument, and those land owners deserve fair payment for their lands. The parcels along I-8 will be especially important to add to the monument pronto before they become truck stops or solar farms.

9. Decline new utility or transportation corridors in the monument. For corridors outside the monument, limit damage to habitat and wildlife resources, and ask if there are ways to incorporate intermontane wildlife corridors with utility corridors through suburban or rural areas, in order to provide more corridors than the plan currently does.

10. Designate I-8 and Highway 238 as scenic highways or byways. The stretch of I-8 through the monument is the only place in America where an interstate passes through pristine scenery of a specially protected Sonoran Desert landscape. It is a beautiful stretch of road, especially in spring or following rains, and it speaks well of Arizona and BLM's stewardship. It is an *Arizona Highways* highway and good for tourism and the state's image.

Currently, BLM seems to condone and even initiate drastic removal of roadside native trees and shrubs in order to meet short-term goals for smuggler apprehension.

11. Add signage announcing the monument along I-8. Be proud it is a monument.

12. Continue protecting historic places, such as Bighorn Station. Its restoration was a proud moment. And protect prehistoric sites, many of which have already suffered from neglect.

13. Develop and present a multi-media interpretive program for monument resources, such as Bighorn Station, ranching history, padres and explorers, Native Americans... the list is long. The NPS interpretive model is appropriate for BLM, too, and again take a look at Escalante-Grand Staircase NM with its successful programs. Your anniversary celebration for the monument and for the Arizona Wilderness Act was splendid. Again, you need a visitor center, even if it is housed with the Gila Bend Museum or a municipal building in Casa Grande or a mobile trailer.

14. Bring back Sonoran pronghorn. The monument is part of their historic grounds –we even have Antelope Peak. With livestock grazing gone, the pronghorn should have a good habitat (certainly better than the southern Kofa). I suspect that smuggling was a key reason that SDNM was not selected, and if Border Patrol can ever be convinced to apprehend smugglers at the border instead of letting the run clear to I-8, that problem will evaporate.

15. For better protection of Lower Gila lands, consider creation of a National Conservation Area for major portions. This could improve cooperation and work with neighboring agencies and private-owner stakeholders, facilitate wildlife corridors, and encourage a regional conservation ethic.

I urge you to treat the monument to higher standards than other BLM lands. Former Secretary Bruce Babbitt supported the monument because he thought BLM would rise to the occasion and could manage premier public lands--- prove him right.

Thank you.

Respectfully,

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