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Emily Garber
Lower Sonoran- Sonoran Desert Resource Management Plan
Phoenix District – Bureau of Land Management
21605 North 7th Ave
Phoenix, Arizona 85027

November 21, 2011

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

Dear Ms. Garber,

From 2002 thru 2004 I worked with Pacific Biodiversity Institute (PBI) on a series of scientific studies regarding the ecological condition of natural communities and distribution of native grasses in the Sonoran Desert National Monument. I was co-author of two reports:

Snetsinger, S.D. and P.H. Morrison. 2004. Native Grass Abundance in the Sonoran Desert National Monument and Adjacent Areas. Pacific Biodiversity, Winthrop, Washington. 62 pp.

Morrison, P.H., H.M. Smith IV, S.D. Snetsinger. 2003. The Natural Communities and Ecological Condition of the Sonoran Desert National Monument and Adjacent Areas. Pacific Biodiversity Institute, Winthrop, Washington. 113 + xvi p. + Vol. 2 (appendices) 395 p.

I am deeply concerned that 1) PBI was referenced as the source for analyses that we did **not** conduct, 2) the BLM (or whoever *is* the source of the fore-mentioned analyses) re-analyzed Pacific Biodiversity Institute's data in inappropriate ways to support 3) a flawed conclusion of the DRMP/DEIS that livestock grazing is compatible protection of monument objects.

1. PBI was referenced as the source for analyses that we did not conduct

It appears that PBI's raw data was re-analyzed by someone else and cited in the document as the work of PBI. These citations are completely inappropriate and need to be removed, and the actual source of the data analysis identified. For example, references are made to the "Pacific Biodiversity Institute Saguaro Study." This study does not exist - we never conducted such work. The DRMP/DEIS document needs to be thoroughly checked and all inappropriate references to PBI removed.

2) Inappropriate re-analysis of Pacific Biodiversity Institute's data

Despite the comprehensive work that PBI conducted to assess the ecological conditions of communities in the SDNM, the BLM has chosen to re-analyze the data using only a small subset of the information. The subset was chosen *specifically* to exclude those areas where livestock impacts most affect the natural communities. This is completely inappropriate and leads erroneous conclusions.

3) Flawed conclusions of DRMP/DEIS

The conclusion of the DRMP/DEIS that livestock grazing is compatible with the protection of monument objects is incomprehensible. This finding is completely contrary to the dominant body of scientific research on the impacts of livestock grazing in desert environments, as well as to PBI's own findings. Throughout the 4 reports published by PBI on the SDNM (the two others not mentioned earlier "Natural Communities of the Sonoran Desert National Monument and Sand Tank Mountains" and "Native Grass Characteristics within Xeroriparian Communities of the Sonoran Desert National Monument") we repeatedly find strong associations of livestock grazing with negative impacts on the natural communities.

Based on PBI's numerous studies and analyses of ecological condition on the SDNM, the only alternative that is supported by our findings is the alternative that eliminates livestock grazing on the SDNM.

Thank you for consideration of these comments.

Sincerely,



Susan Snetsinger