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Thank you for providing a copy of the April 6, 2001 "Preparation Plan for Arizona Strip Field Office Resource Management Plan Revision." The following comments are presented as preliminary scoping information regarding our concerns and interests. We anticipate additional opportunity to expand on these and other issues as the planning effort continues.

One of the most important steps in any planning effort consists of establishing goals and objectives consistent with applicable laws and policies. Section D(1)(e) of the Preparation Plan states that the agencies will "

maintain existing management policies, designations and allocations, except where changes are necessary to comply with the proclamation, and protect the objects of scientific and historic interest within the monument[s].

We submit that management goals for Grand Canyon-Parashant and Vermilion Cliffs National Monuments should clearly reflect the intent of the two proclamations. That intent, we firmly believe, is preservation, not status quo.

Grand Canyon-Parashant National Monument

The proclamation establishing the Grand Canyon-Parashant National Monument describes "a vast, biologically diverse, impressive landscape encompassing an array of scientific and historic objects. The President "...set apart and reserved as the Grand Canyon-Parashant National Monument, for the **purpose of protecting** [emphasis added] the objects identified [in the Proclamation]...." **Note that there is but one purpose stated in the Proclamation, and that purpose is preservation.**

The objects identified in the Grand Canyon-Parashant Proclamation include:

1) A remote area consisting of

- open, undeveloped spaces
- engaging scenery
- natural splendor and a sense of solitude...remote and unspoiled...qualities that are essential to the protection of the scientific and historic resources it contains.

2) A geological treasure, including

- colorful, lava-capped Precambrian and Paleozoic strata against the highly faulted terrain
- recent lake beds
- desert volcanic peaks of the down-dropped Grand Wash trough
- an array of cinder cones and basalt flows
- sinkholes and breccia pipes
- fossils including invertebrate fossils.
- portions of geologic faults, including the Dellenbaugh fault, the Toroweap fault, the Hurricane fault, and the Grand Wash fault.

3) Important watershed for the Colorado River and the Grand Canyon, including the rugged and beautiful Parashant, Andrus, and Whitmore canyons.

4) Features indicating a long and rich human history spanning more than 11,000 years including:

- Archeological sites preserved in good condition due to their remoteness and the lack of easy road access," including large concentrations of ancestral Puebloan villages, a large, intact Pueblo II village, numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, watchtowers, agricultural features, burial sites, caves, rockshelters, trails, and camps.
- Areas of importance to existing Indian tribes
- Historic features (protected in nearly their original context...[by] the remote and undeveloped nature of the monument", including early historic sawmills; the Temple Trail wagon road from Mt. Trumbull down the Hurricane Cliffs to St. George, Utah; ranch structures and corrals, fences, water tanks, and the ruins of sawmills...scattered across the monument...[telling] the stories of the remote family ranches and the lifestyles of early homesteaders; and several old mining sites dating from the 1870s, showing the history of mining during the late 19th and early 20th centuries.

5) Outstanding biological resources preserved by remoteness and limited [vehicle] travel corridors:

- intersection of Sonoran/Mojave/Great Basin floristic provinces to the west and south, and the Colorado Plateau province to the northeast...a distinctive and remarkable feature
- Riparian corridors linking the plateau to the Colorado River corridor below, allowing wildlife movement and plant dispersal
- Giant Mojave Yucca cacti proliferating in undisturbed conditions throughout the monument
- Diverse wildlife, including [but not limited to] a trophy-quality mule deer herd, Kaibab squirrels, and wild turkey
- Numerous threatened or endangered species include the Mexican spotted owl, the California condor, the desert tortoise, and the southwestern willow flycatcher → ?
- Candidate or sensitive species including the spotted bat, the western mastiff bat, the Townsend's big eared bat, and the goshawk
- Two federally recognized sensitive rare plant species: *Penstemon distans* and *Rosa stellata*
- The ponderosa pine ecosystem in the Mt. Trumbull area. — what about Parashant?

Vermilion Cliffs National Monument

3

The proclamation establishing the Vermilion Cliffs National Monument describes a region "[f]ull of natural splendor and a sense of solitude, [remaining] remote and unspoiled, qualities that are essential to the protection of the scientific and historic objects it contains." Again, the single purpose for National Monument designation was the purpose of "protecting the objects identified" in the Proclamation:

1) **"Outstanding biological objects** that have been preserved by remoteness and limited travel corridors," including:

- A unique combination of cold desert flora and warm desert grassland
- A variety of wildlife species, including at least twenty species of raptors; a variety of reptiles and amphibians; California condors; mammals, including desert bighorn sheep, pronghorn[?], antelope, mountain lion; sensitive native fish, including the flannelmouth sucker and the speckled dace; and one threatened species, Welsh's milkweed

2) **Artifacts** of "a long and rich human history," including:

- rock art, some of the earliest in the Southwest
- High densities of Ancestral Puebloan sites, including remnants of large and small villages, some with intact standing walls, fieldhouses, trails, granaries, burials, and camps
- remnants of historic ranch structures and associated objects that tell the stories of early settlement
- the Old Arizona Road or Honeymoon Trail

3) **A geological treasure**, including:

- the majestic Paria Plateau, a grand terrace lying between two great geologic structures, the East Kaibab and the Echo Cliffs monoclines
- The Vermilion Cliffs, which lie along the southern edge of the Paria Plateau, rise 3,000 feet in a spectacular escarpment capped with sandstone underlain by multicolored, actively eroding, dissected layers of shale and sandstone
- Paria River Canyon, amphitheaters, arches, and massive sandstone walls
- Coyote Buttes, a geologically spectacular area.

Access and Transportation (p.6)

We emphasize that the proclamations establishing the Grand Canyon-Parashant and Vermilion Cliffs National Monuments state:

For the purpose of protecting the objects identified above, all motorized and mechanized vehicle use off road will be prohibited, except for emergency or authorized administrative purposes.

The Preparation Plans (p.26) refers to 1,200 miles of road included in the current (FIMMS) transportation system. We urge that any transportation system imposed on the two national monuments should be consistent with the preservation purpose articulated in the Presidential proclamations. Anticipated increases in visitation mean that roads and other travel ways should be strictly managed to achieve conservation goals. Travel ways should not be kept open purely to facilitate motorized recreation at the expense of monument resources.

4

The Preparation Plan asks "[h]ow will motorized and mechanical vehicles be managed to reduce or eliminate adverse effects to natural resources, while providing for a variety of focused, challenging, compatible and mechanized recreation opportunities" (p. 16). The GCPNM and Vermilion Cliffs NM proclamations describe areas, "[f]ull of natural splendor and a sense of solitude... remote and unspoiled, qualities that are essential to the protection of the scientific and historic resources it contains." Nowhere does it mention providing a "variety of focused, challenging and mechanized recreation opportunities."

Studies demonstrate that higher occurrences of adverse ecological and archaeological impacts increase with higher road densities. Such impacts affect monument resources. Roads result in frequent and often negative encounters between wildlife and humans (Buckley and Pannell 1990). Wildlife biologists have recognized problems with open roads that expose large mammals such as deer, pronghorn, cougar and bighorn sheep to heavy hunting pressure, poaching, and harassment (Davidson et al. 1996:110). Open-road density is a good predictor of habitat suitability for large mammals, with habitat effectiveness and population viability declining as road density increases (Noss and Cooperrider 1994). Other studies indicate that habitats with low road density better protect species sensitive to legal or illegal hunting and persecution (Thiel 1985; Mech et al. 1988).

Primitive roads, maintained or not, create adverse impacts on natural (monument) resources. Possibly the most significant adverse impacts on arid biological communities relate to exotic plant invasions along road corridors (see Davidson et al. 1996:111). Disturbed surfaces provide ideal habitat and avenues for exotic plants to spread (Amor and Stevens 1976). Research indicates that large roadless areas with low circumference-to-area ratios offer the best protection of arid and semi-arid ecosystems against wholesale conversion, and that maintaining their roadless character offers the most economical strategy for preventing the spread of introduced grasses to relatively undisturbed areas (see Davidson et al. 1996:112). Exotic plants impact the "unique combination of cold desert flora and warm desert grassland" identified in the proclamations. In addition, scientists suggest that exotic weed invasion might be prevented by restricting access on existing roads (Davidson et al. 1996:112).

Even though roads occupy a small fraction of the landscape in terms of total area, their influence extends far beyond their immediate boundaries. Roads precipitate habitat fragmentation by dissecting otherwise large patches into smaller ones, and in so doing create edge habitat along both sides of the road, potentially at the expense of interior habitat (Reed et al. 1996).

Other undesirable consequences of road access include illegal collecting of rare plants and animals (Noss 1995). The additional vehicular access provided by primitive roads facilitates illegal excavation and collecting of archaeological resources. For example, improvement in mine-related roads in the 1980s outside Grand Canyon National Park resulted in increased visitation to the Kanab Plateau and a corresponding increase in vandalism to cultural resources (Huffman 1993). Cultural resources are identified in both proclamations.

In addition to impacts on archaeological resources, adequate maintenance of primitive roads in remote locations imposes significant ecological as well as monetary costs. Poorly located or unmaintained roads often result in serious erosional problems (Moll 1996; Ketcheson and Megahan

1996). Severe gully formation negatively impacts soils, vegetation, and archaeological resources. The most practical and economical long-term mitigation of these problems lies with closure and revegetation (Moll 1996).

A review of the literature underscores the importance to conservation of not building new roads in roadless or sparsely roaded areas and of removal or restoration of existing roads to benefit native biota and archaeological resources. Sections of the monuments' spectacular and biologically rich areas, contains a network of rough jeep trails that impact natural resources such as desert soils and vegetation, and probably adversely affect wildlife species such as big horn sheep and mountain lion. This problem will certainly accelerate should the area remain open to mechanized access. Closure and active restoration of impacted areas would facilitate ecological recovery and further protect cultural resources.

While we agree that "access will be a major issue in this planning effort," (p.6,15), we urge the BLM to resolve the "growing conflict between off-highway-vehicle user and other resource values and users, including primitive recreation" in favor of resource protection. Protection of native biodiversity requires the maintenance of a remote, rugged, inaccessible reserve cores. The two Presidential Proclamations emphasize an area "[f]ull of natural splendor and a sense of solitude... remote and unspoiled, qualities that are essential to the protection of the scientific and historic resources it contains."

The Plan asks (p.16) "[w]hat criteria will be used to determine whether a route is classified as a "road," "motorized trail," or "abandoned route," or "something else"? According to BLM policy, the word 'roadless' refers to the absence of roads improved and maintained by mechanical means to insure relatively regular and continuous use. A way maintained solely by the passage of vehicle does not constitute a road" (USDI 2001 [H-6310-1, Section .13(A)]). This language is from the House of Representatives Committee Report 94-1163, page 17, dated May 15, 1976, on what became the Federal Lands Policy and Management Act. According to the BLM (USDI 2001, H-6310-1, Section .13(A)(1)), it is the only statement regarding the definition of a road in the law or legislative history. We would expect the BLM to adopt a transportation system consistent with monument conservation goals. All other routes should be "something else," that is, either designated a stock, bicycle or hiking trail, or restored to a natural condition.

Also, the BLM (USDI 2000:46) prohibits mechanized cross-country travel and restricts mechanized vehicular use in the Grand Staircase-Escalante National Monument to routes designated as open. All other routes are considered closed. We urge the Arizona Strip Office to adopt this strategy. In any event, "roads" and other vehicle ways not consistent with the Proclamation's preservation requirements should be retired and restored to a natural condition.

Regarding the "R.S.2477 controversy raised by the Grand Staircase-Escalante National Monument" (p.16), the landmark decision by the U.S. District Court. Judge Tena Campbell ruled in favor of the Southern Utah Wilderness Alliance (SUWA) and the Sierra Club in their suit against three Utah counties for illegally blading roads in the Grand Staircase-Escalante National Monument and in areas under review for wilderness protection.

Grazing

The Preparation Plan (p.24; see page 7) states that the GCPNM proclamation "recognized 'the lifestyle of the early homesteaders' as a resource value." The Preparation Plan further states that "[g]razing will be managed to maintain the ranching lifestyle and associated historic structures in this remote monument. While the proclamation describes "historic features [telling] the stories of the remote family ranches and the lifestyles of early homesteaders," it does not refer to contemporary "lifestyles" or non-historic structures.

The proclamations state that "[l]aws, regulations, and policies followed by the [BLM] in issuing and administering grazing leases on all lands under its jurisdiction shall continue to apply to the remaining portion of the monument. Grazing should be managed in accordance with existing laws and must be consistent with the preservation goals established in the proclamation. The Plan (p.21) also asks the question "[w]ill existing allotment management plans (AMPs) continue to be valid land use plan documents?" Grazing on BLM public lands today is subject to both FLPMA and the Taylor Grazing Act, laws that allow (but not require) grazing permits. Such permits as privileges allowed, but not required, by law and proclamation. We encourage the BLM to re-evaluate existing AMPs in light of the preservation purpose presented in the proclamations.

In any event, FLPMA (Section 202, criteria 9) requires the BLM to only "coordinate" planning and management with "land use planning and management programs" of local communities (Donahue 1999:203,211). Neither FLPMA nor the proclamations require the BLM to "maintain the ranching lifestyle" as implied in the Preparation Plan.

Livestock grazing occurs on seventy percent of the western United States, making it the most widespread land management practice in western North America. Grazing imposes ecological costs including loss of native biodiversity, lowering of populations of a wide range of native species, disruption of ecosystem functions such as nutrient cycling and succession, change in community organization, and change in the physical characteristics of terrestrial and aquatic environments (Fleischner 1994:629). Such impacts affect the "outstanding biological objects" identified in both proclamations.

Grazing impacts are numerous and complex and develop from synergistic, rather than simply additive, cumulative effects (Noss and Cooperrider 1994:237). Grazing's negative impacts in arid and semiarid environments are well documented, and there is general agreement that vegetative diversity generally decreases with increased grazing (Fleischner 1994; Donahue 1999:116). For example, selective grazing of individual plants results in decreased viability of these plants. Over time, plant decadence and death may occur, ultimately resulting in extirpation or extinction.

Overgrazing can result in significant successional changes in vegetation. For example, grazing greatly contributed, if not caused, the regional shift of perennial bunch grasses and open stands of sage brush to dense sagebrush and harmful exotics such as cheatgrass and medusahead (Noss and Cooperrider 1994:230; Donahue 1999:148-149). The result is a significant loss of native biodiversity ("outstanding biological objects"). Excessive removal of vegetation adversely affects the animal community, decreases infiltration of precipitation and increases runoff. An eroded, degraded landscape results (Noss and Cooperrider 1994:238-9).

1

Selective grazing, or “highgrading,” by stock of the most nutritious plants results in loss of forage for native species, and ultimately decreases the abundance and diversity of native herbivores (see Donahue 1999:122).

Water sources are usurped for cattle production, and fouling these sources introduce disease and other problems for wildlife. Avoidance behavior of some wildlife toward stock effectively reduces habitat for native species (Noss and Cooperrider 1994:238-9).

Growing recognition of the importance of cryptobiotic crusts to ecosystem processes has led to concerns about the impacts of nonnative grazers. Cryptobiotic crusts are delicate symbioses of cyanobacteria, lichens, and mosses that form on the soil’s surface. These crusts provide important ecological functions, including increasing organic matter and available phosphorus, increased soil stability, and increased water infiltration (Fleischner 1994:633). On most semiarid lands, a single footprint will virtually stop nitrogen fixation by cryptobiotic crusts and increase wind and water erosion (see Fleischner 1994:633; Davidson et al. 1996:110-111; Donahue 1999:122,127).

Livestock grazing has impacted virtually every acre of the Arizona Strip ecoregion except parts of Grand Canyon National Park (Stevens and Burke 2000:84). Adverse impacts began in the 1870’s, although a few early explorers found the range in good condition. For example, in 1870, John Wesley Powell, descending into the Witches’ Pool vicinity near Mount Trubull, describes a “lovely valley, with a carpet of waving grass” Powell (1961:301). Apparently, conditions dramatically declined and as early as 1872, Frederick Dellenbaugh, one of Powell mapping crew, noted that domestic stock “made well-defined trails in the dry plains and stationed themselves near water holes” (Dellenbaugh 1908:186). A few years later, Clarence Dutton, while mapping Toroweap valley, noted “remnants of low desert shrubs browsed to death by cattle” (Dutton 1882:80). He lamented that “even if there had been no drought the feeding of cattle would have impoverished and perhaps wholly destroyed the grass...as has been the case very generally throughout Utah and Nevada” (Dutton 1882:79).

Although disagreement exists regarding grazing’s quantifiable damage, there is no doubt that sheep and cattle have altered the ecoregion’s soils and biotic communities (Stevens and Burke 2000:84). While most of the early range evaluations remain anecdotal, at least one recent study attributes past unrestricted grazing for severe ecological impacts and describes the majority of the range as in fair or poor condition, with the riparian canyon bottoms especially degraded (USDI 1981). The impact of grazing, especially when sustained by federal subsidies, has contributed to the region’s loss of native biodiversity and desertification (Sheridan 1981:3,121-122; Dregne 1977:325).

no reference

Range science has traditionally been laden with economic assumptions favoring resource use (Fleischner 1994:629). While recent accounts (USDI 1981:11) describe cattle ranching on the Arizona Strip as a major regional economic force, a recent Government Accounting Office (GAO 1991) study disputes this assumption. The GAO reported that the potential loss of employment under the BLM’s Shivwits Resource Area EIS “no livestock grazing alternative” would be less than one percent of the employment in Washington and Kane counties, Utah, as well as in parts of Mohave and Coconino counties, Arizona. Grazing accounts for a small percentage of the region’s personal income and generally requires economic subsidy (GAO 1991:47). The main concern of

many operators is to cover operating cash costs" (GAO 1991:49). Ranchers prefer ranching as a way of life, despite the small earnings and the need for many to supplement their income with outside work (Donahue 1999; GAO 1991).

Adopting the grazing guidelines approved by the Board of Governors of the Society for Conservation Biology offers one strategy for improving range conditions (Fleischner et al. 1994). These guidelines state that livestock grazing may be permitted only where, and in such a manner, that it serves positive ecological roles, an important consideration in managing the National Monuments. Agency staff must evaluate the ecological costs and appropriateness of livestock grazing on an ecosystem basis. This requires analyzing the ecological dynamics to determine whether, and to what extent, livestock grazing is ecologically justified. For example, livestock grazing may be permitted if it helps maintain or improve the health, biological diversity, and long-term productivity of this ecosystem. Otherwise, livestock grazing on public rangelands should be reduced or curtailed (Donahue 1999; Fleischner et al. 1994). The Society for Conservation Biology suggests that agencies should immediately remove livestock grazing from sites that fail to exceed the Bureau of Land Management's definition of "good" with "stable or declining trends," of rangeland conditions (Fleischner et al. 1994).

We urge the agency to develop appropriate standards (including monitoring protocols) to assess damage to native biodiversity from grazing activity. Should disturbance exceed established threshold levels, grazing practices should be modified or eliminated. Grazing should not be accompanied by widespread control of native predators (Fleischner et al. 1994; Donahue 1999).

In order to assure public confidence in the planning process, we urge the BLM to consider Proper Functioning Condition Assessments (PFCA; including, Resource [Land Health] Assessments [p.12] and ecological site inventories [p.32]) as a scientific ecosystem analysis process, involving thoroughly trained and consistent observers comparing detailed field observations and measurements against suitable controls (see Stevens, et al., 2001). The composition, level of expertise, and independence of PFCA teams must be clearly identified. Extensive familiarity with site history and local flora are extremely helpful but may not, by themselves, be sufficient for such evaluations. Additional skills, including a detailed understanding of geomorphology, water quality, ecosystem processes, temporal and spatial scale dynamics, and sensitive species biology are needed, and great familiarity with reference sites is also required. We are concerned that Range Conservation technicians with vested interests in maintaining good relations with local ranchers may downplay the severity of grazing-related impacts in PFCA evaluations and thereby bias their interpretation of conditions.

We support the three options for the BLM to improve the scientific credibility of the PFCA process presented in "Refining Southwestern Riparian Ecosystem Evaluation" (Stevens et al. 2001). These recommendations can apply to riparian and upland management. The first and most scientifically credible option involves development of a competitively bid contract to a small, efficient PFCA team from the region's universities and private sector consultants. This expert team should include at least a geomorphologist, an aquatic ecologist, a riparian ecologist, and a data manager, and should operate at the regional or state level, and should be trained at reference sites. In addition to greatly improving scientific credibility, this approach would enhance the consistency,

9

thoroughness, and cost effectiveness of the assessment. This team would identify problems or anomalies that may have a direct bearing on local management, and would provide the BLM with quality-controlled data, which should be prepared for peer-reviewed scientific publication. This team should have full access to district and state staff to answer questions regarding climate, stream flow, and land use history. This team should be able to conduct a large number (perhaps >120/yr) of site visits annually and over a several-year time frame be effective at a regional or state level.

Alternatively, if the BLM regional office cannot fund such scientifically rigorous assessment, the next most appropriate approach would be to develop a well-trained state-level assessment team composed of agency staff. To its credit, the BLM has developed a highly qualified national PFCA training team; however, we recommend that a similarly qualified, highly efficient state level team should be assembled. Again, this team should consist of at least three field experts and a data manager. This BLM team should be trained at reference sites and should have an efficiency equivalent to that of the independent team described above. Protocol evaluation and reporting should be subject to scientific peer-review, and those findings of should be prepared for publication in a peer-reviewed scientific journal.

The third alternative involves the use of district office staff to conduct assessments. The present PFCA approach endorses additional staff training. We recommend that this team be trained at reference sites and their PFCA results should be reviewed by qualified independent experts to enhance scientific credibility.

We also advocate establishing a network of significant areas excluding livestock to serve as benchmarks for scientific evaluation of the ecological effects of grazing. We recommend establishing these units in all major ecosystem types of the ecoregion, and that they should be large enough to evaluate landscape-level processes (Fleishner et al. 1994; Grand Canyon Wildlands Council 1999).

Wilderness Proposals

The 1984 Arizona Wilderness Act provided "soft release" and did not preclude future consideration of public lands for wilderness. The BLM's Wilderness Inventory and Study Procedures (USDI, 2001:7) states that direction for subsequent wilderness inventories is

provided by FLPMA in Sections 102(a)(2) & (8), 201(a), and 202 (c)(4) & (9) and land-use planning in Sections 202(a),(b), (c), and 205(b). These sections direct BLM to "preserve and protect certain lands in their natural condition" and to "prepare and maintain on a continuing basis an inventory of all public lands and their resources and other values (including, but not limited to, outdoor recreation and scenic values), giving priority to areas of critical environmental concern."

Title II of FLPMA (Section 201), states the BLM has

the mandate to prepare and maintain inventories of public land resources (including wilderness). In Section 202, BLM has the discretion and authority to conduct new wilderness studies and submit recommendations to the Secretary of Interior. Such reviews

10

are to be conducted through the land use planning process (RMPs or their amendments) and recommendations must be accompanied by a legislative EIS. Designations or de-designations of the WSA can only be made through an RMP amendment. Management of the 202 WSAs is found in the 8550 manual. With a few exceptions, the non-impairment policy applies.

The BLM committed to use the land use planning process to determine which inventory areas are to be managed as WSAs (USDI 2001 [H-6310-1, Section .06(A)]).

A preliminary wilderness inventory conducted by the Grand Canyon Wildlands Council and the Arizona Wilderness Coalition concluded that many areas dropped from the 1980 WSA inventory process, or not designated as wilderness in the 1984 Arizona Wilderness Act, still contain wilderness characteristics. We are conducting a wilderness suitability assessment of all lands within the two national monuments, as well as areas surrounding and including the ACECs and the Hurricane Cliff region.

The BLM Wilderness Inventory and Study Procedures (H-6310-1, Section 1.3 (D)) states that inventory units

in which human impacts are substantially noticeable, but which otherwise contains wilderness characteristics, may be further considered for designation as a WSA when it is reasonable to expect that human imprints will return or can be returned to a substantially unnoticeable level either by natural process or by hand labor.

We submit that a significant number of existing travel ways, generally non-numbered by county or BLM designations, should be closed to mechanized access (with some exceptions granted to grazing permittees for stock tank maintenance) and restored to a natural condition. Our preliminary wilderness recommendations incorporate this restoration potential.

Areas of Critical Environmental Concern

Regionally, ACEC designations tend to be small and, from the ecological perspective, problematic. Some scientists have proposed ACEC designation on a broad level that requires managers to take a holistic, ecological view of the interrelating elements and processes that define and govern a landscape (Donahue:213). We suggest that the RMP revision process adopt this strategy for ACEC's within the planning area. Most of these areas contain and/or are surrounded by lands suitable for wilderness consideration. In such cases, wilderness designation would provide significant additional protection for the cultural and biological resources described by the BLM (USDI 1990:A-16,17; USDI 1992:A-46,47,48).

The Grand Canyon Wildlands Council appreciates the professionalism and cordial treatment given, not only ourselves, but the participating public by your staff in this important planning effort. You have a dedicated and competent group working for you. We appreciate the opportunity to participate in this important effort and hope you find our suggestions useful.

Respectfully,

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12

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