

24 November 2011
BLM Lower Sonoran Field Office
LS-SDNM RMP
21605 North 7th Avenue
Phoenix, AZ 85027

BLM:

Enclosed are the Friends of the Sonoran Deserts National Monument's comments on the Draft Resource Management Plan.

We are looking forward to working with the BLM to make the Sonoran Desert National Monument an even better place than it is today.

Sincerely,

Thomas Hulen
Executive Director

Friends of the Sonoran Desert National Monument

RMP Recommendations

New Wildlife Waters

The Bureau of Land Management's preferred alternative calls for the construction of new wildlife waters if needed to maintain or enhance wildlife resources. The FSDNM will support establishing new wildlife waters only if it can be demonstrated that the new wildlife waters will not negatively affect existing resources and all laws and regulations are abided by. The Friends of the Sonoran Desert National Monument will support the renovation of existing wildlife waters if all laws and regulations are abided by.

Restoration

Passive restoration of degraded resources should be used when appropriate. Unfortunately there are areas in the Sonoran Desert National Monument such as the Vekol Valley Grassland, areas around North Tank and Gap Well as well as all the livestock waters located in the Sonoran Desert National Monument that have suffered considerably from activities such as unsustainable grazing and irresponsible OHV use. The Bureau of Land Management should develop and implement a plan that will put the restoration of these and other areas on a faster track for recovery. The Bureau of Land Management has been directed through the Omnibus Public Land Management Act to "conserve, protect and restore nationally significant landscapes for the benefit of current and future generations." By engaging in a more aggressive restoration program the Bureau of Land Management will fulfill their duty to manage for climate change as outlined in Secretarial Order (S.O.) 3289 which unequivocally mandates all agencies within the Department of Interior to "analyze potential climate change impacts when undertaking long-range planning exercises, setting priorities for scientific research and investigations, developing multi-year management plans, and making major decisions regarding potential use of resources under the Department's purview." S.O. 3289, incorporating S.O. 3226 .This planning process falls squarely under this guidance and Bureau of Land Management must assess impacts from the proposed actions that may directly, indirectly, or cumulatively result in exacerbating climate change within this document.

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With particular regard to the Sonoran Desert National Monument, wilderness areas, national historic trails, and other units within the National Landscape Conservation System, Secretarial Order 3308 states that these lands “shall be managed as an integral part of the larger landscape, in collaboration with the neighboring land owners and surrounding communities, to maintain biodiversity, and promote ecological connectivity and resilience in the face of climate change.”

The endangered Sonoran pronghorn is listed in the Monument Proclamation as a Monument object even though Sonoran pronghorn are not currently found on the Sonoran Desert National Monument. It was intended by the framers of the Proclamation to include the Sonoran pronghorn so that future Bureau of Land Management activities should include this species in management plans.

The endangered Sonoran pronghorn’s historic range includes the Sonoran Desert National Monument and the interagency committee responsible for the Sonoran pronghorn’s recovery has identified the Sonoran Desert National Monument as a site for future reintroductions of this important animal.

Currently there are two distinct populations of Sonoran pronghorn free ranging in the world. The Cabeza Prieta National Wildlife Refuge in the United States and one population in the northern Mexican state of Sonora. Both of these populations are suffering from the effects of climate change and border issues facing United States and Mexico such as human and drug smuggling.

Several wildlife managers in the United States responsible for Sonoran pronghorn recovery claim they are unduly restricted by Wilderness Act regulations on the Cabeza Prieta National Wildlife Refuge to meet their recovery goals under the Endangered Species Act.

By establishing a Sonoran pronghorn herd in non-wilderness areas on the Sonoran Desert National Monument wildlife managers will have greater flexibility in recovering the Sonoran pronghorn and will allow the BLM to comply with the intent of the Omnibus Public Land Management Act to “conserve, protect and restore nationally significant landscapes for the benefit of current and future generations.”

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Wildlife Habitat Areas

The Friends of the Sonoran Desert National Monument supports the Bureau of Land Management's preferred alternative that no Wildlife Habitat Areas be established in the Sonoran Desert National Monument because Monument designation offers greater protection but stress that all management prescriptions must be applied to protect Monument objects and the other natural resources in the Sonoran Desert National Monument.

Cultural and Heritage Tourism

The Friends of the Sonoran Desert supports the Bureau of Land Management's preferred alternative to allow Cultural and Heritage tourism as well as scientific research when these activities are compatible with Monument objects and resource protection. The Draft RMP does not discuss how the Bureau of Land Management intends to educate the public about the rich cultural and heritage of the area comprising the Sonoran Desert National Monument.

The Lower Gila Historic Trail Special Cultural Resource Management Area

The Friends of the Sonoran Desert National Monument supports the Bureau of Land Management's preferred alternative to protect a number of historic trails under the Lower Gila Historic Trail Special Cultural Resource Management Area designation.

Protections of Wilderness Characteristics

The Bureau of Land Management is required under the 1976 Federal Land Policy and Management Act is required to inventory and manage lands with wilderness characteristics as wildlands in order to prevent these lands from becoming degraded.

The Bureau of Land Management's preferred alternative (Alternative E) calls for about 109,900-acres in the Sand Tank Mountains south of Interstate 8 to be managed as wildlands.

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The Friends of the Sonora Desert National Monument supports wildland designation in the Sonoran Desert National Monument in the following areas. Sand Tank Mountains: Approximate 109,900-acres; Margie Peak addition: Approximately 14,700-acres; Butterfield Memorial: Approximately 9,600- acres. These areas do meet wildlands criteria and are eligible for Wilderness Act designation.

Grazing in the Sonoran Desert National Monument

The Bureau of Land Management's preferred alternative (Alternative E) calls for the continuation of grazing on the Sonoran Desert National Monument except portions of the Conley allotment would be permanently closed to grazing. Other areas of the Sonoran Desert National Monument would be open to grazing depending upon range conditions and when not incompatible with Monument objects.

The Friends of the Sonoran Desert National Monuments supports Alternative D which would allow for the retirement of all grazing activities on the Sonoran Desert National Monument when each allotment's term expires.

In fulfillment of the Sonoran Desert National Monument's proclamation livestock grazing south of Interstate 8 ceased when the grazing leases expired. The proclamation states that grazing can continue north of Interstate 8 if the Bureau of Land Management can demonstrate that continued grazing is not incompatible with monument objects.

The Friends of the Sonoran Desert National Monument supports allowing grazing leases to expire on the Sonoran Desert National Monument for the following reasons.

If grazing was deemed unsuitable for the area south of Interstate 8 in the proclamation then grazing is just as unsuitable in the area north of Interstate 8. The Sonoran Desert National Monument is to be managed for Monument objects as specified by the proclamation and the Antiquities Act of 1906. Domestic livestock are not Monument objects.

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Sonoran pronghorn, desert bighorn sheep, desert tortoise, mule deer, saguaro cactus, mesquite and palo verde trees and many others are Monument objects and they either compete for the same resources that domestic livestock use or are negatively affected by livestock activity. The Sonoran Desert National Monument has suffered a multi-year drought. There is considerable evidence suggesting that below average precipitation may continue into the future. It is not a tenable position to force Monument objects to continued competition with livestock under stressful environmental conditions.

The Bureau of Land Management's preferred alternative would shift the majority of livestock use on the Monument to the winter and spring months. This is precisely the time when recreational use is at its peak. Many people appreciate the winter wildflowers and go to Sonoran Desert National Monument to see the colorful displays. Under the Bureau of Land Management's proposed action, these wildflowers would be allocated to livestock consumption, limiting visitor enjoyment and removing food for wildlife.

The Bureau of Land Management conducted a Land Health Evaluation for the Sonoran Desert National Monument. They concluded that 127,550-acres or 50.5% of all Monument lands north of Interstate 8 are not achieving land health standards. Of this figure the Bureau of Land Management determined that 8,498-acres or 3.4% of the land north of Interstate 8 did not meet land health standards because of livestock grazing. According to the Bureau of Land Management the remaining 47.1% of the land failed to meet standards because of drought or other factors.

Since 50.5% of Monument lands north of Interstate 8 are not meeting land health standards and livestock are not Monument objects, continued livestock operations must cease in order for the land to recover and to protect Monument objects.

Special Recreation Management Areas and Recreation Management Zones

The Friends of the Sonoran Desert National Monument supports the Bureau of Land Management's preferred alternative to allocate the Sonoran Desert National

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Monument Special Recreation Management Area and the Desert Back Country and Anza National Historic Trail Recreation Management Zones.

Route Designations

The Friends of the Sonoran Desert does not wholly support any of the Bureau of Land Management's alternatives. Alternative D offers the greatest potential protection to the Monument's objects and other resources and alternative E the Bureau of Land Management's preferred alternative does not recommend closing enough routes to adequately protect the Monument's objects and resources. The Friends of the Sonoran Desert National Monument's recommendations are as follows:

Northern Half of SDNM near North Maricopa Mountains Wilderness Area

Current Signed Roads Recommended to Remain Open

- 8000: Main BLM road that parallels the El Paso Natural Gasoline Road
- 8000U: Provides access to North Maricopa Mountain Wilderness Area
- 8001: Provide Access to Margies Cove West Trailhead
- 8001C: Provides access to North Maricopa Mountain Wilderness Area
- 8001E: Provide Access to Margies Cove West Trailhead
- 8002: Provide Access to Margies Cove East Trailhead
- 8002A: Provide Access to Margies Cove East Trailhead
- 8003: Juan de Anza National Historic Trail-Butterfield Trail
- 8004: Provide Access to Margies Cove West Trailhead and 8003
- 8004A: Provide Access to Margies Cove West Trailhead

Current Signed Roads Recommended to be Closed

- 8000A: Illegal dumping and irresponsible target shooting.
- 8000C: Illegal dumping and irresponsible target shooting.
- 8000D: Illegal dumping and irresponsible target shooting.
- 8000E: Illegal dumping and irresponsible target shooting.

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8000F: Illegal dumping and irresponsible target shooting.

8000G: Illegal dumping and irresponsible target shooting.

8000L: Illegal dumping and irresponsible target shooting.

8001A: Into proposed wilderness area.

8001B: Into proposed wilderness area.

8001D: Into proposed wilderness area.

8002B: Unnecessary road.

8002C: Into proposed wilderness area.

8003C: Unnecessary road

8004D: Unnecessary road

8004G: Unnecessary road

8005: Section of Anza Trail badly damaged by OHV use.

8005A: Unnecessary access to damaged section of Anza Trail. This section of Anza Trail will be closed to motorized vehicles.

8005D: Unnecessary access to damaged section of Anza Trail. This section of Anza Trail will be closed to motorized vehicles.

8006H: Into proposed wilderness area.

8006I: Into proposed wilderness area.

8039C: Into proposed wilderness area.

8039D: Into proposed wilderness area.

Area of SDNM between Interstate 8 and State Highway 238 near South Maricopa Mountain Wilderness Area

Current Signed Roads Recommended to Remain Open

8029: Provides access to South Maricopa Mountain Wilderness and AZ Game and Fish Wildlife Water. Administrative cherry stemmed road.

8030: Provides access to South Maricopa Mountain Wilderness and AZ Game and Fish Wildlife Water Administrative cherry stemmed road.

8030A: Provides access to South Maricopa Mountain Wilderness and AZ Game and Fish Wildlife Water Administrative cherry stemmed road.

8032: Main road west of South Maricopa Wilderness

8034: Provides access to Gila Bend

8035:

8036: Provides access to Gila Bend

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8037: Provides access to northern and eastern portions of the South Maricopa Mountain Wilderness Area

8037A: Provides access to northern and eastern portions of the South Maricopa Mountain Wilderness Area

8037Q: Provides access to eastern portions of the South Maricopa Mountain Wilderness Area

8038: Provides access from Highway 238 to South Maricopa Mountain Wilderness Area

8038A: Provides access from Highway 238 to South Maricopa Mountain Wilderness Area

8038B: Provides access from Highway 238 to South Maricopa Mountain Wilderness Area

8038C: Provides access from Highway 238 to South Maricopa Mountain Wilderness Area

8039: Access along the rail road

Current Signed Roads Recommended to be Closed

8031: Into proposed wilderness area.

8033: Redundant road

8033A: Redundant road

8033B: Redundant road

8034A: Redundant road

8034E: Redundant road

8035A: Redundant road

8037: At railroad crossing. Dangerous!

8037B: Redundant road

8037C: Redundant road

Area South of Interstate 8

Current Signed Roads Recommended to Remain Open

8007: Vekol Road

8007C: Provides access to White Hills

8008: Provides access from Vekol Road to Sand tank Mtns.

8008J: Part of scenic loop

8009: Provide access to Javelina and Sand Tanks Mtns.

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8009B: Freeman Road provides access to

8009: Freeman Road

8010: Provides access between Vekol and Freeman Roads

8011: Provides access to Sand tank Mtns.

8012: Getz Well Road provides access to Sand tank Mtns.

8013: Seasonal closure

8014: Provides access to road 8018

8015: Provides access to Javelina Mtns.

8016D: Part of scenic loop

8017: Seasonal closure

8018: Seasonal closure

8018C: Provides access to roads 8018 and 8013 from Gila Bend (A favorite route for locals.)

8019: Seasonal closure

8020: Provides loop between 8011 and 8012; leads to wildlife water

8022: Smith Road

8022A: Provides access to Table Top Wilderness Area

8022B: Provides access to Table Top Wilderness Area

8022C: Provides access to Table Top Wilderness Area

8022D: Provides access to southeast corner of the SDNM

8023: Provides access to eastern edge of SDNM

8023C: Provides access to eastern edge of SDNM

8023D: Provides access to eastern edge of SDNM

8023M: Provides access to eastern edge of SDNM

8023N: Provides access to eastern edge of SDNM

8024: Provides access to Lava Flow South Trailhead and Table Top Trailhead

8024A: Provides access to Lava Flow South Trailhead and Table Top Trailhead

8025: Provides access to southeast corner of the SDNM

8026: Provides access to Sand Tank Mtns.

8026A: Provides access to Sand Tank Mtns.

8026B: Provides access to Sand tank Mtns.

8026C: Provides access to Sand Tank Mtns.

8027: Provides access to Sand Tank Mtns.

8042: Access to Lava Flow North Trailhead

8042A: Provides access to Antelope Peak

8042B: Provides access to Antelope Peak

8044: Access to Lava Flow North Trailhead

8045: Access to Lava Flow North Trailhead

8046: Access to Lava Flow West Trailhead

Current Signed Roads Recommended to be Closed

8007B: Unnecessary-redundant

8007D: Unnecessary-redundant

8007E: Unnecessary-redundant

8007K: Unnecessary-redundant

8007F: Unnecessary-redundant

8008B: Unnecessary-redundant

8008H: Unnecessary-redundant

8009C: Unnecessary-redundant

8009D: Unnecessary-redundant

8009E: Unnecessary-redundant

8009F: Unnecessary-redundant

8011A: Unnecessary-redundant

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8014: Unnecessary-redundant
 8015A: Unnecessary-redundant
 8016: Unnecessary-redundant
 8018D: Unnecessary-redundant
 8023B: Unnecessary-redundant
 8042B: Unnecessary-redundant
 8042C: Unnecessary-redundant
 8043: Unnecessary-redundant
 8043A: Unnecessary-redundant

8023G: Unnecessary-redundant
 8023J: Unnecessary-redundant
 8023K: Unnecessary-redundant
 8025A: Unnecessary-redundant
 8027A: Unnecessary-redundant

Land Use Authorizations

The Friends of the Sonoran Desert supports the Bureau of Land Management's preferred alternative that would not allow the allocation of multiuse utility corridors and new Land Use Allocations within the Sonoran Desert National Monument.

Special Designations

The Friends of the Sonoran Desert National Monument the Bureau of Land Management's preferred alternative to allocate Interstate 8 and State Highway 238 as Scenic Byways.

Priority Wildlife-Travel Corridors

The Friends of the Sonoran Desert National Monument supports alternative D because it offers the great amount of area for wildlife to cross major roadways dissecting the Sonoran Desert National Monument

The proposed wildlife movement corridors are:

Buckeye Hills to North Maricopa Mountains
 Sierra Estrella Mountains to North Maricopa Mountains
 South Maricopa Mountains to the Sand Tank Mountains
 Sierra Estrella Mountains to Table Top Mountain
 North Maricopa Mountains to South Maricopa Mountains

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The Sonoran Desert National Monument was created through the authority of the Antiquities Act of 1906 “for the purpose of protecting monuments objects” such as desert bighorn sheep, desert mule deer and hopefully Sonoran pronghorn in the near future. These five wildlife movement corridors offer the most protection when crossing highways for these and other animals.

Monument wildlife species and habitat must be prioritized

Bureau of Land Management must protect Monument objects as described in the Proclamation. The Proclamation describes many important wildlife species and their habitat as specific objects of interest to be prioritized for protection over other uses of the area. This includes, but is not limited to, the following:

Sonoran pronghorn
 Desert bighorn sheep
 Mule deer
 White-tailed deer (Not in the proclamation but should have been)
 Javelina
 Mountain lion
 Grey fox
 Bobcat
 Lesser long-nosed bat
 California leaf-nosed bat
 Cave myotis
 Over 200 species of birds, including the elf owl and western screech owl
 Sonoran desert tortoise
 Red-backed whiptail
 Sonoran green toad
 Lowland burrowing tree frog (Not in the proclamation but should have been)
 Sonoran desert green toad (Not in the proclamation but should have been)
 Sinaloan narrow mouth toad (Not in the proclamation but should have been)
 Arizona mudturtle (Not in the proclamation but should have been)

The Friends of the Sonoran Desert National Monument believes the BLM needs to inventory, prioritize and protect wildlife and habitat under the Proclamation and

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other laws and policies. The Bureau of Land Management should identify all uses that damage monument objects and present management options in the RMP.

In addition the Bureau of Land Management should include management prescriptions for rare species such as, Lowland burrowing tree frogs, Sonoran desert green toads, Sinaloan narrow mouth toads, and Arizona mud turtles found in the Sonoran Desert National Monument but not identified in the Draft Management Resource Plan.

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