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US DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE
Pacific West Regional Office
333 Bush Street, Suite 500
San Francisco, California, 94104-2828

November 25, 2011

Penny Foreman, RMP Project Manager
LS-SDNM Resource Management Plan
Phoenix District, BLM
21605 North 7th Avenue
Phoenix, AZ 85027
Penny_foreman@blm.gov
Blm_az_ls_sdnm_plan@blm.gov

Re: Comments Regarding Lower Sonoran Desert and Sonoran Desert National Monument
DRMP/DEIS - Impacts to Anza National Historic Trail

Dear Ms. Foreman:

The National Park Service appreciates the opportunity to review the Lower Sonoran Desert and Sonoran Desert National Monument Draft Resource Management Plan (DRMP) and Draft Environmental Impact Statement (DEIS). The following comments on the DRMP/DEIS relate to the Juan Bautista de Anza National Historic Trail, due to our responsibility to administer, coordinate, preserve and enhance this component of the National Trails System.

Introduction

The National Park Service (NPS) has a special interest in ensuring the protection of the Juan Bautista de Anza National Historic Trail. Congress, under the National Trails System Act ([NTSA], 16 USC 1241 et. seq.), established the Juan Bautista de Anza National Historic Trail (Anza NHT) in 1990. The Act states that “*National historic trails shall have as their purpose the identification and protection of the historic route and its historic remnants and artifacts for public use and enjoyment.*” NPS, as Administrator of the Anza NHT, is charged with implementing this vision in collaboration with other federal, state, and local agency partners such as the Bureau of Land Management (BLM).

As stated in the DRMP/DEIS, the Lower Sonoran Desert contains some of the least disturbed landscapes along the entire 1,200 mile length of the Anza NHT. The Juan Bautista de Anza National Historic Trail Comprehensive Management and Use Plan and Final EIS, April 1996 (Anza CMP) identified portions of the trail in the planning area as “High Potential Route Segments,” meaning that the historic trail corridor retains the integrity to convey historic interpretation and appreciation of the Anza expedition. The planning area includes several historic expedition campsites (Camp numbers 26-31), located within the Sonoran Desert National Monument and along the lower Gila River. NPS appreciates BLM’s efforts to protect and interpret the Anza NHT as a component of the National Landscape Conservation System. Many aspects of the agency’s Preferred Alternative (Alternative E) reflect the BLM’s desire to protect the historic trail corridor to the extent feasible while still balancing the agency’s mission of managing federal lands for multiple uses.

Attachment A

Specific NPS Comments on Lower Sonoran and SDNM DRMP/DEIS

Chapter 2

2.7.3 Cultural and Heritage Resources

Anza-Butterfield Interpretive Trail Area within SDNM, Management Actions and Allowable Uses (p. 56):

CL-1.1.7 NPS feels Alternative D may be too restrictive to public visitation.

CL-1.1.6 NPS prefers the uses allowed under Alternative E, which designates Happy Camp, Christmas Camp, and the Anza-Butterfield Interpretive Trail Area as public and scientific use sites. Due to the size and remoteness of the SDNM, we believe that motorized travel along the Anza-Butterfield Interpretive Trail Area is appropriate, if it is sufficiently restricted to protect the extant physical traces of the historic trail(s) from damage from visitor use. However, we also feel that motorized vehicle access should not be permitted through Maricopa Pass, because it would encourage an unacceptably high level of through traffic and motorized use along the trail corridor. As mentioned in 4.19.7.3 Wilderness Areas, approximately four miles of the Anza NHT trail corridor is adjacent to the North Maricopa Wilderness. Closing this section of the trail corridor to vehicle access would protect the wilderness values for which the North Maricopa Wilderness is designated.

CL-1.1.10 Under All Alternatives but D, camping would be permitted within 100 feet of the centerline of the Anza-Butterfield Interpretive Trail in designated campsites. 100 feet in the relatively open desert landscape does not seem an adequate buffer distance to provide a quality recreational experience for trail users or for campers. We recommend a greater separation from the trail to designated campsites, such as 250 feet.

Objective 1.3: Special Cultural Resource Management Area (SCRMA)

Alternative C designates the Lower Gila Historic Trails, as well as the Desert Trails through SDNM as Special Cultural Resource Management Areas (SCRMA). We are unclear as to what additional protection this SCRMA designation would provide to the trail corridor, but are supportive of the concept as it appears to create a larger buffer around the Anza NHT corridor and the Gila River. This buffer could potentially be used to minimize visual impacts to the trail corridor if it restricted large development projects from the SCRMA.

Interpretation and Education, p. 59

NPS is supportive of BLM's interpretation and education goals, and we look forward to future opportunities to collaborate with BLM on the interpretation of the Anza NHT within the Planning area.

2.8 Lands & Realty

2.8.1.1 Land Use Authorizations (LUAs)

Alternatives A & B, Maps 2-5a-b include two utility corridors within the SDNM along Highway 238 (G: Gila Bend – Santa Rosa) and Interstate 8. Alternative C, Map 2-5c would permit only an underground multiuse utility corridor along Hwy 238 through SDNM.

Alternatives D & E, Maps 2-5 d-e, exclude utility corridors along Highway 238 and Interstate 8 from within SDNM. NPS would prefer one of these alternatives to protect viewsheds within SDNM from disruption by large electrical transmission lines or other significant alterations from to the landscape.

Map 2-7e Alternative E (the Agency Preferred Alternative), Utility Scale Renewable Energy Conflict Areas designates nearly all the Planning Area as Avoidance Areas with High and Moderate Sensitivity. While NPS appreciates this designation near high sensitivity and Prohibited areas such as the Wilderness Areas, ACECs, and the SDNM, we understand that “Avoidance” does not equal “Prohibited.” Therefore, it must be assumed that utility scale renewable energy development could occur in any of the Avoidance Areas. We do not feel that designating Avoidance Area provides adequate protection to the Anza Trail historic corridor. NPS is currently a cooperating agency with BLM in the preparation the Hyder Valley Solar Project EIS. The 325 MW concentrating solar trough project is proposed on 2,750 acres about 1 mile north of the Anza NHT corridor, west of Oatman Mountain, in what appears to be a proposed Avoidance Area under the Agency’s Preferred Alternative.

2.8.1.2 Land Tenure

Lands Suitable for Disposal and Acquisition (p.123.)

NPS requests that public lands within the Anza NHT corridor or lands identified on a draft or adopted plan as being within the alignment for the Anza Recreational Trail (retracement route) be excluded from transfer from federal ownership. We also request that lands meeting these criteria be identified for acquisition, or be protected through other suitable protection means.

2.8.4 Recreation Management, p.158

Management Actions and Allowable Uses

p. 166: Alternatives B-E (all except A, No Action):

RR-1.1.1: This action would establish the Lower Gila Historic Trails SRMA as a tourism destination targeted to a regional/national market. The BLM would invest in facilities and visitor assistance, recognizing that the national and regional visitors and constituents value the SDNM as a recreation-tourism destination. NPS agrees this proposed designation and goal to promote tourism oriented to the trail corridor.

RR-1.1.2: The goal of establishing the Gila River Recreation Management Zone (RMZ) seems consistent and appropriate with goal RR-1.1.2.

2.9 Special Designations

2.9.1 ACEC

Lower Gila Terraces and Historic Trails ACEC

NPS appreciates the proposed designation of the Lower Gila Terraces and Historic Trails ACEC, but we also understand that such a designation could still potentially allow for a variety of activities (such as mineral exploration) that could be detrimental to the resources the ACEC is intended to protect. This potential for indirect effects on ACEC resources occurring outside the ACECs is acknowledged in Section 4.19.1.2, Assumptions (p.744).

NPS supports AC-1.1.37 (Alternative E), which would allow additional public use sites within the ACEC if they have negligible or minor impacts such as trailheads, trails, etc. AC-1.1.34 (Alternative D), which would prohibit additional public use sites, seems too restrictive.

Similarly, we support AC-1.1.41 (Alternative E), which would allow and encourage scientific research, including excavation (such as archaeological studies of historic trails) subject to the approval of the research design by BLM. NPS would encourage archaeological studies of potential Anza Expedition campsites.

AC-1.1.38-40: It was unclear from our review of the document where does the plan specifies what portions/parcels within the ACEC would be protected from surface disturbance and mineral exploration and development. Please clarify this. We question the value of the ACEC designation if the entire ACEC is not protected as a unit.

Related to our comment in 2.8.1 Lands and Realty above, we suggest that an additional action be added: Acquire private or State owned parcels within the ACEC that have high resource value or would improve the connectivity of the ACEC, including the connectivity of the Anza Recreational Trail. Acquisition could be accomplished through a land exchange or purchase.

2.9.3 National Trails – Anza Trail

Please add additional text to provide some context regarding the Anza NHT. The Anza NHT commemorates the pioneering Spanish overland colonizing expedition in 1775-76 that brought approximately 240 persons and 1000 livestock from Sonora and Sinaloa to establish a presidio and mission at San Francisco. The expedition doubled the Spanish population of Alta California. The route was also used by colonists in 1781 to establish the pueblo of Los Angeles and the presidio and mission at Santa Barbara.

Please include an explicit definition of the Anza NHT corridor. It appears that the RMP defines the “Anza NHT corridor” as the assumed historic trail corridor as specified by the National Trails System Act, which is the assumed path traveled by the expedition based on original diaries and maps. This assumption is correct, however, a definition should be included so that the term corridor is not misunderstood.

Page 203 states “Today we face the challenge of conserving the natural visual setting along the trail corridor and constructing a recreational retracement route for non-motorized use in the future.” NPS agrees with this statement and we request that the actions in the adopted plan are consistent with this statement. We also desire to protect the visual setting and develop the recreational trail.

We support the development of the recreational retracement route (aka Anza Recreational Trail) throughout the entire planning area. To clarify, the recreational trail need not be located within the mapped historical corridor. The Anza NHT corridor is an important transportation route used by Indian tribes during prehistoric time as well as by many other more recent historic groups. Other historic trail names or events associated with all or portions of the route through the planning area include: the Southern Emigrant Trail, Butterfield Overland Stage, and Mormon Battalion, as stated in the document. NPS welcomes collaboration with BLM and historic trail organizations interested in interpreting the multilayered historical events of the period, and developing one recreational trail alignment that would allow visitors to experience the cultural landscape of this important historic transportation corridor.

A buffer zone of should be provided along the historic corridor to avoid detrimental direct indirect effects of incompatible uses. Of most concern to NPS are significant visual impacts from large scale projects such as utility scale renewable energy projects, large mineral extraction activities, landfills etc.

Consistent with the BLM’s Draft Solar PEIS, large scale projects potentially visible from the historic trail corridor should be evaluated for their potential visual impacts to the trail, and impacts should be avoided or minimized to the greatest extent feasible to avoid significant adverse visual impacts. If significant visual impacts would still occur, mitigation should be provided that benefits the trail.

2.9.3.2 Management Actions for National Trails (NT) Action Alternatives

NT-1.1.7 States that the Anza NHT corridor would be an Exclusion Area for major utility-scale renewable energy development and new major linear LUAs. However, this statement only infers protection of the mapped historic corridor from direct impacts. Adjacent lands designated as Avoidance Areas could still allow large scale projects that could result

in visual or other impacts to the trail corridor. Utility-scale renewable energy projects proposed within several miles of the historic have the potential for significant visual impacts on the viewshed of the trail. All such projects should be required to provide visual impact analysis for views from the trail corridor, with Key Observation Points selected in consultation with NPS.

N.T.-1.1.14 & .15: NPS supports archaeological studies of Anza Expedition campsites and trail corridor subject to the conditions specified in these management actions.

Visual Resource Management

NPS prefers the VRM classifications proposed for Alternative D (Map 2-3c), which Designates nearly all of SDNM as VRM Class I, and nearly all the remaining area as VRM Class II. As a 2nd choice, Alternative C also provides a good degree of protection, but portions of SDNM (along roads and even trailhead up to Happy Camp) are designated as VRM Class III, which seems inappropriate for a National Monument designation.

Ch. 3 Cultural Resources

p. 264 This section seems to infer that the Anza/Mormon/Butterfield trails follow the same route through the entire planning area. Please clarify that while these trails overlap in some locations, such as at Maricopa Pass, they may diverge in other areas while still being separate or parallel. For instance, along the lower Gila River Corridor we believe some trails were on different sites of the river. In striving to provide historically accurate interpretation to visitors, we should be careful not to leave the public the impression that all these different parties followed exactly the same route on the ground. However, it's certainly fine to interpret the area and build/identify a recreational trail on a combined route.

3.4.2.2 Juan Bautista de Anza NHT

p. 342 This section includes an excellent, accurate discussion of the Anza NHT. NPS agrees with this text.

Chapter 4

4.9 Impacts on Special Designations

Assumptions, National Historic Trails (p.744)

This section contains the following statements:

- The historic setting of the Anza NHT on all Federal Protection Components will have management prescriptions applied to a minimum of three miles from the NHT to the visual horizon, whichever is less.
- The recreational setting of the Anza NHT on all Federal Protection Components will have management prescriptions applied to a minimum of five miles from National Register eligible properties to the visual horizon, whichever is less, when management concerns warrant.

NPS would like clarification regarding the exact meaning of the above statements and how they would be implemented. What is meant by “management prescriptions,” and what is meant by “a minimum of three/five miles from the NHT to the visual horizon, whichever is less”? Is the distance (three/five miles) measured from the centerline of the NHT historic trail corridor, or from the sides of the corridor? Also the phrasing of these statements leaves much room for interpretation when applied to specific projects. In some parts of the planning area, the visual horizon for the NHT could be 20 miles or more. Therefore, these statements only will generally afford a degree of management protection to the minimum distance (3 or 5 miles). Some large scale projects proposed in the planning area have the potential to result in significant visual contrast at greater distances, and projects should still be designed to minimize visual contrast if they are within the viewshed of the historic trail corridor and beyond three or five miles. NPS would like to work with BLM on revising this

specific language to clarify how it would be implemented by staff when reviewing applications. Perhaps the specific implementation of these regulations would be specified in the BLM National Scenic and Historic Trails manual (currently under development) or in a similar document specific to the Anza NHT in the planning area.

We appreciate the recognition that historic trail artifacts and campsites are potentially eligible for listing on the National Register. The setting of historic campsites should be protected to the extent feasible from direct or indirect (i.e. visual) impacts. Where impacts are unavoidable, mitigated should be provided that would benefit the trail, through improved interpretation, implementation of the recreation trail, or other means.

4.19.3.1.3 (p.751-752) discusses the potential threats to the Anza NHT from potential Lands and Realty or Grazing action under the No Action Alternative (Alternative A). Alternatives D and E offer superior management policies which would minimize or avoid most of the potential negative effects described here.

4.19.3.2.3 National Historic Trails

Travel Management, p.762

The document acknowledges that cultural resources could be degraded by increased visitation or vehicle use on or near historic trail corridors. NPS prefers Alternatives and management actions that make the Anza NHT (and other more recent historic trails, such as the Mormon Battalion or Butterfield Stage) accessible to the public while also minimizing the potential impacts that could result from increased visitation or vehicle access. Limiting vehicle access to sensitive trail segments or developing a separate recreational retracement trail would help to retain the integrity of historic trail traces. Alternatives D or E seek to balance the goals of increase visitation while minimizing potential damage to sensitive cultural resources.

Visual Resource Management, p.763

NPS prefers that the viewshed of the Anza NHT Corridor be protected through adoption of Visual Resource Management (VRM) Class II designation, which would minimize visual impacts from proposed actions on surrounding lands. As stated in the document, management at a VRM Class III or Class IV level would allow activities and developments “that are completely incompatible with a NHT.”

Alternative D (p.802) would offer the highest level of protection from incompatible developments and visual intrusion (through VRM Class II) upon the historic landscape, but it would place significant restrictions on visitor use and even ground disturbing research activities.

Alternative E, Preferred Alternative, (p. 810) would allow more visual impacts (contrast) than Alternative D, especially in the Lower Gila Terraces / Historic Trails ACEC (VRM Class II + Class III). NPS would prefer more protection of the viewshed of the historic corridor than would be offered by Alternative E. We would prefer VRM Class II protection along the Anza NHT viewshed.

NPS Goals for the Anza NHT

The NPS has the following key goals for the Anza NHT, as outlined in the Anza CMP. These include:

- Protect the historic trail corridor (including historic campsites) from direct and indirect effects that would degrade the cultural landscape and its ability to interpret the story and relevance of the Anza expedition.
- Where the viewshed of the historic trail corridor is relatively unchanged or has minimal modern intrusions, protect this cultural landscape from significant modern alterations such as utility scale renewable energy developments and transmission lines, mineral extraction, landfills, etc.
- Work with partner organizations and agencies to implement the Anza NHT Recreational Trail, with the ultimate goal of a continuous retracement route along the entire trail route from Nogales, Arizona to the San Francisco Bay region.
- Interpret the Anza NHT to the public along the trail route in collaboration with partner organizations and land managers such as the BLM. We concur with BLM's approach to interpreting the trail corridor in the context of other historic trails that followed generally the same alignment, before and after the Anza expedition.
- Facilitate public access to the historic trail corridor for recreational opportunities including historic interpretation while protecting historic properties from degradation.
- Install Anza NHT Auto Tour Route Signage on highways along the entire trail route. The Auto Tour Route is signed throughout the state of California, but in Arizona the Auto Tour Route only has signs in in Pima County and a portion of Maricopa County within the SDNM (along Highway 238).

NPS Comments on DRMP/DEIS

NPS has reviewed the DRMP/DEIS and we generally concur with the approach outlined in the BLM's Preferred Alternative (Alternative E). However, due to the agency's multiple use mission, we are concerned that some aspects of Alternative E would not afford enough protection for the historic trail corridor, lands adjacent to the corridor, or viewsheds from the corridor. This is especially true of federal lands outside SDNM along the lower Gila River corridor. We would prefer greater protection of the viewshed along the historic trail corridor throughout the planning area as proposed by Alternative D, which would zone much of the Lower Gila River ACEC as VRM Class II instead of VRM Class III, as is proposed by Alternative E.

In addition, we recommend that the plan consider requiring a substantial buffer on either side of the historic corridor for large scale projects that would result in potentially significant adverse changes to the landscape. Such large projects should be sited and designed to minimize visual contrast to the trail viewshed to the greatest extent feasible. In addition, all large scale projects proposed within 10 miles of the trail corridor should include a visual impact analysis of the effect on the Anza NHT. Where significant visual effects cannot be avoided, mitigation should be provided to benefit the Anza NHT by improving opportunities to address the key goals outlined above. Section 4.9 refers to the application of management prescriptions to minimize the effects of projects within three to five miles of the trail corridor. NPS appreciates this idea and we would like to discuss this concept with BLM to better understand how the management prescriptions would be applied.

Attachment A of this letter provides more specific comments on the DRMP/DEIS as it relates to the Anza NHT. We enjoy great partnerships with BLM staff located at multiple offices throughout Arizona and California, and we appreciate the opportunity to comment on this document. We are available to work with the staff in refining the language in the DRMP/DEIS.

For any clarification of our comments on the DEIS or for further information relevant to the preparation of an Interpretive Plan, please contact Naomi Torres, Superintendent, Anza NHT (415) 623-2340 (Naomi_torres@nps.gov) or Steven Ross, Outdoor Recreation Planner (415) 623-2343 (steven_ross@nps.gov).

Sincerely,



for

Naomi Torres, Superintendent
Juan Bautista de Anza National Historic Trail

Attachment A - Specific NPS Comments on Lower Sonoran and SDNM DRMP/DEIS

Sent electronically by SDR on 11/25/11.