

November 25, 2011



Bureau of Land Management  
Phoenix District Office  
Attn: LS-SDNM RMP  
21605 North 7<sup>th</sup> Avenue  
Phoenix, Arizona 85027

Dear Sir:

I wish to offer comments on the Lower Sonoran and Sonoran Desert National Monument Draft Resource Management Plan and Environmental Impact Statement. As a hike leader for the Huachuca Hiking Club, I have frequently visited the much of the area included in the Draft RMP during hikes and car camps to our favorite destinations. I have also enjoyed off-highway vehicle (OHV) backcountry touring throughout the area on primitive roads. Lands encompassed by the Draft RMP offer highly valued recreational experiences for both motorized and non-motorized users. Thus, my comments are provided from a recreation and public access perspective.

My comments on the Draft LS/SDNM Resource Management Plan are as follows:

1. Para 1.6.1. Relationship to Other BLM Plans, Plan Amendments & Programmatic EISs (p. 24)

Comment: The Yuma Field Office Record of Decision and Resource Management Plan was recently approved in January 2010. Lands in the Lower Sonoran Field Office have many of the same characteristics as lands in the Yuma Field Office. Recommend the Yuma RMP be considered in preparation of the final Lower Sonoran RMP/EIS. The Yuma Plan also reflects involvement by the Arizona BLM Resource Advisory Council (RAC), while the Draft Lower Sonoran plan does not. From a public perspective, it is good to have consistent policies and a seamless transition for lands that lie in adjacent field offices.

2. Para 2.3.2. Summary of the Lower Sonoran Decision Area Alternatives (p. 36)

Comment: Under the Preferred Alternative E for the Lower Sonoran Decision Area, the second bullet on p. 36 states that "No SCRMA's would be allocated, they would become ACECs". In my view, para 2.7.3., Cultural & Heritage Resources, makes a good case for designating Special Cultural Resource Management Areas (SCRMA's) for both the Lower Sonoran and Sonoran Desert National Monument (SDNM) decision areas. Table 2.4 shows that Alternative C would designate two SCRMA's: Saddle Mountain SCRMA and Lower Gila Terraces and Historic Trails SCRMA; however, under the Preferred

Alternative E, these would be designated as Areas of Critical Environmental Concern (ACECs) instead. I believe the designation of SCRMA better reflects the nature of the resources and values to be managed and protected. Plus it gives some flexibility in terms of management prescriptions (i.e., scientific use, conservation for future use, traditional use, public use, or experimental use). The ACEC designation appears overly restrictive in my view.

3. Para 2.7.5.2. Action Alternatives for Priority Wildlife Species & Habitat Management (PS) (p. 70)

Comment: Table 2.5 reflects that the Preferred Alternative E would allocate 255,700 acres in the Gila Bend Mountains as a wildlife habitat area (WHA). No other WHAs are proposed. As shown on Map 2-2e, this is a very large area that encompasses much of the Lower Sonoran decision area. My concern is that together with the proposed wildlife movement corridors (WHCs) A, B, C, and D, this may create an unbalanced and concentrated focus on wildlife habitat management for the Gila Bend Mountains. This could overly complicate and restrict multiple use activities such as grazing, recreation, and off-highway vehicle (OHV) travel in the Gila Bend Mountains. Why not designate WHAs and wildlife movement corridors in or adjacent to the SDNM which provides a more protected setting for wildlife habitat management? Or why not designate multiple WHAs in the Lower Sonoran decision area instead of one huge WHA for the Gila Bend Mountains? Recommend BLM reconsider the amount of lands to be allocated for a wildlife habitat area and wildlife movement corridors in or adjacent to the Gila Bend Mountains. This area is also important for other values and uses.

4. Para 2.7.5.2. Action Alternatives for Priority Wildlife Species & Habitat Management (PS) (p. 69)

Objective 12.1: Manage wildlife movement corridors in a manner that would assist wildlife in safe passage from one area to another. (p.79)

Comment: Management Action PS-12.1.5 states that road density would be limited to 3 miles of road per section or less within the wildlife movement corridors in accordance with the Habitat Guidelines for Mule Deer (Mule Deer Working Group 2006). I have two concerns here. One, the travel management process should be the exclusive methodology for determining the status of existing or proposed new roads. In my view, a road density restriction is somewhat arbitrary and does not consider the multiple factors that must be considered during a travel management evaluation. Two, the proposed wildlife movement corridors in the Preferred Alternative E are quite large and a road density restriction could overly complicate and restrict travel management designations. The proposed wildlife movement corridors in Alternative B appear more reasonable in terms of amount of lands allocated to WHCs. In summary, recommend the management action PS-12.1.5 be deleted, and instead defer to the travel management process to determine road designations on a case by case basis. Also, recommend the width and extent of WHCs be re-evaluated in the Preferred Alternative E and consider adopting those proposed in Alternative B.

5. Para 2.7.6.2. Action Alternatives for Soil Resources (SL) (p.86)

Objective 2.1: Disturbance of sensitive soil surfaces, including those classified as highly susceptible to wind and water erosion and those with protective desert pavement or well-developed cryptogamic crust will be avoided. If disturbance occurs, damage will be mitigated. (p. 87)

Comment: Management Action SL-2.1.2 (for Lower Sonoran decision area) states that the density of roads and trails would be reduced during route designation within areas known to have sensitive soils. In my view, road density should be based on the travel management process and site-specific conditions. Road density is one factor to consider but should not be the exclusive reason to determine a travel management designation. Recommend the wording of the management action be revised to reflect that approach. Or change the word “would” to “may” in the first sentence of the management action.

Comment: Management Action SL-2.1.5 (for SDNM decision area) states that vehicle parking and camping would be limited to 25 feet from the road centerline or designated sites in areas determined to have sensitive soils. Recommend that the wording of SL-2.1.5 be the same as SL-2.1.4, i.e., change the restriction from 25 feet to 100 feet from the road centerline. Rationale is as follows. From a user perspective, it is very difficult if not impossible to pick a campsite that is only 25 feet or less from the road centerline. One can view existing campsites in the SDNM and see that people who camp there want a buffer from the road to provide some measure of privacy and to avoid vehicle noise and dust. If a management action is too restrictive, it will not encourage compliance. The restriction of 100 feet from the road centerline would be more consistent throughout the Lower Sonoran and SDNM decision areas and easier to administer. Ideally, BLM should designate suitable campsites using existing sites so that new areas do not need to be disturbed.

#### 6. Para 2.7.7.2. Action Alternatives for Vegetation Resources (VM) (p.91)

Objective 4.2: Protect SDNM vegetation by managing collection and uses consistent with the Monument proclamation. (p. 95)

Comment: Management Action VM-4.2.2 states that the collection of dead, down, and detached wood for personal campfire use while camping on public lands would be prohibited in the passage and front country recreation settings. From a user perspective, the recreational setting of camping on the SDNM should include the opportunity to have a campfire. Most camping occurs in the winter months when a campfire is most needed. Is it realistic to impose this restriction on campers in the passage and front country recreation settings? I think this restriction is unnecessary and would degrade the recreational experience that folks expect when they visit the SDNM. A better option in my view is to use the limits of acceptable change (LAC) method to monitor impacts and establish a management action as needed. Thus, recommend the management action VM-4.2.2 be re-worded to reflect use of the LAC method to monitor vegetation impacts of firewood usage.

#### 7. Para 2.7.11.2. Action Alternatives for Wilderness Characteristics (WC) (p. 110)

Objective 1.1: Lands managed to protect wilderness characteristics will have a high degree of naturalness and offer outstanding opportunities for solitude or primitive, unconfined recreation by

reducing impacts to these values while considering manageability and competing resource demands. (p. 110)

Management Action WC-1.1.1: Public lands would be managed to protect wilderness characteristics as shown in Table 2-7. (See Maps 2-4c, d and e)

Comment: Preferred Alternative E would designate 55,400 acres of lands to be managed to protect wilderness characteristics in the Lower Sonoran decision area. These lands would include the Saddle Mountain and Batamote/Sauceda Mountains areas. However, the Saddle Mountain wilderness study area (WSA) was considered but not included in the Arizona wilderness acts of 1984 and 1990. In my view, existing congressionally designated wilderness areas within the Lower Sonoran decision area are more than adequate to provide outstanding opportunities for solitude and primitive and unconfined recreation. I also believe that the Lower Sonoran decision area should largely be managed for semi-primitive motorized and non-motorized recreation in an undeveloped, backcountry setting. Considering the large tracts of BLM desert lands that have already been designated as national monuments and wilderness areas, I think it is time for BLM to step back and evaluate how much wilderness is really needed. From a socio-economic perspective, the rise in motorized public visitation and popularity of backcountry touring with four-wheel drive and all-terrain vehicles will require large tracts of public lands in the semi-primitive motorized recreation category that can support these activities. Unless the management of lands for wilderness characteristics is done carefully so as not to restrict or reduce motorized recreation and off-highway vehicle (OHV) access to public lands in appropriate locations, then the pursuit of additional lands to be managed for wilderness characteristics will not be in the best interests of the general public. It should be noted that enjoyment of non-motorized trails in the Lower Sonoran decision area depends largely on the ability of recreational users to access these trails with OHVs. Also, overnight trips depend on OHV access to dispersed campsites. The Lower Sonoran decision area has been a popular winter destination for our hiking club and we wish to see it remain accessible. Of particular importance are OHV routes south of Agua Caliente Road that provide access to the Woolsey Peak and Signal Peak Wilderness areas, Yellow Medicine Butte, and the Face Mountain area. It is important that this entire area remain accessible and there is connectivity via primitive routes throughout the Gila Bend Mountains for both motorized and non-motorized recreation. With respect to the Saddle Mountain area, the proposed WC designation appears reasonable as the proposed area is relatively small and currently unroaded. However, the Batamote/Sauceda Mountains area is much larger and is popular for motorized recreation and access to campsites and other destinations. Recommend this area be managed for the semi-primitive motorized and non-motorized recreation category. Or, if a WC designation is pursued, then it should be done very carefully so that motorized access and recreational uses will continue as envisioned by the Ajo Desert Recreation Management Zone (RMZ). Finally, I urge BLM not to give any more consideration to the huge amounts of lands proposed for WC designation in Alternative D. These proposals are unbalanced and would severely reduce the public's ability to enjoy these public lands.

Comment: The Preferred Alternative E would designate 110,900 acres of lands to be managed to protect wilderness characteristics in the SDNM decision area. These lands would include the Sand Tank Mountains and White Hills areas. In my view, the existing congressionally designated wilderness areas

within the SDNM decision area are more than adequate to provide outstanding opportunities for solitude and primitive and unconfined recreation. I also believe that the Sand Tank Mountains and White Hills areas should largely be managed for semi-primitive motorized and non-motorized recreation in an undeveloped, backcountry setting. Considering the large tracts of BLM desert lands that have already been designated as national monuments and wilderness areas, I think it is time for BLM to step back and evaluate how much wilderness is really needed. From a socio-economic perspective, the rise in motorized public visitation and popularity of backcountry touring with four-wheel drive and all-terrain vehicles will require large tracts of public lands in the semi-primitive motorized recreation category that can support these activities. Unless the management of lands for wilderness characteristics is done carefully so as not to restrict or reduce motorized recreation and off-highway vehicle (OHV) access to public lands in appropriate locations, then the pursuit of additional lands to be managed for wilderness characteristics will not be in the best interests of the general public. The requirement to obtain a permit to visit the Sand Tank Mountains and the remote location there serves as a measure to protect the area without a WC designation. The Preferred Alternative E also designates this area as a Desert Back Country Recreation Management Zone. I think this is a good fit for the recreational setting in the Sand Tank Mountains and White Hills areas, and a WC designation would potentially complicate the ability of recreational users to pursue motorized and non-motorized uses in the proposed RMZ. Our club has enjoyed hiking and car camping in the Sand Tank Mountains and motorized access to and through this area is very important to our ability to conduct our hikes and car camps. Finally, I urge BLM not to give any more consideration to the huge amounts of lands proposed for WC designation in Alternative D. These proposals are unbalanced and would severely reduce the public's ability to enjoy these public lands.

Management Action WC-1.1.11: Lands managed to protect wilderness characteristics would be designated and managed as limited OHV use areas.....Vehicle spur roads and vehicle routes in washes would be closed to motorized travel and vehicle use.....

Comment: I strongly object to the statement that "Vehicle spur roads and vehicle routes in washes would be closed to motorized travel and vehicle use." Recommend it be deleted. The travel management process should determine the designation of roads based on multiple factors and site-specific conditions. Spur roads may very well be appropriate (examples: spur roads to hiking trails or dispersed campsites). Vehicle routes in washes may be appropriate as well. Washes are common travel routes throughout the Lower Sonoran decision area and may be the least intrusive route from point A to point B. In some cases, vehicle routes occasionally dip into a wash for a short distance. A strict ban on vehicle routes in washes is ill-informed and inappropriate. The management action WC-1.1.11 goes on to say that "Vehicle routes in wilderness character allocations would be designated open, closed, or limited to motorized vehicle use on a case-by-case prescribed by subsequent travel management plans." In my view, this statement is all that needs to be said about vehicle spur roads and vehicle routes in washes.

8. Para 2.8.1.5. Action Alternatives for Lands & Realty (LR) (p.128)

Objective 1.1 (Utility-scale Renewable Energy Development LUAs): Authorize utility-scale renewable energy development LUAs (as defined in Table 2-7) in locations that are found to be suitable due to limited conflicts with other management objectives. (p. 130)

Management Action LR-1.1.2: Utility-scale renewable energy development LUAs would be avoided on lands that fall under the “high and moderate sensitivity” conflict areas (refer to Map 2-7b to Map 2-7e and Appendix N – Renewable Energy Sensitivity).

Comment: I fully support the proposed management action and the maps of high and moderate sensitivity areas. However, there is a credibility issue here because the Draft Programmatic Environmental Impact Statement for Solar Energy Development (Solar PEIS) has proposed the establishment of a solar energy zone (SEZ) within BLM lands in the Lower Sonoran decision area that are included in the “high and moderate sensitivity” conflict areas. The Solar PEIS was apparently prepared with input from the Arizona BLM, yet the proposed Gillespie SEZ would pose significant conflicts with the Draft LS/SDNM RMP. The Gillespie SEZ is located along the proposed Agua Caliente Backcountry Byway and within 2 to 3.5 miles respectively of the Woolsey Peak and Signal Peak Wilderness areas. The SEZ would adversely affect wilderness values of these areas, and would also degrade the scenic viewshed of the Saddle Mountain area (which is proposed for a WC designation). Another major concern is that the Gillespie SEZ would result in closure of inventoried OHV routes that provide the primary access to the Woolsey Peak and Signal Peak Wilderness areas as well as to other destinations within the Gila Bend Mountains. In my view, the BLM must address this disconnect and explain to the public (1) how the Gillespie SEZ is considered compatible with the Draft LS/SDNM RMP, (2) what mitigation actions will be required to resolve the conflicts, or (3) what action will be taken to better inform the Solar PEIS and resolve the conflicts by relocating or eliminating the Gillespie SEZ.

9. Para 2.8.4.2. Action Alternatives for Recreation Management (RM) (p.165)

Objective 1.1: Manage at least one destination location or area to attract regional or national tourism demand. (p. 166)

Management Action RR-1.1.2: The Gila River RMZ would be established (42,300 acres) for regional and national visitors seeking to discover, tour, and learn about the Juan Bautista de Anza National Historic Trail, Arizona history, and natural history of the Sonoran desert.

Comment: I agree with the intent of this management action. However, I wonder how this can be accomplished when, to my knowledge, public access to this RMZ is virtually non-existent. I think the RMP should indicate what actions are proposed to resolve the lack of public access to this area. Also, I think BLM should consider a partnership with the Arizona Game and Fish Department whereby the Gila River RMZ could also offer a wildlife viewing destination at the Painted Rock State Wildlife Area (which currently has no public access).

Management Action RR-1.1.13: At Painted Rock Campground, the camping-stay limit would be 14 days except Oct. 1 to April 30, when the stay limit would be increased to 90 days provided the campground

does not remain at 100 percent capacity for three (3) consecutive nights. If this limit is reached, the 14 day limit will be placed into effect for the remainder of the fiscal year.

Comment: This proposed management action appears to authorize a de facto 90 day long term visitor area for Painted Rock Campground. I think this is inconsistent with the purpose of this developed campground. Recommend the stay limit be designated as 14 days but allow this to be modified by the authorized officer on a case by case basis.

Management Action RR-1.1.14: Public lands adjacent to Painted Rock Petroglyph Campground (.....approximately 10,000 acres) would remain closed to camping and motorized access.

Comment: I believe this statement is too restrictive and should be re-evaluated. The issue of motorized access should be addressed in the Lower Sonoran travel management process. As an example, it is important that motorized access is maintained through this area for travel on the Rocky Point Road (east-west), for travel on the Painted Rock Dam Road (north-south), and the Poco Dinero Road. These roads provide important connectivity to other destinations within the Gila Bend Mountains. Also, the main road going south from the Painted Rock Campground provides important access to other BLM lands in the Painted Rock Mountains. Regarding the camping closure, recommend the size of the closure area be limited so that dispersed camping in or adjacent to the Painted Rock Mountains (where lands are within an Extensive Recreation Management Area) is not affected.

Objective 1.2: In areas with recreation-dependent economies, manage recreation resources in cooperation with local communities. (p.167)

Management Action RR-1.2.28: The Buckeye Hills SRMA would be established (47,900 acres) with a "Community " market strategy for residents of western Maricopa County.

Comment: Based on the recreational values and attractions for both motorized and non-motorized recreational enthusiasts who reside outside of Maricopa County, the Buckeye Hills SRMA should also include a "Destination" market strategy. This is particularly relevant if recreation opportunities include family oriented motorized recreation.

Management Action RR-1.2.34: The Buckeye Hills West RMZ would be established (22,100) acres for dispersed recreational opportunities adjacent to the Buckeye Hills Recreation Area Regional County Park and the nearby Robbins Butte State Wildlife Area. The RMZ would be managed in partnership with Maricopa County and Arizona Game and Fish Department.

Comment: I believe the Buckeye Hills West RMZ should be established for a balanced mix of motorized and non-motorized recreation opportunities as is the proposal for the Buckeye Hills East RMZ. I also disagree with BLM managing this RMZ in partnership with Maricopa County and the Arizona Game and Fish Department. My rationale is that this will bias and constrain the recreation opportunities and policies. BLM managed public lands have a broader group of stakeholders and BLM should strive to provide a balanced mix to both motorized and non-motorized users. I believe BLM should manage these

lands in coordination with the non-Federal agencies, but not be constrained by the more restrictive policies of these agencies.

Management Actions RR-1.2.39 and RR-1.2.47: The RMZ would be established as a Special Management Area (SMA) and an Individual Special Recreation Permit (ISRP) program may be established to allow for special management and protection of the SMA in partnership with Maricopa County and the Arizona Game and Fish Department. Through a Cooperative Management Agreement, partners may be authorized to share in the collection and management of fees.

Comment: The need to designate these RMZs as SMAs with the potential for ISRPs and recreation fees should be re-evaluated. Is there a business case that supports this designation? Why is it necessary to manage these RMZs in partnership with Maricopa County and the Arizona Game and Fish Department? I recommend a more conservative approach that can be done within BLM capabilities and ramps up from there.

Management Action RR-1.2.51: Overnight camping would be prohibited unless specifically authorized.

Comment: These BLM lands in the Buckeye Hills West RMZ should offer the same opportunities for dispersed camping as the Buckeye Hills East RMZ. Recommend the management action be worded like RR-1.2.44: Vehicle-based camping would be limited to existing or designated sites.

Objective 1.3: Manage 70 percent or more of the Lower Sonoran Planning Area recreation opportunities dependent on vast, open, and undeveloped public lands. (p. 172)

Management Action RR-1.3.1: The Gila Bend Mountains SRMA would be established (253, 800 acres), and would have an “Undeveloped” primary strategy targeted to desert explorers from western Maricopa County. To better manage dispersed recreation opportunities, the BLM may provide major investments in visitor services; however investments in visitor facilities would be minor.

Comment: The proposed Gila Bend Mountains SRMA is adjacent to the Yuma East Undeveloped SRMA that was established by the Yuma Record of Decision (ROD) and Approved RMP, dated January 2010. The character and recreational values of the Gila Bend Mountains SRMA match those of the Yuma East Undeveloped SRMA. Recommend the Gila Bend Mountains SRMA be managed similar to the Yuma East Undeveloped SRMA, i.e., establish a Gila Bend Undeveloped SRMA with a Dispersed Use RMZ, a Signal Peak Wilderness RMZ, and a Woolsey Peak Wilderness RMZ (see pages 2-117 and 2-118 of the Yuma ROD and Approved RMP). These distinct RMZs would allow management actions to be more precise and relevant to each RMZ. For example, the Dispersed Use RMZ could have management actions that support semi-primitive motorized recreation, OHV backcountry touring, dispersed camping, and other frontier-like, undeveloped activities in a remote backcountry setting. The Signal Peak and Woolsey Peak RMZs could have management actions that support hiking and other non-motorized dispersed activities in a remote backcountry setting. I also disagree with the proposed strategy to target desert explorers from western Maricopa County. The Gila Bend Mountains are a destination and attraction for desert explorers from across the state if not from across the region.

Management Action RR-1.3.3: The Gila Bend Mountains RMZ would be established (253,700 acres) for visitors primarily seeking non-motorized dispersed recreation experiences in a remote backcountry setting.

Comment: See my comment pertaining to Management Action RR-1.3.1. The Gila Bend Mountains are also a destination for visitors seeking motorized recreation experiences. There should be multiple RMZs with distinct management actions for each.

Management Action RR-1.3.8: Standard camping amenities, interpretive displays, and improved access would be constructed at the Sundad public use site to facilitate visitation.

Comment: See my comment pertaining to Management Action RR-1.3.1. Recommend the Management Action RR-1.3.8 be deleted as it would be incompatible with a Dispersed Use RMZ in an Undeveloped SRMA.

#### General Recreation Management Actions and Allowable Uses (p. 174)

Management Action RR-2.1.12: Collection of dead, downed, and detached ironwood and mesquite for any use would be limited to three pieces at any one time unless otherwise restricted.

Comment: I don't believe the management action as worded is appropriate or realistic for managing vegetation impacts in an undeveloped, backcountry setting. A better option in my view is to use the limits of acceptable change (LAC) method to monitor impacts and establish a management action as needed. Thus, recommend the management action RR-2.1.12 be re-worded to reflect use of the LAC method to monitor vegetation impacts of firewood usage.

Management Action RR-2.1.18: Paintball activities would not be allowed in WA's, ACECs and SRMAs. Paintball activities will be allowed beyond 0.25 miles of any established facility or site, campground, residence, trailhead, road, staging area, Special Designation and other areas as posted. Paintball activities would be restricted in accordance with any applicable local and state law.

Comment: In my view, paintball activities are incompatible with other RMP objectives such as protection of scenic values and native vegetation. Recommend the management action be re-worded to either prohibit paintball activities or only allow it at posted and designated sites (where BLM has determined that paintball impacts are acceptable).

Objective 3.2: Impacts to Monument objects resulting from recreation use do not exceed 2001 levels. (p.176)

#### General Recreation Management Actions & Allowable Uses, Camping and Facilities

Management Action RR-3.2.2: Collection of native vegetation as firewood would be prohibited in front country and passage settings.

Comment: From a user perspective, the recreational setting of camping on the SDNM should include the opportunity to have a campfire. Most camping occurs in the winter months when a campfire is most

needed. Is it realistic to impose this restriction on campers in the passage and front country recreation settings? I think this restriction is unnecessary and would degrade the recreational experience that folks expect when they visit the SDNM. A better option in my view is to use the limits of acceptable change (LAC) method to monitor impacts and establish a management action as needed. Thus, recommend the management action RR-3.2.2 be re-worded to reflect use of the LAC method to monitor vegetation impacts of firewood usage.

Management Action RR-3.2.7: The designated non-motorized travel system would consist primarily of existing vehicle routes; however, construction of short segments of new vehicle routes to provide experience opportunities consistent with the outcome objective(s) of management zones would be allowed.

Comment: This management action is confusing. I believe the intent would be more clear by deleting the word “non-motorized” in the first sentence.

#### 10. Para 2.8.5.2 Action Alternatives for Travel Management (TM) (p. 183)

Objective 1.2: Manage areas for resource protection, conservation, restoration, and public safety using the OHV area allocation closed. (p. 185)

Management Action TM-1.2.3: Approximately 152,400 acres would be closed to motorized use. These areas would include designated wilderness, an area around Painted Rock Campground and dam, and allocated lands managed to protect wilderness characteristics.

Comment: It is difficult to determine from the maps the exact details and impacts of the proposed closure. However, in the area around the Painted Rock Campground and dam, it is important that motorized access is maintained through this area for travel on the Rocky Point Road (east–west), for travel on the Painted Rock Dam Road (north-south), and the Poco Dinero Road. These roads provide important connectivity to other destinations within the Gila Bend Mountains. Also, the main road going south from the Painted Rock Campground provides important access to other BLM lands in the Painted Rock Mountains. Regarding motorized closure within allocated lands managed to protect wilderness characteristics, it is important that motorized access is maintained through or adjacent to these lands via routes designated through the travel management process, i.e., designated routes may need to be “cherry-stemmed” within these lands to provide motorized access to recreational destinations.

Objective 6.1: Plan and implement a networked system of roads, primitive roads, and trails within 1 year of plan completion. (p. 190)

Management Action TM-6.1.1: The use of motorized or mechanized vehicles off designated roads or primitive roads would be prohibited with the following management restrictions:

.....Motorized and mechanized vehicles would be allowed to pull off a designated route 25 feet either side of centerline for the purpose of camping as long as soils, drainages, or woody vegetation are not damaged. This use shall be monitored on a continuing basis and if monitoring results show effects that exceed limits of acceptable change, the 25 feet distance may be reduced.

Comment: Recommend that the wording of management action TM-6.1.1 be the same as management action TM-1.3.7, i.e., change the restriction from 25 feet to 100 feet from the road centerline. Rationale is as follows. From a user perspective, it is very difficult if not impossible to pick a campsite that is only 25 feet or less from the road centerline. One can view existing campsites in the SDNM and see that people who camp there want a buffer from the road to provide some measure of privacy and to avoid vehicle noise and dust. If a management action is too restrictive, it will not encourage compliance. The restriction of 100 feet from the road centerline would be more consistent throughout the Lower Sonoran and SDNM decision areas and easier to administer. Ideally, BLM should designate suitable campsites using existing sites so that new areas do not need to be disturbed.

#### 11. Para 2.9.1.2 Action Alternatives for Areas of Critical Environmental Concern (AC) (p. 195)

Management Actions and Allowable Uses – Common to All Unless Otherwise Noted in Specific ACEC Section (p.195)

Management Action AC-1.1.2: Core roadless areas would be maintained for wildlife while new facilities, including motorized routes, non-motorized trails, and trailheads that concentrate or increase use in these areas would be avoided.

Comment: I believe this statement could complicate implementation of recreation and public access objectives for portions of the Lower Gila Terraces and Historic Trails ACEC, i.e., where portions overlap the Gila Bend Mountains SRMA and the Lower Gila Historic Trails SRMA. For example, access to this proposed ACEC and the east and south sides of the Woolsey Peak Wilderness may require additional motorized routes. Recommend the word “avoided” be changed to “minimized” in order to allow some flexibility in establishing adequate access for non-motorized dispersed recreational experiences.

Management Action AC-1.1.33: An area of 79,100 acres would be designated as the Lower Gila Terraces and Historic Trails ACEC.

Management Action AC-1.1.42: An area of 48,500 acres would be designated as the Saddle Mountain ACEC.

Comment: In my view, para 2.7.3., Cultural & Heritage Resources, makes a good case for designating Special Cultural Resource Management Areas (SCRMA) for both the Lower Sonoran and Sonoran Desert National Monument (SDNM) decision areas. Table 2.4 shows that Alternative C would designate two SCRMA: Saddle Mountain SCRMA and Lower Gila Terraces and Historic Trails SCRMA; however, under the Preferred Alternative E, these would be designated as Areas of Critical Environmental Concern (ACECs) instead. I believe the designation of SCRMA better reflects the nature of the resources and values to be managed and protected. Plus it gives some flexibility in terms of management prescriptions (i.e., scientific use, conservation for future use, traditional use, public use, or experimental use). The ACEC designation appears overly restrictive in my view.

#### 12. Para 2.9.2.2. Action Alternatives for National Byways (BY) (p. 200)

Objective 1.1: Identify and evaluate potential roads that meet nomination criteria for BLM National Scenic or Back Country Byway designation. (p.201)

Management Action NB-1.1.1: Approximately 21 miles of Agua Caliente Road would be evaluated as a potential BLM national back country byway (Maps 2-16b and c).

Comment: The Yuma ROD and Approved RMP, dated January 2010, approved the nomination of 11 miles of Agua Caliente Road as a National Back Country Byway. I fully support the nomination of an additional 21 miles of Agua Caliente Road in the Lower Sonoran decision area for that designation. In my view, this road offers stunning views of pristine Sonoran Desert landscapes and is truly a highly valued recreational destination.

Thank you for the opportunity to provide these comments. Feel free to contact me if there are questions or you need clarification (email: [REDACTED]). Please include my contact information on your mailing list for future updates and opportunities for public comment.

Sincerely,

[REDACTED]

[REDACTED]