

The Anza Trail Foundation
P.O. Box 24654
Tempe, AZ 85285

November 25, 2011

Penny Foreman, RMP Project Manager
BLM Lower Sonoran Field Office
LS-SDNM RMP
Phoenix District, BLM
21605 North 7th Avenue
Phoenix, AZ 85027

RE: Comments Regarding Lower Sonoran Desert and Sonoran Desert National Monument Draft Resource Management Plan and Environmental Impact Statement - Impact on Anza National Historic Trail

Dear Ms. Foreman,

The Anza Trail Foundation appreciates the opportunity to comment on the draft RMP/EIS and its impact on the Juan Bautista de Anza National Historic Trail. We value our partnership with the BLM and the positive results we have achieved through our collaboration with the Lower Sonoran Field Office.

The Anza Trail Foundation is a 501(C)(3) organization that raises visibility and promotes knowledge of the epic eighteenth century expeditions of Juan Bautista de Anza and preserves the Anza National Historic Trail through collaboration and partnering with organizations and individuals. We believe the final RMP must provide a level of protection that preserves the Anza NHT corridor, campsites, and landscape so that future generations may envision and, to the extent possible, experience travel along the trail much as expedition members did.

The Lower Sonoran Desert and the SDNM contain some of the least disturbed landscapes along the entire length of the 1,200 mile Anza NHT in addition to six historic expedition campsites, and portions of the trail designated as "High Potential Route Segments" by the Juan Bautista de Anza National Historic Trail. Consequently, the ATF requests that BLM place greater emphasis on protection of both the Anza NHT corridor and its setting as set forth below.

ATF requests that the following be prohibited in the SDNM and in a 3-10 mile buffer zone on either side of the Anza NHT in the Lower Gila Historic Trails SCRMA: renewable energy projects, transmission lines, multi-use utility corridors, mineral activity of any nature, grazing, target shooting, paintball, firewood gathering, landfills, OHV use, and all-terrain vehicles weighing less than 1800 pounds. Further we request that BLM provide the same level of protection to the Anza NHT corridor

and its setting in the Lower Gila SCRMA as in the SDNM and that BLM protect the ANZA NHT viewshed, soundscape, and air quality from disturbances caused by activities within the SDNM and SCRMA and on adjacent lands.

2.7.3 CULTURAL AND HERITAGE RESOURCES

CL-1.1.6 ATF prefers uses allowed under Alternative E, however, we believe that only limited motorized travel along the Anza-Butterfield Trail is appropriate and that BLM must take appropriate measures to protect the historic trails from damage from visitor use. Motorized travel should not be permitted through the Maricopa Pass or through the approximately 4 miles of the Anza NHT trail corridor adjacent to the North Maricopa Wilderness referenced in 4.19.7.3.

CL-1.1.10 Camping should not be allowed within 500 feet of the Anza NHT.

Objective 1.3: Special Cultural resource Management Area (SCRMA)

ATF supports the designation of the Lower Gila Historic Trails SCRMA and request that the RMP specify that this area will receive the same protections against visual impacts, ground disturbances, air and water quality degradation and sound disturbances as the SDNM.

2.8 LANDS AND REALTY

2.8.1.1 ATF prefers Alternatives D & E, Maps 2-5 d-e, which exclude utility corridors along Highway 238 and I-8 within SDNM. This is necessary to protect the viewshed within SDNM.

Map 2-7 e Alternative E, ATF requests that the SDNM and the Lower Historic Trails SCRMA and the viewshed of both be designated a Prohibited Area (instead of an Avoidance Area) for Utility Scale Renewable Energy development.

2.8.4 RECREATION MANAGEMENT

The Gila Trail SRMA, page 161

ATF request that surface disturbing activities be prohibited within the entire buffer zone of 3-10 miles from the Anza NHT and other historic trails instead of being mitigated within one-quarter mile.

ATF requests that off -highway travel be prohibited within the Anza historic trail corridor to prevent ground, sound, and air degradation and preserve the historic setting.

ATF requests that recreational target shooting, paintball, and firewood gathering be prohibited in the Gila Trail SRMA.

2.9 SPECIAL DESIGNATIONS

2.9.3 National Trails - Anza Trail

A buffer zone should be established along the historic corridor to avoid detrimental direct and indirect effects from incompatible uses, particularly the visual impacts from large scale projects such as renewable energy projects, transmission lines, mineral extraction activities and landfills. Additionally, all large scale projects located on adjacent BLM lands should be evaluated for their visual impact on the Anza NHT.

Visual Resource Management

ATF prefers the VRM classification in Alternative D.

CHAPTER 4

4.9 IMPACTS ON SPECIAL DESIGNATIONS

ATF requests that the historic setting of the Anza NHT on all Federal Protection Components have management prohibitions in addition to prescriptions applied to a minimum of three miles from the NHT to the visual horizon, whichever is greater.

ATF requests that the setting of the Anza NHT on all Federal Protection Components have prohibitions in addition to prescriptions applied to a minimum of five miles from National Register eligible properties to the visual horizon, whichever is greater.

4.19.3.2.3 National Historic Trails

Vehicle access to sensitive and more primitive trail segments should be limited.

Visual Resource Management, page 763

ATF prefers that the Anza NHT corridor viewshed be protected through the adoption of Visual Resource Management (VRM) Class II designation to minimize visual impacts from actions on surrounding lands. We endorse the protection from incompatible developments and visual intrusion on the historic landscape described in Alternative D but would like to ease some restrictions on visitor use and research activities.

The ATF would welcome the opportunity to work with BLM personnel in revising the language in the draft RMP and EIS to provide greater protection to the Anza NHT

corridor and its setting. Please contact me at (480) 252-2599 or estewart@fastq.com if you would like additional information regarding these comments or the RMP.

Elizabeth Stewart
Board Member
The Anza Trail Foundation