

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

Please do not allow dirt bikes and off road vehicles to destroy the beauty, the quiet, the clean air, the majesty of the Grand Canyon-Parashant and the Vermillion Cliffs National Monuments.

There are few places left that have been saved from this destruction and we must protect what we have left. Let us preserve these wonderful places and revere them for what they are. Let's keep them in their pristine condition for ourselves and those who follow us. Once they have been spoiled there is no turning back and we will have lost the majesty forever.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health.

To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping

process.

Sincerely,

Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]

USA



[REDACTED]
<caton@slonet.org>

07/02/2002 09:05 PM

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>
cc:
Subject: Scoping Comments, Grand Canyon-Parashant and Vermilion Cliffs NMs

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

As a retired teacher and active hiker, I am looking forward to visiting these new National Monuments and enjoying their beauty, wildness and cultural resources.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health.

To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,

USA



(b) (6)

07/02/2002 08:59 PM

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>
cc:
Subject: Preserve the wildness in Grand Canyon-Parashant and Vermilion Cliffs
NMs

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

Grand Canyon-Parashant and Vermilion Cliffs National Monuments should be managed for biodiversity, ecosystem integrity, and wilderness values for future generations. Our children should have the option of comparable experiences to what has been available to us historically; primitive recreation and a connection to their origins in wilderness, along with all of Earth's life.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health. To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]

USA



(b) (6)

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>
cc:
Subject: we need more wilderness

07/02/2002 08:58 PM

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

There is nothing I can say that will convey how much I want the land to be managed well. There are so many examples of civilizations that have not left land as "wilderness" and yet not overused land or destroyed its beauty. The Amerindians of the Great Plains used the land and changed it, but respected that it was a necessary part of their lives. The Amerindians in the Southern Hemisphere did the same with the jungles of Brazil. These places were not wilderness. They were being USED and modified by the people who lived in them. We citizens of the United States can use land without "using it up." We have to control our desires for speed, danger and thrills. Please don't allow a small minority (dirt bikers, ski jetters, snowmobilers, etc.) to destroy what belongs to the Earth -- that is to say what belongs to eternity and to you and me.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health. To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,

A black rectangular redaction box covering the signature of the sender.

USA



[REDACTED]
<j-boudart@northwest
ern.edu>

07/02/2002 08:57 PM

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>
cc:
Subject: How I Feel about Land Management

08-01-2002 0777

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

I believe that anything that emits exhaust should not be allowed in our parks, except of course park services and emergency services.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health. To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.


- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,


[REDACTED]
[REDACTED]

USA



(b) (6)

07/02/2002 08:55 PM

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>

cc:

Subject: Scoping Comments, Grand Canyon-Parashant and Vermilion Cliffs NMs

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

When I hike, I like to know that I will have only the noise of nature to listen to.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health. To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.


- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,




USA



(b) (6)

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>
cc:
Subject: Scoping Comments, Grand Canyon-Parashant and Vermilion Cliffs NMs

07/02/2002 08:54 PM

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

Please protect our natural resources from the invasion of off-road recreational motor vehicles.

Those who wish to enjoy those vehicles can do so at their own expense and where the noise and devastation will not intrude into the silence and biodiversity of our natural treasures.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health.

To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,

[REDACTED]
[REDACTED]

USA



[REDACTED]
<marybart@itilink.com>

07/02/2002 08:51 PM

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>
cc:
Subject: Scoping Comments, Grand Canyon-Parashant and Vermilion Cliffs NMs

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

There's always much to be said about protecting our world from ourselves. But briefly, why is it so hard to understand that in the long run we need land left untainted. Maybe not right now noticeably, but the future will reap the consequences. Our sanity in this world is at stake even if we can't understand that right now. I try to do my part, recycling, walking, etc... so I ask why without being hypocritical. Off road vehicle traffic in these parks? There're already places for that. Introducing chaos in a natural park doesn't sound too natural to me.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health. To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping

process.

Sincerely,

Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]

USA



(b) (6)

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>
cc:
Subject: Scoping Comments, Grand Canyon-Parashant and Vermilion Cliffs NMs

07/02/2002 08:39 PM

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

The following letter nicely sums up my feelings on what your planning objectives should include.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health. To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.


- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,



USA



(b) (6)

07/02/2002 08:35 PM

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>
cc:
Subject: Scoping Comments, Grand Canyon-Parashant and Vermilion Cliffs NMs

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

Please keep our remote areas beautiful. Ban off-road vehicles.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health.

To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,

[Redacted signature]

USA



(b) (6)

07/02/2002 08:34 PM

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>
cc:
Subject: Scoping Comments, Grand Canyon-Parashant and Vermilion Cliffs NMs

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process. I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do. I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources. It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health. To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.
- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.
- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.
- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment. In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process. Sincerely,

Christopher Milligan

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health. To that end, the BLM should:

-Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

-Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

-Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

-Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,


USA



[REDACTED]
<cgm707@earthlink.net>

07/02/2002 08:33 PM

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>
cc:
Subject: Scoping Comments, Grand Canyon-Parashant and Vermilion Cliffs NMs

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

This area in the United States is a valuable place for all Americans to visit. It is a beautiful landmark as well as a pristine sight. Allowing dirt bikes, etc. to meander through this lovely area will only spoil it and the beauty that it offers us as Americans to behold. Destroying such a place as this is wrong! Please do not let this happen ever! Certainly there are alternatives for dirt bikes in other pathways some where within the state whereby they can travel freely without creating dust, pollution and destruction of monuments that hold much interest to the general public. Consider what will happen if this landmark is no longer available for us to view! Have a heart and some compassion. Rearrange areas within your power to allow dirt bikes, etc. to roam without harming anything. May God give you wisdom (He will, if you but ask Him) and understanding in this delicate situation.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health. To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,

A large black rectangular redaction box covering the signature of the sender.

USA



<basia49@optonline.net>

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>

cc:

Subject: Scoping Comments, Grand Canyon-Parashant and Vermilion Cliffs NMs

07/02/2002 08:31 PM

08-01-2002 0785

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

I encourage protection of all national monuments from off-road vehicle abuse, many of which I have visited.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health. To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.


- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,




USA



(b) (6)

07/02/2002 08:29 PM

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>
cc:
Subject: Scoping Comments, Grand Canyon-Parashant and Vermilion Cliffs NMs

08-01-2002 0786

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

These precious areas must be preserved as they are and should not be allowed to become the playground of inconsiderate ORV owners. These destructive thrill machines should be banned except for official use.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health.

To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,

[REDACTED]

USA



(b) (6)

07/02/2002 08:24 PM

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>
cc:
Subject: No ORV's in National Parks and Monuments.

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

As a resident of an wooded area where unrestricted ATV use has damaged much of my own home environment, I am deeply aware of and concerned about the danger to public land of unrestricted off-road vehicle access.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health. To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,

[REDACTED]

USA



[REDACTED]
<SteffT@carolina.rr.co
m>

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>
cc:
Subject: Save our public lands

07/02/2002 08:24 PM

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

Our generation inherited these beautiful natural places from our ancestors. Shouldn't we allow future generations to enjoy this untouched wilderness too? In order to accomplish this, we must leave it as we have found it.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health.

To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,



USA



(b) (6)

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>
cc:
Subject: Scoping Comments, Grand Canyon-Parashant and Vermilion Cliffs NMs.

07/02/2002 08:21 PM

08-01-2002 0789

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

Each loss of habitat affects all of us. Please try to preserve what little we have left.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health.

To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.


- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,




USA



(b) (6)

07/02/2002 08:20 PM

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>
cc:
Subject: Scoping Comments, Grand Canyon-Parashant and Vermilion Cliffs NMs

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

I feel that it's extremely important to take immediate steps to protect our wilderness areas and other fragile natural features. Once they are disturbed, or destroyed, they're gone. Too much has already been lost.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health. To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed--

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,

[REDACTED]

USA



(b) (6)

07/02/2002 08:16 PM

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>
cc:
Subject: Scoping Comments, Grand Canyon-Parashant and Vermilion Cliffs NMs

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

Let us take off dirt bikes and all off-road machines out of our national parks and national monuments. These drivers care nothing about the beauty of the land or the wild life habitat. So please take action to stop them, before it is too late.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health. To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,

[REDACTED]

USA



(b) (6)

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>
cc:
Subject: Scoping Comments, Grand Canyon-Parashant and Vermilion Cliffs NMs

07/02/2002 08:13 PM

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process. I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources. It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health. To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment. Thank you for considering my comments as part of the scoping process.

Sincerely,

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning

for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health.

To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,


USA



[REDACTED]
<lmdrucker@earthlink
.net>

07/02/2002 08:12 PM

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>
cc:
Subject: Conservation Stewardship - Grand Canyon-Parashant and Vermilion
Cliffs NMs

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

We, as present day Americans, have a civic duty to leave these great parks as unspoiled as they were during all the ages the Native Americans lived here, and the way that they most certainly were when Our government decided to protect these natural wonders for future generations of Americans. Thoughtless vandalism must not be allowed in any form.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health.

To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,

[REDACTED]

USA



(b) (6)

07/02/2002 08:11 PM

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>
cc:
Subject: Scoping Comments, Grand Canyon-Parashant and Vermilion Cliffs NMs

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

I stongly urge you to ban the use of off-road (recreational) vehicles in and on our National Monuments. I believe the continued abuse of our enviornment is selfish and serves no higher purpose. This planet and the life on it is a gift that should be treated with dignity and respect.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM , the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health. To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,

[REDACTED]

USA



[REDACTED]
<annefran@swcp.com

>

07/02/2002 08:06 PM

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>
cc:
Subject: Anne Stehr

08-01-2002 0795

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health. To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,




USA



[REDACTED]
<jpbuckisj@juno.com
>

07/02/2002 08:04 PM

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>
cc:
Subject: Scoping Comments, Grand Canyon-Parashant and Vermilion Cliffs NMs

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

While off road vehicles, especially dirt bikes are great fun for many people, allowing them unlimited access to national parks and monuments completely disregards the preservation of these lands for the generations to come, is hurtful to the fragile ecosystem, and disrupts the peace of those people who are hiking or just enjoying nature. Please curtail the use of these vehicles on our public lands.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health. To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,

[REDACTED]

USA



[REDACTED]
<sbinyon@earthlink.net>

07/02/2002 08:04 PM

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>
cc:
Subject: Scoping Comments, Grand Canyon-Parashant and Vermilion Cliffs NMs

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

we need to treasure the beauty and solitude of these wilderness areas, keeping them free from noise pollution and other distractions.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health.

To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.


- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,





USA



(b) (6)

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>

cc:

Subject: Scoping Comments, Grand Canyon-Parashant and Vermilion Cliffs NMs

07/02/2002 08:03 PM

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

Once nature has been restored, it is extremely difficult, sometimes impossible to restore it. Please preserve our last great spaces for the future generations of animals and humans. It will be a decision no one will regret. Do not allow greed to take over our precious wilderness please.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health. To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.
- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.
- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.
- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,

[REDACTED]

USA



(b) (6)

07/02/2002 07:59 PM

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>

cc:

Subject: Scoping Comments, Grand Canyon-Parashant and Vermilion Cliffs NMs

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

We are excited to think that more of our great lands will be saved forever and that you will ensure No off-road or snowmobile type vehicles will despoil these beautiful places.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health.

To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,

[REDACTED]

USA



[REDACTED]
<jspence6@cfl.rr.com
>

07/02/2002 07:55 PM

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>
cc:
Subject: Scoping Comments, Grand Canyon-Parashant and Vermilion Cliffs NMs

08-01-2002 0800

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

Our treasured lands are the heritage for our children and their children. Every time I go to Sedona I mourn the fact that one of the most beautiful lands in the US was not preserved. Let's not spoil what has been set aside and let's set aside whatever is possible for our future and the future of America.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health.

To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,

[REDACTED]

USA



(b) (6)

07/02/2002 07:55 PM

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>
cc:
Subject: Scoping Comments, Grand Canyon-Parashant and Vermilion Cliffs NMs

To: Dianna Hawks
 Bureau of Land Management
 Arizona Strip Field Office
 345 East Riverside Drive
 St. George, Utah 84790
 phone: 435 688-3266
 fax: 435 688-3388
 E-mail: Diana_Hawks@blm.gov

July 31, 2002

From: Kane County Resource Development Committee, Kane County Utah

Re: Scoping Comments concerning Arizona Strip EIS planning development related to the Grand Canyon-Parashant National Monument, the Vermillion Cliffs National Monument and public lands between the two monuments

Kane County, Utah is immediately adjacent to the planning area. As recognized in agency literature, "Geographically, culturally and economically, the planning area is linked with communities in northern Arizona, southern Nevada, and Utah".

Kane County residents have a long history of association with lands of the "Arizona Strip" predating the present state and federal political subdivisions. As clearly recognized in the above BLM quotation the lands of the Arizona Strip are significantly important to our county residents **geographically, culturally and economically**.

Geographically, the Grand Canyon to the east and the south, and the Grand Wash to the west act as physical barriers that tie the lands of the Arizona Strip to the readily accessible lands and people to the north, in southern Utah. Culturally, pioneer settlers of southern Utah the Arizona Strip of northern Arizona are of the same culture. Our heritage and traditions are socially united. Economically, the lands and resources of the Arizona Strip have historically had a direct impact on the economy of southern Utah and Kane County. The loss of the Kaibab timber industry is a recent example of the significant and direct impact a resource loss on the Arizona Strip has on residents of Kane County. Many Kane County residents lost timber careers and a significant downturn in our local economy resulted from the loss of Kaibab timber. Kane County and our residents are an important stakeholder in Arizona Strip planning, a stakeholder with significant local interests that directly affect our residents lifestyle.

Kane County has experience with monuments and monument planning. Kane and Garfield Counties share a relatively new neighbor, the Grand Staircase-Escalante National Monument. The GSENM is still under legal challenge. Its designation, size and monument plan are controversial. Only the issue of the GSENM plan is relevant to these comments.

The GSENM was the first monument assigned the BLM. Previous monuments were assigned to the National Park Service to be managed for preservation purposes.

Kane County hoped for a multiple use, sustained yield planning policy consistent with the agency's congressional management direction, proclamation provisions and consistency regarding local planning and needs as required under federal law. That did not happen in the case of the GSENM. The GSENM plan and management philosophy is, unfortunately, preservation oriented, rather than multiple use, sustained use oriented, and has been controversial as a result. Most importantly consistency regarding local planning and needs has not been adequately considered in GSENM planning.

The KCRDC suggests that rather considering the GSENM plan as a model, the Arizona Strip planning offers an opportunity to develop appropriate BLM multiple use, sustained yield planning conditions in concert with the proclamation's mandate to protect **objects** of scientific and historic interest. Another important condition of the Antiquities Act is that objects warranting protection must first be **endangered**.

Proclamation references to archaeological prehistoric objects such as rock art, burial sites, and villages are clearly understandable. The proclamations do not offer clear and specific descriptions of endangered objects of historic and scientific interest but rather appear to allow for a great deal of discretion regarding specific protection needs.

"Geologic treasures", "geologic faults", "abundant fossils", cliffs", "canyons", "old mining sites", "physiographic ecoregions", "ecosystems", "diverse wildlife", "sense of solitude", historic ranch structures and associated objects", "Old Arizona Road or Honeymoon Trail", "biological objects", etc. are not clearly understood as they relate to the Antiquities Act, the proclamation or to this planning effort.

The Antiquities Act allows for the protection of objects on the land. It does not allow for the protection of the land itself. The Act does not appear to specifically allow for the protection of ecosystems or wilderness like conditions, such as solitude. Other federal legislation allows for wilderness and ecosystem management.

Some preservation groups recommend that **the BLM should use this planning opportunity to re-invent the agency** to focus on long-term **protection of ecosystems**. Preservation groups claim that energy development, grazing, OHV and other recreational emphasis is inappropriate, but that planning must protect the remote and undeveloped character of the monuments.

The local governmental entities, such as Coconino and Mohave Counties' hosting these monuments within their geographical boundaries, should have their special standing regarding local planning consistency validly regarded to the greatest extent possible, as required under federal law.

The significant stakeholder status of Kane County and its residents should also be considered for the reasons previously stated. The impact to Kane County's local planning should be considered. Whether Kane County planning is consistent with, and corroborates northern Arizona local planning efforts should be considered.

Balance and reasonable action, determined by credible and relevant science, should take precedence over preservation philosophy generalizations. Local economic and cultural needs, within those parameters should be honored.

Reasonable access and resource use, in balance with local good stewardship should be considered as a planning issue. Economic stability, the custom and culture of local inhabitants and community-based ecosystem management partnerships should be a part of effective planning. Monument planning considerations should not “bleed over” into non-monument public land involved in these planning efforts.

The planning effort should not be so much about “values” as about the more pragmatic question of “How do we balance multiple use and sustained yield needs against protection needs?”. The activities and uses of these lands are important locally for our economy and our lifestyle and culture. What minimal restrictions to historic uses and activities will comply with the protection requirement of the proclamation? The scientific, traditional, recreational, cultural and natural resources of these areas must be managed according to federal law with planning developed using reasonable and balanced decisions based on credible and relevant science and analysis.

Valid existing rights must be fully considered. Road rights established under RS 2477 and water rights existing under state law as well as private property rights must be fully recognized and protected in these planning efforts.

The proclamations appear to protect grazing under current law but the GSENM is attempting to amend its 3 year old plan to permanently eliminate grazing from significant portions of the monument. That effort has created controversy in Kane and Garfield Counties.

Destination tourism depends on destination activities regarding both motorized and non-motorized access. Those activities are economically significant to both Arizona and Utah counties. Family picnics and reunions as well as firewood and fence post cutting are important traditionally, culturally and economically to local residents.

Sight seeing and family drives in the backcountry are cultural activities important to rural residents. Hunting and shooting firearms are a cultural tradition in the rural west.

An inventory of both resources and endangered objects should be developed as part of the planning effort. The need for a designated OHV recreational area on non-monument public lands, within the planning area, providing recreational opportunity supported by the majority of Americans should be considered as an issue. Local economic benefits from both motorized and non-motorized recreational opportunity should be considered. The high percentage of federal lands and the large amount of designated and withdrawn federal lands within northern Arizona and southern Utah should be fully considered in planning.

Grand Canyon-Parashant planning should consider management differences between the NRA, Park Service managed lands and the BLM managed monument lands due to the organic act differences between the two agencies. The BLM need not, and should not, “re-invent” the agency to mimic the preservation standards of the Park Service. Congress did not intent the BLM to “re-invent” itself in that direction.

The consideration of “values” must be in the context of FLPMA rather than the Wilderness Act. In fact, the BLM is simply mandated to follow NEPA, APA, FLPMA and 43 CFR 1610 in successfully developing Arizona Strip planning consistent with the purposes of the proclamations.

Members of the KCRDC and Kane County residents attended the Community-Based Partnerships and Ecosystems Workshops recently sponsored by the BLM Arizona Strip Field Office. All attendees were impressed by the concepts presented. The KCRDC offers participation and shared responsibility in these local planning efforts. We will gladly supply a copy of the Kane County General Plan.

Your job as land managers in a modern word is not an easy one. Community –Based concepts do not make your job easier but they do help to make the right decisions.

For further assistance or comment please contact:

Kane County Commissioner [REDACTED]
KCRDC Chairman [REDACTED]
KCRDC Vice Chair [REDACTED]

July 31, 2002

Roger Taylor
Field Manager
BLM Arizona Strip Field Office
345 E. Riverside Drive
St. George, Utah 84790

Dear Mr. Taylor:

The Grand Canyon Trust appreciates the opportunity to comment on the Notice of Intent to Prepare an EIS and Management Plans for Vermilion Cliffs National Monument, Grand Canyon Parashant National Monument, and for non-monument BLM lands on the Arizona Strip.

The proclamations creating the Grand Canyon Parashant and the Vermilion Cliffs National Monuments identify *"a vast, biologically diverse, impressive landscape encompassing an array of scientific and historic objects"* and *"outstanding objects of scientific and historic interest...natural splendor and a sense of solitude"* as objects to be protected through the designation and management of the monuments. The proclamations state that, *"the national monument shall be the dominant reservation"*. All management practices and land uses must be evaluated in this context and management plans must be written to ensure the protection of monument objects.

During the scoping meetings and in other BLM communications, agency staff have indicated that the BLM is intending to manage the Arizona Strip monuments for "multiple use". This is clearly not the intent of the proclamations. The proclamations state that the monuments are set aside for the purpose of protecting the objects identified above—which clearly means that protection of objects is the purpose of the monument and that other uses and considerations are secondary. Multiple use is relevant only to the extent that there are "multiple uses" still allowed in the Monument—but the range of allowable uses is narrower and they must be consistent with the purpose and protection of the monuments.

Multiple use management may be an appropriate approach for non-monument BLM lands on the Arizona Strip; however, it is contrary to the purpose and aims of the monuments. The proclamations recognize the monuments as places of outstanding

historical and scientific importance and require that they be “protected” and managed as such.

The Grand Canyon Trust’s comments identify those issues that must be considered in the scoping and planning process if the management plans are to protect the remoteness, geological treasures, important watersheds, cultural and historic features, and biological resources identified in the proclamations, and for proper management of non-monument Arizona Strip lands. We respectfully request that the BLM address and/or consider the following during the Arizona Strip planning process:

1) Ecosystem Approach To effectively manage the monuments in such a way as to protect and restore the objects of scientific interest necessitates that the BLM take an ecosystem approach to management. The premise of the ecosystem approach is that ecosystems are complex webs of organisms, habitats, and processes that have evolved over time and in a particular place. Biodiversity is a cornerstone of healthy functioning ecosystems—it is key to ensuring stable ecosystems with the capacity to respond to and recover from disturbance. Management plans that support decisions and actions that foster and protect diversity—genetic, species, habitat and ecosystem diversity—are critical to protect the ability of our landscapes to adapt to substantial environmental changes. Changes to an ecosystem can cause dramatic reductions in the population of species or even shift from one biological community to another over short periods of time. Please refer to the 1999 report by the Ecological Society of America’s Committee on Land Use titled, “Ecological Principles and Guidelines for Managing the Use of Land”. It is an excellent guide to land use planning and decision-making in an ecosystem context.

We encourage the BLM to identify and use ecological subunits based on watersheds in developing the management plan. The Grand Canyon Trust has worked with EROS and USGS on the preliminary delineation of sixth-order watersheds in the Greater Grand Canyon area. We are happy to make this GIS-based information available to the BLM. In addition, the Natural Resource Conservation Service is working on a similar watershed delineation project. Watersheds serve as unbiased, ecological units that can be identified and subsequently ranked and prioritized based on a variety of criteria including biological, cultural, and geological.

The success of protecting the objects of the monuments will depend on the application of the best available science, educated judgments where timing does not permit immediate and intensive analysis, and the diligent application of the precautionary principle. Where conclusive scientific information is lacking to make well-founded, ecosystem based management decisions, a precautionary approach should be taken wherein actions that may have an adverse environmental effect are not taken or measures to prevent environmental degradation are not postponed. The precautionary approach should be applied and reflected in selecting each of the alternatives in the draft EIS.

Coconino County is currently integrating the ecosystem approach into the revision of their Comprehensive Plan. The BLM should continue to coordinate with Coconino County to ensure consistency between the conservation goals of the Vermilion Cliffs management plan and the Coconino County Comprehensive Plan.

2) Conservation Biology In following with the Ecosystem Approach, the alternatives in the draft EIS should incorporate the principles of Conservation Biology. This requires that evolutionary change, dynamic ecology, and the presence of humans on the landscape be considered in the following ways:

- 1) Ensure the protection and management of enough habitat to support viable populations of all native species on the Arizona Strip;
- 2) Manage at regional scales large enough to accommodate natural disturbance processes such as fire, wind, and climate change;
- 3) Plan with long-term (decades and centuries) perspective to allow for the continued evolution of species, habitats and ecosystems;
- 4) Allow for human use on the Arizona Strip and within the monuments at levels and in ways that do not result in significant ecological degradation.

The “Analysis of the Grand Staircase-Escalante National Monument Draft Management Plan: A Conservation Biology Perspective” prepared by Allison Jones for Round River Conservation Studies provides a good analysis of the GSE Draft Plan and details a Conservation Biology Alternative for GSE. Many of the issues raised and addressed in the document are pertinent to the Arizona Strip planning process, and should be considered here. We suggest that the Arizona Strip BLM review this document in preparation of the Arizona Strip EIS.

We encourage the BLM to coordinate and collaborate with researchers and scientists from universities, other federal agencies, ecological consulting firms, and non-profit research groups to develop comprehensive, far-reaching, and coordinated research efforts within the monuments and on the Arizona Strip as a whole.

3) Restoration The proclamations recognize that habitat and ecosystem restoration are an essential component of protecting healthy functioning ecosystems. Restoring vegetation types such as grasslands, ponderosa forests, springs, and riparian areas must be done in concert with restoration of natural ecological processes such as fire. The monument management plans should identify and analyze impacted areas for restoration potential, outline specific steps that the BLM will take to restore degraded lands (including the development of a restoration plan for each monument), implementation priorities, and a strong budgetary commitment to restoration. It is imperative that native species be utilized in all restoration programs within the monuments. We urge the BLM

and NPS to support and encourage the development of local native seed producers and sources.

4) Transportation and Access As early as 1979, the White House Council on Environmental Quality found that off-road vehicles had caused damage to “every kind of ecosystem in the United States.” Since that time, off-road vehicle use and the adverse effects on public lands have increased significantly. More than 20 years later the Bureau of Land Management acknowledged in a report to Congress that increased use of off-road vehicles has resulted in “wide resource damage affecting other uses such as grazing and wildlife, fragmentation of habitats, and a reduction in air and water quality”. Indiscriminate OHV use and weak enforcement have resulted in environmental damage on the Arizona Strip and across the west.

The Grand Canyon Parashant and Vermilion Cliffs proclamations clearly and unequivocally state that, “*all motorized and mechanized vehicle use off road will be prohibited.*” No exceptions other than for emergency or authorized administrative use should be allowed. In addition, the BLM should designate a single transportation system for all motorized and mechanized vehicles. To preserve solitude and the “*remote and unspoiled qualities that are essential to the protection of the scientific and historic resources*” the transportation system should include only the minimal roads necessary to provide reasonable access. Extraneous routes, routes with the potential to impact vegetation, wildlife and other natural resources directly or through excessive fragmentation of habitat, archaeological resources, and other monument objects should be closed and obliterated/restored where necessary.

The analysis for the transportation system should consider the impacts of all motorized vehicles (and the roads and routes they travel) on habitat fragmentation, watershed quality, soil compaction and erosion, spread of noxious weeds, and nongame species. In addition, enforcement should be prioritized and funded in proposed wilderness areas, inventoried roadless areas, and wilderness study areas. The EIS analysis should consider road obliteration as an effective way to restore soil and hydrological function, secure terrestrial and aquatic wildlife habitat, decrease habitat fragmentation, dramatically reduce noxious weed invasions, and restore native ecosystems. The Grand Canyon Trust has compiled a bibliography on the impacts of roads and will make this available to the BLM.

We recommend that the draft EIS include a range of transportation alternatives that are based on the following considerations.

- 1) Each transportation alternative should further the protective purposes of the monuments and provide the minimum level of access necessary;
- 2) Anything identified as a “road” in the draft plan must meet the legal definition of a road as “improved and maintained by mechanical means to insure relatively regular and continuous use. A way maintained solely by the passage of vehicles

does not constitute a road.” (H.R. Rep. No. 94-1163 at 17);

- 3) Roads should be justified and managed with the proper level of NEPA analysis (centered on the objects of scientific and historic interest) taking into account the spatial pattern of roads, not merely mileage;
- 4) All roads must be deemed necessary for specified and defined uses of the National Monument; and
- 5) Reclamation procedures and standards must be incorporated when closing roads and routes that are not justified, are no longer necessary, or do not meet the definition of a road.

Additionally, we urge the BLM to adopt a road management policy of “closed unless open” which would be consistent with the current Lake Mead policy. This would allow vehicle use only on roads specifically signed “open”. In conjunction with a strong enforcement program, such a policy will significantly reduce the proliferation of unauthorized off-road use and associated impacts.

5) Grazing The proclamations establish the responsibility of the BLM and Lake Mead to put top priority on management of biological and ecological resources and to emphasize ecosystem restoration. At the same time the proclamations allow for continued grazing, stating that, *“laws, regulations, and policies...in issuing and administering grazing permits or leases...shall continue to apply”* within the monuments. Livestock grazing is an allowable use under existing laws; however, it is not recognized in the proclamations as an object to be protected.

Grazing is the primary land use across all ecosystem types in the western US, and has been ubiquitous on the Arizona Strip. The EIS should consider the continued impacts of livestock grazing on ecosystem health, including the spread of noxious weeds, native biodiversity, composition and vigor of native vegetation, soil erosion and compaction, altered fire regimes, watershed health, springs and riparian vegetation, wildlife habitat, and non-game species, including predator populations. In order to meet the intent of the monument proclamations, the EIS should evaluate alternatives that reduce and/or eliminate livestock grazing in ecologically sensitive areas such as riparian areas, areas of unstable or fragile soils, etc. Such alternatives should include support for voluntary retirement of livestock grazing. In addition, as a potential management tool for meeting the grazing challenge in the monuments, the BLM should evaluate the viability and potential for establishing “grassbanks” with clear, measurable environmental goals.

The Trust urges the BLM to consider the Society for Conservation Biology’s recommendations for livestock grazing as outlined in their 1994 Position Statement. Grazing should be evaluated from an ecological perspective. If it can be administered in a manner that “helps to maintain or improve the health, biodiversity, and long-term productivity of the ecosystem,” then it should be allowed. If not, steps should be taken to

phase grazing out of these areas in a way that is respectful and considerate of the permittees. Livestock should be immediately withdrawn from all areas that do not meet “good” with “stable or upward trends” rangeland conditions.

The draft management plan should outline a defensible and consistent process to implement the Standards and Guidelines for Rangeland Health; adopt additional land health objectives, and establish monitoring protocols. This should include appropriate assessment methods (including proper intensity of assessments and density of observation points, appropriate field indicators that are linked to the Standards and Guidelines, quantitative monitoring data, etc.). It should include a schedule for truly interdisciplinary teams to assess all the allotments.

Handbook 4180-1, Rangeland Health Standards, instructs BLM to set up a consistent, defensible approach to drawing conclusions about whether rangeland health standards are being met.... “an approach that is logical and provides a pathway between data, indicators, standards, and conclusions.” The current approach of conducting individual EA’s for each allotment is veiled in Standards and Guidelines language, but has little real connection to the intent of the Standards and Guidelines for Rangeland Health. The BLM Technical Reference (Interpreting Indicators of Rangeland Health TR 1734-6) outlines a process for assessing allotments in the field, even if in a qualitative way, to see if the standards are being met.

The recent GSE grazing EA’s are the best science-based evaluation of the impacts of livestock grazing by the BLM to date. Please refer to the following EA’s in preparation of the grazing aspects of the management plan: EA UT-030-02-005 Proposed Amendments to the Escalante and Paria Management Framework Plans to retire animal unit months in the Last Chance and Big Bowns Bench allotments; EA UT-030-02-002 Proposed amendment to the Escalante Management Framework Plan to retire animal unit months in the Willow Gulch allotment; and, EA UT-030-02-001 Proposed amendment to the Paria Management Framework Plan to retire animal unit months in the Clark Bench allotment.

6) Recreation The proclamations recognize remoteness as one of the key attributes of the monuments that should be protected. The Arizona Strip Field office has also recognized the remote character of the Strip as a unique characteristic to be preserved. Protecting remoteness will be one of the greatest challenges of monument management as people hear about and visit the new Monuments. It is essential that monument planning anticipate increases in visitation. As such, we ask that the management plan approach recreation management proactively with such tools as group size limits, allocations, and use zones. These are easier and more effective tools for controlling the impact of visitor use, rather than letting damage occur and then trying to mitigate after the fact. This approach will also help the BLM avoid the difficult circumstance of having to decrease recreational opportunities in the future to not exceed carrying capacity.

The cumulative affects of private individual visitors should be analyzed and considered

as well as the impacts of organized commercial recreation. All Special Recreation Permits (SRPs) within the monuments should be evaluated for consistency with the monument proclamations to ensure protection of the monument. SRPs should be analyzed in regard to their long-term effect on recreational uses in the Monument and on overall visitor experience.

7) Land Exchanges The Grand Canyon Trust is extremely concerned about proposed state/federal land exchanges that would consolidate state lands into huge blocks just outside both the Grand Canyon Parashant and Vermilion Cliffs National Monuments. This is a concern because of the potential of State lands to be developed or sold for development that would be inconsistent with monument values and to the overall aim of maintaining remoteness on the Arizona Strip as a whole. We will continue our efforts to ensure that the proposed land exchanges do not occur. The Trust urges the BLM to actively seek partners and funding for acquiring private lands that come up for sale within the monuments. Criteria for acquisition should be established based both on threats to monument objects and on opportunities for restoration and protection.

8) Wilderness Designation As part of the scoping process BLM should conduct a wilderness inventory for the entire Arizona Strip that considers new information submitted in citizen inventories. The old Wilderness Study Areas (WSAs) that were released in the 1984 Arizona Wilderness Act should be the starting point for the wilderness inventory and other potentially suitable wilderness areas should be evaluated as well. Direction and authority for protection of wilderness values and attributes is provided in the BLM's Wilderness Inventory and Study Procedures, the Federal Land Policy and Management Act, and the monument proclamations. Public land inventories and planning efforts should be coordinated with other federal agencies and with Indian tribes and state and local agencies.

9) Threatened and Endangered Species/ACEC Section 7(a)(1) of the Endangered Species Act of 1973, as amended, states that all Federal departments and agencies shall seek to conserve endangered and threatened species and shall utilize their authorities in furtherance of the purposes of the Act. This section further outlines bold purposes of the Act to provide a "means whereby the ecosystems upon which [they] depend may be conserved." Thus, implementation of the Act goes hand-in-hand with the ecosystem approach discussed earlier. Our review indicates that at least nine federally listed species and one candidate species are present or may be present on the Arizona Strip. The Trust urges the BLM to thoroughly review these species and complete an analysis to proactively eliminate or minimize impacts to these species. In addition, species of concern should be identified and managed to prevent future decline and potential listing.

10) Cultural Resources Because human beings are integral components of the ecosystem and have played a crucial role in shaping the environments in which they live, conserving natural systems can also help to conserve important cultural elements of those systems. Conservation guidelines that help to conserve healthy, functioning ecosystems by protecting rare habitats, wildlife corridors, large blocks of roadless land, and natural

processes will inevitably benefit the historical features and traditional cultural practices that are embedded in or dependent upon the perpetuation of the natural landscape.


The issues brought to the forefront by designation of the Grand Canyon Parashant and the Vermilion Cliffs National Monuments challenge us all to work together through the monument planning process toward management of these public lands that recognizes and respects various resource uses while protecting the objects that the monuments were created to protect. This means coming together in good faith, to find creative solutions to achieve our collective goals while respecting and protecting the Monuments. In all cases and at all times, protection of Monument objects and values must be paramount. This is precisely the purpose of the planning effort. We must all recognize that the joy we experience in this landscape is inextricably linked to our ability and commitment to stewardship.


The Grand Canyon Trust notes that the purpose of the scoping stage is to identify issues for consideration during the drafting of the EIS. We have included references to some key supporting documentation with these comments and will continue to provide BLM with additional information, analysis, and relevant supporting documentation throughout the planning process.

On a final note, the Grand Canyon Trust appreciates the ongoing efforts of the Arizona Strip Field Office to provide forums for local input and to encourage local involvement from a wide range of interests in the planning process. It is important to remember that the Monuments are national treasures that belong to all the people of the United States, not just those of us with the privilege of living, playing and working on them. As such, we hope that the BLM will give equal consideration to all comments from people across the country that have taken the time and energy to provide input.

The Grand Canyon Trust is a non-profit conservation organization whose mission includes the protection and restoration of the canyon country of the Colorado Plateau. Our goal is to maintain the Colorado Plateau's ecological integrity and open, beautiful landscapes well into the future. We appreciate the opportunity to comment.

Sincerely,


Program Officer, Grand Canyon Trust
Arizona RAC Member


Program Associate, Grand Canyon Trust



08-01-2002 0803

**THE WILDERNESS SOCIETY
FOUR CORNERS STATES OFFICE**

7475 Dakin Street, Suite 410

Denver, CO 80221

Phone: (303) 650-5818

FAX: (303) 650-5942

FAX TRANSMITTAL

Date/Time: July 31, 2002

Please deliver this fax to: Diana Hawks

From: [REDACTED] The Wilderness Society-Denver
(303) 650-5818 ext. 104
greg_aplet@tw.s.org

Total number of pages, including this one: 5

Please find my scoping comments on planning for the future of the ponderosa pine forests of the Grand Canyon-Parashant National Monument. Thank you.



THE WILDERNESS SOCIETY

July 31, 2002

Submitted by e-mail and facsimile

Mr. Roger Taylor
District Manager, Arizona Strip
Bureau of Land Management
345 E. Riverside Dr.
St. George, UT 84790

Re: Scoping Comments for the Grand Canyon-
Parashant National Monument Management Plan

Dear Roger,

Thank you for the opportunity to present comments to be considered as you prepare the management plan for the Grand Canyon-Parashant National Monument. On behalf of The Wilderness Society, I will be addressing issues regarding the old-growth ponderosa pine ecosystems overall and specifically as they occur in the Mount Trumbull Wilderness. Many of these issues have been raised before in other contexts, but The Wilderness Society wishes to raise them in the context of monument planning.

The proclamation establishing this Monument recognized the ponderosa pine ecosystem of the entire Mount Trumbull area as an object of scientific interest, thus requiring protection of the entire ecosystem. Approximately one-third of the 14-17,000 acres of ponderosa pine forest in the area still supports large, old trees, but the quality of the larger landscape does not appear to have been formally evaluated. Before plans are made for the future of the Monument's ponderosa pine, a thorough assessment of its restoration potential should be conducted.

The Wilderness Society shares the widening sentiment that old-growth forests of all types, but especially ponderosa pine, should be protected and that their logging should cease immediately. In the interest of protecting these forests, we support activities aimed at restoring ecosystem composition, structure, and function, including the cutting of small diameter trees when necessary. Furthermore, while we have no formal policy opposing restoration in wilderness, we do place a high burden of proof on those who would propose such activities.

REGIONAL OFFICE, FOUR CORNERS STATES
7475 DAKIN STREET, SUITE 410, DENVER, COLORADO 80221
TEL: (303) 650-5818 FAX (303) 650-5942

Scoping Comments

July 31, 2002

Page 2

There are two threshold questions that must be answered before intervention should be undertaken in wilderness. The first is: "Is intervention appropriate in this case?" If the first is answered affirmatively, the follow-up question regarding "minimum requirement" is: "What intervention is appropriate in this case?" Usually, the first threshold can be quickly rejected by the application of a procedural screen: "Has a wilderness management plan been approved, and if appropriate, has a wilderness fire plan been approved?" Very often the answer to either of these is "no," and intervention is clearly inappropriate.

In order to address the first question, another set of questions must be asked that evaluate context. They examine the role of the wilderness in the larger system.

1. Is the wilderness itself a large landscape ecosystem that is on a clear trajectory of degradation that will continue without human intervention?
2. Is the wilderness critical to the function of the larger ecosystem outside the wilderness, and is its unnatural condition a threat to the integrity of the larger landscape?
3. Are there especially rare or valued elements within the wilderness that are at risk without intervention?

An example of wilderness that meets the first condition might be the 1.3 million acre Marjorie Stoneman Douglas Wilderness. Without the massive restoration of hydrology being implemented in and around Everglades National Park, this large ecosystem can be expected to continue its downward trend. Another possible example might be action taken to control weed invasions in the 2.2 million acre Frank Church-River of No Return Wilderness in Idaho. Much of the lowland country surrounding "the Frank" is highly degraded by weeds, and many people would view it as a tragedy if such degradation spread to the wilderness. Taking action there may be necessary to protect a vast ecosystem. At 7,880 acres, the Mount Trumbull Wilderness would not qualify as a landscape ecosystem by itself and, instead, must be considered as a part of the larger surrounding area.

The second question refers to wilderness areas that are so degraded or so important that their degradation is a threat to a larger ecosystem. An example might be an abandoned mine that is poisoning an entire downstream ecosystem. There, reclamation and restoration may be justified due to the magnitude of the threat. I have seen no evidence that Mount Trumbull meets this criterion either, as the risk of fire spreading into or out of the wilderness is minimal. Likewise, there is no evidence that the Mount Trumbull Wilderness *per se* is a critical resource for regional wildlife in the context of the larger ecosystem.

The third question, regarding rarity or significance, would seem to be the most relevant to the Mount Trumbull Wilderness. As mentioned, ponderosa pine old growth is rare wherever it occurs, and uncut stands even more so. There is anecdotal evidence of the significance of the old growth in the wilderness, but we have seen no hard evidence

Scoping Comments

July 31, 2002

Page 3

of that quality in terms of density of large trees, etc., in comparison with the rest of the Mount Trumbull area or the North Rim. The wilderness plan acknowledges the high visual quality of the Mount Trumbull Wilderness in contrast to Mount Logan, but it does not examine the rest of the landscape. Thus, it is not perfectly clear just how special a resource is the ponderosa pine old growth of the Mount Trumbull Wilderness.

Even if the Mount Trumbull Wilderness passes the rarity/significance screen, I believe there is at least one other question that must be answered affirmatively before intervention should be considered: "Is the wilderness on a clear trajectory of degradation that will not reverse itself without human action?" Many areas have been admitted to the National Wilderness Preservation System in a degraded or unnatural condition, but as long as they appear to be returning to more natural conditions, most managers seem comfortable leaving them to their own devices.

We have seen in the Mount Logan area a far more degraded state in a ponderosa pine ecosystem, but it is getting better. Before we "trammel" the wilderness of Mount Trumbull, we need to be sure that conditions are on a deteriorating course that will get worse without our help.

Researchers have presented compelling evidence that forest structure is far denser today than it was 120 years ago, but the research has not addressed the question of a trajectory. There has been no specific evidence that tree density is continuing to increase, nor any evidence that fire danger continues to increase. While some people's personal experiences have suggested that the big, old trees in the wilderness are dying at an accelerating rate, there has been no research results supporting that contention.

In fact, anecdotal evidence suggests the opposite. The most recent (1989) large fires to have burned in the Mount Trumbull Wilderness certainly blew up in places, but they also burned desirably across the forest floor, killing small pines. Such behavior suggests that a lightning fire might not have the catastrophic consequences that some assume it will have. In addition, the Mount Trumbull Wilderness is believed to be one of the least weed-infested and most intact native plant communities in the region, suggesting that whatever is (or is not) going on in there now has some beneficial effects on the ecosystem. In summary, even if one accepts that the old-growth ponderosa pine forest of the Mount Trumbull Wilderness is rare and worthy of protection through intervention, the trajectory of increased threat to the ecosystem without intervention has not been demonstrated.

Prior to the establishment of the monument, the question at Mount Trumbull might have been confined to "What should we do with this wilderness area?" The question now, though, must be "How should we manage the Mount Trumbull Wilderness as a part of the larger object of scientific interest, the ponderosa pine ecosystem in the Mount Trumbull area?" In this context, the role of the Mount Trumbull Wilderness as a scientific "control" or comparison assumes a much higher value.

Scoping Comments

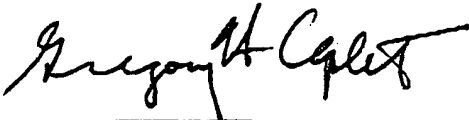
July 31, 2002


Page 4

The Wilderness Society holds as a core value that the "freedom from human control," and the humility it represents, is an essential quality of wilderness that cannot be tossed aside in the interest of maintaining naturalness. At the same time, we are not willing to stand idly by and watch the natural quality of the National Wilderness Preservation System degrade through neglect. However, the importance of maintaining "the freedom of the wilderness" demands a high burden of proof from those who seek to intervene on behalf of naturalness. The plan for the Grand Canyon-Parashant National Monument should include a strategy for ensuring the health of the entire ponderosa pine forest of the Mt. Trumbull area. That plan should be based on a thorough assessment of conditions and trends at the stand and landscape scales -- and it must respect the freedom of the wilderness.

Thank you for considering these comments.

Sincerely,




Forest Ecologist and Director,
Center for Landscape Analysis

Dear Roger,

Thank you for the opportunity to present comments to be considered as you prepare the management plan for the Grand Canyon-Parashant National Monument. On behalf of The Wilderness Society, I will be addressing issues regarding the old-growth ponderosa pine ecosystems overall and specifically as they occur in the Mount Trumbull Wilderness. Many of these issues have been raised before in other contexts, but The Wilderness Society wishes to raise them in the context of monument planning.

The proclamation establishing this Monument recognized the ponderosa pine ecosystem of the entire Mount Trumbull area as an object of scientific interest, thus requiring protection of the entire ecosystem. Approximately one-third of the 14-17,000 acres of ponderosa pine forest in the area still supports large, old trees, but the quality of the larger landscape does not appear to have been formally evaluated. Before plans are made for the future of the Monument's ponderosa pine, a thorough assessment of its restoration potential should be conducted.

The Wilderness Society shares the widening sentiment that old-growth forests of all types, but especially ponderosa pine, should be protected and that their logging should cease immediately. In the interest of protecting these forests, we support activities aimed at restoring ecosystem composition, structure, and function, including the cutting of small diameter trees when necessary. Furthermore, while we have no formal policy opposing restoration in wilderness, we do place a high burden of proof on those who would propose such activities.

There are two threshold questions that must be answered before intervention should be undertaken in wilderness. The first is: ☐ Is intervention appropriate in this case? ☐ If the first is answered affirmatively, the follow-up question regarding ☐ minimum requirement ☐ is: ☐ What intervention is appropriate in this case? ☐ Usually, the first threshold can be quickly rejected by the application of a procedural screen: ☐ Has a wilderness management plan been approved, and if appropriate, has a wilderness fire plan been approved? ☐ Very often the answer to either of these is ☐ no, ☐ and intervention is clearly inappropriate.

In order to address the first question, another set of questions must be asked that evaluate context. They examine the role of the wilderness in the larger system.

1. Is the wilderness itself a large landscape ecosystem that is on a clear trajectory of degradation that will continue without human intervention?
2. Is the wilderness critical to the function of the larger ecosystem outside the wilderness, and is its unnatural condition a threat to the integrity of the larger landscape?
3. Are there especially rare or valued elements within the wilderness that are at risk without intervention?

An example of wilderness that meets the first condition might be the 1.3 million acre Marjorie Stoneman Douglas Wilderness. Without the massive restoration of hydrology being implemented in and around Everglades National Park, this large ecosystem can be expected to continue its downward trend. Another possible example might be action taken to control weed invasions in the 2.2 million acre Frank Church-River of No Return Wilderness in Idaho. Much of the lowland country surrounding the Frank is highly degraded by weeds, and many people would view it as a tragedy if such degradation spread to the wilderness. Taking action there may be necessary to protect a vast ecosystem. At 7,880 acres, the Mount Trumbull Wilderness would not qualify as a landscape ecosystem by itself and, instead, must be considered as a part of the larger surrounding area.

The second question refers to wilderness areas that are so degraded or so important that their degradation is a threat to a larger ecosystem. An example might be an abandoned mine that is poisoning an entire downstream ecosystem. There, reclamation and restoration may be justified due to the magnitude of the threat. I have seen no evidence that Mount Trumbull meets this criterion either, as the risk of fire spreading into or out of the wilderness is minimal. Likewise, there is no evidence that the Mount Trumbull Wilderness *per se* is a critical resource for regional wildlife in the context of the larger ecosystem.

The third question, regarding rarity or significance, would seem to be the most relevant to the Mount Trumbull Wilderness. As mentioned, ponderosa pine old growth is rare wherever it occurs, and uncut stands even more so. There is anecdotal evidence of the significance of the old growth in the wilderness, but we have seen no hard evidence of that quality in terms of density of large trees, etc., in comparison with the rest of the Mount Trumbull area or the North Rim. The wilderness plan acknowledges the high visual quality of the Mount Trumbull Wilderness in contrast to Mount Logan, but it does not examine the rest of the landscape. Thus, it is not perfectly clear just how special a resource is the ponderosa pine old growth of the Mount Trumbull Wilderness.

Even if the Mount Trumbull Wilderness passes the rarity/significance screen, I believe there is at least one other question that must be answered affirmatively before intervention should be considered: Is the wilderness on a clear trajectory of degradation that will not reverse itself without human action? Many areas have been admitted to the National Wilderness Preservation System in a degraded or unnatural condition, but as long as they appear to be returning to more natural conditions, most managers seem comfortable leaving them to their own devices.

We have seen in the Mount Logan area a far more degraded state in a ponderosa pine ecosystem, but it is getting better. Before we trammel the wilderness of Mount Trumbull, we need to be sure that conditions are on a deteriorating course that will get worse without our help.

Researchers have presented compelling evidence that forest structure is far denser today than it was 120 years ago, but the research has not addressed the question of a trajectory. There has been no specific evidence that tree density is continuing to increase, nor any evidence that fire danger continues to increase. While some people's personal experiences have suggested that the big, old trees in the wilderness are dying at an accelerating rate, there has been no research

results supporting that contention.

In fact, anecdotal evidence suggests the opposite. The most recent (1989) large fires to have burned in the Mount Trumbull Wilderness certainly blew up in places, but they also burned desirably across the forest floor, killing small pines. Such behavior suggests that a lightning fire might not have the catastrophic consequences that some assume it will have. In addition, the Mount Trumbull Wilderness is believed to be one of the least weed-infested and most intact native plant communities in the region, suggesting that whatever is (or is not) going on in there now has some beneficial effects on the ecosystem. In summary, even if one accepts that the old-growth ponderosa pine forest of the Mount Trumbull Wilderness is rare and worthy of protection through intervention, the trajectory of increased threat to the ecosystem without intervention has not been demonstrated.

Prior to the establishment of the monument, the question at Mount Trumbull might have been confined to □What should we do with this wilderness area?□ The question now, though, must be □How should we manage the Mount Trumbull Wilderness as a part of the larger object of scientific interest, the ponderosa pine ecosystem in the Mount Trumbull *area*?□ In this context, the role of the Mount Trumbull Wilderness as a scientific □control□ or comparison assumes a much higher value.

The Wilderness Society holds as a core value that the □freedom from human control,□ and the humility it represents, is an essential quality of wilderness that cannot be tossed aside in the interest of maintaining naturalness. At the same time, we are not willing to stand idly by and watch the natural quality of the National Wilderness Preservation System degrade through neglect. However, the importance of maintaining □the freedom of the wilderness□ demands a high burden of proof from those who seek to intervene on behalf of naturalness. The plan for the Grand Canyon-Parashant National Monument should include a strategy for ensuring the health of the entire ponderosa pine forest of the Mt. Trumbull area. That plan should be based on a thorough assessment of conditions and trends at the stand and landscape scales -- and it must respect the freedom of the wilderness.

Thank you for considering these comments.

Sincerely,

██████████, Ph.D.
Forest Ecologist and Director,
Center for Landscape Analysis

██████████, Ph.D.
Forest Ecologist and Director,
Center for Landscape Analysis
The Wilderness Society
7475 Dakin St., Suite 410

[REDACTED]
[REDACTED]
(887) 666-5512



[REDACTED]
<greg_aplet@twc.org>
>

To: arizona_strip@blm.gov
cc:
Subject: Scoping on the Grand Canyon-Parashant Plan


07/31/2002 05:50 PM

July 31, 2002

Submitted by e-mail and facsimile

Mr. Roger Taylor
District Manager, Arizona Strip
Bureau of Land Management
345 E. Riverside Dr.
St. George, UT 84790

Re: Scoping Comments for the Grand Canyon-
Parashant National Monument Management Plan


July 30, 2002

Ms. Diana Hawks
BLM, Arizona Strip Field Office
345 E. Riverside Dr.
St. George, UT 84790

Dear Ms. Hawks,

Please accept the following comments regarding the planning process for the Arizona Strip. Please also put my name on your mailing list for this process.

I've lived in Arizona since 1958 and in Flagstaff since 1985. My main interest in the area that comprises the new Grand Canyon-Parashant National Monument is its great (although rare) opportunity to hunt truly record class mule deer. I was fortunate enough to draw a permit from the Arizona Game and Fish Dept to hunt deer there in 1994. I will forgo other deer hunting opportunities through the Az. Draw system for deer hunting until I am awarded another permit. That could be many years. Its less than a 3% chance of being drawn in any one year. I am now 55 years old and don't know how old I will be when I am drawn. No matter what age I am then, I can not walk the distances I could when I was in my twenties. That means that taking advantage of an opportunity to hunt Unit 13B again will depend on the ability to access remote areas by motorized vehicle, in particular, a 4x4 such as my old 1967 International Scout. This access is required both to hunt and also to get reasonably close to a downed deer to bring it out.

Hunters my age often depend on a good network of what we call "2-track" roads that are passable only in a good 4x4 to access remote areas. Most such roads were never planned. They developed by use. Maybe from woodcutters, maybe from miners, maybe from ranchers, who knows. They are frequently not maintained. They are infrequently traveled, especially in remote areas like the Strip. That is what we want and need for our enjoyment of these areas.

I find that more and more, these roads are being closed at the behest of preservationists. Once they are closed, they claim the areas are roadless. They then want them designated as Wilderness. There are already LOTS of wilderness areas in AZ, including in the new Monument. Please, leave some remote areas for those of us too old to walk to pursue our recreation.

While I will not visit the Monument often the way the draw odd are, I look forward to hunting trophy deer there again around areas like Snap Point, Mt. Dellenbaugh, Grassy and Poverty Mountains and being able to access these areas on rarely used "2-track" roads.

Please do not invoke any rules that prohibit travel except on a designated set of roads. Nobody can predict where that big buck will be in advance. Travel by motorized vehicle should be permitted on any roads (ways?) that show evidence of prior use. Off road travel should be generally discouraged, but as in AZ statute, should be allowed for retrieval of legally taken big game.

In general, my comments also apply to the area of the Vermillion Cliffs Monument.

Thanks for your consideration.

Sincerely,

Bruce H. Johnson (not signed since it was sent directly from my computer via fax)

F A X

.....
.
- (Dr. Diet Mountain Dew) -
.
.
.
.
.
.
.
.
.
.

To: Diana Hawks

Company:

Fax number: +1 (435) 6883388

Business phone:

From: Bruce H. Johnson

Fax number: +1 (520) 5265208

Business phone:

Home phone:

Date & Time: 07/31/2002 3:21:25 PM

Pages: 2

Re: Grand Canyon Parashant/Vermillion Cliffs Monument Comments

Please accept my comments on the planning for the new Monuments.

Diana Hawks
Bureau of Land Management,
Arizona Strip Field Office
345 E. Riverside Drive
St. George, UT 84790

08-01-2002 0905

July 31, 2002

Dear Ms. Hawks:

These are the comments of the Flagstaff Activist Network concerning management plans for Grand Canyon-Parashant and Vermilion Cliffs National Monuments. We support strong protection for the monuments' remote character, and ecological, geological, scientific and cultural resources. The proclamations designating the monument place top priority on protection of these objects. We urge you to draft plans consistent with these priorities; this will include addressing impacts from roads, off-road vehicle use and grazing and implementing ecological restoration where degradation has occurred.

Roads:

To protect archeological and ecological resources it will be necessary to designate a transportation network limited to the minimum roads necessary for reasonable access and to close unnecessary routes and those that impact wildlife, archaeological resources and other monument objects. Toroweap Road should remain unpaved.

Wildlands and Wildlife

Inventory and protect lands qualifying for wilderness designation; protect and restore springs and seeps, critical wildlife water sources; assess and mitigate negative grazing impacts on grassland animals and desert tortoise habitat; protect and restore native fish populations impacted by dams and non-native species.

Cultural resources

Pot hunters and off-road vehicle use threaten archaeological resources. These objects should be protected by road closures, regulated access and designation of a minimum transportation network.

Remoteness and wilderness characteristics.

The monuments are spectacular in their remote and undeveloped character. We ask that you protect this character and inventory and protect lands that qualify for wilderness designation. Visitor services should not be developed within the monuments and recreational use should be limited as necessary to protect the character and integrity of the monuments.

Seeps and Springs

The region's seeps and springs are essential for wildlife and provide important biological hot spots. We ask you to prioritize their protection and implement restoration where degradation has occurred.

Grazing

Adverse impacts from grazing to soils, native plant communities, cryptobiotic soil crusts and wildlife species such as pronghorn, mule deer, desert tortoise and bighorn sheep are well documented. The BLM is not mandated to place retention of grazing in the monuments higher than protection of the objects. We urge rigorous evaluation of all existing allotments and AMPs under existing regulations (43 CFR 4180) and the Standards and Guidelines for Rangeland Health and implementation of changes in grazing practices as necessary to protect the objects.

Native Plant Species

We urge protection and restoration of all native species in natural patterns of abundance and distribution. The Arizona Strip has experienced significant exotic species invasions and altered biotic communities. Grazing, roads, off-road vehicle use and seeding with non-native species exacerbate these problems. Native species should be used in all restoration programs.

Thank you for your consideration of these comments.

[REDACTED], Executive Director

[REDACTED]
flagact@infomagic.net
[REDACTED]
[REDACTED]



08-01-2002 0806

The Wilderness Society
1615 M Street NW
Washington, DC 20036
Main: (202) 833-2300
Fax: (202) 429-3945

FAX COVER SHEET

DATE 7/31/2002 TIME 6:30 PM
EST

Deliver to:

NAME Roger Taylor
FAX # 435 688 3388

Total number of pages (including cover sheet): 24

SENDER [REDACTED]

MESSAGE:

Scoping Comments Re:
AZ Strip Planning -
67 FR 20155-20157 (4/24/02)

Supplementary Scoping Comments of The Wilderness Society

THE WILDERNESS SOCIETY

*******Via Fax and Certified Mail*******

July 31, 2002

Roger Taylor
Bureau of Land Management
Arizona Strip Field Office
United States Department of the Interior
345 E. Riverside Drive
St. George, Utah 84790

Re: Notice of Intent to Prepare an Environmental Impact Statement and to develop or revise Resource Management Plans for the Grand Canyon-Parashant National Monument, Vermilion Cliffs National Monument, and non-monument BLM lands on the Arizona Strip.

Dear Mr. Taylor:

The Wilderness Society (TWS) and its 200,000 members thank you for the opportunity to contribute to the resource management planning process for key units of the National Landscape Conservation System, the Grand Canyon-Parashant and Vermilion Cliffs National Monuments, as well as non-National Monument BLM public lands on the Arizona Strip. Please accept these scoping comments as a supplement to our other correspondence, including our detailed letter regarding transportation planning and the scoping comments submitted jointly with several of our partner organizations. We present the following comments to clearly identify the issues and approaches we feel the BLM must take during the planning process.

We emphasize that the resource management planning processes underway in the Arizona Strip will have a profound impact on the management of these spectacular and irreplaceable lands for generations, long past the point where they are replaced by a new generation of plans. This should underscore the importance of getting the planning process done right from the start – a process that should ensure the health and integrity of these lands for present and future generations of Americans consistent with Proclamations 7265 and 7374 and other applicable laws and policies.

*Supplementary Scoping Comments of The Wilderness Society***I. GENERAL RECOMMENDATIONS****1. THE BLM MUST CONDUCT ALL PLANNING AND DECISION-MAKING IN ACCORD WITH THE PROTECTIVE PURPOSES OF THE NATIONAL MONUMENT AND MANAGE SECONDARY PURPOSES ACCORDINGLY.**

National Monuments are “protective” units meaning that their primary purpose is not use for commercial development, recreation or use, but rather to protect and prioritize management of the “objects of interest” articulated in Proclamations 7265 and 7374 for the whole American public. Other uses are not necessarily prohibited, but are allowed only to the extent compatible with the protective purpose of the National Monument.

The BLM manages the public lands – including National Monuments – through a broad management framework grounded in the Federal Land Policy and Management Act of 1976 (“FLPMA”). FLPMA’s roots in conservation run strong and deep, though often unseen and thus mistakenly ignored. In its declaration of policies, 43 U.S.C. § 1701(a)(8), FLPMA directs that:

the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; that where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use.

The resources and values that FLPMA directs the BLM to protect – scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological – are all included within the Grand Canyon-Parashant and Vermilion Cliffs National Monuments. Moreover, protection of the remote and undeveloped character of the National Monument landscape is wholly consistent with the BLM’s mandate to “preserve and protect certain public lands in their natural condition.”

The same is true in terms of FLPMA’s primary management philosophy, multiple use and sustained yield. In general, multiple use and sustained yield provide a considerable amount of discretion to the BLM to allocate uses and manage resources on the public lands. Importantly, this discretion is not unbounded. Multiple use and sustained yield do not provide for a “free-for-all” or “anything goes” management philosophy on the public lands and do not automatically dictate energy development, high-impact off-road vehicle use, or livestock grazing. Multiple use and sustained yield are completely compatible with *preservation* of National Monument resources. Instead of supplanting multiple use and sustained yield management, the National Monument designation *intensifies* the BLM’s preservation oriented duties and substantially *limits* the BLM’s discretion to authorize environmentally adverse activities, unequivocally outlining what resources and values (i.e., objects of interest) must be protected and given management priority. This

reinforces the base level of protection under the Antiquities Act that prohibits actions that conflict with Proclamations 7265 and 7374.

Understanding National Monuments as an element of the BLM's multiple use and sustained yield authority is important because the definition of multiple use (43 U.S.C. § 1702(c)) obligates the BLM to "prevent permanent impairment of the productivity of the land and the quality of the environment." This provision establishes a legal threshold – again, intensified in National Monuments – that the BLM cannot exceed. Notably, FLPMA does not allow the BLM to manage the public lands to the very brink of this threshold. FLPMA (43 U.S.C. § 1732(b)) states that the BLM must "take any action necessary to prevent unnecessary or undue degradation of the lands." An action could be deemed "unnecessary or undue" even if it does not cause "permanent impairment."

In terms of specific mechanics, we submit that ecological systems are dynamic and function within multiple scales in both time and space. Application of the prevention of permanent impairment provision should reflect this basic scientific principle. The BLM should link its activities, whether at the broad or narrow landscape level, to the ecological systems of the Arizona Strip, prioritizing the objects of interest articulated in Proclamations 7265 and 7374. Impairment can then be quantified by measuring the degree to which the Arizona Strip's ecological systems are impaired. If the impairment caused by the activity is permanent, it must be prohibited. The BLM holds an adequate – though underutilized – planning and decision-making tool to undergo such an analysis: NEPA's cumulative impact analysis (40 C.F.R. § 1508.7).

"Degradation" is the consequence of an impact that impairs, inhibits, degrades, or damages the structure, composition, or function of the landscape. The landscape includes both biological and ecological resources, such as wildlife and wildlife habitat, but also geologic resources, such as free-flowing rivers and waterways, and healthy, stable soils, and archeological and historic resources protected under, *inter alia*, the Antiquities Act of 1906 and National Historic Preservation Act of 1966.

An action could be deemed *unnecessary* if the BLM could avoid harm to the land or the environment, or if the BLM's actions are ill advised (e.g., the costs outweigh the benefits, the resources harmed are rare, or the action is not environmentally or economically sustainable).

An action could be deemed *undue* even where those impacts are considered *necessary* (e.g., unavoidable) to the proposed action. This type of situation could arise where the action permanently impairs the productivity of the land or quality of the environment (43 U.S.C. § 1702(c)). It could also arise where the action has an exceptionally high negative impact on other resources, or, similarly, where the action prevents the public from realizing other resource values (e.g., an authorization to allow widespread use of off-road vehicles could eliminate the opportunity for high-quality low-impact hiking or wildlife watching).

Supplementary Scoping Comments of The Wilderness Society

Fundamentally, in no way does multiple use and sustained yield dilute the BLM's protective duties in the Grand Canyon-Parashant and Vermilion Cliffs National Monuments – in fact, it does the exact opposite.

2. THE RESOURCE MANAGEMENT PLANS FOR THE NATIONAL MONUMENTS SHOULD ARTICULATE A VISION FOR THE LAND THAT PROTECTS THE SPECIAL, REMOTE, OPEN, AND UNDEVELOPED CHARACTER OF THE LANDSCAPE.

Articulating a vision – the purpose and significance of the public lands in question – is critical because it is the foundation upon which the BLM establishes more specific desired future conditions – the goals, standards, and objectives – that dictate how activities happen on the land. This vision should be designed consistent with the protective purposes of the National Monuments and the primacy given to the myriad objects articulated within Proclamations 7265 and 7374. In accord with these principles:

- ❑ The BLM must articulate unequivocal and enforceable desired future conditions – goals, standards, and objectives – consistent with the vision.
- ❑ The BLM must protect the structure, function, and composition of the ecological landscape by protecting the landscape's values and remote and undeveloped character of the landscape.
- ❑ The BLM must foster responsible and non-degrading scientific inquiry to enhance resource management and public education.
- ❑ The BLM must build community relationships to foster cooperative stewardship.

3. THE BLM MUST PROTECT AND MANAGE ALL BLM PUBLIC LANDS IN THE ARIZONA STRIP AS NATIONAL TREASURES FOR THE BENEFIT OF PRESENT AND FUTURE GENERATIONS OF ALL AMERICANS.

In 43 U.S.C. 1701(a)(1) of the Federal Land Policy and Management Act of 1976, Congress declares that the federal government will retain ownership of the public lands. Retention of the public lands in the national interest confirms that our public lands and the values and resources within them are a fundamental aspect of our national, not simply local, heritage. The BLM's responsibilities in managing the public lands are analogous to the responsibilities inherent in a legal trust. The trustee (the BLM) holds a fiduciary duty to manage the trust's assets (the public lands) for the benefit of all beneficiaries (current and future American publics). Retention – and its invocation of legal trust duties – is critical for nationally undervalued or underproduced nonmarket goods, services, and values (e.g., wilderness) as it justifies allocating public lands to provide or protect such goods, services, and values.

4. THE RESOURCE MANAGEMENT PLAN SHOULD INCORPORATE AN ENFORCEABLE ADAPTIVE ECOSYSTEM MANAGEMENT FRAMEWORK TO IMPLEMENT THE VISION

FOR EACH RESPECTIVE NATIONAL MONUMENT AND ENSURE THE PRIMACY OF THE NATIONAL MONUMENTS' PROTECTIVE PURPOSES.

Adaptive ecosystem management incorporates the BLM's traditional obligations to inventory, monitor, and evaluate the public lands and the activities conducted on the public lands. We emphasize that in designing such a framework, the BLM recognize that the amount of data necessary to justify a management action is linked to the potential intensity of the impacts of the action: the greater the intensity of the impacts, the higher the burden of proof on the BLM to authorize the action. Justified by NEPA, this management principle is too often ignored. The BLM traditionally imposes a *de facto* burden of proof on actions that shift management away from the status quo. This is troubling given the proportion of lands exposed to various forms of degradation from, *inter alia*, energy and minerals development, intensive, high-impact recreational use, and commercial livestock grazing. In the context of protective management units such as the Grand Canyon-Parashant and Vermilion Cliffs National Monuments, the burden of proof is always on the proponent of an action that could impair or degrade the protective values for which the management unit was dedicated.

We therefore encourage the BLM to improve its information management practices. All data should be identified in terms of its source, location, and time. Furthermore, the public should be afforded the opportunity to independently review and evaluate the data and its application in planning and decision-making. The BLM should disclose not only the results of a given analysis, but the underlying methodology and data management practices used. On a broader level, data collection and application practices should be formalized and standardized to allow for sophisticated and accurate aggregate understanding of the landscape and the impacts of management practices within the landscape. This can only enhance agency credibility and accountability.

The adaptive ecosystem management framework should ensure that information collection is scaleable and, ultimately, tied to understanding ecological systems encompassing or within BLM public lands. The focus of data collection should be on the impacts – whether adverse or beneficial – caused by particular activities and not the activity itself. The NEPA process – especially the cumulative impact analysis conducted for the umbrella Arizona Strip EIS (40 C.F.R. § 1508.7) – is therefore important as it can “glue” seemingly disparate decisions together to ensure that overall management conforms to the RMP. Actions with environmentally adverse or questionable impacts should be prohibited unless enforceable monitoring and evaluation programs with defined time frames are built into decisions and in fact implemented.

5. THE BLM MUST COMPLETE A RIGOROUS CUMULATIVE IMPACT ANALYSIS WITHIN THE UMBRELLA EIS FOR THE ARIZONA STRIP.

A cumulative impact is defined by the CEQ regulations implementing NEPA (40 C.F.R. § 1508.7) as:

Supplementary Scoping Comments of The Wilderness Society

the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

Cumulative impacts are extremely important to disclose as they account for the proposed action in the context of the broader landscape and the actions collectively taken on that landscape. Cumulative impacts, which can be either “additive” or “interactive,” are the result of “crowding” in both space and time and associated cause and effect relationships. Before the landscape can recover from the impact of a particular action, another action within the boundaries of the impact (whether in space or time) takes place. The impacts of the second action add on or interact with the impacts from the original action. The complexity of these impacts can be daunting, and the BLM must focus on meaningful environmental impacts to maintain a practical focus. Cumulative impacts – and for that matter, direct and indirect impacts – may last beyond the lifetime of the actual action or use. Cumulative impact analysis can determine what actions (e.g., mitigation, monitoring, etc.) are necessary to ensure the continued productivity and quality of the environment.

Solid, well-constructed cumulative impact analysis enhance the entire NEPA process (and, for that matter, *all* BLM planning and decision-making). Through cumulative impact analysis, the BLM can avoid or minimize adverse consequences that are otherwise undetected in the context of a single action at a single point in time. Cumulative impact analysis broadens the BLM’s perspective, establishing a link between individual activities and related activities within the same landscape. This provides a vehicle to gauge the total health and integrity of the landscape by focusing on resource sustainability and the relationships between integrated ecosystems and human communities. In so doing, the BLM can track whether both individual and cumulative activities conform to the RMP and to legal thresholds (*See Council on Environmental Quality, Cumulative Effects Analysis Under the National Environmental Policy Act* 49-50 (1997) (Discussing dual, complementary approaches to cumulative effects analysis involving the traditional impact assessment and more contemporary planning approaches)).

II. WILDERNESS QUALITY LANDS

1. THE BLM MUST INVENTORY AND STUDY ALL WILDERNESS QUALITY LANDS WITHIN THE ARIZONA STRIP.

Permanently protecting wilderness quality lands pursuant to the Wilderness Act of 1964 would ensure the protection of the Arizona Strip’s biodiversity, endemism, wildlife corridors, paleontology, archaeology, relict plant communities, natural quiet, and overall ecological health and integrity. Although it is Congress’ prerogative to designate

Wilderness, the BLM plays a key role in this process through inventories and studies of wilderness quality lands.

The BLM completed initial wilderness reviews pursuant to section 603 of FLPMA. This process, however, has run its course. Notably, the BLM holds a *continuing* obligation to inventory public lands for wilderness values and protect wilderness quality lands as Wilderness Study Areas (“WSAs”) to maintain Congress’ prerogative to designate such lands as Wilderness pursuant to the Wilderness Act of 1964. This obligation is derived from FLPMA, specifically sections 201(a) (43 U.S.C. § 1711(a)) and 202 (43 U.S.C. § 1712). Thus, simply because an area was released from wilderness study by Congress in the past does not exempt the BLM from inventorying such areas for wilderness qualities and protecting such lands accordingly, if appropriate (unless Congress *explicitly* prohibited the BLM from doing so). Ecological systems – and human use of such systems – are dynamic and change with time, changes that may in fact enhance the wilderness quality of those lands. We direct you to your policies as set forth in the updated Wilderness Inventory and Study Procedures Handbook (<http://www.blm.gov/nhp/efoia/wo/fy01/ib2001-043.html>).

2. THE BLM MUST CONDUCT WILDERNESS INVENTORIES AND STUDIES IN LIGHT OF INFORMATION SUBMITTED BY THE PUBLIC.

The BLM does not have to provide for public involvement in the section 201(a) *inventory* process as such inventories do not, by themselves, “change or prevent change of the management or use of public lands.” They do, however, have to provide for public involvement in the section 202 resource management *planning* process (P.L. 94-579, §§ 202(f), 309(e); 43 U.S.C. §§ 1712(f), 1739(e)). In its planning regulations, the BLM states that the public “shall be given an opportunity to suggest concerns, needs, and resource use, development and protection opportunities for consideration in the preparation of the resource management plan” (43 C.F.R. § 1610.4-1). This allows the public to identify wilderness as a management issue in the resource management planning process. The BLM must then consider updating its wilderness inventories and protecting wilderness quality areas as WSAs. The BLM can only reject the public’s suggestions if the agency has a reasoned and informed justification.

Even where the BLM is not in the midst of land use planning, public information is important. For example, in making the threshold determination whether the BLM needs to amend or revise its land use plans and update implementation decisions, the agency is motivated by new data or information. In its Land Use Planning Handbook, the BLM states that such data and information can include “[p]ublic comment” and “[i]nformation from the public or others regarding conditions or uses of resources on public lands” (*BLM Land Use Planning Handbook*, H-1601-1, VI(B)(4), (15)). Thus, the BLM, by its own guidance, cannot ignore compelling requests supported by maps, narratives, and photos to inventory and potentially protect wilderness quality lands.

*Supplementary Scoping Comments of The Wilderness Society***III. BIODIVERSITY MANAGEMENT****1. THE BLM SHOULD GIVE PRIMACY TO THE PROTECTION OF NATIVE BIODIVERSITY BY PROTECTING THE SPECIAL, REMOTE, OPEN, AND UNDEVELOPED CHARACTER OF THE ARIZONA STRIP.**

The protection of native biodiversity within the Arizona Strip is of intensifying concern. As populations expand, and use of the land continues, the viability of native populations and communities is threatened. We encourage the BLM to proactively use its management authority to protect all native biodiversity within the Arizona Strip. We encourage the BLM to do this through the protection of the remote and undeveloped character of the area – especially within the Grand Canyon-Parashant and Vermilion Cliffs National Monument. In part, we believe that the protection of wilderness quality lands operates as a key tool to protect native biodiversity and should be used accordingly.

We specifically note the intensification of vegetation management problems. Scientists who specialize in the field of vegetation management have repeatedly written about the importance of addressing the causes of vegetation problems. For example, Dr. Richard Mack (Washington State University) wrote "[e]ffective prevention and control of biotic invasions requires a long-term, large-scale strategy rather than a tactical approach focused on battling individual invaders. An underlying philosophy of such a strategy should be to establish why nonindigenous species are flourishing in a region and to address the underlying causes rather than simply destroying the currently most oppressive invaders." (Source: Mack, R.N. et al. 2000. Biotic invasions: Causes, epidemiology, global consequences, and control. *Ecological Applications* 10(3): 689-710). Note also that the fact that the BLM is currently developing a programmatic EIS for vegetation treatments only enhances the relevance and importance of our recommendations and by no means precludes the BLM from incorporating them at this time.

Consistent with these above principles, we recommend the following additional actions (separated into Wildlife, Vegetation Management, and Riparian Areas & Wetlands):

WILDLIFE MANAGEMENT

- ❑ BLM's goal should strive to achieve and maintain natural populations, population dynamics, and population distributions of wildlife.
- ❑ BLM should define the status and distribution of the wildlife species within the Arizona Strip using a variety of data resources in delineating wildlife populations and habitats before developing alternatives for each RMP.
- ❑ BLM should adopt management actions necessary to protect and preserve the biodiversity, integrity, and population viability of wildlife.
- ❑ BLM should preserve the integrity of wildlife corridors, migration routes, and access to key forage by limiting development.

Supplementary Scoping Comments of The Wilderness Society

- ❑ BLM should include visitor restrictions to prevent impacts to wildlife populations.
- ❑ BLM should reintroduce native species extirpated from the Arizona Strip.
- ❑ BLM should link biodiversity management to an adaptive ecosystem management framework established for each management unit.
- ❑ BLM should define what animal damage control activities will be permitted, and in what manner.

VEGETATION MANAGEMENT

- ❑ BLM's goal should be to manage for a natural range of native plant associations. Management activities should not be allowed to significantly shift the makeup of those associations, disrupt their normal population dynamics, or disrupt the normal progression of those associations.
- ❑ The BLM must analyze how to: (1) prevent conditions that have favored the introduction, establishment, and spread of invasive species and other vegetation problems; (2) restore conditions favoring native vegetation; and (3) reduce the need for continued direct control treatments of vegetation.
- ❑ BLM should outline the desired conditions of the vegetation types within the Arizona Strip.
- ❑ BLM should place a priority on the control of noxious weed species and prevent the introduction of new invasive species.
- ❑ As qualified by our other recommendations, the BLM must remedy invasive and exotic species vegetation management problems by considering all demonstrably effective vegetation treatments – including the prohibition or restriction of commercial and recreational Activities
- ❑ The use of machinery (e.g., roller chopping, chaining, plowing, discing) for vegetation manipulation should be carefully limited and should not be used where it will harm resources or objects.
- ❑ Chaining should not be allowed.
- ❑ Aerial chemical applications for vegetation management should be strictly limited.
- ❑ Native plants should be used in all restoration and revegetation projects.
- ❑ Vegetation manipulation should not be allowed for the purpose of increasing forage for cattle.

Supplementary Scoping Comments of The Wilderness Society

- BLM should outline the status and distribution of the vegetative communities within the national monument, and develop a plan to monitor vegetation to assess whether it is meeting desired conditions.

RIPARIAN AREAS & WETLANDS

- BLM should evaluate or re-evaluate all wetlands and riparian areas within the Arizona Strip to assess whether they are in properly functioning condition (PFC) and should take action to restore and protect PFC on all streams.
 - BLM should incorporate biotic and ecological indicators into its Riparian PFC assessments. Current PFC assessments are inadequate because they only cover physical (hydrology and soils) components of the system.
 - Trails and recreation facilities should not be placed in riparian areas.
- 2. BLM'S GOAL SHOULD BE TO ENSURE THE PROTECTION OF AND RECOVERY OF THREATENED AND ENDANGERED SPECIES, SPECIAL STATUS SPECIES, AND CRITICAL HABITAT WITHIN ARIZONA STRIP.**

The BLM has attempted to comply with the ultimate intent of the Endangered Species Act of 1973 ("ESA") to conserve the ecosystems that support endangered and threatened species (16 U.S.C. § 1531(b)) only haphazardly. The BLM must operate on a more proactive, aggressive footing to ensure that the ESA is complied with and our native biodiversity preserved for present and future generations. Consistent with the above goal:

- BLM should designate protected activity centers around known species.
 - BLM should manage visitation and use by limiting activities and closing certain areas to prevent impacts (i.e.: theft and disturbance) to sensitive species.
- 3. THE BLM MUST ENGAGE IN FORMAL SECTION 7 ENDANGERED SPECIES ACT CONSULTATION WITH THE FISH & WILDLIFE SERVICE .**

The development and implementation of RMPs requires the BLM to engage in section 7 Endangered Species Act ("ESA") consultation with the Fish and Wildlife Service ("FWS") (*Pacific Rivers Council v. Thomas*, 30 F.3d. 1050 (9th Cir. 1994)). Section 7 of the ESA directs the BLM to ensure that any action authorized, funded, or carried out by it is not likely "to jeopardize the continued existence of any endangered or threatened species or result in the destruction or adverse modification of habitat of such species" (the "jeopardy provision") (16 U.S.C. § 1536(a)(2)). Section 7 requires the BLM to consult with either NMFS or the FWS (depending on the species of concern) to ensure that an action does not violate the jeopardy provision (16 U.S.C. § 1536(a)(2)). Section 7 intends to not only protect endangered or threatened species, but also to encourage dialogue between federal agencies and the individual components of a given project. The driving force behind section 7 is the use of the best available scientific and commercial

Supplementary Scoping Comments of The Wilderness Society

data applied through an ecosystem approach to conservation (16 U.S.C. § 1536(a)(2) (Duty to use best available scientific and commercial data); 59 Fed. Reg. 34273-34274 (July 1, 1994) (use of ecosystem approach to species conservation)).

During the section 7 consultation process, section 7(d) of the ESA prohibits any “irreversible or irretrievable commitment of resources” that forecloses the “formulation or implementation of any reasonable and prudent alternative measures” that would not violate the jeopardy provision 16 U.S.C. § 1536(d). In other words, the BLM cannot take an action before the consultation process runs its course. This provision takes effect when the BLM determines that an action *may affect* a listed species. Consultation, depending on the situation, is either “informal” or “formal.” Generally, the BLM begins with the informal consultation process, using it to determine whether the more resource-intensive formal consultation process is necessary. Informal consultation determines if a listed species is present and whether a given action will have an adverse effect on the listed species. Formal consultation must be entered into – with the implication that the FWS completes a Biological Opinion – if there is a likelihood of adverse effects to any species protected under the ESA.

The section 7 consultation process is closely interrelated with section 9. Section 9 prohibits all persons (private and public) within the jurisdiction of the United States from “taking” a listed species (16 U.S.C. § 1538(a)). A take does not necessarily require a “dead body.” A take arises whenever the listed species is harassed, harmed, pursued, shot, wounded, killed, trapped, captured, or collected (16 U.S.C. § 1532(19)). Even an *attempt* at any of these actions constitutes a “take” (16 U.S.C. § 1532(19)). The BO issued under section 7 is usually issued in conjunction with an incidental take statement that analyzes the possibility that the proposed action will take a listed species.

Where the incidental take statement concludes that a take *will not* occur, the BO can provide “discretionary conservation recommendations” to ensure the protection of the listed species or its critical habitat (50 C.F.R. § 402.14(g)(6)). If the BO concludes that the BLM action *will* take a listed species, the FWS or NMFS specifies “reasonable and prudent measures ... necessary and appropriate to minimize” the impact (50 C.F.R. § 402.14(i)(1)(ii)). This generally accompanies a section 10 “incidental take permit” that allows the BLM to take a listed species only if the action “is incidental to, and not the purpose of, the carrying out of an otherwise lawful activity” (16 U.S.C. § 1539(a)(1)(B)). An incidental take by the BLM is only lawful where the action will not jeopardize the continued existence of the listed species (16 U.S.C. § 1536(b)(4)).

Given the significant and complex problems and issues facing the Arizona Strip, the BLM must enter into formal section 7 consultation with the FWS and identify a preferred management action only after the section 7 consultation process is complete. In this manner, the BLM can ascertain not only the best course of action, but concurrently ensure that any further ESA obligations (e.g., an incidental take permit) are fully satisfied.

Supplementary Scoping Comments of The Wilderness Society

IV. WATER & AIR QUALITY MANAGEMENT

1. THE BLM MUST PROTECT AND ADEQUATE QUANTITY AND QUALITY OF WATER FOR ARIZONA STRIP BLM PUBLIC LANDS.

Water is a vital resource of BLM public lands in the Arizona Strip. Proclamations 7265 and 7374 do not reserve – nor relinquish – water as a matter of federal law. However, this does not prevent the BLM from protecting both an adequate *quantity* and *quality* of water resources for the public lands – especially through protection and restoration of instream flows. This includes, where appropriate, the assertion of federally reserved water rights to satisfy the protective purposes of the Grand Canyon-Parashant and Vermilion Cliffs National Monuments.

As a general proposition, the BLM does not fully use its authority to proactively protect water resources. Instead, the BLM subordinates water resource *protection* to water resource *use* for other programs. In many instances, other statutory programs come into play, most notably the Clean Water Act and the Wild and Scenic Rivers Act. RMPs should focus these programs into a coherent set of objectives, standards, and decisions. Unfortunately, BLM intransigence and continued commitment to unrestrained resource programs, such as grazing and recreation, has not produced RMPs with focused, coherent water resource management programs. We strongly encourage the BLM to fully utilize its authority to protect water quantity and quality – including the protection and restoration of instream flows – within Arizona Strip BLM public lands – especially the National Monuments in light of their ultimately protective purposes. This includes a consideration of the role of commercial and recreational activities in impacting water quantity and quality and the development of management prescriptions to remedy water quantity and quality problems in the present and future.

In addition, we recommend the following:

- ☐ Water developments only are allowed where it is the only method to protect resources.
- ☐ Water developments/diversions not be allowed to dewater springs or streams.
- ☐ Existing water developments and diversions are assessed for their impact on resources, and BLM should consider removing them where they are causing harm.
- ☐ Water developments not be allowed for the purpose of increasing livestock numbers.

2. THE BLM MUST PROACTIVELY AND AGGRESSIVELY COMPLY WITH THE POLICIES, PLANS, AND PROGRAMS OF THE CLEAN WATER ACT AND DISCLOSE THE CONTENT AND PROCEDURES OF HOW IT INTENDS TO COMPLY WITH THE CLEAN WATER ACT THROUGH THE RMPs DEVELOPED FOR THE ARIZONA STRIP.

Supplementary Scoping Comments of The Wilderness Society

The Clean Water Act (“CWA”) (33 U.S.C. §§ 1251-1387) is a comprehensive congressional attempt to “restore and maintain the chemical, physical, and biological integrity of the Nation’s waters” (33 U.S.C. § 1251(a)). Initially passed in 1972, the CWA regulates both pollutant *emissions* into waters of the United States and human-made or human-induced *alterations* of the chemical, physical, biological, and radiological integrity of the waters of the United States (pollution). The CWA does this by focusing on both “point” and “nonpoint” sources of pollution through a complicated, evolving mix of programs managed by the States with considerable oversight by the federal EPA.

As per 43 U.S.C. § 1712(c)(8) of FLPMA, the BLM must comply with applicable pollution control laws, standards, and implementation plans. In the context of water resources management, the BLM traditionally has significant problems fully and faithfully complying with the CWA. These include lax implementation and enforcement, a failure to disclose CWA compliance methods and practices, and unclear interactions between the BLM, other agencies, most notably the Environmental Protection Agency and appropriate State governments of Utah, and the public. We strongly encourage the BLM to take a serious look at its obligations to comply with the plans, policies, and programs of the CWA and establish and implement a model water quality management program in the Arizona Strip – a program that details the BLM’s responsibilities so that the public can ensure that the agency is living up to its obligations.

3. THE BLM MUST PROACTIVELY AND AGGRESSIVELY COMPLY WITH THE POLICIES, PLANS, AND PROGRAMS OF THE CLEAN AIR ACT AND DISCLOSE THE CONTENT AND PROCEDURES OF HOW IT INTENDS TO COMPLY WITH THE CLEAN AIR ACT THROUGH THE RMPs DEVELOPED FOR THE ARIZONA STRIP.

FLPMA directs the BLM to “protect the quality of ... ecological, environmental, [and] air and atmospheric ... values” (43 U.S.C. § 1701(a)(8)). In implementing this mandate, the BLM relies primarily on the plans, programs, and policies of the Clean Air Act (“CAA”) to regulate air quality over the National Monument. We request that the BLM classify the National Monuments within the Arizona Strip as Prevention of Significant Deterioration (“PSD”) Class I areas and ensure that all activities within the Arizona Strip do not negatively impact the air quality of nearby and adjacent PSD areas.

IV. LIVESTOCK GRAZING

1. THE BLM MUST ANALYZE THE IMPACTS OF LIVESTOCK GRAZING WITHIN THE ARIZONA STRIP RELATIVE TO THE PROTECTIVE PURPOSES OF THE GRAND CANYON-PARASHANT AND VERMILION CLIFFS NATIONAL MONUMENTS .

Grazing has a significant impact on BLM public lands in the Arizona Strip. The BLM authorizes livestock grazing through the issuance of permits and leases. Such permits and leases are issued under the authority granted to the BLM by the Taylor Grazing Act of 1934, FLPMA, and the Public Rangelands Improvement Act of 1978. Permits and leases do not give ranchers a property right in the public lands, a principle repeatedly

Supplementary Scoping Comments of The Wilderness Society

upheld by the federal courts, including the Supreme Court of the United States; rather, they give ranchers a privilege to use the public lands consistent with applicable laws. In this regard, grazing use is not unbounded, but limited by the mix of laws on the public lands, including the Endangered Species Act, the Clean Water Act, and the aforementioned laws that not only authorize, but also restrict, grazing.

Proclamations 7265 and 7374 do not affect grazing use. However, this does not obviate the BLM's obligation to analyze the impacts of livestock grazing and ensure that such use is compatible with the protective purposes of the Grand Canyon-Parashant and Vermilion Cliffs National Monuments. This is consistent with the BLM's obligation pursuant to 43 U.S.C. § 315 of the Taylor Grazing Act of 1934 to identify the public lands "*chiefly* valuable for grazing and raising forage crops" in order to "promote the *highest* use of the public lands."

2. THE BLM MUST ENSURE THAT THE FUNDAMENTALS OF RANGELAND HEALTH AND ARIZONA BLM'S STANDARDS AND GUIDELINES ARE FULLY ACHIEVED.

We are concerned that BLM management of livestock grazing has stagnated and that the BLM is not taking the necessary actions to ensure that the BLM's commitment to achieving the Fundamentals of Rangeland Health set out in 43 C.F.R. § 4180.1 and Arizona BLM's specific Standards and Guidelines. To ensure consistency across the affected lands, the BLM must clearly articulate within the RMPs for the Arizona Strip how implementation level planning and decision-making will occur and explain (with sufficient justification) how those actions will ensure compliance with the Fundamentals of Rangeland Health and Arizona BLM's Standards and Guidelines.

3. BLM SHOULD ADDRESS HOW IT WILL HANDLE BUY-OUT OF GRAZING PERMITS BY CONSERVATION ORGANIZATIONS. BLM SHOULD IDENTIFY HOW IT WILL RETIRE SUCH PERMITS THROUGH THE PLANNING PROCESS.

**V. TRANSPORTATION AND MOTORIZED AND
MECHANIZED VEHICLE USE**

We previously submitted a letter articulating our positions concerning travel system planning in the Grand Canyon-Parashant and Vermilion Cliffs National Monuments. We have attached a position paper outlining those positions (See ATTACHMENT). We also have several other, more specific recommendations applicable both the National Monuments and, in several instances, the Arizona Strip. We recommend that:

1. THE BLM ESTABLISH A TRAVEL SYSTEM FOR THE ARIZONA STRIP THAT RETAINS THE MINIMUM AMOUNT OF ROUTES NECESSARY TO PROVIDE FOR REASONABLE ACCESS TO PUBLIC LANDS WITHIN THE ARIZONA STRIP. EXTRANEOUS, LITTLE USED, UNAUTHORIZED, AND UNJUSTIFIED ROUTES SHOULD BE CLOSED WITHIN A DEFINED TIME PERIOD THROUGH A DEFINED PROCESS.

Supplementary Scoping Comments of The Wilderness Society

2. **THE TRAVEL SYSTEMS FOR THE ARIZONA STRIP DIFFERENTIATE “ROADS” FROM “TRAILS” BY USING THE LEGAL DEFINITION OF “ROAD” AS DERIVED FROM THE DEFINITION OF “ROADLESS” IN THE LEGISLATIVE HISTORY OF FLPMA (H.R. REP. NO. 94-1163 AT 17 (1976)).**
3. **RECREATIONAL OFF-ROAD VEHICLE USE ON THE ARIZONA STRIP MUST BE AUTHORIZED ONLY AFTER THE BLM FULLY APPLIES THE OFF-ROAD VEHICLE DESIGNATION CRITERIA SET FORTH IN 43 C.F.R. § 8342.1.**
4. **BLM MUST USE ONLY THE “CLOSED” AND “LIMITED TO DESIGNATE ROADS” OFF-ROAD VEHICLE DESIGNATION CATEGORIES IN THE GRAND CANYON-PARASHANT AND VERMILION CLIFFS NATIONAL MONUMENTS AS SET FORTH IN 43 C.F.R. PART 8340.**
5. **THE BLM USE ONLY THE “CLOSED” AND “LIMITED TO DESIGNATED ROADS” OFF-ROAD VEHICLE DESIGNATION CATEGORIES FOR NON-NATIONAL MONUMENT LANDS IN THE ARIZONA STRIP AS SET FORTH IN 43 C.F.R. PART 8340.**
6. **THE BLM SPECIFY THE LOCATIONS, TERMS, AND CONDITIONS FOR ALL EMERGENCY AND AUTHORIZED ADMINISTRATIVE MOTORIZED AND MECHANIZED USE WITHIN THE ARIZONA STRIP AND ANALYZE THE IMPACTS – ESPECIALLY CUMULATIVE IMPACTS – OF SUCH USE WITHIN THE UMBRELLA EIS AND CLOSE ADMINISTRATIVE ROUTES ONCE THE ADMINISTRATIVE PURPOSE ENDS.**
7. **BLM NOT UPGRADE EXISTING ROUTES OR BUILD ANY NEW ROUTES.**
8. **BLM CONSIDER THE IMPACTS OF EXISTING ROADS IN ECOLOGICALLY SENSITIVE AREAS AND CONSIDER THEIR REMOVAL (OR RECONSTRUCTION WITH APPROPRIATE MITIGATION MEASURES).**
9. **BLM SHOULD NOT BUILD NEW PARKING AREAS OR TURNOUTS UNLESS THOSE AREAS HAVE ALREADY BEEN DISTURBED, TAKING INTO ACCOUNT NATURAL, CULTURAL AND SCENIC VALUES. IN GENERAL, WE ASSERT THAT PARKING AREAS SHOULD NOT BE BUILT.**
10. **BLM CLOSE AND RECLAIM INFORMAL (UNOFFICIAL OR UNDESIGNATED) PARKING AREAS.**
11. **LIMIT VEHICULAR SPEED.**
12. **AS PART OF MONITORING, BLM UNDERTAKE RELEVANT TRANSPORTATION STUDIES TO UNDERSTAND HOW INCREASED VISITATION IMPACTS NATURAL RESOURCES.**
13. **BLM ADDRESS THE NEED FOR SIGHTSEEING/RECREATION TURNOUTS.**

*Supplementary Scoping Comments of The Wilderness Society***14. BLM ENCOURAGE BICYCLE TRANSPORTATION OR WALKING INSTEAD OF VEHICLE USE WITHIN HIGH-USE AREAS.****VI. CULTURAL, GEOLOGIC, AND PALEONTOLOGIC RESOURCES**

The Arizona Strip contains a plethora of cultural, geologic, and paleontologic resources deserving of protection under a variety of laws and policies. In particular, Proclamations 7265 and 7374 contain numerous references to cultural, geologic, and paleontologic resources. The Arizona Strip should be managed through incorporation of our following recommended principles:

- 1. BLM'S GOAL SHOULD BE TO PROTECT CULTURAL, GEOLOGIC, AND PALEONTOLOGICAL RESOURCES.**
- 2. BLM SHOULD DETERMINE THE SITES OR AREAS THAT ARE MOST VULNERABLE TO CURRENT AND FUTURE IMPACT AND ADOPT MANAGEMENT ACTIONS NECESSARY TO PROTECT AND RESTORE THESE RESOURCES.**
- 3. BLM SHOULD OUTLINE SPECIFIC MANAGEMENT ACTIONS, SUCH AS STABILIZATION, FENCING, SIGNING, CLOSURES, OR INTERPRETATIVE DEVELOPMENT, TO PROTECT AND PRESERVE CULTURAL, GEOLOGIC, AND PALEONTOLOGICAL RESOURCES.**
- 4. BLM SHOULD ADOPT MEASURES TO PROTECT CULTURAL, GEOLOGIC, AND PALEONTOLOGY RESOURCES FROM ARTIFACT COLLECTORS, LOOTERS, THIEVES, AND VANDALS.**
- 5. BLM SHOULD ENGAGE THE NATIVE AMERICAN COMMUNITY TO DETERMINE WHETHER THERE ARE SITES OR SPECIFIC AREAS OF PARTICULAR CONCERN.**
- 6. BLM SHOULD DEFINE THE LEVEL OF INVENTORY NEEDED TO PROVIDE A BASIS FOR UNDERSTANDING THE DISTRIBUTION, COMPARATIVE IMPORTANCE, AND POTENTIAL USES OF CULTURAL, GEOLOGIC AND PALEONTOLOGICAL RESOURCES I.E., RELATIVE SENSITIVITY, RELATIVE OPPORTUNITIES FOR INTERPRETIVE DEVELOPMENT, RELATIVE SCIENTIFIC IMPORTANCE, RELATIVE POTENTIAL FOR RESEARCH AND EDUCATION.**

VII. GENERAL RECREATION/VISITATION

How the BLM manages visitation to the Arizona Strip – especially the Grand Canyon-Parashant and Vermilion Cliffs National Monuments – will have a profound impact on the future health and integrity of all BLM public lands in the area. We support visitation and recreational use of the Arizona Strip but emphasize that it is the remote and undeveloped character of the area that ascribes it with such special value. We encourage

Supplementary Scoping Comments of The Wilderness Society

the BLM to manage the area consistent with its inherent nature to preserve it for present and future generations. As such, we recommend that:

1. **BLM SPECIFICALLY IDENTIFY USES THAT WILL BE ACCEPTABLE/ALLOWABLE; E.G., HIKING MAY BE ALLOWED ONLY ON DESIGNATED TRAILS IN CERTAIN AREAS, BUT GROUPS GREATER THAN 25 MIGHT NOT BE ALLOWED AT ALL IN SOME AREAS.**
2. **BLM MANAGE OVERNIGHT CAMPING TO PREVENT IMPACTS TO RESOURCES. BLM SHOULD CONSIDER PROHIBITING CAMPING IN SENSITIVE AREAS OR LIMITING CAMPING TO DESIGNATED SITES.**
3. **ROCK CLIMBING NOT BE ALLOWED WHERE IT WOULD HARM ARCHEOLOGICAL, PALEONTOLOGICAL, BIOLOGICAL OR OTHER RESOURCES.**
4. **BLM PROHIBIT RECREATIONAL COLLECTING OF OBJECTS. BLM SHOULD LIMIT OR PROHIBIT COMPETITIVE EVENTS, ESPECIALLY IN THE NATIONAL MONUMENTS.**
5. **BLM LIMIT OR PROHIBIT THE PRODUCTION OF FEATURE FILMS.**
6. **BLM LOCATE VISITOR SERVICES, VISITOR CENTERS, AND OPERATIONAL FACILITIES OUTSIDE OF THE BLM PUBLIC LANDS IN LOCAL COMMUNITIES IN ORDER TO ENHANCE ECONOMIC OPPORTUNITIES.**
7. **BLM DESCRIBE IN DETAIL THE TYPE OF STRUCTURES THAT WILL BE ALLOWED AND THE TYPE THAT WILL NOT BE ALLOWED WITHIN THE BOUNDARIES AND WITHIN VARIOUS PARTS OF THE ARIZONA STRIP. THESE STRUCTURES SHOULD BE LIMITED TO MINOR VISITOR FACILITIES (SIGNS, FENCES, ETC.) NECESSARY FOR SAFETY OR RESOURCE PROTECTION.**
8. **BLM MAKE USE OF EXISTING INFRASTRUCTURE RATHER THAN DEVELOPING NEW FACILITIES.**
9. **BLM NOT ALLOW LODGES OR DEVELOPED CAMPGROUNDS TO BE BUILT IN THE ARIZONA STRIP. THESE FACILITIES SHOULD BE PRIVATELY OWNED IN THE LOCAL COMMUNITY.**
10. **BLM NOT ALLOW CONCESSIONS IN THE ARIZONA STRIP.**

VIII. STATE/PRIVATE PROPERTY AND PERMITTED USES

Reflecting a nation-wide problem, the Arizona Strip is fragmented amongst a variety of owners. The interplay between these owners – and the rights and responsibilities of each – has a significant effect on the health and integrity of the BLM public lands in the area. Clearly delineating these rights and responsibilities of the various property owners is thus critical. As such, we recommend that:

Supplementary Scoping Comments of The Wilderness Society

1. **BLM SPECIFY HOW IT PLANS TO ADDRESS ACCESS TO PRIVATE PROPERTY.**
2. **BLM IDENTIFY A STRATEGY FOR PURCHASING OR ACQUIRING INHOLDINGS WITHIN THE ARIZONA STRIP FROM WILLING SELLERS.**
3. **BLM SPECIFY HOW IT INTENDS TO HANDLE EXISTING PERMITS.**
4. **BLM SPECIFY HOW IT INTENDS TO HANDLE REQUESTS FOR NEW PERMITS.**
5. **BLM PROHIBIT NEW RIGHTS-OF-WAY IN THE GRAND CANYON-PARASHANT AND VERMILION CLIFFS NATIONAL MONUMENTS, EXCEPT THOSE PROVIDING REASONABLE AND NECESSARY ACCESS TO STATE/PRIVATE PROPERTY.**
6. **BLM ADDRESS HOW IT WILL HANDLE ENERGY LEASES AND MINING CLAIMS THAT WERE VALID AT THE TIME THE GRAND CANYON-PARASHANT AND VERMILION CLIFFS NATIONAL MONUMENTS WERE ESTABLISHED. BLM SHOULD PERFORM A VALIDITY EXAMINATION BEFORE CLAIMANTS CONDUCT SURFACE DISTURBING ACTIVITIES GREATER THAN CASUAL USE.**

VII. FIRE MANAGEMENT

Fire management is a controversial issue that should be dealt with through the application of the best available science to protect the public welfare and the health and integrity of the ecological landscape. We recommend that for the Arizona Strip:

1. **BLM DEVELOP A COMPREHENSIVE FIRE MANAGEMENT PROGRAM.**
2. **BLM IDENTIFY THE THREATS IMPOSED BY HAZARDOUS FUEL SITUATIONS.**
3. **BLM DEVELOP APPROPRIATE EMERGENCY FIRE REHABILITATION PROTOCOLS. SUCH PROTOCOLS MUST BE CONSISTENT WITH THE PROTECTION OF THE GRAND CANYON-PARASHANT AND VERMILION CLIFFS NATIONAL MONUMENT'S OBJECTS, RESOURCES, AND OBJECTIVES.**
4. **BLM DEFINE THE APPROPRIATE MANAGEMENT RESPONSE TO FIRES. SUCH RESPONSES MUST TAKE INTO ACCOUNT PROTECTION OF OBJECTS AND RESOURCES WITHIN THE GRAND CANYON-PARASHANT AND VERMILION CLIFFS NATIONAL MONUMENTS.**

*Supplementary Scoping Comments of The Wilderness Society***IX. CONCLUSION**

We again thank you for the opportunity to contribute to the development of the umbrella EIS and associated RMPs for the Arizona Strip, including the Grand Canyon-Parashant and Vermilion Cliffs National Monuments. If you have any questions, do not hesitate to contact us. Please place both of us on your mailing list for the Arizona Strip planning process and any future planning or decision-making processes involving the area.

Sincerely,



Erik Schlenker-Goodrich
Legal Fellow
Ecology and Economics Research Department
The Wilderness Society
1615 M Street NW
Washington, DC 20036
202.429.2643
eriksg@twc.org

On behalf of:
Pamela Pride Eaton
Regional Director
Four Corners Office
The Wilderness Society
7475 Dakin Street, Ste. 410
Denver, CO 80221

*Supplementary Scoping Comments of The Wilderness Society***ATTACHMENT****THE WILDERNESS SOCIETY****BUREAU OF LAND MANAGEMENT NATIONAL MONUMENT
TRANSPORTATION SYSTEM PLANNING¹****OVERVIEW**

The Wilderness Society and its 200,000 members are committed to the resource management planning processes for the spectacular and irreplaceable National Monuments managed by the Bureau of Land Management ("BLM"). This position paper outlines our concerns and suggestions involving one of the most critical aspects of the planning process: the creation of a coherent and legal transportation system.

**STARTING OUT RIGHT: CREATING AN APPROPRIATE FRAMEWORK FOR
TRANSPORTATION SYSTEM PLANNING**

A transportation system is important to allow for use and enjoyment of our National Monuments. However, to further the protective purposes of each National Monument, the BLM must establish a transportation system for use and enjoyment *only to the extent that such is necessary*. In large part, this makes use of the sufficient road networks currently in place and does not require the construction of new roads. In fact, we believe that there are many unnecessary roads that should be closed and reclaimed to protect the healthy, wild, and open landscapes of these precious lands.

Systematic travel planning is especially important given the burgeoning conflict involving off-road vehicles ("ORVs"). In nearly all National Monuments, the proclamation creating the National Monument states that motorized or mechanized vehicle use is prohibited "off-road" except for emergency or authorized administrative purposes.² Importantly, just because tire tracks or other user-created evidence is etched into the ground does not mean that such evidence is sufficient proof of a road. Our suggested framework accounts for the substantial controversy over what does or does not constitute a "road," providing a forum to effectively consider the interests of the National Monuments' varied stakeholders.

**ASSESSING NEEDS: THE GRAND STAIRCASE-ESCALANTE NATIONAL MONUMENT
MODEL**

¹ Authored by Erik Schlenker-Goodrich, Legal Fellow, The Wilderness Society.

² This includes Agua Fria, Canyons of the Ancients, Carrizo Plain, Cascade-Siskiyou, Craters of the Moon, Grand Canyon-Parashant, Ironwood Forest, Kasha-Katuwe Tent Rocks, Sonoran Desert, Upper Missouri River Breaks, and Vermilion Cliffs National Monuments. The Santa Rosa and San Jacinto Mountains National Monument permits motorized or mechanized vehicle use only on roads and trails designated for such use as part of the land use plan.

Supplementary Scoping Comments of The Wilderness Society

The model used by the BLM in the Grand Staircase Escalante National Monument represents an excellent template for all BLM National Monuments. In the Grand Staircase-Escalante, the BLM did not conduct a comprehensive inventory of every road, route, trail, and tire track ("travel ways") in the National Monument. Instead, the agency sought input from the public concerning access needs, combined that information with agency experience and insight, and identified a set of alternative transportation networks that were then evaluated during the resource management planning process in accordance with the National Environmental Policy Act of 1969 ("NEPA"). Travel ways that were not included in the transportation system were, by definition, closed and travel on them prohibited and illegal. Unresolved issues involving specific components of the transportation system were dealt with in the protest phase of the resource management planning process.

We are concerned that the BLM will ignore the precedent set in the Grand Staircase-Escalante and may instead complete an inventory of travel ways and release that inventory to the public. That approach is unnecessary, inadequate, and legally suspect. National Monuments require a transportation *system* – a collection of roads designed to further the protective purposes of the National Monument. To effectively participate in the resource management planning process, the public must be presented with a varied set of transportation systems that have gone through a thorough NEPA review. Merely presenting the public with an inventory of travel ways politicizes the public debate, dilutes the importance of science-based management, and undermines the integrity, credibility, and legality of the resource management planning process. It also legitimizes illegally created routes and/or tracks that could compromise National Monument resources.

The following sections expand upon our position and are consistent with the precedent established by the Grand Staircase-Escalante National Monument. First, we outline a set of general principles for management of the National Monument. Second, we suggest a series of mechanics for creating a transportation system for the National Monument. Third, we set forth the legal definition of "road." These sections establish an effective framework consistent with the BLM's legal duties that enhances the meaningfulness of public participation.

GENERAL PRINCIPLES

We first note that National Monuments are given unequivocal protective purposes for objects of scientific and historic interest articulated in the proclamations and protected by the Antiquities Act of 1906. Management of National Monuments must *further* these protective purposes, not merely be consistent with them. Invariably, the connections – especially the ecological and archeological connections – between these objects are of exceptional importance and every effort should be levied to protect and restore the integrity and health of the National Monuments' broader landscape. Furthermore, the exercise of the BLM's management duties should account for the protective purposes of the National Monuments. We suggest that the BLM use three general, overarching management principles:

1. The BLM must protect and restore the structure, function, and composition of the National Monument's landscape to further its protective purposes.
2. The BLM must give priority to the objects of scientific and historic interest in all planning and decision-making activities, including allocations of staff time and funding.

Supplementary Scoping Comments of The Wilderness Society

3. **The BLM can allow use of the National Monument only if such use does not interfere with the protection, restoration, and prioritization duties described above in (1) and (2).**

In this context, any action affecting the infrastructure within a National Monument is important because decisions to sanction, build, or maintain travel ways and to allow various uses of travel ways impose detrimental and long-lasting effects on the landscape that are rarely evaluated adequately, if at all. The spatial pattern of roads on the landscape – not simply the mileage – must be considered when agencies evaluate alternative management scenarios or decide which roads should be open for travel and which should not. This means that the location of a road relative to the objects of interest and other significant resources within a National Monument is likely as important as the length or width of the road itself. In this context, establishing baseline information is essential, but must be properly carried out in accordance with the protective purposes of the National Monument.

MECHANICS OF A PROPER & LEGAL NATIONAL MONUMENT INVENTORY

We believe that the BLM must *first* inventory the objects of historic and scientific interest and other relevant and consistent uses of the land and *then* – and only then – determine what and where roads are necessary through the planning process. Through this framework, the BLM can focus on ground-truthing (if required) *only those roads deemed necessary* for use and enjoyment of the National Monument to further the National Monument's protective purposes.

Subsequent to the inventory of National Monument resources, the BLM should present the public with a series of alternative transportation systems in the Draft Resource Management Plan ("DRMP") appropriately analyzed in the Draft Environmental Impact Statement ("DEIS") pursuant to NEPA. Within the DRMP and DEIS, the public should have access to credible and convincing evidence that satisfies *each* of the following criteria:

- (1) **A given transportation alternative must further the protective purposes of the National Monument and thus provide access to the minimum level necessary to accomplish such purposes;**
- (2) **Anything identified as a "road" in the draft plan must meet the legal definition of a road as set forth in FLPMA's legislative history (*see below*);**
- (3) **Each road must be justified and managed with the proper level of NEPA analysis (centered on the objects of scientific and historic interest) taking into account the spatial pattern of roads, not merely mileage;**
- (4) **Each road must be deemed in fact necessary for specified and defined uses of the National Monument; and**
- (5) **Reclamation procedures and standards must be incorporated to close roads and routes that are not justified, do not meet the definition of a road, or for which specified uses have been completed.**

This information must be available before the BLM can present the public with a transportation system alternative. If this information is unavailable, the BLM must *not* identify questionable "routes" on any map or data set except to the extent that the BLM needs such information to

Supplementary Scoping Comments of The Wilderness Society

restore and reclaim affected lands to better protect the National Monument's objects. Even in this situation, the information must be appropriately qualified and its use unequivocally articulated. Without adequate inventories of the National Monuments' objects of scientific and historic interest, we fail to see how the BLM can comply with its legal obligations.

THE LEGAL DEFINITION OF "ROAD"

An important facet of the above framework is the definition of what is or is not a "road." Even if the BLM appropriately prioritizes its inventory obligations, the BLM must still apply a legal definition of "road" within the planning process, develop appropriate criteria to accurately gauge what is or is not a road, ensure that illegal "ghost roads" are not legitimized, and, in fact, close and reclaim such "ghost roads." The legal definition of road for the BLM public lands is derived from the definition of "roadless" in the legislative history of FLPMA:

The word "roadless" refers to the absence of roads which have been improved and maintained by mechanical means to insure relatively regular and continuous use. A way maintained solely by the passage of vehicles does not constitute a road. (H.R. Rep. No. 94-1163 at 17 (1976)).³

Thus, tracks created by the repeated passage of vehicles, people, wildlife, or anything else, standing alone, do not constitute a road; mechanical improvement, whether by hand tools or power machinery, is necessary. In other words, "use" or "nonuse" of a given route is inadequate information to determine what is or is not a "road."

Again, an accurate and precise definition of road is necessary to meet the unequivocal obligations articulated by the proclamation, especially in the context of the prohibition against motorized and mechanized vehicle use "off-road." This prohibition *intensifies* the BLM's obligations to minimize impacts to resources from recreational ORV use (43 C.F.R. § 8342.1(a)-(d)).

CONCLUSION

The Wilderness Society believes that the methods and definitions outlined above present the best opportunity to protect the National Monuments, accommodate the varied needs of the public, ensure well-crafted, durable Resource Management Plans, and allocate funds in the most economical and ecologically sound manner possible. We look forward to the development of transportation systems that ensure the protection of the healthy, wild, and open landscapes of the National Monuments.

³ In the context of proposed wilderness areas, the Wilderness Society asserts that nothing in the Wilderness Act of 1964 precludes proposed wilderness from containing roads. Such roads must simply be removed once the area is designated as Wilderness.

08-01-2002 0807



Diana Hawks

08/01/2002 11:57 AM

To: Dori Ann Taylor/ASFO/AZ/BLM/DOI@BLM
cc:
Subject: AWC Wilderness Proposal Part I

----- Forwarded by Diana Hawks/ASFO/AZ/BLM/DOI on: 08/01/2002 11:59 AM -----



[REDACTED]
<kcrumbo@grand-canyon.az.us>

07/31/2002 04:44 PM

To: "Diana Hawks" <Diana_Hawks@blm.gov>
cc:
Subject: AWC Wilderness Proposal Part I

Diana,
Our wilderness proposal. Hard copy to follow.

[REDACTED]
Grand Canyon Wildlands Council

[REDACTED]
Grand Canyon, AZ 86023

[REDACTED]
<kcrumbo@grand-canyon.az.us>



- Wilderness Proposal Billy Goat East.doc



- Wilderness Proposal Lime Kiln Mtn.doc



- Wilderness Proposal Grand Wash Cliffs Addition.doc



- Wilderness Proposal Hidden Canyon.doc



- Wilderness Proposal Hidden Hills.doc



- Wilderness Proposal Hidden Rim.doc

WILDERNESS

Introduction

The Arizona Wilderness Coalition (AWC) presents this 900,000-acre conservationist's wilderness recommendation as part of the Bureau of Land Management's scoping process for the Arizona Strips Resource Management Plan revision process. This effort comprises the first comprehensive citizen's wilderness proposal for the Arizona Strip and provides thorough documentation of "requisite wilderness characteristics" for 26 units within and one outside the Grand Canyon-Parashant and Vermilion Cliffs National Monuments. The AWC is also preparing subsequent wilderness proposals outside the monuments for the Hurricane Cliff; Kanab Creek Wilderness addition (Robinson-Water Canyons, Grama Canyon), Castle Peak (GCPNM), Rock Canyon (Buck Pasture Quad), Lost Springs Mountain, and Seegmiller-Rock Canyon in the western House Rock region.

We believe our wilderness recommendations are well justified within the scope of BLM's continuing obligation to inventory and study lands exhibiting wilderness characteristics. We further believe that our wilderness recommendations are very reasonable, particularly in the context of the wilderness residual transportation network. These recommendations should have minimal affect on mechanized users that are currently and legally accessing the National Monuments:

- The roads adjacent to the proposed wilderness boundaries and our recommended cherry stems meet the legal BLM definition for roads.
- The wilderness recommendation does not close any County Roads and only two numbered BLM Routes within the two National Monuments.
- The wilderness residual transportation network provides for a very high level of legal motorized access within the National Monuments. 60% of the GCPNM is within one mile of a road. 88% of the GCPNM is within 2 miles of a road.
- The wilderness residual transportation network provides about 0.5 miles of legal road per section (sq. mi.) which is compatible with the preservation mandate for many of the proclaimed objects of the monuments.
- The conservationists' wilderness recommendation respects the permitted ranchers' access needs based on provisions within the Wilderness Act of 1964 and adherence to minimum requirement analysis.

While the wilderness residual transportation network supports our wilderness recommendations, the BLM still has a responsibility to conduct a comprehensive analysis that will provide a transportation network that is compatible with the purpose of preserving the proclaimed objects of the National Monuments. The following discussion provides the justification for our wilderness recommendations.

Mandate from Congress

In the 1976 Federal Land Policy and Management Act (FLPMA; Public Law 94-579), Congress gave BLM its first unified, comprehensive mandate on public lands

management. The law established a policy of retaining the public lands in Federal ownership, and it directed the BLM to manage them under principles of multiple use and sustained yield. Management decisions for the public lands are made through land-use planning processes that consider all potential uses of each land area, including wilderness. All public lands are to be managed so as to prevent unnecessary or undue degradation of the lands as required by Section 302(b) of FLPMA (USDI 1995).

FLPMA established wilderness preservation as part of BLM's multiple-use mandate, and recognized wilderness values as part of the spectrum of resource values considered in the land-use planning process. FLPMA (Section 603) specifically directed the BLM, for the first time, to carry out a wilderness review of the public lands. Section 202 of FLPMA provides for subsequent evaluation of lands qualifying as wilderness (USDI 1995).

The Arizona BLM Wilderness Inventory (1978-82)

The wilderness inventory began in the fall of 1978 when Arizona Strip District personnel identified roadless areas of 5,000 acres or more. Once inventory units were numbered and defined, the agency's district offices prepared a "Situation Evaluation" for every unit. This process described general conditions based on information readily available to the staff. Five wilderness criteria were, in theory, considered for each inventory unit: size, naturalness, outstanding opportunities for solitude or primitive and unconfined recreation, other supplemental values, and **"the unit's potential for returning to its natural condition if there had been human activity in the unit"** (emphasis added; USDI, BLM 1979:3 Preliminary Findings).

The review "included "roadless parcels of public land of at least 5,000 acres...and all roadless parcels of public land adjacent to existing or proposed wilderness administered by another federal agency, again regardless of the size of the parcel" (USID, BLM, 1979, Decision Report). This latter criteria was consistently ignored (Arizona Wilderness Coalition 2002).

"Roads" were presented as "important factors in determining the wilderness potential of an area," specifically the **boundaries** of the Inventory Units:

The word 'road' refers to a means of access which has been improved and maintained by mechanical means (use of hand tools or power machinery) to ensure relatively regular and continuous use. A way maintained solely by the passage of vehicles does not constitute a road"....We need to know whether you have knowledge of roads which we overlooked in defining the unit boundaries, or whether the roads we did use may not meet the definition. (USDI, BLM, 1979, Preliminary Findings, page 8).

This definition is derived from the FLPMA legislative history (H.R. Rep. No. 94-1163 at 17 (1976).

When the Situation Evaluations were completed, District Managers reviewed and subsequently forwarded each to the State BLM Director for decisions on preliminary findings. The agency eliminated areas "clearly and obviously" lacking wilderness characteristics (USDI, BLM, 1979, Preliminary Findings, page 1; USDI, BLM, 1979, Decision Report). After a 90-day public review, lands believed to meet wilderness criteria were proposed for a more intensive inventory involving on-the-ground inspections to verify the wilderness qualities. This "intensive inventory," including a 90-day public review, produced 41 Wilderness Study Areas (WSA's), subsequently evaluated in the 1982 Arizona Strip Wilderness Study Areas Draft Environmental Impact Statement (USDI, BLM 1982, page 7, 15).

After the WSA's were identified in the wilderness inventory, they became the wilderness recommendations in "Step 1" of the management framework plans (MFPs) for the study area. Step 2, "manageability," addressed whether or not the area could be "effectively managed to preserve its wilderness character." The agency's final step, Step 3, was the District Manager's final decision regarding wilderness suitability (USDI, BLM 1982:7-8). The historical review presented in this wilderness proposal disputes the manager's decision to drop from wilderness consideration most of the WSAs. The Secretary of the Interior forwarded the recommendation to the President, who in turn forwarded the recommendation to Congress as required by FLPMA.

Criteria 1 consisted of four "wilderness study criteria and quality standards" applied to each WSA between Step 1 and Step 2: (USDI, BLM 1982, page 7-8). "Mandatory Wilderness Characteristics" consisted of size, naturalness, and outstanding opportunities for solitude or primitive recreation. Other considerations included

- Special Features: ecological, geologic, or other features of scientific, educational, scenic, or historic value.
- Multiple Resource Benefits: benefits to other resources and uses that only wilderness designation could ensure.
- Diversity in the National Wilderness Preservation System: 1) expanding the diversity of natural systems, 2) assessing the opportunities for solitude or primitive recreation within a day's driving time (5 hours) of major population centers, and 3) balancing the geographic distribution of wilderness areas (conservationists dispute the validity of these criteria).

Of the 2.8 million acres on the Arizona Strip (USDI, BLM, 1990:S-1), 1,576,672 acres (56 percent) were considered for additional study (USDI, BLM, 1980 Proposal Report). Of this total, the BLM administratively designated 774,148 acres (about 50 percent of the intensively inventoried lands, and about 28 percent of the Arizona Strip) as WSA's. In 1982, the *Arizona Strip Wilderness Study Areas Draft Environmental Impact Statement* recommended designating as wilderness all or parts of only eight of the original 41 WSA's, including 26,186 acres of public land (approximately three and a half percent of the original 774,148 acres; USDI, 1982, DEIS:1). The Arizona Wilderness Act of 1984 designated 265,520 acres (34 percent of the WSA's acreage).

Requirement for Wilderness Study

The 1984 Arizona Wilderness Act provided release of Wilderness Study Areas (WSAs) established under Section 603 (c) of FLPMA not designated wilderness on the Arizona Strip District and certain areas in Utah. Such lands were no longer subject to the requirement of section 603(c) to manage "in a manner that does not impair suitability for preservation as wilderness." The Act's provided a "soft release" and did not preclude future consideration of public lands for wilderness.

The BLM's Wilderness Inventory and Study Procedures reiterates direction for subsequent wilderness inventories

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." These Sections also direct the Bureau to utilize inventory information in the development of land-use plans and coordinate public land inventories and planning efforts with other Federal, State, and local agencies and Indian tribes [endnotes added].

BLM is instructed to evaluate wilderness inventory areas "through the land use planning process, using regulations at 43 CFR 1600, and the BLM 1600 Manual and Handbook series, to analyze the values, resources, and uses with the area." The planning process will be used to determine whether these areas should be designated as Wilderness Study Areas (WSAs) to be managed under the IMP BLM Handbook 8550-1. The BLM will 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)]). The BLM's Draft Procedures and Policy notes that Title II of FLPMA (Section 201) affirms that 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 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. Pre-FLPMA mining claims are to be managed under the unnecessary and undue standard.

Citizen's Wilderness Proposals

Other public lands that may require a wilderness inventory include "lands within externally generated proposals that document new or supplemental information regarding

resource uses and condition of the lands not addressed in current land use plans and/or prior wilderness inventories (USDI 2001 [H-6310-1, Section .06(D)]). According to a "Recently Issued Solicitor's Opinion Regarding Land Use Planning," the BLM may not refuse to consider credible new information which suggest that the WSA boundaries identified in the late 1970's do not include all public lands within the planning area that have wilderness characteristics are suitable for management as wilderness" (USDI, Bureau of Land Management 2001, Information Bulletin).

The FLPMA and the BLM planning manual require that the BLM provide opportunity for public participation in federal public land use decision making conducted under FLPMA (USDI 2001 [H-6310-1, Section .06(E), page 5]). This includes citizen or BLM generated information regarding wilderness suitability. In order for public requests to be considered, they should be accompanied by (1) a map which identifies specific boundaries of the area in question; (2) a detailed narrative that describes the wilderness characteristics of the area and documents how that information significantly differs from the information in prior inventories conducted by BLM regarding the wilderness values of the area; and (3) photographic documentation (USDI 2001 [H-6310-1, Section .06(E), page 5])). This proposal provides the requisite information. The BLM is required to determine whether the area in question (or a significant portion thereof) may have wilderness characteristics, and if actions proposed that could degrade the wilderness values or the roadless character so as to disqualify the area from further consideration as a WSA. If so the BLM should initiate a new land use plan or plan amendment to address the wilderness values (USDI 2001 [H-6310-1, Section .06(E), page 5]; see Section .06(F), page 6).

Evaluation of Wilderness Values

The BLM defines "mandatory" and "optional" wilderness characteristics as presented in Section 4(b) of the Wilderness Act (USDI 2001 [H-6310-1, Section .22(A), page 19]). Mandatory wilderness characteristics include size, naturalness, and outstanding opportunities for solitude and a primitive and unconfined type of recreation (USDI 2001 [H-6310-1, Section .22(A)(1), page 20]).

A. Mandatory Wilderness Characteristics (Wilderness Character)

1) Size

The BLM states (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]) that the size criteria will be satisfied for inventory units if the area is greater than 5,000 acres, or if the area is less than 5,000, if the following conditions apply

- The area is contiguous with lands which have been formally determined to have wilderness or potential wilderness value
- It is demonstrated that the area is clearly and obviously of sufficient size as to make practicable its preservation and use in an unimpaired condition, and of a size suitable for wilderness management
- The area is contiguous with an area of less than 5,000 acres of other Federal lands administered by an agency with authority to study and preserve wilderness lands, and the combined total is 5,000 acres or more.

The BLM cautions against concluding

that simply because an area is relatively small, it does not have an outstanding opportunity for solitude. Consideration must be given to the interrelationship between size, screening, configuration, and other factors that influence solitude (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]).

2) Naturalness

The BLM requires determination as whether or not the area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]). The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]).

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs the agency to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

- Roads

The BLM Wilderness Inventory and Study Procedures Handbook (Section .14, page 18) states that "[a]ny portion of an inventoried area found to be roaded...will not be studied further" (this assertion is not supported by wilderness legislative history; see discussion below). A road is defined as a vehicle way "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]).

- "Improved and maintained" requires actions taken physically by people to keep the road open to vehicle traffic. Note that according to the BLM, "improved" does not necessarily mean formal construction, and "maintained" does not necessarily mean annual maintenance (USDI 2001 [H-6310-1, Section .13(A)(2)(a), page 10]).
- "Mechanical Means" requires the use of hand or power machinery or tools (USDI

2001 [H-6310-1, Section .13(A)(2)(b), page 10]). The sole use of hands and feet to move rocks or dirt without the use of tools or machinery does not meet the definition of "mechanical means"(USDI 2001 [H-6310-1, Section .13(A)(3), page 10]). Vehicle routes constructed by mechanical means but which are no longer being maintained by mechanical methods are not roads (USDI 2001 [H-6310-1, Section .13(A)(3), page 10]).

- "Relatively regular and continuous use" means vehicular use which has occurred and will continue to occur on a relatively regular basis. Examples given include access roads for equipment to maintain a stock water tank or other established water sources, mining claims, or maintained recreational sites or facilities (USDI 2001 [H-6310-1, Section .13(A)(2)(c), page 10]). Roads need not be maintained on a regular basis but rather when road conditions warrant actions to keep it in a stable condition (USDI 2001 [H-6310-1, Section .13(A)(3), page 10]).
- A way maintained solely by the passage of vehicle does not constitute a road" (USDI 2001 [H-6310-1, Section .13(A)]). A route established or maintained solely by the passage of vehicles is not considered a road, even if it is used on a relatively regular and continuous basis (USDI 2001 [H-6310-1, Section .13(A)(3), page 9]).

- Roads and Wilderness

The presence of a "road" does not disqualify an area for wilderness. In fact, the Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation. Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c), provides a more permissive standard for designating a wilderness; a second definition, in section 4(c), provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25). The BLM provides for WSA designation "when it is reasonable to expect that human imprints will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

- Facilities

Provided that such influences are "substantially unnoticeable, the inventory area may include some human impacts such as trails, trail signs, foot or stock bridges, fire towers fire pre-suppression facilities, pit toilets, research monitoring markers and devices, wildlife enhancement facilities, fisheries enhancement facilities (such as fish traps and stream measuring devices), radio repeater sites, air quality monitoring devices, fencing, spring developments, and small reservoirs" (USDI 2001 [H-6310-1, Section .13(B)(2)(a)(2), page 12]).

- "Purity Standards"

The BLM cautions against an "overly pure approach to assessing naturalness"(USDI 2001 [H-6310-1, Section .13(B)(2)(b)(2), page 13]).

- Outside Human Impacts

The BLM states that human impacts outside the inventory will not "normally" be considered in assessing naturalness of an area, but the agency makes allowances for evaluating such impacts for their "direct affects on the inventory area (USDI 2001 [H-6310-1, Section .13(B)(2)(c)]). The Wilderness Act, and subsequent legislation such as the Eastern Areas Wilderness Act, generally prohibit outside "sights and sound" precluding wilderness designation (see Scott 2001).

3) Solitude or a Primitive and Unconfined Type of Recreation

The BLM states that "[e]ach inventory area must be assessed on its own merits or in combination with an adjacent wilderness area or WSA as to whether an outstanding opportunity exists. There must be no comparison among areas. [H-6310-1, Section .13(B)(3)(b), page 13]]. Inappropriate comparisons were invoked as reasons to drop from wilderness consideration a significant number of WSAs (Arizona Wilderness Coalition 2002).

The BLM requires evaluation of the area's "outstanding opportunities for solitude or a primitive and unconfined type or recreation" as specified by Section 2(c) of the Wilderness Act. The agency states the area need not provide outstanding opportunities for both solitude and wilderness recreation, it "has only to possess one or the other"(USDI 2001 [H-6310-1, Section .22(A)(1)(b), page 21]). A significant number of WSA's were inappropriately dropped by the 1982 analysis for lacking one element or the other (Arizona Wilderness Coalition 2002).

The BLM stresses that each inventory unit must be assessed on its own merits or in combination with an adjacent wilderness area or wilderness study area (USDI 2001 [H-6310-1, Section .13(B)(3)(b), page 13]). In the earlier review, several WSAs or intensively inventoried units were dropped from wilderness consideration because adjacent unit's wilderness characteristics were not taken into consideration (Arizona Wilderness Coalition 2002). Comparisons are not permitted nor are numerical, alphabetical, or qualitative rating systems. Again, a number of early WSAs or intensively inventoried units were not recommended for wilderness designation because of inappropriate qualitative assumptions (Arizona Wilderness Coalition 2002).

Consideration should be given of only whether factors which influence a person's opportunity to avoid the sights, sounds, and evidence of other people **in** the inventory unit, rather than evaluate opportunity for solitude in comparison to human habitation (USDI 2001 [H-6310-1, Section 13(B)(3)(c)(1)(a), page 15]). The BLM states that "[t]he fact that non-wilderness activities or uses can be seen or heard from areas within the inventory area shall not be considered when analyzing an area's manageability as a WSA" (USDI 2001 [H-6310-1, Section .2(B)(4), page 24]). The agency instructs its staff to

- Avoid using lack of terrain variation or vegetation, or size as disqualifying conditions for outstanding opportunities for solitude (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(2)]). Do not assume that simply because an area or portion of an area is flat and/or unvegetated, it automatically lacks an outstanding opportunity for solitude (USDI 2001 [H-6310-1, Section 13(B)(3)(c)(1)(b), page 14]). Similarly, do not conclude that simply because an area is relatively small, it does not have an outstanding opportunity for solitude. Consideration must be given to the interrelationship between size, screening, configuration, and other factors that influence solitude (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]), and
- Consider factors or elements influencing solitude including size, natural screening, and the ability of the user to find a secluded spot (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(c)], page 15).

B. Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]). The Presidential Proclamations specify a number of optional wilderness characteristics (objects) possessed by units proposed for wilderness designation by conservationists (Arizona Wilderness Coalition).

Inventory Process

The primary purpose of the wilderness inventory is to document the presence or absence of public lands with *wilderness character* (USDI 2001 [H-6310-1, Section .11(A), page 8]). The wilderness inventory is the process of determining the presence of roadless areas (inventory area) with wilderness character (USDI 2001 [H-6310-1, Section .12]). The BLM utilizes its own seven-page "Wilderness Inventory Evaluation" form that describes and documents each inventory unit's presence, extent, and "quality" of wilderness values. Conservationists expanded on the BLM format and extensively documented travel ways and wilderness character in 26 units proposed as wilderness within both monuments.

Wilderness Study Area (WSA) Recommendation

The BLM Wilderness Inventory and Study Procedures Handbook (Section .14, page 18) states that

[a]n inventory area found to possess the requisite wilderness characteristics as defined by the Wilderness Act of 1964 will be further evaluated through the land use planning process to determine if it should be designated as a WSA.

The conservationist's wilderness recommendation provides a thorough documentation of "requisite wilderness characteristics" for 28 units within the two national monuments (Arizona Wilderness Coalition 2002).

WSA Management

Once public lands designated as a WSA through a land use plan (Section 202) shall be managed under the Interim Management Policy for Lands Under Wilderness Review (IMP), Handbook H8550-1 so as not to impair their suitability for wilderness designation (USDI 2001 [H-6310-1, Section .06(G)]). For FLPMA Section 603 WSAs, existing and new mining operations under the 1872 Mining Law are regulated according to the nonimpairment standard. The BLM has the authority under Section 302 of FLPMA to manage Section 202 lands similarly (USDI 1995).

Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Billy Goat Peak East Proposed Wilderness (Quads: St. Thomas Gap, Azure Ridge, Virgin Peak and Pakoon Springs).

Summary:

The Arizona Wilderness Coalition recommends the (24,832-acreage) Billy Goat Peak East for Wilderness designation. A review of the 1979-82 WSA process demonstrates that wilderness suitability criteria for the unit was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

This scenic, rugged, proposed wilderness consists of Mojave Desert vegetation and wildlife, including the endangered desert tortoise and bighorn sheep. An important component of the larger Nevada's proposed Billy Goat Peak Wilderness (30,541 acres), Arizona's 24,832 acres create a combined proposed wilderness of 55,373-acres. The Arizona portion includes the dramatic northern "Cockscomb," a prominent ridge visible throughout much of the southwestern National Monument (see photo H-5). This unit is part of the Pakoon ACEC, an area managed primarily for recovery of desert tortoise (USDI, BLM, 1998, page 5 and Map 4).

B. Historical Review and Critique of the 1982 WSA Decision Process

In 1982, the agency stated that

overall, the unit is in a fairly natural condition (USDI, BLM, 1982, EIS:52-3) [and] meets the minimum standards for solitude and recreation...but overall its wilderness character is not of high quality (USDI, BLM, 1982, EIS:21).

Based on this assessment, the BLM proposed entire unit as nonsuitable for wilderness designation (USDI, BLM, 1982, EIS:20).

The Wilderness Act's "minimum standard" for solitude or a primitive and unconfined type of recreation consists of "outstanding opportunities" for those experiences. The agency admitted, albeit reluctantly, that this area met the standard. In addition, policy prohibits comparisons or numerical, alphabetical, or qualitative rating systems (USDI 2001 [H-6310-1, Section .13(B)(1), page 11) and would not support the agency's earlier, unsubstantiated "high-quality" exclusionary logic.

C. AWC Recommendation

AWC proposes the entire Billy Goat Peak East (former Pakoon Springs WSA) for wilderness designation based on the analysis presented below.

1) Mandatory Wilderness Characteristics (Wilderness Character)

a) Size

The proposed Billy Goat Peak Wilderness (55,373 acres: Nevada, 30,541 acres;

Arizona, 24,832-acreage) meets the BLM (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]) size criteria of greater than 5,000 acres. The Nevada BLM component is already proposed wilderness.

b) Naturalness

In 1982, the BLM stated that "overall, the unit is in a fairly natural condition" (USDI, BLM, 1982, EIS:52-3). The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs the agency to assess the latter: "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammeled" (uncontrolled) by humans and their activities?

Regarding the proposed Billy Goat Peak Wilderness, the answer to both questions is a resounding yes. The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable ["fairly natural?"]," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]; see photos H-4,5).

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Billy Goat Peak East's human imprints consist primarily of an abandoned or little-use travel way not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). As mentioned above the BLM considered Billy Goat Peak East (Pakoon Springs WSA) as "fairly natural," noting that a "pipeline route and vehicle trails are returning to a natural condition, and if closed to vehicles and scarified, they would not be noticeable" (USDI, BLM, 1982, EIS:52-3). AWC recommends maintains that it is reasonable to assume past impacts created by the travel ways described below (see Travel Way Closure section) "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads.

even paved roads, to qualify areas for wilderness designation. Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c), provides a more permissive standard for designating a wilderness; a second definition, in section 4(c), provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The entire proposed Billy Goat Peak Wilderness size, terrain variation ranging from the softly undulating badlands, to rugged canyons and mountains contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation (photos H-4,5). In the past, the BLM stated Billy Goat Peak East (Pakoon Springs WSA) met the "minimum standards for solitude and recreation" but recommended against wilderness designation because it lacked "high quality" wilderness characteristics (USDI, BLM, 1982, EIS:21). As mentioned above, policy prohibits qualitative rating systems (USDI 2001 [H-6310-1, Section .13(B)(1), page 11) and would not support the agency's earlier, unsubstantiated "high-quality" exclusionary logic.

The agency's 1982 decision regarding naturalness and outstanding opportunities for solitude should have supported, not precluded wilderness designation. In addition, the failure to consider the BLM Arizona WSA as an integral part of a much larger wilderness resulted in a seriously flawed suitability analysis. Current BLM policy states that "[e]ach inventory area must be assessed on its own merits **or in combination with an adjacent wilderness area or WSA** as to whether an outstanding opportunity exists [H-6310-1, Section .13(B)(3)(b), page 13]. AWC firmly believes that the proposed Billy Goat Peak Wilderness (Nevada and Arizona) possesses the requisite mandatory wilderness characteristics and that the BLM should re-evaluate the Arizona portion area under the current criteria.

2) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]). The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Billy Goat Peak's "optional Wilderness Characteristics" and include:

a) 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.

b) A geological treasure, including

- Precambrian and Paleozoic strata against the highly faulted terrain
- fossils including invertebrate fossils.
- portions of geologic faults

c) Important watersheds for the Colorado River

d) 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... numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, 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."

e) 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...allowing wildlife movement and plant dispersal
- Giant Mojave Yucca cacti proliferating in undisturbed conditions
- Diverse wildlife
- Numerous threatened or endangered species including the desert tortoise (most of the unit lies within the Pakoos ACEC, an area managed primarily for desert tortoise recovery (USDI, BLM, 1998, page 5 and Map 4).

We urge the BLM to reconsider its earlier analysis and provide Billy Goat Peak East interim protection as a WSA.

1) Proposed Boundary

Beginning in the unit's northwest corner at the intersection of State Route 111 with the Arizona-Nevada state line in Section 18 (Virgin Peak Quad; T36N, R16W); then along SR 111 in a southerly direction (excluding the Pakoos Springs landing strip on the east) to its junction with State Route 113 in Section 15 (Azure Ridge Quad; T34N, R16W); then along SR 113 in a northwesterly direction to its intersection with the Arizona-Nevada state line; then due north to the intersection of the Arizona-Nevada state line with State Route 111 in Section 18 (Virgin Peak Quad; T36N, R16W).

2) Travel Way Closures

A-B; this travel way appears on the BLM map (USDI 2000) and the Azure Ridge and Pakoon Springs quads. Beginning at its junction with State Route 113 in Section 5 (Azure Ridge Quad; T34N, R16W; see photo H-1), A-B becomes generally revegetated and appears abandoned (photos H-2,3) and completely fades. This route is substantially unnoticeable and should be closed to mechanized access to protect Monument values, especially the habitat for the endangered desert tortoise.

Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Proposed Lime Kiln Mountain Wilderness (30,175 acres; Quads: Jacobs Well and Elbow Canyon).

Summary:

The Arizona Wilderness Coalition recommends the 30,175-acre Lime Kiln Mountain for Wilderness designation. A review of the 1979-82 WSA process demonstrates that wilderness suitability criteria for the unit was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

This spectacular portion of the central Virgin Mountains consists of the dramatic escarpments of Lime Kiln and Lead Mine Mountains, and Mojave desert vegetation including critical desert tortoise habitat,. The proposed wilderness north of the Virgin Mountain axis lies outside the Grand Canyon-Parashant National Monument.

B. Historical Review and Critique of the 1982 WSA Decision Process

According to the BLM, Lime Kiln Mountain (originally called the Virgin Mountains WSA, Unit 1-129; 37,681 acres)

[o]ffers outstanding opportunities for hiking, hunting, backpacking, rock climbing, sightseeing, and photography [primitive and unconfined type of recreation].... Moreover, the Virgin Mountains are also of scientific and scenic value" (USDI, BLM, 1982, EIS:54; emphasis added).

Although the BLM considered the area "primarily natural...its five miles of vehicle ways, three corrals, and two tanks are largely unnoticeable" (USDI, BLM, 1982, EIS:54), the agency proposed the entire unit as nonsuitable for wilderness designation:

[t]he unit's broad eastern and western slopes lack outstanding opportunities for solitude and reduce the overall quality of solitude. Opportunities for primitive and unconfined recreation are not of high quality, and the unit has 400 acres of nonfederal mineral estate (USDI, BLM, 1982, EIS:21).

On one hand the BLM lauds the area's outstanding opportunities for a primitive and unconfined type of recreation, and on the other contradicts itself by stating the unit lacks such qualities. The agency did not elaborate on how the unit's "broad eastern and western slopes lack outstanding opportunities for solitude and reduce the overall quality of solitude." While recent citizen's inventories reported outstanding opportunities for each wilderness-dependant experiential quality, current policy requires outstanding opportunities for either solitude or primitive and unconfined type of recreation, not both "somewhere in the area," not everywhere (USDI 2001 [H-6310-1, Section .13(B)(3),

page 13]). In addition, policy prohibits comparisons or numerical, alphabetical, or qualitative rating systems (USDI 2001 [H-6310-1, Section .13(B)(1), page 11) and would not support the unsubstantiated "high-quality" exclusionary logic.

The AWC submits that the agency's 1982 decision regarding naturalness and outstanding opportunities for a primitive and unconfined type of recreation should have supported, not precluded wilderness designation.

C. Preliminary AWC Recommendation

New information derived from a recent citizen's inventory demonstrates that Lime Kiln Mountain meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

1) Mandatory Wilderness Characteristics (Wilderness Character)

a) Size

The proposed Lime Kiln Mountain Wilderness (30,175 acres) meets the BLM size criteria of greater than 5,000 acres (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]).

b) Naturalness

In 1982, the BLM stated that Lime Kiln Mountain was "primarily natural...its five miles of vehicle ways, three corrals, and two tanks are largely unnoticeable" (USDI, BLM, 1982, EIS:54). Recent citizen's surveys concluded that most of the travel ways remain in fact substantially unnoticeable and the area appears natural (photos MEH-7; KC-A1-12, 14; KC-39-20).

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammeled" (uncontrolled) by humans and their activities?

Regarding the proposed Lime Kiln Mountain Wilderness, the answer to both questions is a resounding yes (photos KC-A1-17, KC-B1-4). As concluded in the BLM's 1982 assessment described above and the recent citizen's inventory, the area "...generally

appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]). It's dramatic escarpments and canyons, expansive desert grasslands, intricate drainages, and jagged mountains creates a picturesque, rugged wilderness home to bighorn sheep, desert tortoise, mule deer, mountain lions, raptors and other desert avian species.

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness... which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Lime Kiln Mountain's human imprints consist primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). As mentioned above the BLM considered Lime Kiln Mountain (Virgin Mountain WSA) as "primarily natural...its five miles of vehicle ways, three corrals, and two tanks are largely unnoticeable" (USDI, BLM, 1982, EIS:54). AWC maintains that it is reasonable to assume past impacts created by the travel ways described below (see Travel Way Closures section) "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation. Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c), provides a more permissive standard for designating a wilderness; a second definition, in section 4(c), provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Lime Kiln Wilderness' size, terrain variation (ranging from rugged mountain escarpments to the softly undulating, picturesque Mojave desert grasslands and Joshua trees) contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation (photos KC-A1-17, KC-B1-4.MEH 4). In 1982, the agency lauded the area's **outstanding opportunities** for hiking, hunting, backpacking, rock climbing, sightseeing, and photography [primitive and unconfined types of recreation] (USDI, BLM, 1982, EIS:54; emphasis added).

The BLM stated that the "unit's broad eastern and western slopes lack outstanding opportunities for solitude and reduce the overall quality of solitude" (USDI, BLM, 1982,

EIS:54). The AWC disagrees with this assessment (photo KC-A1-17). Recent citizen's evaluations demonstrate Lime Kiln Mountain's outstanding opportunity for solitude. In addition, current policy instructs agency staff to "avoid using lack of terrain variation or vegetation, or size as disqualifying conditions for outstanding opportunities for solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(2)]). The staff should not assume that "simply because an area or portion of an area is flat and/or unvegetated, it automatically lacks an outstanding opportunity for solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]). Policy instructs management to "give consideration to the interrelationship between size, screening, configuration, and other factors that influence solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]). Finally, consideration must be given to "factors or elements influencing solitude including size, natural screening, and the ability of the user to find a secluded spot" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(c)], page 15).

Recent citizen's inventories demonstrate the area's outstanding wilderness experiential potential, including opportunities for solitude, based on all the factors presented above. The AWC strongly urges the BLM reconsider Lime Kiln's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

2) *Optional Wilderness Characteristics*

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]).

In 1982, the BLM noted that "the Virgin Mountains [Lime Kiln Mountain] are also of scientific and scenic value" (USDI, BLM, 1982, EIS:54). Portions of the proposed Lime Kiln Mountain Wilderness include parts of the Virgin Slopes ACEC, significant habitat "to be managed primarily for recovery of desert tortoises (USDI 1988, Mojave Desert Amendment, page 5 and Map 3). The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Lime Kiln Mountain's "optional Wilderness Characteristics" and 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...Paleozoic strata against the highly faulted terrain
- fossils including invertebrate fossils.
- portions of geologic faults

3) Important watershed for the Colorado River and the Grand Canyon

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"...[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... allowing wildlife movement and plant dispersal
- Giant Mojave Yucca cacti proliferating in undisturbed conditions
- Diverse wildlife [including big horn sheep]
- Numerous threatened or endangered species including the Mexican spotted owl, the California condor, and the desert tortoise.

1) Proposed Boundary

Beginning in the unit's northwestern corner at the junction of travel way B-C-D with State Route 299 (Elbow Canyon Quad; T39N, R15W, Section 13) and traveling in an easterly direction along 299 to its junction with Elbow Canyon Road in Section 8; then in a southerly and then easterly direction up Elbow Canyon to its junction with BLM Route 1004 (Mt. Bangs Quad; T39N, R15W, Section 24); then in a southerly direction along 1004 to its junction with BLM Route 1041 in Section 3; then in a southeasterly direction along 1041 to the bottom of Section 6 (Jacobs Well Quad; T37N, R15W); then in a westerly direction along the proposed boundary depicted in the AWC base map (roughly parallel and north of State Route 242) to its junction with 242 in Section 3 (Hen Springs Quad; T37N, R16W); then along 242 in a northerly direction to its junction with travel way B-C-D at "D" in Section 9 (Hen Springs Quad; T38N, R16W); then in a easterly direction along travel way B-C-D to point "C1"(Jacobs Well Quad; T38N, R16W, Section 1); then in a southeasterly then northerly direction along travel way C1-C2-B3 in Section 31 (T38N, R15W); then in a northerly direction to the junction of travel way B-C-D to its junction with State Route 299 (Elbow Canyon Quad; T39N, R15W, Section 13).

2) Travel Way Closures

- AA-BB; an abandoned travel way depicted on the Jacobs Well Quad but not on the

BLM map (USDI 2000). Its junction with BLM Route 1041 is difficult to discern (photo KC-A1-9; T38, R15W, Section 31) and the entire route is substantially unnoticeable (photos KC-A1-10,12,14). It should be permanently closed to mechanized travel to protect monument values.

- C3-C4; an abandoned travel way depicted on the Jacobs Well Quad and the BLM map (2000 USDI) beginning at its junction with travel way B-C-D in Section 12 (photo KC-39-19; T38N, R16W). The way quickly deteriorates in a severely eroded section (photo KC-39-21) that should be stabilized with primitive water bars and drainage berms. The way appears abandoned and is substantially unnoticeable (photo KC-39-20). It should be closed to mechanized travel to protect wilderness values.
- G-G2; an abandoned travel way depicted on the Jacobs Well Quad but not on the BLM map (USDI 2000). Its junction with BLM Route 1004 is difficult to discern (see photo MEH-13; T38N, R15W, Section 34) and indicates little, if any 4X4 use. Most of the way is revegetated and substantially unnoticeable (photos MEH 7-12).

3) Cherry Stems

Lead Mine Springs Road (C5-C6) is a 0.3-mile route leading to a filthy hunter's camp in Section 13 (photo KC-38-22; Jacobs Well Quad; T39N, R15W). AWC staff could not discern the north-south trending jeep trail depicted on the quad and BLM map (USDI 2000) as ending north of Lead Mine Mountain. It should be closed to mechanized travel to protect wilderness values.

Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Grand Wash Cliffs Wilderness Addition (Quads: Grand Gulch Bench, Last Chance Canyon, Mustang Point, Olaf Knolls, St. George Canyon, Wildcat Ranch)

Summary:

The Arizona Wilderness Coalition recommends the (acreage) Grand Wash Cliffs Addition for Wilderness designation. A review of the 1979-82 WSA process demonstrates wilderness suitability criteria for the unit was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory reveals that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The proposed Grand Wash Cliff Wilderness addition consists primarily of the former Last Chance WSA (1-111; 34,625 acres) excluding approximately 1200 acres on its western margin that became part of the Grand Wash Cliffs Wilderness. The area's most prominent feature is 19 miles of the Upper Grand Wash Cliffs and parts of Hidden and Pigeon Canyons. The Grand Wash Cliffs form part of the boundary for two physiographic provinces: the Basin and Range to the west, and the Colorado Plateau to the east. The Upper Grand Wash Cliffs, formed by erosion along the Grand Wash Fault, present a 1800-foot escarpment of the Kaibab and Toroweap formations and Coconino sandstone. Steep slopes comprised of the Hermit and Supai formations, and supporting desert vegetation consisting primarily of blackbrush, sagebrush, and pinyon-juniper with scattered sagebrush and cliffrose, lie at the cliff's base (USDI, BLM, 1982, Briefing Paper).

B. Historical Review and Critique of the 1982 WSA Decision Process

The BLM described the former Last Chance WSA as possessing

Outstanding opportunities for solitude and unconfined types of recreation (emphasis added). *The viewpoints from atop the rim along with the exposure of geologic formations provide outstanding opportunities for sightseeing and photography...excellent opportunities for hiking and solitude...supplemental features such as prehistoric sites, geologic features, and wildlife are of additional interest...excellent habitat for mule deer and the cliffs themselves provide nesting sites for raptors such as red-tailed and Cooper's hawks and golden eagles* (USDI, BLM, 1982, Briefing Paper).

The BLM documented Last Chance WSAs'

outstanding opportunities for primitive recreation, especially hunting, hiking, and backpacking (USDI, BLM, 1982, EIS:52) [including] [n]umerous side canyons along the escarpment [that] screen visitors for the rest of the unit.... [t]he unit has high-quality wilderness characteristics and has few impacts on naturalness(emphasis added)....[as well as] 16 miles of the Grand Wash Cliffs, an

important geologic supplemental value (USDI, BLM, 1982, EIS:52).

Unfortunately, the Shivwits MFP Step II recommended the entire unit as nonsuitable for wilderness designation:

the unit is 17 miles long and 1.5 to 6 miles wide. It contains 12.2 miles of vehicle trails, 640 acres of state land, and 22 mining claims. The unit's narrowness combined with these other considerations detracts from its manageability as wilderness (USDI, BLM, 1982, EIS:20).

At the time the BLM understood it would (and could) have to "acquire 640 acres of state land to assure this unit's manageability as wilderness" (USDI, BLM, 1982, EIS:20). The agency also stated that "several human impacts occur, including 12.25 miles of vehicular trail, four reservoirs, one catchment, and a mineshaft." But, "except for the trails, the impacts dispersed along the unit's boundary are largely unnoticeable because of the unit's large size" (USDI, BLM, 1982, EIS:52). While

vehicular trails are scattered throughout the unit...many that penetrate the unit below the cliffs do not extend as far as a mile and are returning to a natural state. The trails above the cliffs wind through pinyon-juniper and are largely unnoticeable (USDI, BLM, 1982, EIS:52).

The recent citizen's inventory of travel ways is discussed below, but we concur that the "impacts along the unit's boundary are largely unnoticeable" to this day.

The "unit's narrowness" is not a relevant issue today since Last Chance is contiguous with an existing designated wilderness. The BLM raised another objection to wilderness designation:

The National Park Service has endorsed 2.9 million acres of similar country [not specified] for designation, and MFL has recommended designation of similar country within 20 miles [amount and location not specified]. This WSA would not add to the diversity or improve upon the distribution of wilderness within the National Wilderness Preservation System (USDI, BLM, 1982, EIS:20).

Current BLM policy stresses that each inventory unit must be assessed on its own merits or in combination with an adjacent wilderness area or wilderness study area (USDI 2001 [H-6310-1, Section .13(B)(3)(b), page 13]) including other federal agencies such as the NPS (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]). Proximity and similarity to other non-contiguous wilderness areas does not detract from the unit's wilderness character. In addition, comparisons are not permitted nor are numerical, alphabetical, or qualitative rating systems. Even under the earlier criteria, the unit should have been recommended for wilderness designation and not dropped.

C. Preliminary AWC Recommendation

The Arizona Wilderness Coalition recommends the (acreage) Grand Wash Cliffs

Addition for WSA designation. A review of the 1979-82 WSA process demonstrates that wilderness suitability criteria for the unit was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

1) Mandatory Wilderness Characteristics (Wilderness Character)

a) Size

The proposed addition to the Grand Wash Cliffs Wilderness meets the BLM (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]) size criteria of greater than 5,000 acres.

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed addition to the Grand Wash Cliffs Wilderness, the answer to both questions is yes (see photos KC-29-1,4,9,12; KC-37-2,4,10,20,23,24)). The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]). The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). The Grand Wash Wilderness addition's human imprints consist of primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]) and are in fact "substantially unnoticeable."

In 1982, the BLM noticed that "vehicular trails are scattered throughout the unit...[but] many that penetrate the unit below the cliffs do not extend as far as a mile

and are returning to a natural state." The agency also pointed out "[t]he trails above the cliffs wind through pinyon-juniper and are largely unnoticeable" (USDI, BLM, 1982, EIS:52). The BLM stated that the Last Chance WSA "has high-quality wilderness characteristics and has few impacts on naturalness" (USDI, BLM, 1982, EIS:52). The recent citizen's inventory of travel ways is discussed below, but we concur that the "impacts along the unit's boundary are largely unnoticeable" to this day.

The AWC maintains that it is reasonable to assume past impacts created by the travel ways described below "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]). In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation.

Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c), provides a more permissive standard for designating a wilderness; a second definition, in section 4(c), provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25). For example, Congress designated the adjacent Grand Wash Cliffs WSA (also recommended by the BLM as nonsuitable for wilderness designation; USDI, BLM, 1982, EIS:20) as wilderness in 1984 and included the eight-mile "road" separating the former Grand Wash Cliffs WSA from Last Chance WSA. That road is now a hiking trail.

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Grand Wash Wilderness addition's size, terrain variation ranging from the gently undulating juniper and pinyon forests to rugged canyons and cliff contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation (see photos KC-29-1,4,9,12; KC-37-2,4,10,20,23,24).

In 1982, the BLM assessed that the area possessed "outstanding opportunities for solitude and unconfined types of recreation" (USDI, BLM, 1982, Briefing Paper; USDI, BLM, 1982, EIS:52). The agency stressed that "[n]umerous side canyons along the escarpment screen visitors for the rest of the unit." The recent citizen's inventory demonstrates the area's outstanding wilderness experiential potential. The AWC strongly urges the BLM reconsider the area's outstanding opportunities for solitude and primitive and unconfined types of recreation.

2) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states

that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]).

The objects identified in the Grand Canyon-Parashant Proclamation and located within the proposed Grand Wash Wilderness Addition provide a compelling list of "optional Wilderness Characteristics" and include:

a) 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.

b) A geological treasure, including

- colorful...Precambrian and Paleozoic strata against the highly faulted terrain
- recent sinkholes and breccia pipes
- fossils including invertebrate fossils.
- portions of geologic faults, including 16 miles of the Grand Wash Cliffs, an important geologic supplemental value [see USDI, BLM, 1982, EIS:52].

c) Important watersheds for the Colorado River and the Grand Canyon....

d) 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 numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, 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"...scattered across the monument...[telling] the stories of the remote family ranches and the lifestyles of early homesteaders....

e) 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
- Diverse wildlife
- Numerous threatened or endangered species including the Mexican spotted owl and the California condor.

Resources Forgone or Adversely affected by Wilderness Designation

- *Mining* The BLM states that the agency must "consider the extent to which other resource values and uses of the area would be forgone or adversely affected as well as the benefits that may accrue to other multiple resource values and uses as a result of designating the area as a WSA" (USDI 2001 [H-6310-1, Section .2(C), page 24]). While the agency requires "consideration of any identified or potential energy and mineral resource values present in the area," the two National Monuments were withdrawn from the mining laws and from mineral leasing.

- *Motorized Recreation* The 2001 BLM "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 Grand Canyon-Parashant National Monument proclamation describes 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." The proclamation's emphasis on protection, not mechanized recreation, further supports the wilderness alternative.

Multiple Resource Benefits from Wilderness Designation

The BLM also instructs agency staff to document multiple resource benefits resulting from WSA designation, including watershed, archaeological sites and wildlife habitat preservation (USDI 2001 [H-6310-1, Section .22(C), page 24]). Regarding "multiple resource benefits," the President "...set apart and reserved as the Grand Canyon-Parashant for the **"purpose of protecting [emphasis added] the objects identified [in the Proclamations]..."** (The White House 2000, 2000a). **There is but one purpose stated in both Proclamations, and that purpose is preservation.** Wilderness designation, would significantly strengthen protection of these "objects."

1) Proposed Boundary

The unit is contiguous to the Grand Wash Cliffs Wilderness to the west. Beginning in the northeastern corner at the junction of the Grand Wash Cliffs Wilderness and BLM Route 1003 (St. George Canyon Quad; T36N, R13W, Section 7), in an easterly direction along BLM Route 1003 (approximately 2.2 miles) to its junction with BLM Route 1071 in Section 13; then in a southerly direction along 1071 to its junction with an unnumbered route beginning immediately west of "Eastview 6593" (Last Chance Canyon quad; T34N, R13W, Section 32); then along that unnumbered route in a southerly direction to point "H" (Mustang Pt. Quad; T34N, R13W, Section 16); then continuing in an easterly direction to point "E" in Section 23; then continuing in an easterly direction along the unnumbered route (Wayne Cummings Gardner Road) to its junction with State route 103 in Section 18 (Wildcat Ranch Quad; T34N, R12W); then continuing in a southerly direction along State Route 103 to its junction with BLM Route 1002 (Pigeon Canyon Road) in Section 29; then in a southerly to westerly direction along BLM Route 1002 to its junction with BLM Route 1050 (see the "Other Recommended Travel Way

Closures" section); then along BLM Route 1050 in a westerly direction (approximately 1/2 mile) to its junction with the Grand Wash Cliffs Wilderness boundary.

2) Travel Way Closures

- Route "W" (St. George Canyon quad; T36N, R13W, section 18) depicted as a jeep trail on the 2000 BLM map and the quad as a jeep trail, is substantially unnoticeable and could not be located.
- Route "Y" (St. George Canyon quad; T36N, R13W, section 16-17) is depicted as a jeep trail on the 2000 BLM map and the quad. It is completely blocked by a washout immediately near its junction with BLM Route 1071 (see photos KC-13-1,2). It should remain closed to mechanized transport.
- Route "X" (Last Chance Canyon Quad; T35N, R3W, sections 6,7, and 8) is depicted as a 2.5 mile jeep trail on the 2000 BLM map and the quad. The travel way is completely revegetated at its junction with BLM Route 1071 with no signs of use (see photos KC-13-3,4,5). It should be closed to all mechanized use.
- Route "Z" (Last Chance Quad; T35N, R13W, section 20) provides access to a wildlife water catchment immediately (20 yards) to the west of BLM Route 1071. The route, indicated on the 2000 BLM map and the quad, is revegetated and is difficult to discern on the ground (see photos KC-13-7,8,9). It should be closed to all mechanized travel beyond the water catchment.
- G-G1 (Mustang Point Quad; T34N, R13W, Sections 21,27,28) a 1.4 mile little-used spur, should be closed and restored to a natural condition. Vistas afforded at travel way H-H1 (Section 20; see photos KC-37-23,24), Hudson Point, or F-F1 (Sections 22,27; see photo KC-37-16), routes AWC proposes to remain open, are much more spectacular.
- K-E begins just west of Pigeon Tank (Wildcat Ranch Quad; T33N, R12W, Section 6; see photo KC-36-24) on BLM Route 1002 and continues four miles until its junction with the "Wayne Cummings Gardner Road" (Mustang Point Quad; T34, R13W, Section 23; see photo KC-37-7). The first 1/2 mile is heavily eroded (photos KC-36-25, KC-37-1). Most of the travel way is generally revegetated with dense, encroaching pinyon-juniper and shrub vegetation (photos KC-37-2,3,4,5,6). The route should be closed to mechanized travel and restored to a natural condition to protect Monument values such as soil and microbiotic crusts, wildlife, and native vegetation. The first 1/2 mile should be stabilized with log checks and drainage bars, and close to mechanized travel.
- C-D (Grand Gulch Bench Quad) begins in Section 10 (T34N, R14W; photo KC-30-5) on BLM Route 1002 as an indistinct travel way that disappears in dense grass in approximately 0.75 miles in Section 3 (photo KC-30-6). This travel way appears on the BLM map (USDI, BLM, 2000) and the Grand Gulch and Olaf Knolls Quads. It should be close to protect monument values.
- Travel way depicted on the BLM map (USDI, BLM, 2001) and the Grand Gulch Quad (T34N, R14W, Sections 2 and 11) was not evident.

- A-B (Mustang Pt., Grand Gulch Bench Quads) originates on BLM Route 1002 (T34N, R14W, Section 12; photo KC-30-2) and continues 0.6 miles (photo KC-30-3). The travel way is depicted on the BLM map (USDI, BLM, 2001) and the Mustang Pt. Quad. This is a "road to nowhere" and should be closed to protect Monument values such as soils, microbiotic crusts, and desert vegetation.
- C-D is depicted on the Mustang Point Quad but not on the BLM map. This 1.4-mile travel way originates off of BLM Route 1002 in Section 12 (T34N, R14W; photo KC-29-10) and ends at a water tank and trough in Section 6 (T34N, R13W; photo 18). The route is eroded (photo KC-29-19) and should be closed to mechanized use. Agreements for essential maintenance of both tanks can be developed under the BLM's minimum requirement procedures.
- C1-C2, an abandoned or little-used travel way depicted on the Mustang Point Quad (T34N, R13W, Section 7) but not on the BLM map (USDI, BLM, 2000), begins on travel way C-D (photo KC-29-13) and fades in approximately 0.5-miles (photo KC-29-14). The eroding travel way (see photo KC-29-16) is a "road to nowhere" and should be closed to mechanized travel to protect Monument values.
- D1-D2, an abandoned travel way depicted on the Mustang Point Quad (T34N, R13W, Section 7) but not on the BLM map (USDI, BLM, 2000), begins on BLM Route 1002 (T34N, R13W, Section 7; photo KC-29-23) and ends at a tank on travel way C-D (photo KC-29-22). The travel way is redundant (C-D provides better administrative access) and is generally revegetated (see photos KC-29-20,24). It should be closed to mechanized use.
- The travel way depicted on Last Chance Canyon and Mustang Point Quads (T34N, R14 W, Section 1) off of BLM Route 1002 and immediately west of Red Rock Knoll begins as a heavily eroded spur (photos KC-29-5,6,7) and abruptly ends in a wash. Beyond the wash the abandoned route is completely revegetated and should be closed to all mechanized use to protect Monument values.
- The travel way depicted on the BLM map (USDI, BLM, 2000) and Last Chance Canyon Quad (T35N, R14W, Section 36) could not be located.
- A-B (Olaf Knolls Quad; T35N, R14W, Section 26), depicted on the quad but not the BLM map, is an abandoned or little used travel way and should be closed to protect Monument values (see photos KC-29a-22,24).

3) Non-Wilderness Cherry Stems

- Hudson Point (Westview) Road (T35N, R13W, sections 30 and 29) provides access to the spectacular view west of the Upper Grand Wash Cliff and is proposed as an approximately 1.75-mile cherry-stem.
- BLM Route 1002 from its junction with BLM Route 1050 (see the "Other Recommended Travel Way Closure" section) to its terminus at the Grand Wash Cliffs Wilderness Trailhead is proposed as an approximately 6.5 miles cherry-stem to provide access to the trailhead (T35N, R14W, Section 26).

Grand Canyon- Parashant National Monument Wilderness Recommendation

Unit: Proposed Hidden Canyon Wilderness (10,594 acres; Quads: St. George Canyon, Poverty Springs and Last Chance Canyon).

Summary:

The Arizona Wilderness Coalition recommends the 10,594-acre proposed Hidden Canyon Wilderness for Wilderness designation. A review of the 1979-82 WSA process demonstrates that BLM's wilderness suitability criteria for the unit was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory concludes that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The area consists of the 1979 Intensive Inventory Unit 1-116 (Nutter, 6,835 acres) and an unnamed roadless unit (approximately 3,000 acres) to the south. Since the unit's the eastern Hidden Canyon escarpment dominates the region, we propose the name "Hidden Canyon" for the area. Rugged, 1,400-foot escarpment and dense pinyon and juniper woodlands comprise the proposed Hidden Canyon Wilderness. It is home to mule deer, mountain lions, raptors and other desert and woodland species.

Proposed Boundary

Beginning in the unit's northwest section at the junction of BLM Routes 1034 and 1059 (St. George Quad; T37N, R12W, Section 35); then in a easterly direction along 1059 to its junction with travel way I-I1 (southwest of Shoe Buckle Reservoir); then in a southerly direction along I-I1 to its intersection with the Monument boundary in Section 12 at point "I1"; then continuing in a southerly direction along the Monument boundary to its intersection with BLM Route 1039 (Monument boundary); continuing in a southerly direction along 1039 to its junction with travel way K1-J at "J" (Poverty Springs Quad; T36N, R12W, Section 30; excluding Pumphouse Storage Tank); then along travel way K1-J in a westerly direction to the Hidden Canyon rim (Section 31); then along the rim to its intersection with 1039 (T36N, R12W, Section 32); then crossing the Monument boundary along 1039 in a southerly direction to its junction with State Route 103 near M&M Pond (T35N, R12W, Section 15); then along 103 in a southwesterly direction (bypassing to the north an impacted woodcutters camp in Section 22) to its junction with BLM Route 1003 near Head of Hidden Pond (Poverty Springs Quad; T35N, R12W, Section 28); then along 1003 in a northerly direction to its junction with BLM Route 1034 (St. George Canyon Quad; T36N, R13W, Section 15); then continuing in a northerly direction along 1034 to its junction with BLM Route 1059 (St. George Quad; T37N, R12W, Section 35).

B. Historical Review and Critique of the 1982 WSA Decision Process

Hidden Canyon (Unit 116, Nutter) was describe by BLM in 1980 as "rugged" and "natural," but was dropped from further wilderness consideration due to several impacts, its size and configuration (USDI, BLM, 1980 Decision Report):

Much of the most rugged portion of the unit has remained natural while the flatter areas have been disturbed. These disturbances include a chaining, water developments, roads and ways (USDI, BLM, 1980 Decision Report).

The recent citizen's wilderness inventory did not locate any water developments or evidences of chaining that would preclude wilderness designation (see discussion below). The BLM reported a "road and part of the southern boundary" creating a "narrow finger" of land one-eighth of a mile wide resulted in a decision to reduce the unit to below 5,000 acres (USDI, BLM, 1980 Decision Report). While the agency stated that "according to BLM policy, the narrow finger left by this situation may be dropped from further review," current policy does not support this conclusion.

Hidden Canyon's configuration continued to bother the agency:

The rest of the unit is also narrow," the agency stated, "and does not have sufficient topographic and vegetative screening to provide outstanding opportunities for solitude (USDI, BLM, 1980 Decision Report).

Hidden Canyon's narrow configuration should not preclude wilderness consideration. BLM policy states that "[t]he fact that non-wilderness activities or uses [outside the unit] can be seen or heard from areas within the inventory area shall not be considered when analyzing an area's manageability as a WSA" (USDI 2001 [H-6310-1, Section .2(B)(4), page 24]). The agency should give "consideration of only whether factors which influence a person's opportunity to avoid the sights, sounds, and evidence of other people in the inventory unit, rather than evaluate opportunity for solitude in comparison to human habitation" (emphasis added; USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(a), page 15]). While much of Hidden Canyon consists of gently rolling woodlands, current policy instructs agency staff to "avoid using lack of terrain variation or vegetation, or size as disqualifying conditions for outstanding opportunities for solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(2)]). Policy also instructs management to "give consideration to the interrelationship between size, screening, configuration, and other factors that influence solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]). Finally, consideration must be given to "factors or elements influencing solitude including size, natural screening, and the ability of the user to find a secluded spot" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(c)], page 15).

In summary, current BLM policy supports, not detracts from Hidden Canyon's wilderness suitability. In any event, our citizen's inventory demonstrated that the unit's narrow configuration (four-tenths of a mile at its most slender segment) did not preclude wilderness suitability.

B. Preliminary AWC Recommendation

1) Mandatory Wilderness Characteristics (Wilderness Character)

a) Size

The proposed 10,594-acre Hidden Canyon wilderness meets the BLM (USDI

2001 [H-6310-1, Section .13(B)(1), page 11]) size criteria of greater than 5,000 acres.

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Hidden Canyon Wilderness, the answer to both questions is a resounding yes. The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]). It's woodlands, intricate drainages, escarpments and size creates a picturesque, rugged wilderness home to mule deer, mountain lions, raptors and other woodland avian species.

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Hidden Canyon's human imprints consist of primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). These impacts consist of two abandoned travel ways (C-D and K-KI) and are in fact "substantially unnoticeable" (see photos KC-10-7; KC-11-26,27).

The principal proposed "road" closures within the proposed wilderness consists of one little-used, probably abandoned primitive travel ways (A-B). This travel way should be closed to vehicular access and stabilized to protect Monument values. AWC maintains that it is reasonable to assume past impacts created by these travel ways described below (see Travel Way Closures section) "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation. Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c), provides a more permissive standard for designating a wilderness; a second definition, in section 4(c), provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Hidden Canyon Wilderness' size, and terrain variation contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation. Recent citizen's inventories demonstrate the area's outstanding wilderness experiential potential, including opportunities for solitude, based on all the factors presented above. The AWC strongly urges the BLM to reconsider Hidden Canyon's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

2) Travel Way Closures

- C-D (Poverty Spring quad; T35N, R12W, section 4) is a short (0.25 mile) "road to nowhere" used by woodcutters. It is largely revegetated (photo KC-11-25), substantially unnoticeable (photos KC-11-26) and should be closed.
- A-B (Poverty Spring quad; T36N, R12W, section 32; and T35N, R12W, section 5) is a one-mile route depicted on the 2000 BLM map and the quad. The route is generally revegetated (photo KC-11-27), substantially unnoticeable (photos KC-10-1, KC-11-27), steep and susceptible to erosion (photo KC-11-14), and provides no access to tanks or grazing structures. It should be closed. This action allows an extension of the proposed WSA to the south.
- K-K1 (St. George Canyon Quad; T36N, R13W, Section 24); travel way is depicted on the BLM map and the St. George Canyon and Poverty Springs Quad, but is difficult to discern on the ground (photo KC-10-7). It appears abandoned and provides redundant access to route I-K-J. It should be closed to protect Monument values.

Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Hidden Hills Proposed Wilderness (22,808 acres; Quads: St. George Canyon;
Last Chance Canyon; and Poverty Springs).

Summary:

The Arizona Wilderness Coalition recommends the 22,808-acre Proposed Hidden Hills Wilderness for Wilderness designation. A review of the 1979-82 WSA process demonstrates that wilderness suitability criteria for the unit was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The 22,808-acre Proposed Hidden Hills Wilderness consists of picturesque woodland hills and incised, intricate canyons and other drainages of pinyon and juniper forests (photo HH-1).

B. Historical Review of the 1982 WSA Decision Process

The area inventoried consists of old Intensive Inventory Hidden Wash Unit (1-110; 19,950 acres) as well as a 6,000-acre area (between Last Chance Canyon and Rattlesnake Canyon) not previously evaluated. The principal "Hidden Wash" area was dropped from further wilderness consideration because of the "cumulative effect" of "water developments, several miles of roads and ways, and several miles of bulldozed fence line" (USDI 1980).

C. Preliminary AWC Recommendation

While we acknowledge some of the impacts described in the 1980 Proposal Report (USDI 1980), we do not concur that the area lacks sufficient wilderness character for wilderness consideration. Based on the new information presented below, the AWC believes the proposed Hidden Hills Wilderness should be further evaluated for interim protection as a WSA. The "roads and ways" issue is discussed in detail below. The "several miles of bulldozed fence line" forms the unit's boundary and therefore lies outside of the proposed wilderness. The area's major water developments (Rattlesnake Springs, T35N, R13W, Section 3; an earthen tank along BLM Route 1054 in Section 21; a steel tank in Section 33; and the "Head of Hidden Pond, T35N, R12W, Section 28) lie outside the wilderness proposal. The semi-trailer tank along F-G (photo KC-11-21, T35N, R12W, Section 16) lies approximately 1/4 mile inside the proposed boundary. It is not a permanent feature and could be moved. Two small troughs (Coin Springs, photo KC-11-7, T35N, R13W, Section 36; and one located along travel way K-L, photo KC-13-20, Section 20) are "substantially unnoticeable." Access to these two troughs is addressed below as part of a minimum requirement process.

1) Mandatory Wilderness Characteristics (Wilderness Character)

a) Size

The proposed 22,808-acre Hidden Hills wilderness meets the BLM (USDI 2001

[H-6310-1, Section .13(B)(1), page 11]) size criteria of greater than 5,000 acres.

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammeled" (uncontrolled) by humans and their activities?

Regarding the proposed Hidden Hill Wilderness, the answer to both questions is a resounding yes. The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]; see photos HH-1,3). It's expansive woodlands, intricate drainages, grasslands and size creates a picturesque, rugged wilderness home to mule deer, mountain lions, raptors and other woodland avian species.

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Hidden Hills' human imprints consist of primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). These consist of three abandoned travel ways (D-D1, A1-D2, and E-J) and are in fact "substantially unnoticeable" (see photos KC-11-1,2; KC-13-23,25). Two largely revegetated and little-used routes recommended for closure (B1-H1-H, and B2-B4), form the proposed boundary.

The principal proposed "road" closures within the proposed wilderness two little-used primitive travel ways (A-B [Dry Canyon] and K-L), and two severely eroding and impacting routes (Coin Springs and a section of BLM Route 1054 [Rattlesnake Canyon road]). These travel ways should be closed to vehicular access and stabilized to protect Monument values. AWC maintains that it is reasonable to assume past impacts created by these travel ways described below (see Travel Way Closures section) "will return or can

be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation. Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c), provides a more permissive standard for designating a wilderness; a second definition, in section 4(c), provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Hidden Hills Wilderness' size, terrain variation ranging from the softly undulating juniper and pinyon forests to rugged canyons contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation (photos HH-1,3). Recent citizen's inventories demonstrate the area's outstanding wilderness experiential potential. The AWC strongly urges the BLM reconsider the area's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

2) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]).

The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Hidden Hill's "optional Wilderness Characteristics" and include:

a) 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.

b) A geological treasure, including

- recent sinkholes and breccia pipes
- fossils including invertebrate fossils.
- portions of geologic faults, including...the Grand Wash fault.

c) Important watersheds for the Colorado River and the Grand Canyon....

d) 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 numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, 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"...scattered across the monument...[telling] the stories of the remote family ranches and the lifestyles of early homesteaders....

e) 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... allowing wildlife movement and plant dispersal
- Diverse wildlife
- Numerous threatened or endangered species including the Mexican spotted owl and the California condor.

1) Proposed Boundary

Beginning in the unit's northwest corner, the proposed boundary begins at the junction of the Hidden Canyon Road (BLM Route 1003) and BLM Route 1071 (Last Chance Canyon Road; St. George Canyon quad; T36N, R13W, Section 16) and along 1003 in an easterly and southerly direction to its junction with H1-H at "Head of Hidden Pond," one-quarter mile west of the 1003-State Route 103 junction (Poverty Springs Quad; T35N, R12W, section 28); then in an easterly direction following the H1-H portion of the B1-H1-H route from point "H" in the east to the bulldozed fenceline at the top of sections 25 and 26 (Last Chance Quad; T35N, R13W), and then westerly along the fenceline to the rim of Dry Canyon in the north-west corner of section 26; then in a southerly and then westerly direction along travel way B1-B2-B3 to its junction with BLM Route 1071 at B3 (Last Chance Canyon Quad; T35N, R 13W, Section 33, southeast corner at BM 6528); then in a westerly and then northerly direction along 1071 to its junction with BLM Route 1003 (Last Chance Canyon Road; St. George Canyon quad; T36N, R13W, Section 16).

2) Travel Way Closures

- Coin Springs (Last Chance Canyon quad, T36N, R13W, Section 36); a little-used (see photo KC-11-6) travel way providing access to Coin Springs. A permanent house trail is located along this route approximately 50 yards from BLM route 1003 and lies outside the wilderness proposal. This 0.75-mile route severely impacts the wash (see photo KC-11-9). In addition, cattle have damaged a fence protecting a small riparian area of free-flowing water and the vicinity of the catchment (photo KC-11-9). The

route should be closed to mechanical travel, stabilized with primitive waterbars and drainage berms, and restored to a natural condition.

- Dry Canyon (A-B; Last Chance Canyon quad, T36N, R13W, section 36; and T35N, R13W, sections 2,11,14,13,23,26, and 34), a 9.1 mile travel way indicating little, if any, recent maintenance, and for most of its length, infrequent use (photo KC-12-27). The 2000 BLM map does not show this route in Lower (northern) Dry Canyon and indicates a jeep trail in the upper reaches. The quad indicates a short (0.6-mile) road in the lower reaches, and approximately 2.5 miles of travel way in the southern highlands. Much of the central route is generally revegetated, with erosional problems and minor traffic indications in the northern lower sections and in its southern-most reaches (photos KC-11-4,5). The route does not appear to access stock tanks, and continued use impacts vegetation, wildlife and soils. The entire travel way should be closed to protect Monument values.
- F-G (Poverty Spring quad, T35N, R12W, sections 16,17,18 and Last Chance Canyon quad, T35N, R13W, sections 13,24, and 25), 4.5 mile route, with the exception of the eastern 0.25 miles to a semi-trailer water tank (photo KC-11-21), appears abandoned (photos KC-11-18,20,23). Significant erosion persists in some sections (photos KC-11-17,19,22). These sections should be stabilized with primitive waterbars and earthen drainage berms. The travel way should remain closed to all mechanized use.
- B1-H1-H (Poverty Spring quad, T35N, R12W, sections 19,20,28-29, and 30; Last Chance Canyon quad, T35N, R13W, sections 25 and 26) a 4.65-mile segment that forms the southern proposed wilderness boundary. The travel way is largely revegetated and indicates little, if any use except for the eastern mile. It is indicated on the 2000 BLM map as a jeep trail. It should be closed to protect Monument values such as soil, vegetation, and wildlife.
- B2-B4 (Last Chance quad, T35N, R13W, sections 26,35,34, and 33) is a one-mile segment that comprises part of the southern boundary of the Hidden Hills proposed wilderness. It disappears 0.5 miles north of B4. There is a trick tank located approximately 0.1 miles north of B4. The entire route from the tank to B2 should be closed to mechanized transport to protect Monument values.
- D-D1, located approximately 2.2 miles north of the BLM route 1071 junction on the southern Rattlesnake Canyon Road (BLM Route 1054; T35N, R13W, sections 21,22) this quarter-mile route is not indicated on the 2000 BLM map, but is depicted as forking one mile jeep trail network on the quad. The route is completely unused and revegetated (photo KC-13-27) and enters an extensive burn area where the travel way disappears (photo KC-13-25). The entire route should be closed to mechanized use to protect Monument values.
- A1-A2 (Last Chance quad; T35N, R13W, sections 23 and 13), a 1.1-mile route depicted on the 2000 BLM map and the quad as a jeep trail, is revegetated (photos KC-11-1,2) with microbiotic crust establishment and presented no evidence of use. The route should be closed to all mechanized use to protect Monument values.
- E-J (Last Chance Canyon quad; T35N, R13W, sections 16,20, and 21) is a two-mile travel way depicted on the 2000 BLM map and the quad as a jeep trail. The route's eastern junction at Rattlesnake Canyon Road (BLM Route 1054) is completely revegetated and shows no sign of use (photo KC-13-23). Its western junction with the

Last Chance Canyon road (BLM Route 1071) could not be located. The route should be administratively closed to all mechanized travel.

- K-L (Last Chance Canyon quad; T35N, R13W, sections 9,17 and 20) is a 2.3 mile travel way depicted on the 2000 BLM map and the quad as a jeep trail. The route provides access to a watering trough (photo KC-13-20) located halfway to Last Chance Canyon road (BLM Route 1071). While its junction with 1071 and Rattlesnake Canyon road (1054) is conspicuous (photo KC-13-16) with some sections significantly eroded (photo KC-13-15), most of the travel way is generally revegetated (photos KC-13-14,19,21). We suggest closing the route to all mechanized transport and restoring it to a natural condition. The water trough can be moved to the fence line just west of K-L's junction with Rattlesnake Canyon road, and a supplemental tank can be placed at it's junction at Last Chance Canyon road; or the existing tank could be refilled using stock.

3) Cherry Stems

Rattlesnake Canyon Road (BLM Route 1054; Last Chance Quad, T35N, R13W, sections 33,28,21,16,9,4, and 3; T36N, R13W, sections 34,27, and 26), is a 9.8-mile route providing access to stock tanks in section 21 (T35N, R13W) and at Rattlesnake Springs. The route appears on the 2000 BLM map, but the southern two miles is not depicted on the 1971 quad where the 2.5-mile northern portion appears as a road and the remainder as a jeep trail. The route is in generally good shape (high clearance trucks can pass) with the notable exception of a 1.8-mile section between junction "K" and the corral at Rattlesnake Springs. Here the route enters the main wash and is severely eroded, with two locations that currently are impassible to 4X4 (see photo KC-13-1). The segment's location within an active, large drainage assures that the erosion problem will persist regardless of maintenance activities. We suggest administratively closing this severely eroded section permanently from Rattlesnake Springs (T35N, R13W, Section 3) north to the stock tank and corral in the southeastern corner of Section 16 (BM 6143). This action would allow access to the two stock corrals in Rattlesnake Canyon through two non-wilderness corridors (see discussion of travel way K-L water trough) .

Grand Canyon- Parashant National Monument Wilderness Recommendation

Unit: Hidden Rim Proposed Wilderness (17,519 acres; Quads: St. George Canyon; Cane Springs SE).

Summary:

The Arizona Wilderness Coalition recommends the 17,519-acre Proposed Hidden Rim Wilderness for Wilderness designation. A review of the 1979-82 WSA process demonstrates that wilderness suitability criteria for the unit (former Hidden Rim WSA, Unit 119; 16,563 acres) was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The proposed Hidden Rim Wilderness contains spectacular sections of the Upper Grand Wash Cliffs, Hidden, Jump, and St. George Canyons. The plateau lands consist of rolling hills of grasslands and pinyon-juniper woodlands separated by open drainages. Lower Jump Springs provides a luxuriant example of a desert springs environment free from grazing impacts.

B. Historical Review of the 1982 WSA Decision Process

The proposed Hidden Rim Wilderness consists of the old Hidden Rim WSA (1-119; 16,563 acres). In 1982, the BLM stated that "[v]egetation below the cliffs provides good screening and, when combined with topography, offers an **outstanding opportunity for solitude**" (emphasis added; USDI, BLM, 1982, EIS:53). In addition, the BLM emphasize that:

*Hidden Rim WSA has **outstanding opportunities** for hiking, photography, and plant and geologic sighting [primitive and unconfined or primitive type of recreation]....The rim offers excellent photographic vistas [and] [t]he limestone cliffs and sloping Hermit shale of the Upper Grand Wash Cliffs and Supai sandstone below provide interesting and colorful rocks and erosion forms for geologic study (USDI, BLM, 1982, EIS:53. Emphasis added).*

While Hidden Rim's experiential wilderness characters are obviously superior, the BLM qualified its endorsement by noting "these opportunities are limited to the rim of the Upper Grand Wash cliffs, the cliffs, and the area below the cliffs"(USDI, BLM, 1982, EIS:53) and not the plateau. Earlier BLM requirements that not only the traditional wilderness characteristics (size, naturalness, outstanding opportunities for solitude or primitive and unconfined recreation, and other supplemental values) required consideration, but also "**the unit's potential for returning to its natural condition if there had been human activity in the unit,**" that is its potential for restoration, would be considered (emphasis added; USDI, BLM, 1979, Preliminary Findings, page 3). Perhaps with this requirement in mind, agency staff noted that the

burning of a large area above the cliffs [the plateau] has temporarily eliminated vegetation screening and reduce opportunities for solitude....[but] [w]ith the return of juniper and pinyon to this portion of the unit, opportunities for solitude are expected to be outstanding (USDI, BLM, 1982, EIS:53).

In addition, the BLM acknowledged that the plateau contained "some human imprints, including several ways and range developments....[but] [t]hese developments, however, are largely unnoticeable, and the unit appears to be natural" (USDI, BLM, 1982, EIS:53). Obviously the Hidden Rim's plateau met BLM's existing wilderness character criteria. In any event, current policy requires outstanding opportunities for either solitude or primitive and unconfined type of recreation, not both "somewhere in the area," not everywhere (USDI 2001 [H-6310-1, Section .13(B)(3), page 13]). The AWC submits that the agency's 1982 conclusions should have supported, not precluded, wilderness designation.

In 1982, the BLM recommended the entire unit as nonsuitable for wilderness designation (USDI, BLM, 1982, EIS:21). "The unit lacks high-quality wilderness characteristics and has an undesirable configuration due to two cherrystem roads dividing the unit into three segments (USDI, BLM, 1982, EIS:21). Current BLM policy prohibits comparisons or numerical, alphabetical, or qualitative rating systems (USDI 2001 [H-6310-1, Section .13(B)(1), page 11) and would not support the unsubstantiated "high-quality" conclusion. The agency's reference to "undesirable configuration" is not explained, and in any event current policy states that a "dead-end (cherry-stem) road ...does not by itself disqualify an area from being considered 'roadless'" (USDI 2001 [H-6310-1, Section .13(A)(3), page 10]).

The BLM's initial (1982) assessment of Hidden Rim's naturalness and outstanding opportunities for solitude or a primitive and unconfined type of recreation unquestionably should have resulted in a recommendation for wilderness designation. The recent citizen's inventory demonstrates that the former Hidden Rim WSA still retains outstanding opportunities for solitude and a primitive or unconfined type of recreation.

All Wilderness Alternative mentions 40 acres of nonfederal mineral estate (USDI, BLM, 1982, EIS:21).

C. Preliminary AWC Recommendation

New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

1) Mandatory Wilderness Characteristics (Wilderness Character)

a) Size

The proposed Hidden Rim Wilderness (17,519 acres) meets the BLM size criteria of greater than 5,000 acres (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]).

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Hidden Rim Wilderness, the answer to both questions is a resounding yes. As concluded in the BLM's 1982 assessment described above and the recent citizen's inventory, the area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]; see photos HR-1,3). It's spectacular cliffs, expansive woodlands, intricate drainages, grasslands and size creates a picturesque, rugged wilderness home to mule deer, mountain lions, raptors and other desert avian species.

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Hidden Rim's human imprints consist of primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). These consist of two travel ways (Lower Jump Springs and E-F; described below) and are in fact "substantially unnoticeable" (see photos KC-10-18,19, 23 and 26). One principal proposed "road" closure within the proposed wilderness (D-C) provides redundant access to the rim vista. These travel ways should be closed to vehicular access and stabilized to protect Monument values (see discussion presented below).

AWC maintains that it is reasonable to assume past impacts created by the travel ways described below (see Travel Way Closures section) "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

In any event, the presence of a "road" does not disqualify an area for wilderness

designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation. Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c), provides a more permissive standard for designating a wilderness; a second definition, in section 4(c), provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Hidden Rim Wilderness' size, terrain variation (ranging from the softly undulating juniper and pinyon forests to rugged canyons and cliffs) contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation (photos HR-2,3; KC-10-19). Recent citizen's inventories demonstrate the area's outstanding wilderness experiential potential. The AWC strongly urges the BLM reconsider the area's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

2) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]).

The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Hidden Rim's "optional Wilderness Characteristics" and include:

a) 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.

b) A geological treasure, including

- colorful...Paleozoic strata against the highly faulted terrain
- recent sinkholes and breccia pipes
- fossils, including invertebrate fossils.
- portions of geologic faults, including...the Grand Wash fault.

c) Important watersheds for the Colorado River and the Grand Canyon....

d) 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 numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, 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"...scattered across the monument...[telling] the stories of the remote family ranches and the lifestyles of early homesteaders....

e) 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. This includes a "Mohave Desert plant community [occupying] the lower slopes and Supai bench area...[and] include Joshua trees, yuccas, and agave" (USDI, BLM, 1982, EIS:53). Lower Jump Springs provides a luxuriant example of a desert springs environment free of cattle impacts.
- Riparian corridors...allowing wildlife movement and plant dispersal
- Diverse wildlife
- Numerous threatened or endangered species including the Mexican spotted owl and the California condor.

1) Proposed Boundary

Beginning in the northeast corner of the proposed wilderness at the junction of BLM Route 1033 with 1032 (St. George Canyon Quad; T37N, R13W, Section 16); continuing along 1032 in a southerly direction to the junction of BLM Route 1034 in Section 15; then along 1034 in southerly direction to its junction with BLM Route 1003 (St. George Canyon; T36NR13W, Section 15); following 1003 in a westerly direction to its junction with BLM Route 1033 (St. George Canyon; T36N, R14W, Section 2); then following 1033 in a northerly then easterly direction to its junction with BLM Route 1032 (St. George Canyon Quad; T37N, R13W, Section 16).

2) Travel Way Closures

- Travel way "D-C" (T 37 N, R 13 W, sections 28, 29, 32) is depicted on the quad and the 2000 BLM map. This route provides redundant access to the rim vista and should be closed and restored to a natural condition. Agreements for essential maintenance of the tank in Sections 28 (T37N, R13W) can be developed under the BLM's minimum requirement procedures.
- Travel way "E-F" (T 36 N, R 13 W, sections 3,4,5; 2.9 miles) is depicted on the quad and the 2000 BLM map and provides access to a livestock tank and wildlife water catchment. The non-functional wildlife catchment (T36N, R13W, Section 5; see photo KC-10-24) is in complete disarray and should be removed. A 0.5-mile travel way continuation is depicted on the quad, but this section is revegetated and indicates no recent use (photo KC-10-26). Sections of E-F indicate infrequent use (photo

KC-10-23) and the entire travel way should be closed to mechanized travel.

Agreements for essential maintenance of the stock tank can be developed under the BLM's minimum requirement procedures.

- Lower Jump Springs travel way (T 37 N, R 14 W, Sections 24, 25 [includes Cane Springs Quad]; 1.0 mile) is completely revegetated (photos KC-10-18,19) and leads to a spring that is free flowing with abundant, mature oak and redbud. The surrounding terrain appears to be free of grazing activity. This route should remain closed to all mechanized travel.

3) Cherry Stems

A-B (Tweeds Point Overlook; 5.0 miles; T 37 N, R 13 W, sections 20, 21, 29, 30 and 31) provides access to one of the monuments most stunning vistas, a wildlife water catchment (Section 30), as well a large trick tank in section 29. The road, depicted on the quad and the 2000 BLM map, contains numerous eroding sections, but is generally passable in a high clearance vehicle. AWC proposes A-B as a non-wilderness "cherry stem" providing vehicular access to the scenic overlook.

Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Proposed Hobbie Canyon Wilderness (12,477 acres) Quads: Mustang Knoll and St. George Canyon).

Summary:

The Arizona Wilderness Coalition recommends the 12,477 -acre proposed Hobbie Canyon Wilderness for Wilderness designation. A review of the 1979-82 WSA process demonstrates that the agency inconsistently and incorrectly applied wilderness suitability criteria to the unit. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

Hobbie Canyon consists of rugged valleys, rolling hills and escarpments, and scenic vistas. Its expansive pinyon and juniper woodlands includes sage grading into blackbrush and grasslands.

B. Historical Review and Critique of the 1982 WSA Decision Process

The BLM described Hobbie Canyon's "[r]olling hills, twisting canyons, and small escarpments...covered primarily with pinyon-juniper and sagebrush...[containing] a few minor developments which do not impact naturalness (USDI, BLM, 1982, EIS:53). While the agency stated "[p]ortions of the unit provide **outstanding opportunities for seclusion [solitude]** in the hill, canyons, and dense pinyon-juniper stands...[t]he unit, however, lacks outstanding opportunities for such primitive recreation as hiking, hunting, backpacking, horseback riding, and sightseeing (USDI, BLM, 1982, EIS:53; emphasis added). The BLM proposed Hobbie Canyon as unsuitable for wilderness designation:

[t]he Unit offers no outstanding opportunities for primitive and unconfined recreation and meets only the minimum criteria for solitude.... Moreover, the overall wilderness characteristics are not of high quality (USDI, BLM, 1982, EIS:21).

While recent citizen's inventories reported outstanding opportunities for each wilderness-dependant experiential quality, current policy requires outstanding opportunities for either solitude or primitive and unconfined type of recreation, not both "somewhere in the area," not everywhere (USDI 2001 [H-6310-1, Section .13(B)(3), page 13]). In addition, policy prohibits comparisons or numerical, alphabetical, or qualitative rating systems (USDI 2001 [H-6310-1, Section .13(B)(1), page 11) and would not support the unsubstantiated "high-quality" conclusion. The AWC submits that the agency's 1982 decision regarding naturalness and outstanding opportunities for solitude should have supported, not precluded, wilderness designation.

C. Preliminary AWC Recommendation

New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness

Inventory and Study Procedures.

1) Mandatory Wilderness Characteristics (Wilderness Character)

a) Size

The proposed Hobbie Canyon Wilderness (12,477 acres) meets the BLM size criteria of greater than 5,000 acres (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]).

b) Naturalness

In 1982, the BLM stated that Hobbie Canyon WSA contained "a few minor developments which do not impact naturalness" (USDI, BLM, 1982, EIS:53). Recent citizen's surveys support the same conclusion. The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Hobbie Canyon Wilderness, the answer to both questions is a resounding yes (see slide Hob-2). As concluded in the BLM's 1982 assessment described above and the recent citizen's inventory, the area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]; see photos HR-1,3). It's scenic escarpments, expansive woodlands, intricate drainages, grasslands creates a picturesque, rugged wilderness home to mule deer, mountain lions, raptors and other desert avian species.

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Hobbie Canyon's human imprints consist primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). These consist of travel ways (J1-J2, K-J, L-L1, Z-T-X, and Y-T-S4) described below and are in fact "substantially unnoticeable." AWC maintains that it is reasonable to assume past impacts created by the travel ways described below (see Travel Way Closures section) "will

return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation. Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c), provides a more permissive standard for designating a wilderness; a second definition, in section 4(c), provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Hobbie Canyon Wilderness' size, terrain variation (ranging from the softly undulating juniper and pinyon forests to rugged canyons and escarpments) contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation (photos HR-2,3; KC-10-19). In 1982, the agency stated "[p]ortions of the unit provide **outstanding opportunities for seclusion [solitude]** in the hills, canyons, and dense pinyon-juniper stands (USDI, BLM, 1982, EIS:53; emphasis added). Recent citizen's inventories demonstrate the area's outstanding wilderness experiential potential, including outstanding opportunities for primitive recreation as hiking, hunting, backpacking, horseback riding, and sightseeing, contrary to the agency's 1982 negative assessment (USDI, BLM, 1982, EIS:53). The AWC strongly urges the BLM reconsider the area's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

2) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]).

The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Hobbie Canyon's "optional Wilderness Characteristics" and include:

a) 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.

b) A geological treasure, including

- colorful...Paleozoic strata against the highly faulted terrain
- recent sinkholes and breccia pipes
- fossils, including invertebrate fossils.
- portions of geologic faults

c) Important watersheds for the Colorado River and the Grand Canyon....

d) 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 numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, 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"...scattered across the monument...[telling] the stories of the remote family ranches and the lifestyles of early homesteaders....

e) 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...allowing wildlife movement and plant dispersal
- Diverse wildlife
- Numerous threatened or endangered species including the Mexican spotted owl and the California condor.

1) Proposed Boundary

Beginning in the unit's upper northwest corner at the junction of BLM Route 1007 with State Route 101 (Mustang Knoll; T38N, R13W, Section 20); continuing in an easterly direction along 101 to point "Z" in Section 22 (excluding Imlay Airstrip Wildlife Catchment in Section 23); then in a southerly direction along travel way Z-T to point "T"; then in an easterly direction along travel way T-S3 to point "S3" in section 25; then in a southerly direction bypassing to the west "Imlay Resort Tank and corrals; then along BLM Route 1032 in a southerly direction past its junction with BLM Route 1059 (St. George Quad; T37N, R13W, Section 18); then in a westerly direction along 1032 past its junction with BLM Route 1034 in Section 15; then in a northerly direction along 1032 to its junction with BLM Route 1007 in Section 30(Mustang Knoll; T38N, R13W), excluding on the west the corrals depicted on the quad; then in a northeasterly direction along 1007 to its junction with State Route 101 in Section 20.

2) Travel Way Closures

1. J1-J2 is depicted on the St. George Quad and the BLM map (USDI, 2000). It begins

as an inconspicuous two-track at its junction with 1032 in Section 14 (T37N, R13W; photo KC-8-26) and quickly fades to become substantially unnoticeable (photos KC-8-22,24). It is a route to nowhere and should be closed.

2. K-J is depicted on the Mustang Knoll Quad and the BLM map (USDI 2000). It begins on BLM Route 1032 (T38N, R13W, Section 36) as a two-track and quickly ascends in an eroding steep incline (photos KC-7-10,8, and 6). Much of the route is generally revegetated (photo KC-7-9) and the travel way completely fades in a burn area in Section 2 (T37N, R13W; photo KC-7-7). While the St. George and Mustang Knoll Quads depict the travel way's continuation to travel way J1-J2, the route is completely obscured. K-J is a route to nowhere and should be closed to mechanical travel and restored to a natural condition to protect Monument values.
3. L-L1 is depicted on the Mustang Knoll and St. George Quads as a jeep trail. The travel way is blocked at its junction with BLM Route 1032 (T37N, R12W, Section 6; photo KC-7-4) and quickly fades dense pinyon and juniper forest (photo KC-7-2). This route should remain closed to mechanized travel.
4. Z-T-X is depicted on the BLM map (USDI 2000) and the Mustang Knoll Quad as a jeep trail. The route is blocked by a fallen juniper at its junction with State Route 101 (Mustang Knoll Quad; T38N, R13W, Section 22; photo KC-7-21) at point "Z." The abandoned travel way is completely blocked by a washout near its terminus at BLM Route 1032 (photo KC-7-13; Mustang Knoll Quad; T3N, R13W, Section 35). The travel way is abandoned and is substantially unnoticeable through most of its course (photos KC-7-17 and 24). The route up Hobbie Canyon indicated on Mustang Knoll Quad is completely revegetated except for a cow trail (photo KC-7-15; Mustang Knoll Quad; T38N, R13W, Section 35). It should remain closed to mechanized travel to protect Monument values.
5. Y-T-S4 is depicted on the BLM map (USDI 2000) and the Mustang Knoll Quad as a jeep trail. It is closed by a fenceline without a gate in Section 22 (T38N, R13W, Section 22) and appears abandoned along most of its way (photos KC-6-2; KC-7-19-27). Numerous sections are severely eroded and should be stabilized with primitive water drainage berms and/or checks (photos KC-6-5, KC-7-26). The travel way forms the northeastern boundary of the proposed Hobbie Canyon Wilderness, and should be closed to mechanized travel to protect monument values.

Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Proposed Ide Valley Wilderness (10,218 acres). Quad: Mustang Knoll).

Summary:

The Arizona Wilderness Coalition recommends the 10,218-acre proposed Ide Valley Wilderness for Wilderness designation. A review of the 1979-82 WSA process demonstrates that the agency inconsistently and incorrectly applied wilderness suitability criteria to the unit (1-127; 7,970 acres). New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

Ide Valley consists of rugged, serpentine valleys, rolling hills and scenic vistas providing wildlife connectivity with the Paiute Wilderness to the northwest. Its expansive pinyon and juniper woodlands include sage grading into blackbrush and grasslands.

B. Historical Review and Critique of the 1982 WSA Decision Process

In 1982, the BLM described Ide Valley as consisting of "rolling hills, twisting canyons, small escarpment, knolls, and a few largely unnoticeable vehicle ways and range improvements (USDI, BLM, 1982, EIS:53).

The topography lends itself to excellent screening with rolling hilly terrain, small valleys, occasional rock and cliff outcropping, small escarpments, narrow twisting canyons, and a large knoll rising 700 feet above the terrain below the vegetation, consisting of various densities of pinyon-juniper, sage, grasses, cliffrose, oak, manzanita, and other shrubs, complements the screening effect of the topography. Together, the topographic relief and vegetation provide the visitor with outstanding opportunities for solitude (USDI, BLM, 1982, EIS:53. Emphasis added).

The agency added "[a]lthough opportunities for hiking, backpacking, camping, horseback riding, and sightseeing exist, they are not outstanding" (USDI, BLM, 1982, EIS:53).

The BLM proposed Ide Valley as nonsuitable for wilderness designation:

The unit lacks high-quality wilderness characteristics and outstanding opportunities for primitive and unconfined recreation, and its solitude does not exceed the minimum standards (USDI, BLM, 1982, EIS:21).

While recent citizen's inventories reported outstanding opportunities for each wilderness-dependant experiential quality, current policy requires outstanding opportunities for either solitude or primitive and unconfined type of recreation, not both "somewhere in the area," not everywhere (USDI 2001 [H-6310-1, Section .13(B)(3), page 13]). In addition, policy prohibits comparisons or numerical, alphabetical, or qualitative rating systems (USDI 2001 [H-6310-1, Section .13(B)(1), page 11) and would

not support the unsubstantiated "high-quality" exclusionary logic. The BLM's did not elaborate on the unit's failure to **exceed** "the minimum standards" for solitude. The Wilderness Act and BLM policy refers to outstanding opportunities for solitude and the unit met this hurdle. Nowhere in policy or law is "exceeding" this standard required. The AWC submits that the agency's 1982 decision regarding naturalness and outstanding opportunities for solitude should have supported, not precluded wilderness designation.

C. Preliminary AWC Recommendation

New information derived from a recent citizen's inventory demonstrates that the area (former WSA 1-127; 7,970 acres and Monument lands surrounding Mustang Knoll) meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

1) Mandatory Wilderness Characteristics (Wilderness Character)

a) Size

The proposed Ide Valley Wilderness (10,218 acres) meets the BLM size criteria of greater than 5,000 acres (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]).

b) Naturalness

In 1982, the BLM stated that Ide Valley WSA contained "a few largely unnoticeable vehicle ways and range improvements" (USDI, BLM, 1982, EIS:53). Recent citizen's surveys concluded that most of the travel ways remain in fact substantially unnoticeable and the area appeared natural (photos IV-1,2,3,4). The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammeled" (uncontrolled) by humans and their activities?

Regarding the proposed Ide Valley Wilderness, the answer to both questions is a resounding yes (photos IV-1,2,3,4). As concluded in the BLM's 1982 assessment described above and the recent citizen's inventory, the area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]). It's scenic escarpments and knolls,

expansive woodlands, intricate drainages, and grasslands creates a picturesque, rugged wilderness home to mule deer, mountain lions, raptors and other desert avian species.

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Ide Valley's human imprints consist primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). As mentioned above the BLM stated that Ide Valley WSA contained "a few largely unnoticeable vehicle ways and range improvements" (USDI, BLM, 1982, EIS:53). AWC maintains that it is reasonable to assume past impacts created by the travel ways described below (A2-D-F and D-D2; see Travel Way Closures section) "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation. Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c), provides a more permissive standard for designating a wilderness; a second definition, in section 4(c), provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Ide Valley Wilderness' size, terrain variation (ranging from the softly undulating juniper and pinyon forests to picturesque valleys, knolls and escarpments) contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation. In 1982, the agency stated that "the topographic relief and vegetation provide the visitor with **outstanding opportunities for solitude**" (USDI, BLM, 1982, EIS:53. Emphasis added). In addition, recent citizen's inventories demonstrate the area's outstanding wilderness experiential potential, including outstanding opportunities for primitive recreation as hiking, hunting, backpacking, horseback riding, and sightseeing, contrary to the agency's 1982 negative assessment regarding primitive and unconfined recreation (USDI, BLM, 1982, EIS:53. See photos IV-1,2,3,4). The AWC strongly urges the BLM reconsider the area's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

2) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also

contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]).

The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Ide Valley's "optional Wilderness Characteristics" and include:

a) 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.

b) A geological treasure, including

- Paleozoic strata against the highly faulted terrain
- fossils, including invertebrate fossils.
- portions of geologic faults

c) Important watersheds for the Colorado River and the Grand Canyon....

d) 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 numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, 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"...scattered across the monument...[telling] the stories of the remote family ranches and the lifestyles of early homesteaders....

e) 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...allowing wildlife movement and plant dispersal
- Diverse wildlife
- Numerous threatened or endangered species including the Mexican spotted owl and the California condor.

1) Proposed Boundary

Beginning in the southwestern corner at the junction of State Route 101 with BLM Route 1051 (T38N, R14W, Section 24); in a northerly direction along 1051 to a

point east of Ide Valley Spring; then continuing along 1051 in an easterly direction to its junction with point "A1" in Section 4 (T38N, R13W); then along boundary presented in AWC topographic map to point "A2" in Section 34 (near BM 5282); then along the Monument boundary in an easterly then southerly direction to State Route 101; then in a westerly direction along 101 to its junction with BLM Route 1051.

2) Proposed Travel Way Closures

- A2-D (T 38 N, R 13 W, Sections 3, 10; T 39 N, R 13 W, Section 34) is an unnumbered route marked on BLM map (USDI 2000). The travel way consists of 2.85 miles of severe erosion (photos KC-5-1,2) and should be closed to its junction at "D" in section 10 to protect monument values (photo KC-5-8; KC-6-27).
- F-D-D2; an unnumbered travel way depicted on the quad and the BLM map (USDI, 2000). It contains numerous, significant eroding sections (photos KC-38-7,8) and provides redundant access to a trick tank better accessed by travel way F-G. F-D-D2 should be closed to protect Monument values.
- E1; a 1/4-mile access travel way to an earthen tank in Section 22. It should be closed to mechanized access. Agreements for essential maintenance can be developed under the minimum requirement process.
- A'-A2 (T 38 N, R 13 W, Sections 3-4; T 39 N, R 13 W, Section 34), a 2.0-mile travel way not located on either the quad map nor the BLM map (USDI 2000). It forms part of the unit's the northern boundary. The western 0.5 miles provides access to a structure and well site. The route continues to its junction with A2-D-F at A2. This section consists of numerous steep, severely eroding sections following a buried pipeline. Impassible to four-wheel drive, there was no indication of any type of vehicular use. This eroding, eastern 1.5-mile route should be stabilized with water drainages and closed to all mechanized vehicles.

3) Cherry Stems

F-G-E; an access road to a very large (100x200-ft) water catchment and steel tank (T 38 N, R 13 W, Section 16). The travel ways west of the tank depicted on the quad and the BLM map (USDI 2000) are not locatable on the ground and should be considered permanently closed to mechanized travel to protect monument values. "A dead-end (cherry-stem)...does not by itself disqualify and area from being considered 'roadless'"(USDI 2001 [H-6310-1, Section .13(A)(3), page 10]).

Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Proposed Jump Canyon Wilderness (13,832 acres; Quads: Cane Springs, Cane Springs SE, Mustang Knoll and St. George Canyon).

Summary:

The Arizona Wilderness Coalition recommends the 13,832-acre proposed Jump Canyon Wilderness for Wilderness designation. A review of the 1979-80 wilderness inventory process indicates that agency's wilderness suitability criteria was not consistently and correctly applied to the unit. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The proposed Jump Canyon wilderness consists of colorful cliffs (photo KC-43-23), expansive grasslands (photo KC-43-15,16), and intricate canyons. It is home to mule deer, bighorn sheep, mountain lions, raptors and a variety of other desert species.

B. Historical Review and Critique of the 1982 WSA Decision Process

In 1979, the Bureau of Land Management identified Jump Canyon (Unit 1-123; 14,054 acres) for further wilderness study (USDI, 1979, Decision Report). This process included the "Overthrust Belt accelerated intensive inventory" of 21 units from Grand Wash Cliffs to the Nevada state line (510,000 acres; USDI, BLM, 1979, Memo (8500[931]), including Jump Canyon. The agency intended the accelerated inventory to "determine which lands within the area may be dropped from further wilderness consideration, and thereby opened for oil and gas exploration" (USDI, BLM, 1979, Memo (8500[931])). As a result of this process, 110 acres of the unit's 14,054 acres were recommended for non-wilderness status (USDI, BLM, 1979, Memo (8500[931]), "Summary of Results"). In spite of the unit clearing a succession of administrative hurdles, and apparently without further public documentation of the area's wilderness character, the BLM dropped the entire Jump Canyon from further wilderness evaluation.

Since new information derived from a recent citizen's inventory demonstrates that Jump Canyon meets the agency's wilderness suitability criteria, a new wilderness analysis is warranted.

C. Preliminary AWC Recommendation

1) Mandatory Wilderness Characteristics (Wilderness Character)

a) Size

The proposed 13,832-acre Jump Canyon Wilderness meets the BLM (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]) size criteria of greater than 5,000 acres.

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity

as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammeled" (uncontrolled) by humans and their activities?

Regarding the proposed Jump Canyon Wilderness, the answer to both questions is a resounding yes (photos KC-43-11,15,16,23). The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]; see photos KC-43-11,15,23). It's expansive grasslands (photo KC-43-15,16), rugged cliffs (photo KC-43-23), intricate drainages, and size creates a picturesque wilderness home to mule deer, mountain lions, bighorn sheep, raptors and other desert species.

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Jump Canyon's human imprints consist of primarily of an abandoned or little-use travel way not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). Most of travel way AA-BC meets this criteria and is in fact "substantially unnoticeable" (photo KC-43-17,18,20).

The principal proposed "road" closures within the proposed wilderness consist of little-used section of travel way AA-BC to wildlife water catchment (St. George Canyon Quad) and FF-GG (Mustang Knoll Quad). These travel ways should be closed to vehicular access and stabilized to protect Monument values. Agreements for essential maintenance of to the corral in along travel way FF-GG and the wildlife water catchment along AA-BC can be developed under the minimum requirement process. AWC maintains that it is reasonable to assume past impacts created by these travel ways described below (see Travel Way Closures section) "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

In any event, the presence of a "road" does not disqualify an area for wilderness

designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation. Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c), provides a more permissive standard for designating a wilderness; a second definition, in section 4(c), provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Jump Canyon Wilderness' size, terrain variation contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation (photos KC-43-11,15,16,23). While much of the area consists of gently rolling grasslands (photos KC-43-15,16), current BLM policy instructs agency staff to "avoid using lack of terrain variation or vegetation, or size as disqualifying conditions for outstanding opportunities for solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(2)]). The evaluator should not assume that "simply because an area or portion of an area is flat and/or unvegetated, it automatically lacks an outstanding opportunity for solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]). Policy instructs management to "give consideration to the interrelationship between size, screening, configuration, and other factors that influence solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]). Finally, consideration must be given to "factors or elements influencing solitude including size, natural screening, and the ability of the user to find a secluded spot" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(c)], page 15).

Recent citizen's inventories demonstrate the area's outstanding wilderness experiential potential, including opportunities for solitude, based on all the factors presented above. The AWC strongly urges the BLM to reconsider Jump Canyon's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

2) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]). The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Jump Canyon's "optional Wilderness Characteristics" and include:

a) 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.

b) A geological treasure, including

- colorful...Paleozoic strata against the highly faulted terrain
- recent sinkholes and breccia pipes
- fossils, including invertebrate fossils.
- portions of geologic faults

c) Important watersheds for the Colorado River and the Grand Canyon....

d) 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 numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, 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"...scattered across the monument...[telling] the stories of the remote family ranches and the lifestyles of early homesteaders....

e) 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. This includes a Mohave Desert plant community occupying the lower slopes and Supai bench area including Joshua trees, yuccas, and agave
- Riparian corridors...allowing wildlife movement and plant dispersal
- Diverse wildlife
- Numerous threatened or endangered species including the Mexican spotted owl and the California condor.

1) Proposed Boundary

Beginning in the unit's southeastern corner at the junction of BLM Routes 1032 and 1033 (St. George Canyon Quad; T37N, R13W, Section 16); continuing along 1033 in a westerly direction to its junction with BLM Route 1003 (Cane Springs SE Quad; T36N, R14W, Section 2); then along 1003 in a westerly direction to its junction with BLM Route 1007 in Section 3; then in a northerly direction along 1007 to an unnamed wash labeled point "A" in Section 35 (Cane Springs Quad; T38N, R14W); then along the wash south of BM 4049t in an easterly direction and continuing in an easterly direction along the boundary depicted in the AWC Quads (Cane Springs and Mustang Knoll), excluding the road loop depicted on the BLM map (USDI 2000) in Section 30, to BLM Route 1032 at the southern boundary of Section 29 (Mustang Knoll; T38N, R13W); the along 1032 its junction with 1033 (St. George Canyon Quad; T37N, R13W, Section 16).

2) Travel Way Closures

- AA-BC; a little-used (photos KC-43,17,18,20), eroded (photo KC43-14) travel way off of BLM Route 1032 (St. George Quad, T37N, R13W, Section 17). The travel way's first mile follows a wash and is severely eroded at crossings. A wildlife water catchment is located about 2.3 miles from 1032. Beyond this location, the travel way is generally revegetated (photos KC-43,17,18,20). This portion of the travel way, a "road to nowhere," should be closed to protect Monument values. The lower, eroding sections should be closed to mechanized travel and stabilized with waterbars and other primitive drainage features. Access for essential maintenance for the wildlife catchment can be determined through the minimum requirement process.
- FF-GG; a little-used, eroding (photo KC-43-8) travel way to a corral in Section 7 (Mustang Knoll, T37N, R13W; photo KC-43-9), should be closed to protect Monument Values. Agreements for essential maintenance of the corral can be developed under the BLM's minimum requirement procedures.

Grand Canyon- Parashant National Monument Wilderness Recommendation

Unit: Million Hills East Proposed Wilderness ([14,433] acres; Quads: Azure Ridge and Iceberg Canyon).

Summary:

The Arizona Wilderness Coalition recommends the 14, 433-acre Proposed Million Hills East Wilderness (NPS and BLM) for WSA designation. A review of the 1979-82 WSA process demonstrates that wilderness suitability criteria for the BLM portion of the unit was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The 14,433-acre proposed "Million Hills East" wilderness consist of the former Grand Gulch WSA (Unit 1-107; 8,141 acres) and the Arizona portion of the "Indian Hills proposed wilderness" (6,292 acres). This austere, rugged region is contiguous with the Nevada proposed Million Hills Wilderness forming a proposed wilderness of approximately 47,200 acres. The Arizona portion's greatest topographical relief occurs along its northwestern and western sections. This desert land consists of low ridges, rugged hills, and deep gullies of Mojave wildlife and vegetation. An ancient lava bed also lies along the northwest boundary. This unit is part of the Pakoon ACEC, an area managed primarily for recovery of desert tortoise (USDI, BLM, 1998, page 5 and Map 4).

B. Historical Review and Critique of the 1982 WSA Decision Process

The BLM described Million Hills (Grand Gulch WSA) as "[e]xisting in a natural condition" (USDI, BLM, 1982, EIS:51). In addition, the agency stated

This WSA's size and topography provide opportunities for solitude. The rugged landforms in the western part of the unit provide screening and cover. Below the escarpment, ridges and ravines offer seclusion. Although vegetation is generally low and scattered and does not provide ample screening for solitude, the somewhat rough topography enables a visitor to find a secluded place. Moreover, the lack of intrusions and the absence of man's imprints add to feelings of solitude and remoteness... Opportunities exist for such unconfined types or recreation as hiking, photography, and plant and geologic sightseeing. (USDI, BLM, 1982, EIS:51).

After this tepid description of Million Hills East wilderness qualities, the following conclusion seemed inevitable: "[t]hese portunities, however, are not outstanding" (USDI, BLM, 1982, EIS:51). The BLM recommended entire unit as nonsuitable for wilderness designation (USDI, BLM, 1982, EIS:20):

The unit's overall wilderness characteristics are not of a high quality, and the unit meets but does not exceed the minimum standard for solitude. Moreover, the unit

lacks outstanding opportunities for primitive and unconfined recreation (USDI, BLM, 1982, EIS:20).

Recent citizen's inventories demonstrate that the wilderness character of entire proposed Million Hills Wilderness (47,200 acres) meet the requirements of the Wilderness Act. The area encompasses both NPS and Nevada BLM proposed wilderness units. A cursory historical review of the BLM wilderness process reveals a flawed process that led to the nonsuitable decision. In 1982, the Interior Board of Land Appeals (IBLA) ruled that "it was improper to assess an area's wilderness characteristics in association with contiguous lands administered by agencies other than the BLM" (Federal Register 1982). In a BLM "Fact Sheet" (1983), the BLM stated the agency "could not designate any area a WSA contiguous to another Federal agency's wilderness or wilderness candidate area unless the BLM unit, on its own merit, met all required wilderness criteria." Finally, in a 1983 memo, the agency stated that applying the criteria of Interior Board of Land Appeals that Grand Gulch (Million Hills East) lacked sufficient wilderness characteristics by itself (USDI, 1983, Memo, page 3). Interestingly, it also stated that an adjacent Nevada BLM WSA (NV-050-0233) "also lacks wilderness character on its own" implying that the BLM may have considered its Nevada and Arizona offices as "separate Federal agencies." The Nevada BLM apparently disagreed, for that state's unit is protected as a WSA.

Today, BLM policy states that "[e]ach inventory area must be assessed on its own merits **or in combination with an adjacent wilderness area or WSA** as to whether an outstanding opportunity exists [H-6310-1, Section .13(B)(3)(b), page 13]. AWC firmly believes Million Hills possesses the requisite mandatory wilderness characteristics and that the BLM should re-evaluate the Arizona portion area under the current criteria.

C. Preliminary AWC Recommendation

The proposed Million Hills Wilderness size, natural character, and outstanding opportunities for solitude and a primitive and unconfined type of recreation support wilderness designation. In fact, all but the Arizona BLM portion and a 2,184-acre Nevada BLM portion of the 47,000-acre unit, or 78 percent, is already administratively proposed wilderness.

1) Mandatory Wilderness Characteristics (Wilderness Character)

a) Size

The proposed Million Hills Wilderness (47,000 acres) meets the BLM (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]) size criteria of greater than 5,000 acres. The NPS and Nevada BLM components are already "proposed wilderness" (USDI, NPS, 2001).

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity

as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs the agency to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Million Hills Wilderness, the answer to both questions is a resounding yes. The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Million Hills Wilderness size, terrain variation ranging from the softly undulating badlands to rugged canyons and mountains contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation.

In the past, the BLM disqualified Million Hills (Grand Gulch) WSA as unsuitable for wilderness designation because it lacked "high quality" wilderness characteristics and that the "unit meets but does not exceed the minimum standard for solitude" (USDI, BLM, 1982, EIS:20). While recent citizen's inventories reported outstanding opportunities for each wilderness-dependant experiential quality, current policy requires outstanding opportunities for either solitude or primitive and unconfined type of recreation, not both "somewhere in the area," not everywhere (USDI 2001 [H-6310-1, Section .13(B)(3), page 13]). In addition, policy prohibits comparisons or numerical, alphabetical, or qualitative rating systems (USDI 2001 [H-6310-1, Section .13(B)(1), page 11) and would not support the agency's earlier, unsubstantiated "high-quality" exclusionary logic. The BLM did not elaborate on the unit's failure to **exceed** "the minimum standards" for solitude. The Wilderness Act and BLM policy refers to outstanding opportunities for solitude and the unit met this hurdle. Nowhere in policy or law is "exceeding" this standard required.

The agency's 1982 decision regarding naturalness and outstanding opportunities for solitude should have supported, not precluded wilderness designation. In addition, the failure to consider the BLM Arizona WSA as an integral part of a much larger wilderness resulted in a seriously flawed suitability analysis. We urge the BLM to reconsider its earlier analysis and provide Million Hills East interim protection as a WSA.

2) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]). The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Million Hills "optional Wilderness Characteristics" and include:

a) 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.

b) A geological treasure, including

- lava-capped Precambrian and Paleozoic strata against the highly faulted terrain
- fossils including invertebrate fossils.
- portions of geologic faults

c) Important watersheds for the Colorado River

d) 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... numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, 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."

e) 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...allowing wildlife movement and plant dispersal
- Giant Mojave Yucca cacti proliferating in undisturbed conditions
- Diverse wildlife
- Numerous threatened or endangered species including the the desert tortoise (the entire unit lies within the Pakoon ACEC, an area managed primarily for desert tortoise recovery (USDI, BLM, 1998, page 5 and Map 4).

D. Proposed Boundary

Beginning in the unit's northwest corner at the intersection of the Nevada-Arizona stateline with State Route 113 (T34N, R17W, Section 6 [1/4 section west of Section 6]); then in a southerly direction along 113 to its intersection with the Lake Mead National Recreation Area (NRA) boundary in Section 34; then due west along the NRA boundary to the Arizona-Nevada stateline

Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Proposed Mud Mountain Wilderness (47,350 acres; Quads: Cane Springs; Cane Springs SE; Jacobs Well; Red Pockets).

Summary:

The Arizona Wilderness Coalition recommends the 47,350-acre proposed Mud Mountain Wilderness for Wilderness designation. A review of the 1979-80 "Overthrust Belt intensive inventory" process demonstrates that agency wilderness suitability criteria for the unit was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The proposed Mud Mountain Wilderness' varied landscape, ranging from the picturesque Mud Mountain (elevation 5,794 feet, about 1,700 feet above surrounding drainages) to the lower Mojave grasslands, presents a rugged, austere, and alluring wildland. The northern region consists of extensive plateaus dominated by rolling plateaus of pinion and juniper woodlands (photo MM-3). The southern Mojave hills, plains and drainages offer Joshua tree forest and desert grasslands (photos MM-1,2,4,5). The area's vastness and varied topography offers outstanding opportunities for solitude and a primitive type and unconfined type of recreation. The impacts of man are generally unnoticeable, or can be restore to a natural condition.

B. Historical Review and Critique of the 1979 "Overthrust Belt Intensive Inventory" Decision Process

In July, 1979, the Bureau of Land Management's initiated, as part of wilderness inventory, the "Overthrust Belt accelerated intensive inventory" within an area of about 510,000 acres located within the Shivwits Resource Area of Arizona Strip District. The BLM described an "Overthrust Belt" in northwest Arizona as an area of potentially important new oil and gas (USDI, BLM, 1980 Proposal Report, page 3). The inventory encompassed 21 inventory units from Grand Wash Cliffs to the Nevada state line. The BLM intended the accelerated inventory to determine which lands could "be dropped from further wilderness consideration, and thereby opened for oil and gas exploration" (USDI, BLM, 1979, Memo (8500[931])).

The BLM originally scheduled Mud Mountain for "intensive inventory" in 1979 (USDI 1979, Initial Inventory). The agency engaged in a hasty, apparently cursory wilderness evaluation "so that restrictions are lifted on areas not having wilderness characteristics" (USDI, BLM, 1979, BLM Wilderness Bulletin; see USDI, BLM, 1979, Memo (8500[931])). The oil and gas potential soon proved illusionary, but Mud Mountain and seven other units were apparently dropped from any further WSA consideration as a direct result of this flawed process. Since the AWC staff were unable to locate any additional historical information regarding the decision to drop this area, it is assumed its supposed oil and gas potential was the primary rationale for the agency's non-wilderness

recommendation.

C. Preliminary AWC Recommendation

Mud Mountain meets the Wilderness Act's criteria for wilderness designation.

1) Mandatory Wilderness Characteristics (Wilderness Character)

a) Size

The proposed 47,350-acre Mud Mountain Wilderness meets the BLM's wilderness size criteria of greater than 5,000 acres (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]).

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammeled" (uncontrolled) by humans and their activities?

Regarding the proposed Mud Mountain Wilderness, the answer to both questions is yes (see photos MM-1,2,3,4,and 5). The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]).

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Mud Mountain's human imprints include a mechanically treated burn area, but most consist primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). Most imprints, including the treated burn area, are substantially unnoticeable (photo MM-5). There are, however, travel ways meeting the "road" definition that require closure to mechanized access to protect monument values and well as wilderness criteria. AWC maintains that it is reasonable to assume past impacts

created by the travel ways described below "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

The principal proposed "road" closure, the 1.7-mile Corral Canyon road and the 5.2-mile "F-H-I", contains evidences of construction, but the degree of regular use is not apparent and the route appears to serve no essential use (see the discussions presented below). The other "road" closure consists of the 3.8-mile "G-I" and travel way "G1-J" to stock tanks (again, see discussion presented below). Both features may require access for infrequent, essential maintenance developed under the minimum requirement process. Provisions can be developed for removal of the truck tank in the event the permittee prefers a voluntary retirement of the grazing lease.

In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation. Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c), provides a more permissive standard for designating a wilderness; a second definition, in section 4(c), provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Mud Mountain's size, terrain variation ranging from the undulating juniper and pinyon forests to rugged canyons and cliffs, to expansive grasslands and Joshua tree forests contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation. While the BLM dropped Mud Mountain from wilderness consideration in 1980, the recent citizen's inventory demonstrates the area's outstanding wilderness experiential potential (see photos MM-1,2,3,4, and 5). The AWC strongly urges the BLM reconsider the area's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

2) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]).

The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Mud Mountain's "optional Wilderness Characteristics" and include:

a) 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.

b) A geological treasure, including

- colorful... Paleozoic strata against the highly faulted terrain
- fossils including invertebrate fossils.
- portions of geologic faults, including...the Grand Wash fault.

c) Important watersheds for the Colorado River and the Grand Canyon....

d) 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 numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, 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"...scattered across the monument...[telling] the stories of the remote family ranches and the lifestyles of early homesteaders....

e) 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...allowing wildlife movement and plant dispersal
- Diverse wildlife
- Numerous threatened or endangered species including the Mexican spotted owl and the California condor.

1) Proposed Boundary

Beginning in the northeast corner of the proposed wilderness, the boundary begins at the junction of State Route 101 with an unnamed north-south trending spur route in Section 24 (Mustang Knoll Quad; T38N, R14W) immediately south of the 101-BLM Route 1051 junction; then along this unnamed spur in a southerly direction to its junction with BLM Route 1007; then along 1007 in a southerly direction then westerly direction to its junction with travel way segment D-E-G-H at "D" (Cane Springs SE; T36N, R15W, Section 13); then along D-E-G-H in a northerly then westerly direction to its junction with BLM Route 1027 at "H" (Red Pockets Quad; T36N, R15W, Section 16); continuing along 1027 in a northerly direction to an unnamed drainage in Section 33 (Jacobs Well Quad; T38N, R15W) approximately 0.5 miles southwest of BM 4545 in the

northwest corner of Section 34; then along this unnamed drainage in an easterly direction to the top of the unnamed plateau across the "T" (in the "Pack Trail" in Section 34); then in an easterly direction to the unnamed drainage beginning 0.2 miles due south of BM 4251 in Section 27; then in a southeasterly direction along a direct line to the northern base of Knoll 4412 in Section 35; then continuing east 0.2 miles to travel way H-O-E in Section 35; then along H-O-E in an easterly direction to its junction with State Route 101 in Section 31 (T38, R14W); then in an easterly direction along 101 to its junction with an unnamed north-south trending spur route in Section 24 (Mustang Knoll Quad; T38N, R14W) immediately south of the 101-BLM Route 1051 junction.

2) Travel Way Closures

- G-I, is an unnamed travel way appearing on the 2000 BLM recreational map but not on the quad. It provides access to an exclosure in Section 25 (Cane Springs Southeast; T37N, R15W; photo KC-2-9) and the trick tank in Section 19 (T37N, R14W; photo KC-2-8), and travel way G1-J (1.6 miles) which ends at an earthen tank in Section 19 (photo KC-2-5). G-I is a little-used travel way that could easily be restored to a natural condition (see photos KC-2-3,6). G-I ends at the trick tank (photo KC-2-7). G1-J is also little-used and would quickly return to a natural condition through non-use (photos KC-2-4,6). We suggest closing both routes to mechanized travel. Agreements for essential maintenance can be developed under the minimum requirement process, with provisions for the permittee to access both tanks. In the event that the grazing permit is retired, we suggest removing the trick tank completely and restore the entire area to a natural condition.
- B-C (2.5 miles; Cane Springs SE Quad, T37N, R15W, Sections 8 and 9) consists of little used route to a hunter's camp and an abandoned (photo KC-5-22), heavily eroded (KC-5-24,25,26) switchback which continues its 700-foot climb to the plateau. This section of route from the western terminus ("B"; marked "corral"; T37N, R14W, Section 10) of unnamed road heading west of BLM Route 1007, to its terminus at "C" on the unnamed plateau (T37N, R14W, Section 8; photo KC-5-22) should be closed and restored to a natural condition.
- F-H-I (5.2 miles) is depicted on the BLM Map (USDI 2000), begins at the junction of travel ways E-F and F-G (Cane Springs Quad, T37N, R15W, Section 1) and immediately ascends through an eroding wash (photo KC-4-21). The route is generally revegetated and apparently little-used (photo KC-4-20) and provides access to two wildlife water catchments. The first is in a serious state of disrepair and remains non-functional (photo KC-4-9). It should be dismantled and removed. The second (T37N, R14W, Section 4) is readily accessible by foot, or with some trail relocation and stabilization, by horseback from Pocum Wash through an abandoned switchback (J-K). Travel way F-H-I route should be closed to mechanical access to protect monument values, especially soil, vegetation, archaeological sites and wildlife.
- J-K is an abandoned and eroding (photos KC-4-16,18,19) switchback originating in Pocum wash (Cane Springs Quad; T37N, R14W, Section 10) and is depicted on the Cane Springs quad as a four wheel drive route connecting to Pocum Wash. It

completely fades on the flats west of BLM Route 1007. The travel way should remain closed to mechanized travel and stabilized in the eroding sections. One option would be to convert the route into a hiking and/or stock trail.

- H-K, a travel way depicted as a "jeep trail" on the Cane Springs and Cane Springs SE Quads, completely fades about a half mile from Cane Springs SE B-C (photo KC-4-10; T37N, R14W, Section 7). This is a "road to nowhere" and should remain closed to protect monument values.
- F-G (3.5 miles) begins junction of travel ways E-F and F-H-I (Cane Springs Quad, T37N, R15W, Section 1). It is a little-used (photo KC-4-22) "road to nowhere" and completely fades out near a fence line in Section 23 (photo KC-4-24; Red Pockets Quad; T37N, R15W). It should be closed to all mechanized use to protect monument values.
- Corral Canyon road (Cane Springs E-F, 1.7 miles) begins as an infrequently used two-track (T38N, R15W, Section 36; photo KC-4-27) and leads up to the plateau immediately south of Mud Mountain to join travel ways F-H-I and F-G. Closure of this route to mechanized travel would ensure protection of northern Mud Mountain's monument's values including soils, vegetation, and wildlife.
- O-N (3 miles) begins on State Route 101 (Cane Springs Quad; T38N, R15W, Section 1) and is depicted on the quad and the BLM map (USDI 2000) as a "4-wheel drive" route. The travel way consists of steep, eroded switchbacks that currently cannot accommodate 4-wheel-vehicles and much of the route is largely revegetated and apparently little used (photo KC-3-9; T37n, R15W, Section 2). The travel way fades at the first two fenced stock tanks (Red Pockets Quad; photo KC-3-8; T37N, R15W, Section 11). We recommend closure to mechanized access and the emplacement of primitive waterbar and drainage berms in the steep, eroding section to protect monument values. Agreements with the permittee to access both tanks for essential maintenance can be developed under the minimum requirement process.
- A-B (Cane Springs Quad, 0.6 miles) provides access to a corral and the lower part of Cane Springs (T38N, R14W, Section 34). The eroded travel way above the corral fades about 0.2 miles above the corral (photo KC-1-19). The route above the corral should be closed to protect monument values and restored to a natural condition. We could not locate the travel way B-C (approximately 2 miles), depicted on the 2000 BLM map and the Cane Springs quad (Sections 34 and 26).
- R-M is an abandoned (photo KC-3-27; T36N, R15W, Section 9) travel way depicted as a four-wheel drive route on the quad but not on the 2000 BLM map. Most (3/4) of the route has no evidence of two-track traffic and completely fades in Section 2. The route should be closed to mechanized access to protect Monument values.
- JW-JW' begins on State Route 103 immediately south of Jacobs Well (Jacobs Well Quad; T38, R15, Section 27) and is depicted as a "stock trail" on the quad. It is not indicated on the 2000 BLM map. The actual travel way consists of an eroded series of switchbacks impassible to 4-wheel drive and should be closed to mechanized travel to protect monument values. The proposed wilderness boundary begins at the top of the switchbacks and includes a large burn area with disk-reseeding treatment (photo KC-3-11). The treatment area is visible on-site, but not from across Cow Canyon to the east and can be considered substantially unnoticeable (MM-6). The route

completely fades beyond the treatment area and remains substantially unnoticeable (KC-3-12).

Grand Canyon- Parashant National Monument Wilderness Recommendation

Unit: Proposed Mustang Point Wilderness

Quads: Snap Draw, Snap Canyon East, Mustang Point, Grand Gulch Bench

The Arizona Wilderness Coalition recommends the (acreage) the proposed Mustang Point Wilderness for Wilderness designation. A review of the 1979-82 WSA process demonstrates that wilderness suitability criteria for the unit was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The proposed Mustang Point Wilderness consist primarily of the 1982 Mustang Point WSA (1-104B; 25,952 acres) and the 1982 Salt House WSA (104A; 13,465 acres). The proposed Mustang Point Wilderness contains six spectacular, colorful miles of the Upper Grand Wash Cliffs, including the picturesque Mustang Point and scenic rolling hills of juniper, pinyon, and sage.

B. Historical Review and Critique of the 1982 WSA Decision Process

Salt House WSA

BLM recommended the entire Salt House WSA as nonsuitable for wilderness designation. The BLM maintained that Salt House WSA's "**outstanding opportunity for solitude...** is confined to areas screened by dense pinyon-juniper" (Emphasis added; USDI, BLM, 1982, EIS:19,50). "Visitors can hike and camp in the area," the agency noted, "but such experiences lack variety and challenge" (USDI, BLM, 1982, EIS:50). The BLM concluded that "The unit lacks the outstanding opportunities for primitive and unconfined recreation" (USDI, BLM, 1982, EIS:19,50). Since current policy requires outstanding opportunities for either solitude or primitive and unconfined type of recreation, not both "somewhere in the area," not everywhere (USDI 2001 [H-6310-1, Section .13(B)(3), page 13]), the AWC submits that the agency's 1982 conclusions, even if true, would not preclude wilderness designation.

The agency reported that "[t]he unit's wilderness characteristics are not of high quality" (USDI, BLM, 1982, EIS:19). Current BLM policy prohibits comparisons or numerical, alphabetical, or qualitative rating systems (USDI 2001 [H-6310-1, Section .13(B)(1), page 11) and would not support the earlier conclusion.

In addition, the BLM stated Salt House contained 6,500 acres of nonfederal mineral estate (USDI, BLM, 1982, EIS:19; and Map 2-9). The BLM is currently pursuing acquisition of mineral estates within this unit (USDI, BLM, 2002, Memo to Diana Hawks).

Mustang Point WSA

The BLM assessed that the Upper Grand Wash Cliffs are "highly scenic and have high

geologic value...[and that] the WSA offers opportunities for sightseeing, hiking, and photography" (USDI, BLM, 1982, EIS:51). Never-the-less, the agency proposed the entire unit as nonsuitable for wilderness designation, "lacking high-quality wilderness characteristics (USDI, BLM, 1982, EIS:19). Again, current BLM policy prohibits comparisons or numerical, alphabetical, or qualitative rating systems (USDI 2001 [H-6310-1, Section .13(B)(1), page 11).

In regards to human impacts, the agency stated that, although the "unit has five miles of trails and five stockpounds," those disturbances "are largely unnoticeable and do not degrade naturalness" (USDI, BLM, 1982, EIS:51). In addition, the agency reported that the unit contains 40 acres of state land and 4,920 acres of nonfederal mineral estate (USDI, BLM, 1982, EIS:19). As noted in the Salt House section above, the BLM is currently pursuing acquisition of mineral estates within the former Mustang Pt. WSA (USDI, BLM, 2002, Memo to Diana Hawks).

C. AWC Recommendation

The AWC believes that the Salt House and Mustang Pt. WSA's were inappropriately separated during the 1982 process. The BLM stated that the area "contains 13 miles of ways and four reservoirs, imprints that are largely unnoticeable" (USDI, BLM, 1982, EIS:50). Some of these travel ways constituted the boundaries between the former Salt House and Mustang Point WSA (see USDI, BLM, 1982, EIS; Map 2-9) Our recent (2001) inventory demonstrates the former common boundary consisted of unnumbered, abandoned or little-used travelways which remain "largely unnoticeable." The former Salt House and Mustang Point WSAs should be combined.

1) Mandatory Wilderness Characteristics (Wilderness Character)

a) Size

The proposed Mustang Point wilderness meets the BLM (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]) size criteria of greater than 5,000 acres.

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their

activities?

Regarding the proposed Mustang Point Wilderness, the answer to both questions is yes. The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]).

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Mustang Point's human imprints consist of primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]) and are in fact "substantially unnoticeable." AWC maintains that it is reasonable to assume past impacts created by the travel ways described below "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

The principal proposed "road" closures consists of the northern portion of travel way "J-K" (see discussion below). The 2.3-mile section south of Pigeon Tank contains evidences of construction, but the degree of regular use is not apparent and the route appears to serve no essential use. In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation. Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c), provides a more permissive standard for designating a wilderness; a second definition, in section 4(c), provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Mustang Wilderness size, terrain variation ranging from the softly undulating juniper and pinyon forests to rugged canyons and cliff lines contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation.

In 1982, the BLM assessed that the Upper Grand Wash Cliffs are "highly scenic and have high geologic value...[and that] the WSA offers opportunities for sightseeing, hiking, and photography" (USDI, BLM, 1982, EIS:51). Never-the-less, the agency proposed the entire unit as nonsuitable for wilderness designation, "lacking high-quality wilderness characteristics (USDI, BLM, 1982, EIS:19). Recent citizen's inventories demonstrate the area's outstanding wilderness experiential potential. In any event, current

BLM policy prohibits comparisons or numerical, alphabetical, or qualitative rating systems (USDI 2001 [H-6310-1, Section .13(B)(1), page 11) and, as describe above, would not support the 1982 conclusion. The AWC strongly urges the BLM reconsider the area's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

2) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]).

The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of "optional Wilderness Characteristics" and include:

a) 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.

b) A geological treasure, including

- colorful...Precambrian and Paleozoic strata against the highly faulted terrain
- recent sinkholes and breccia pipes
- fossils including invertebrate fossils.
- portions of geologic faults, including...the Grand Wash fault.

c) Important watersheds for the Colorado River and the Grand Canyon....

d) 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 numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, 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"...scattered across the monument...[telling] the stories of the remote family ranches and the lifestyles of early homesteaders....

e) 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
- Diverse wildlife
- Numerous threatened or endangered species including the Mexican spotted owl and the California condor.

Proposed Boundary

From the junction of BLM Routes 1002 and 1012 in Section 36 (Mustang Point Quad; T34N, R14W) in the unit's northwestern corner, continuing in a southerly direction and then easterly direction to travel way "D" (Snap Draw Quad, T32N, R13W, Section 20); then in a northerly direction 1/4 mile along travel way "D" to its junction with a NW-SE trending fence line; then in a southeasterly direction along the fence line 1/2 mile to its junction with the southern boundary of Sections 20-21; then in a easterly direction along the southern border of Sections 20-21 to its junction with BLM Route 1062 in Section 22 immediately north of Upper Salt House Tank; then in a northeasterly direction along 1062 (excluding Lower Salt House Tank) to its junction with travel way "E1" (Section 13); then in a northerly direction along travel way "E1" approximately one mile to, and excluding, Snap Tank in Section 12; then in an easterly direction along "Snap Tank Road" in Snap Draw approximately 3/4 miles to its junction with "Lundell Tank Road (Castle Peak Quad);" then in a northerly direction approximately 3/4 miles to, and excluding, Lundell Tank (T33N, R12W, Section 31); then in a northeasterly direction on travel way "L-L1" continuing to its junction with the private property boundary immediately west of Mary's Tank (T33N, R12W, Section 29); then in a northerly direction along the private property boundary approximately 3 miles to a fence line at the SE corner of Section 5 (Wildcat Ranch Quad; T33N, R12W); then along fence line in a northwesterly direction to a location approximately 0.25 SE of Pigeon Tank; then in an easterly direction approximately 0.3 miles to its junction with BLM Route 1002 (Pigeon Canyon Road); then in a westerly direction to its junction with BLM Route 1012 in Section 36 (Mustang Point Quad; T34N, R14W).

Travel Way (TW) Closures

- "D" (Snap Draw Quad; T32N, R13W, Section 19) is a 0.2-mile section originating on BLM Route 1012 and quickly fades into an abandoned or little-used travel way (photo KC-35-5). Although depicted on the BLM map (USDI 2000) and the USGS quad as a continuous route down Snap Draw, investigations at several possible exits (point "F" of travel way E-F, Section 15, photo KC-35-7; Snap Tank, Section 1, photo KC-35-9; and point "H" of travel way G-H, T33N, R13W, Section 33) demonstrate the travel way south of the T33N-T32N boundary are abandoned or seldom used. This entire interior network should be closed to mechanized use and restored to a natural condition to protect National Monument values.
- "E-F" (Snap Draw Quad, T32N, R13W, Sections 15,22) begins on BLM Route 1062 (photo KC-35-6) and continues 0.9 miles to a earthen tank at point "F" in section 15 (photo KC-35-7). The segment should be closed to protect National Monument values. Agreements for essential maintenance of the tank can be developed under the

BLM's minimum requirement procedures.

- "G-H" (Snap Draw Quad, T33N, R13W) begins in Section 27 (photo KC-35-15) and trends westward 2.4 miles to point "H" in Section 32 (photo KC-35-19). This route is very rough, eroding and little-used (see photo KC-35-18) and should be closed to protect National Monument values including soils, native vegetation, wildlife and archaeological resources. Agreements for essential grazing feature maintenance can be developed under the BLM's minimum requirement procedures.
- "G1" (Snap Draw Quad, T33N, R13W, Section 27) begins just north of Gardner Tank (photo KC-35-24) and quickly ends in an eroded, revegetated section including established microbiotic crusts (photos KC-35 22,23). This segment provides one possible entrance to a travel way network depicted on the BLM map (2000) and the Snap Draw and Mustang Point Quads. One possible exit, point "J2" (Section 24; photo KC-36-7) is eroding and abandoned or seldom-used. The only other possible exit route is point "G2" in section 33 is completely revegetated (photo KC-35-17, 20). The entire network depicted in Sections 15,16,17 (Mustang Point Quad) and Sections 20,21,22,23,24,27,28,29 and 33 (Snap Draw Quad) should be closed to mechanized vehicles to protect Monument values including soils, microbiotic crusts, native vegetation, wildlife and archaeological resources.
- "J1-MM" (Snap Draw Quad, T33N, R13W) is a one-mile section beginning (photo KC-35-13) at the Gardner Tank Road in Section 25 and ending at point J1 in section 24. This "road to nowhere" is very eroded at point J1 (KC-36-4) and should be closed to protect Monument values including soils, native vegetation, wildlife and archaeological resources.
- "L-LL" begins at "L" (T33N, R12W, Section 31; photo KC-36-23) ends at LL (T33N, R13W, Section 25). This route provides redundant access to the Gardner Tank Road and should be closed to protect Monument values including soils, native vegetation, wildlife and archaeological resources.
- "K1-K2" is a short (0.5 mile) route depicted on the BLM map (USDI 2000) and the Mustang Point Quad (T33N, R13W, Section 13). It actually ends approximately 0.1 miles from its junction with travel way "J-K" (see photo KC-36-14) and should be closed (see discussion on travel way J-K).
- "J-K," a 6.7-mile travel way beginning in Section 26 (Snap Draw, T33N, R13W; photo KC-35-25). A short segment ("J-J1") ends at a tank approximately 0.5 miles to the northeast (photo KC-36-3). This segment is badly eroding (photo KC-36-1,2,3). Agreements for essential grazing feature maintenance can be developed under the BLM's minimum requirement procedures. The TW continues northward through Section 24 and Section 13 (Mustang Point Quad) where it is subjected to severe erosion (photos KC-36-12, 16 and 17). Section 18 (T33N, R12W; photo 36-18) contains some of the travel way's most extensive damage. AWC inventory staff could not discern the east-west trending route depicted on the Wildcat Ranch Quad (T33N, R12W, Section 17,18,19, and 20) and BLM map (2000). Travel way "L-K" continues northward through section 7 (Wildcat Ranch Quad, T33N, R12W) and ends at Pigeon Tank (Section 6) on BLM Route 1002. The travel way's significant erosional problems and the general lack of signs of regular use warrants closure to protect Monument values including soils, native vegetation, wildlife and

archaeological resources.

- The BLM excluded a large Y-shaped section from the former Mustang Point WSA based on the presence of two jeep trails (USDI, BLM, 1982, EIS: Map 2-9). Today, those "jeep trail" are depicted on both the BLM (USDI, 2000) and quads. The western travel way, beginning on BLM Route 1012 approximately 1/4 mile south of its junction with BLM Route 1002 (Mustang Pt. Quad; T34N, R13W, Section 36), extends approximately 4 miles southward into Snap Draw quad (T33N, R13W, Section 20) appears to be either abandoned or little used (see photo KC-31-7) and should remain closed. The eastern fork of this "jeep trail" beginning in Section 33 (Mustang Point; T34N, R13W), south of BLM Route 1002, and intersecting the first travel way in Section 7 could not be located.

5) Non-Wilderness Cherry Stem

Gardner Tank Road begins at Lundell Tank (Castle Peak Quad, T33N, R12W, Section 31) and continues approximately 3 miles westward to Gardner Tank (Snap Draw Quad, T33N, R13W, Section 27).

Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Proposed Olaf Knolls Wilderness (16,248 acres; Quads: Olaf Knolls, Pagoon Springs, Cane Springs SE, and Red Pockets).

Summary:

The Arizona Wilderness Coalition recommends the 16,248-acre proposed Olaf Knolls Wilderness for Wilderness designation. A review of the 1979 "Overthrust Belt accelerated intensive inventory" process indicates that agency's wilderness suitability criteria was not consistently and correctly applied to the unit. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

Olaf Knolls consists of gently undulating plains cut by washes. Vegetation consists of Joshua trees, creosote and grasses. The entire unit consists of significant desert tortoise habitat (USDI, BLM, 1998, Map 4).

B. Historical Review and Critique of the 1982 WSA Decision Process

In 1979, the Bureau of Land Management identified Olaf Knolls (Unit 1-113; 25,702 acres) for further wilderness study (USDI, 1979, Decision Report). This process included the "Overthrust Belt accelerated intensive inventory" of 21 units from Grand Wash Cliffs to the Nevada state line (510,000 acres; USDI, BLM, 1979, Memo (8500[931])). The Overthrust Belt, a geologic formation, was thought to contain significant oil and gas reserves (USDI, BLM, 1980 Proposal Report, page 3). The agency intended the accelerated inventory to "determine which lands within the area may be dropped from further wilderness consideration, and thereby opened for oil and gas exploration" (USDI, BLM, 1979, Memo (8500[931])). As a result, and apparently without further public documentation of the unit's wilderness character, the BLM dropped the entire Olaf Knolls from further wilderness evaluation (USDI, BLM, 1979, Memo (8500[931]), "Summary of Results").

The predictions of the Overthrust Belt's energy potential dissolved without any economically recoverable oil or gas deposits developed on the Arizona Strip. Since new information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria, a new wilderness analysis is warranted.

C. Preliminary AWC Recommendation

1) Mandatory Wilderness Characteristics (Wilderness Character)

a) Size

The proposed 16,248-acre Olaf Knolls Wilderness meets the BLM (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]) size criteria of greater than 5,000 acres.

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI

2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Olaf Knolls Wilderness, the answer to both questions is a resounding yes (photo). The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]; see photos HH-1,3). It's expansive grasslands, intricate drainages, and size creates a picturesque, rugged wilderness home to desert tortoise, raptors and other desert species.

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Olaf Knoll's human imprints consist of primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). This consist of abandoned travel way F-G and is in fact "substantially unnoticeable" (photo KC-44-13) .

The principal proposed "road" closures within the proposed wilderness consist of redundant and little-used routes (A-B, A1-A2, C-D). These travel ways should be closed to vehicular access and stabilized to protect Monument values. Agreements for essential maintenance of to the corral in along travel way A-B can be developed under the minimum requirement process. AWC maintains that it is reasonable to assume past impacts created by these travel ways described below (see Travel Way Closures section) "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation. Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c), provides

a more permissive standard for designating a wilderness; a second definition, in section 4(c), provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Olaf Knolls Wilderness' size, terrain variation contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation (photos KC-44-4). While much of the area consists of gently rolling grasslands, current BLM policy instructs agency staff to "avoid using lack of terrain variation or vegetation, or size as disqualifying conditions for outstanding opportunities for solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(2)]). The evaluator should not assume that "simply because an area or portion of an area is flat and/or unvegetated, it automatically lacks an outstanding opportunity for solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]). Policy instructs management to "give consideration to the interrelationship between size, screening, configuration, and other factors that influence solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]). Finally, consideration must be given to "factors or elements influencing solitude including size, natural screening, and the ability of the user to find a secluded spot" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(c)], page 15).

Recent citizen's inventories demonstrate the area's outstanding wilderness experiential potential, including opportunities for solitude, based on all the factors presented above. The AWC strongly urges the BLM to reconsider Olaf Knolls' outstanding opportunities for solitude and a primitive and unconfined type of recreation.

2) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]). The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Olaf Knolls' "optional Wilderness Characteristics" and include:

a) 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.

b) A geological treasure, including

- fossils, including invertebrate fossils.
- portions of geologic faults

d) 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...numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, agricultural features, burial sites, caves, rockshelters, trails, and camps.
- Areas of importance to existing Indian tribes

e) 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...allowing wildlife movement and plant dispersal
- Giant Mojave Yucca cacti proliferating in undisturbed conditions
- Diverse wildlife
- Numerous threatened or endangered species including the desert tortoise (the proposed wilderness lies within desert tortoise habitat; see USDI, BLM, 1998, Map 4).

1) Proposed Boundary

Beginning in the unit's northeast corner at the junction of BLM Route 1007 with BLM Route 1061 (T36N, R14W, Section 9); along 1061 in a southerly direction to its junction with road segment AA-D-E at point "E" (Olaf Knolls, T35N, R14W, Section 30); then in a westerly direction along AA-D-E to its junction with 1007 (Pakoon Springs, T35N, R15W, Section 16); then in a northerly then easterly direction along 1007 to its junction with BLM Route 1061 (T36N, R14W, Section 9).

2) Travel Way Closures

- A-B; an eroding (photo KC-44-11), redundant route connecting BLM Routes 1061 (photo KC-44-5) to 1007 (photo KC-44-10). AWC proposes closing this travel way to protect monument values, especially desert tortoise. The eroded section should be stabilized with rock or log checks and the travel way closed to mechanized travel to protect monument values. Agreements for essential maintenance from BLM Route 1007 to "Upper Well" in Section 25 (Olaf Knolls Quad, T36N, R15W) can be developed under the minimum requirement process.
- A1-A2; a little used (photos KC-44-6,8), redundant route connection travel way A-B with a tank located along BLM Route 1061 (T36N, R14W, Section 32). It should be closed to mechanized use and restored to a natural condition to protect Monument values.
- C-D; a redundant, little used travel way (photos KC-44-12,14) depicted on the BLM map (USDI 2000) and the Olaf Knolls and Pakoon Springs Quads as beginning on

BLM Route 1061 in Section 18 (Olaf Knolls Quad, T35N, R14W; photo KC-44-12). It should be closed to protect Monument values.

- F-G; an abandoned (photo KC-44-13) travel way depicted on the BLM map (USDI 2000) and the Olaf Knolls and Pakoon Springs Quads. The route is revegetated and substantially unnoticeable. It should be removed from all maps.

Vermilion Cliffs National Monument Wilderness Recommendation

Unit: Paria Canyon-Vermilion Cliff Proposed Wilderness Additions (Quads: Coyote Buttes, Emmett Hills, Emmett Wash, Ferry Swale, House Rock Spring, Navajo Bridge, One Toe Ridge, Poverty Flat, The Big Knoll, Water Pockets, Wrather Arch).

Summary: The Arizona Wilderness Coalition recommends approximately 165,000 acres as additions to the existing Paria Canyon-Vermilion Cliffs Wilderness. A review of the 1979-82 WSA process demonstrates that wilderness suitability criteria for the unit was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

Expansive stationary sand dunes, level-to-rolling plateau topography, pinyon-juniper woodlands, and Great Basin grasses comprise the Paria Plateau and the Vermilion Cliffs Natural Area. A variety of colorful sandstone buttes and knolls, physical challenges, archaeological resources, and spectacular scenic views enhance its wilderness character.

B. Historical Review and Critique of the 1982 WSA Decision Process

In its 1982 wilderness review, the BLM reported that

...only two portions of the Paria Plateau WSA provide outstanding opportunities to avoid the sights and sounds of others. Numerous buttes, ridges, alcoves, washes, and sand dunes on 5,760 acres in the White Pockets Hole-In-The-Rock area provide topographic screening for solitude and seclusion. These rugged features are part of the Paria Canyon erosional system.... [and the] unit provides opportunities for hiking, backpacking, horseback riding, photography, and viewing scenery. A variety of sandstone features, physical challenges, archaeological resources, and scenic views enhance these opportunities (USDI, BLM, 1982, EIS:45).... [the Overlook WSA] offers opportunities for hiking, backpacking, horseback riding, photography, and viewing scenery. A variety of sandstone features, physical challenges, archaeological resources and scenic views enhance these opportunities (USDI, BLM, 1982, EIS:46).

The BLM ignored the Paria Plateau's abundant outstanding opportunities for a primitive and unconfined types of recreation. Out of the 105,000-acre Paria Plateau WSA, the BLM recommended only 2,800 acres as suitable for wilderness designation (USDI, BLM, 1982, EIS:16). The Vermilion MFP Step II rejected wilderness suitability:

the unit [Overlook Unit 1-8B] lacks superior wilderness characteristics and variety and challenge in recreational opportunities (USDI, BLM, 1982, EIS:17). Solitude is primarily based on juniper-pinyon conifer and not topographic relief (USDI, BLM, 1982, EIS:17). The rest of the [Paria Plateau] WSA lacks topographic diversity and vegetation density, having level-to-rolling plateaus too

open for backcountry travelers to experience outstanding solitude (USDI, BLM, 1982, EIS:45)... The unit [Overlook WSA], however, lacks topographic diversity and vegetation density. The level-to-rolling plateau is too open for backcountry travelers to experience outstanding solitude (USDI, BLM, 1982, EIS:46).

Current BLM policy instructs agency staff to "avoid using lack of terrain variation or vegetation, or size as disqualifying conditions for outstanding opportunities for solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(2)]). The evaluator should not assume that "simply because an area or portion of an area is flat and/or unvegetated, it automatically lacks an outstanding opportunity for solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]). Policy instructs management to "give consideration to the interrelationship between size, screening, configuration, and other factors that influence solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]). In any event, consideration must be given to "factors or elements influencing solitude including size, natural screening, and the ability of the user to find a secluded spot" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(c)], page 15). Finally, current policy requires outstanding opportunities for either solitude or primitive and unconfined type of recreation, not both, and "somewhere in the area," not everywhere (USDI 2001 [H-6310-1, Section .13(B)(3), page 13]).

The agency seemed determined to understate the Plateau's wilderness character and announced that

Most of this unit, though, does not provide regionally unique or significant opportunities [no mention of the type of opportunities] (USDI, BLM, 1982, EIS:46). A lack of topography diversity and the common occurrence of these vegetation types and this terrain throughout the most of the Four Corners region detract from potential outstanding primitive recreation opportunities (USDI, BLM, 1982, EIS:46). This unit [Overlook Unit 1-8B], thought, does not provide regionally unique or significant opportunities [sic] (USDI, BLM, 1982, EIS:46).

Current BLM policy stresses that each inventory unit must be assessed on its own merits or in combination with an adjacent wilderness area or wilderness study area (USDI 2001 [H-6310-1, Section .13(B)(3)(b), page 13]) including other federal agencies such as the NPS (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]). While proximity and similarity to other wilderness areas enhances the unit's wilderness character, "regionally unique or significant opportunities" are not a prerequisite for wilderness designation nor does a landscape's ubiquitous qualities detract from an area's suitability as such. In addition, current BLM policy prohibits comparisons, numerical, alphabetical, or qualitative rating systems. Even under the earlier criteria, the unit should have been recommended for wilderness designation and not dropped from wilderness consideration.

C. Preliminary AWC Recommendation

1) Mandatory Wilderness Characteristics (Wilderness Character)

a) Size

The proposed 200,000-acre Paria-Vermilion Cliffs Wilderness Addition meets the BLM (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]) size criteria of greater than 5,000 acres.

b) Naturalness

In its 1982 wilderness review, the BLM reported that

Numerous impact are scattered throughout Paria Plateau WSA, including 100 miles of ways, 37 miles of pipeline, 54 miles of fence, 15 reservoirs, four corrals and 11 troughs. The unit, however, retains its naturalness because these intrusions are well distributed throughout the unit and are effectively screened by topography and vegetation (USDI, BLM, 1982, EIS:45).

Today, the BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Paria Plateau Wilderness, the answer to both questions is a resounding yes. The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]). It's expansive grasslands and sand hills, picturesque sandstone buttes and knolls, and size creates a picturesque wilderness home to mule deer, mountain lions, bighorn sheep, raptors and other desert species.

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Paria Plateau's human imprints consist of primarily of

little-use travel ways through deep sand not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). Most of travel way meets this criteria and is in fact "substantially unnoticeable" (photos).

The principal proposed "road" closures within the proposed wilderness consist of little-used section of travel way (see discussion below). These travel ways should be closed to vehicular access and stabilized to protect Monument values. AWC maintains that it is reasonable to assume past impacts created by these travel ways described below (see Travel Way Closures section) "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]). Agreements for essential maintenance of corrals or stock tanks can be developed as a condition of permit and under the minimum requirement process.

In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation. Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c), provides a more permissive standard for designating a wilderness; a second definition, in section 4(c), provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Paria Plateau's Wilderness' size, terrain variation contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation (photos). While much of the area consists of gently rolling grasslands and sand hills, current BLM policy instructs agency staff to "avoid using lack of terrain variation or vegetation, or size as disqualifying conditions for outstanding opportunities for solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(2)]). As discussed above, the evaluator should not assume that "simply because an area or portion of an area is flat and/or unvegetated, it automatically lacks an outstanding opportunity for solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]).

Recent citizen's inventories demonstrate the area's outstanding wilderness experiential potential, including opportunities for solitude, based on all the factors presented above. The AWC strongly urges the BLM to reconsider the Paria Plateau's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

2) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or

historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]). The objects identified in the Vermilion Cliffs National Monument Proclamation provide a compelling list of the Paria Plateau's "optional Wilderness Characteristics" and include:

- a) An area "[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."
- b) "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; and one threatened species, Welsh's milkweed
- c) 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
- d) A geological treasure, including "the majestic Paria Plateau."

1) ***Proposed Boundary Wilderness Addition 1***

- *Exterior Boundary* Beginning in the addition's southwest corner at the extreme northwest corner of the Paria Canyon-Vermilion Cliffs Wilderness boundary (House Rock Springs Quad, T39N, R3E, Section 14) and continuing due north along the center of Section 14 to its intersection with the Four Springs private section; then due east along the private sections southern boundary; then due north along the private sections eastern boundary; then due west along the private sections northern boundary to its intersection with the 6,200-foot contour; then continuing along in a northerly direction approximately along the contour to its intersection with the northeast corner of the House Rock Spring private section in Section 10; then due west along the private section's northern boundary to its intersection (approximate) with the 6,000-foot contour; then in a northerly direction approximately along the contour to its intersection with the southern boundary of the Two Mile Spring private section in Section 34 (T40N, R3E); then due east along the private section's southern boundary; then due north along the private section's eastern boundary; then due west along the private section's northern boundary to its approximate intersection with the 6,000-foot contour; then in a northerly direction following the base

of the cliffs to their intersection with BLM Route 1017 just west of BM5883 (House Rock Quad; T40N, R3E, Section 14); then in a northerly direction along an unnumbered travel way in to "Kitchens Tank" then along Coyote Wash in a northerly direction and passing east of Lone Tree Reservoir and continuing northward to the Paria Canyon-Vermilion Cliffs Wilderness boundary just east of BM5366 (Coyote Buttes Quad, T41N, R3E, Section 23). The remainder of the exterior boundary follows the interior boundary of the Paria Canyon-Vermilion Cliffs Wilderness.

- *Interior Boundary* Beginning at the intersection of BLM Route 1017 and the western boundary of Section 27 at Pine Tree Pockets (One Toe Ridge Quad; T40N, R4E); then due south along the western boundary of Section 27; then due east along the southern boundary of Section 27 to its intersection with BLM Route 1104; then in a southerly then easterly direction along 1104 to its intersection with state Section 18; then due south along Section 18's west boundary; then due east along state Sections 17 and 18's southern boundary; then due north along Section 17's eastern boundary; then continuing due north along the eastern boundary of Section 8 to its intersection with BLM Route 1105; then continuing in a easterly direction along 1105 to its junction with BLM Route 1110 (The Big Knoll Quad; T39N, R5E, Section 9); then along 1110 in a northerly direction to its intersection with private land (Joe's Tank; The Big Knoll Quad; T40N, R6E, Section 31; then due south along the private section's western boundary; then due east along the private section's southern boundary; then due north along the private section's eastern boundary; then due west along the private section's northern boundary to its intersection with 1110; then continuing in a northeasterly direction along 1110 to its junction with BLM Route 1093 (The Big Knoll; T40N, R6E, Section 20); then in along 1093 in a northerly direction to its junction with 1088 (The Big Knoll; T40N, R6E, Section 20); then western direction along BLM Route 1088 to its junction with state sections in Wrather Arch Quad (T40N, R5E, Sections 1,2,11,12; and T41N, R5E, Sections 35,36); then along the state section in a northern then western then southern direction to its intersection with 1088 (T40N, R5E, Section 10); then in an easterly direction along 1088 to its junction with travel way D in Section 5 (Poverty Flats Quad; T40N, R5E); then in a northerly direction along travel way D to its junction with travel way L-G (Poverty Flats Quad, T41N, R5E, Section 20); then along L-G to its intersection with travel way L-J at point "J" in Section 18; then along L-J in a southerly direction to its junction with travel way H2 in Section 19; then along H2 in a westerly direction to its junction with travel way H2-MM in Section 23 (T41N, R4E); then along travel way H2-MM in a northerly then southerly direction to its junction with BLM Route 1081 at point MM (T41, R4E, Section 16); then junction with BLM Route 1081 at Poverty Flat in Section 27; then in a southerly direction along 1081 (excluding Red Pocket) to its junction with BLM Route 1066 in Section 5 (T40N, R4E); then along 1066 in a southerly direction to its junction with BLM Route 1017 in Section 19 (House Rock Spring Quad; T40N, R4E); then in a easterly direction (excluding the windmill area in Section 19) to the western boundary of Section 27 (One Toe Ridge; T40N, R4E) just west of Pine Tree Pockets.

Wilderness Addition 2 Beginning in the unit's southwestern corner at the junction of BLM Routes 1017 and 1066 (House Rock Springs Quad; T40N, R4E, Section 19);

continuing along 1066 in a northeasterly direction to its junction with BLM Route 1081 at Red Pocket (Poverty Flat Quad; T40N, R4E, Section 5); then along 1081 in a northeasterly direction to its junction with travel way H-H2 at Poverty Flat (T41N, R4E, Section 28); then along travel way H-H2 in a northeasterly direction to its junction with travel way H2 in Section 23; then along travel way H2 in an easterly direction to its junction with travel way L-J in Section 19 (T41N, R5E); then along travel way L-J in a southerly direction to its junction with BLM Route 1087 in Section 12 (T40N, R4E); then along 1087 in a southwesterly direction to its junction with BLM Route 1017 at Pine Tree Pockets (One Toe Ridge Quad; T40N, R4E, Section 27); then along 1087 in a westerly direction to its junction with BLM Route 1066.

Wilderness Addition 3 Beginning at the unit's most western location at the junction of BLM Routes 1087 and 1105 at Pine Tree Pockets (One Toe Ridge Quad; T40N, R4E, Section 27); then along 1087 in a northeasterly direction to its junction with BLM Route 1088 near Big Sink (Poverty Flats Quad; T40N, R5E, Section 5); then along 1088 in an easterly direction to its intersection with state section 11 (Wrather Arch Quad; T40N, R5E); then in a southerly direction along the western boundary of Section 11; then in an easterly direction along Section 11's southern boundary to its intersection with travel way J-X in Section 13 (The Big Knoll Quad; T40N, R5E); then along travel way J-X in a southwesterly direction to its junction with BLM Routes 1105/1110 in Section 9 (T39N, R5E); then along 1105 in a westerly then northwesterly direction to its junction with 1087 at Pine Tree Pockets.

Wilderness Addition 4 Beginning in the unit's northwest corner at the junction of BLM Routes 1105 and 1104 (One Toe Ridge Quad; T40N, R4E, Section 27); then along 1104 in a southerly then easterly to its intersection with state section 18 (T39N, R5E); then along state sections 18's western boundary in a northerly direction; then along state sections 18 and 17 northern boundary in an easterly direction to its intersection with BLM Route 1105; then along 1105 in a northwesterly direction to its junction with BLM Route 1104 in Section 27.

Wilderness Addition 5 Beginning in the unit's southeast section at the junction of the Dominguez-Escalante Historic Trail and the Paria-Vermilion Cliffs Wilderness in Section 6 (Ferry Swale; T40N, R8E); then continuing in a northerly direction along the Dominguez-Escalante Historic Trail past Willow Tank to its intersection with the Monument boundary at BM 4104T (T41N, R8E, Section 19); then along the Monument boundary approximately 0.3 miles to its intersection with travel way G-C-B; then along G-C-B in a northerly direction to its intersection with the Monument Boundary in Section 12 (T41N, R7E); then in a northwesterly direction along the Monument boundary to its intersection with the "Cedar Mountain Catchment" road in Section 31 (Water Pockets Quad; T41N, R7E); then along this road in a southerly direction to its junction with travel way R-O-M2 at "R" (T41N, R6E, Section 12); then in an easterly direction along R-O-M2 to its junction with travel way "N" (east M2-M1; T41N, R6E, Section 10); then along "N" to the Paria Canyon-Vermilion Cliffs Wilderness boundary in Section 31; then in an easterly direction along the Paria Canyon-Vermilion Cliffs Wilderness boundary to

its intersection with the Dominguez-Escalante Historic Trail in Section 6 (Ferry Swale; T40N, R8E).

Vermilion Cliffs Natural Area Wilderness Addition (28,000 acres). The entire area outside the Paria Canyon-Vermilion Cliffs Wilderness is proposed as Wilderness.

Glen Canyon Wilderness Addition (Approximately 3,500 acres); this unit is contiguous with the Glen Canyon National Recreation wilderness proposal. Beginning at the southeast corner at the intersection of the Monument boundary and the Glen Canyon National Recreation boundary in the southeast corner of Section 21 (Ferry Swale Quad; T41N, R8E); then in an alternating southerly and westerly direction along the NRA boundary to its intersection with the Paria Canyon-Vermilion Cliffs Wilderness boundary at the bottom of Section 6 (T40N, R8E); then along the Wilderness Boundary to its intersection with the Dominguez-Escalante Historic Trail; then along the Dominguez-Escalante Historic Trail in a northerly direction to its intersection with the Monument boundary in Section 19 (T41N, R8E); then along the Monument boundary in an northeasterly direction to its intersection with the Glen Canyon National Recreation boundary in the southeast corner of Section 21 (Ferry Swale Quad; T41N, R8E).

2) Travel Way Closures

Wilderness Addition 1

- LG (Poverty Flat Quad); an eroding (photo LB,16), redundant travel way depicted on the BLM map (USDI, 2000) and the Poverty Flat Quad as a "jeep trail," this route should be closed to protect monument values. The travel way should be closed to mechanized travel in order to protect monument values and discourage illegal traffic in the designated wilderness. Access for essential maintenance of the tank can be provided through administrative agreements with the BLM.
- D (Poverty Flat Quad); an eroding (photo LA-4-4) travel way depicted on the BLM map (USDI, 2000) and the Poverty Flat Quad and providing access to a steel water tank in Section 20 (T41N, R5E) and continuing on into the Paria Canyon-Vermilion Cliffs Wilderness (photo LA-4-7).
- F (Poverty Flat and Wrather Arch Quads); an eroding (photo LA-4-21) that provides access to an earthen tank in Section 16. The route ends at the Paria Canyon-Vermilion Cliffs Wilderness boundary and encourages illegal ATV access. It should be closed to mechanized travel. Essential maintenance of the tank can be provided through the minimum requirement process. The "4WD" route depicted on the BLM map (USDI, 2000) and the quads as beginning north of BLM Route 1088 in Section 5 (Poverty Flats Quad; T40N, R5E) and ending in Section 21 (Wrather Arch Quad; T41N, R5E) could not be located. It should be removed from the maps and classified as closed to mechanized travel.
- BLM Route 1091 (Wrather Arch Quad); north of the state section 35, a little-used route to nowhere (photo LB-2-2,3) that penetrates the Paria Canyon-Vermilion Cliffs Wilderness (photo LB-2-1). The route should be closed north of state section 35 to protect Monument resources and values.
- K-L (Big Knoll and Wrather Arch Quads); the travel way, depicted on the BLM map

(USDI 2000) and the quads, appears abandoned or little used beyond the Middle Reservoir fence (photos KC-42-14). It should be closed to all mechanized travel to protect Monument values. Any essential maintenance of grazing features should be developed through a minimum requirement process. The spur L1 (photo KC-42-14) provides redundant access to Middle Reservoir and should be closed as well.

- F-A (Navajo Bridge and Water Pockets Quads); a redundant access road to a ranch complex in Section 3 (Water Pockets Quad; T40N, R6E). The travel way begins at a point "A" in Section 15 (Navajo Bridge Quad) and ends at the ranch. A redundant travel way, it should be closed to mechanized travel to protect Monument values.
- A-B; a little-used (photos KC-42-22,24), eroding travel way beginning at its junction with BLM Route 1093 (Water Pockets Quad, T41N, R6E, Section 27) providing access to a metal stock tank in Section 28 (Wrather Arch Quad). The route should be closed to mechanized travel. Provision for essential maintenance of the tank can be determined through the minimum requirement process.
- Q-R; an eroding (photo EC-1-18) travel way that disappears in Section 17 (Navajo Bridge). It is a "road to nowhere" that should be closed to mechanized use and converted to a hiking and pack trail to the Powell Monument overlook. It can connect to the pack trail depicted in Sections 23 and 24 (R6E) and Sections 18 and 19 (R7E).
- N-O-P; depicted on the BLM map (USDI 2000) and the quads (The Big Knoll, T40N, R6E, Section 21; and Navajo Bridge, Sections 15 and 22) as a 4WD route is a redundant travel way and should be closed to protect monument values. A similar spur depicted in Section 22,23 should be closed as well.
- AE; depicted on the BLM map (USDI 2000) and the quad, AE is an eroding and highly impacting route to slickrock tanks (photos LA-3-11,12). It should be closed to mechanized travel to protect Monument values.
- R; depicted on the BLM map (USDI 2000) and the One Toe Ridge Quad, is a little used (photo KC-28-8), eroding (photo KC-28-9) "road-to-nowhere" ending at the Paria Canyon-Vermilion Cliffs Wilderness boundary. It should be closed to mechanized travel to protect Monument values.
- Black Valley; little used or abandoned travel way (photo KC-41-9) depicted on the BLM map (USDI 2000) and The Big Knoll Quad (T39N, R6E, Sections 7, 8 and 18) should be closed to mechanized travel to protect Monument values.
- BLM Route 1108; the proposed closure extends along most of 1108 beginning at the southern boundary of state Section 18 (One Toe Ridge Quad; T39N, R5E) and continuing in a easterly then northerly direction to its junction with BLM Route 1110 (The Big Knoll Quad, T39N, R5E, Section 1). The route is little used (photo KC-41-1,6) and extremely sandy and susceptible to erosion (photo-41-1,8). Archeological features consisting of scattered lithics are impacted by vehicular traffic (photo KC-41-5). The route provides no essential function and should be closed to mechanized travel to protect Monument values. Essential maintenance to stock tanks in Section 28 (The Big Knoll Quad; T39N, R5E) and Section 29 (Emmett Hill, T39N, R5E) can be determined through a minimum requirement analysis. The placement and maintenance of the portable weather station (Emmett Wash Quad; T39N, R5E, Section 35) and rain gauge (One Toe Ridge, T39N, R4E, Section 25) can be

determined through the minimum requirement process.

- D1, D2; these redundant, eroding (One Toe Ridge; photo LA-3-17), and little-used (photos LA-3-18,21) should be closed to protect monument values. The routes severely impact archeological lithic sites (photo LA-3-18) and should be closed to protect Monument values.
- U; a little used (photo LA-3-33), eroding (photo LA-3-28) impacting lithic scatter sites (photo LA-3-32). It should be closed to mechanized travel to protect Monument values.
- AD; a redundant, little used (photo LA-2-4), eroding (photo LA-2-3) providing access to a water trough in Section 5 (One Toe Ridge Quad, T39N, R4E) and an abandoned trough in the northern end of Section 5. The route should be closed to mechanized travel to protect Monument values. Essential access to the trough approximately 1/2 mile to the northeast of BLM Route 1100 can be determined through application of the minimum requirement process.
- BLM Route 1103; an eroding (photo KC-45-24), little used or abandoned travel way (photo KC-46-1) depicted on the BLM map (USDI 2000) as beginning at its junction with BLM Route 1104 (One Toe Ridge Quad; T40N, R4E, Section 34) and ending at its junction with BLM Route 1100 in Section 8. It appears from the map to provide access to Moquitch Tank, but the condition of the route indicates little, if any use from 1100 and its junction with 1104 cannot be discerned. The travel way should be closed to mechanized travel to protect Monument values.
- L-B; a redundant, eroding (House Rock Spring) photos KC-33-5,2), little used (photo KC-33-6) travel way incorrectly depicted on the BLM map (USDI 2000). It should be closed to protect Monument values.
- K1; a redundant, apparently abandoned travel way (photos LA-1-14,15,16) depicted on the House Rock Spring Quad. It should be closed to mechanized travel and removed from the quad.
- BLM Route 1100 (House Rock Springs/One Toe Ridge Quads); an eroding (photos KC-29A-2; KC-28-21) that directly bisects the West Bench Pueblo (photo KC-28-24). The road should be closed near the base of the slope (approximately 1/2 mile downslope), stabilized with water bars and checks, and converted to a hiking trail. Any possible relocation of the road would severely impact well-developed microbiotic crusts, lithic scatter sites and possible subsurface archeological features (photo KC-28-25), important Monument resources. While 1100 provides access to a water pump, windmill and other grazing features in Section 6 (T39N, R4E), access to these structures can be provided through the proposed cherry stem travel way "A." Closing this route would greatly facilitate the other proposed closures within the proposed wilderness addition and would provide substantial protection of Monument values.
- G1-G2; a sandy, eroding (photo KC-32-20) travel way in Sections 18 and 19 (T39N, R4E) that accesses a scenic view of the Vermilion Cliffs. The vista is not as spectacular as those accessed elsewhere, and resource damage by this route is excessive. It should be closed to protect Monument values.
- G-H; a sandy (photo KC-32-22) travel way with severely eroding spurs (photo

LB-1-8,9) that provides access to a condor feeding station (photo KC-32-15). The travel way begins at the terminus of the proposed cherry stem "A" (T39N, R4E, Section 6) and loops to the south through Sections 18 and 17, and Sections 1, 12 and 13 (R3E). The travel way should be closed to protect Monument values. Access to the condor feeding station can be determined through application of the minimum requirement process.

- I; an abandoned travel way that once impacted an archeological site (photo LA-1-6). The travel way is recovering through the establishment of microbiotic crust (photos LA-1-3,4). It should be closed to all mechanical travel to protect Monument values.
- J; an abandoned travel way (photo LA-1-10) in Sections 36 (T40N, R3E) and 31 (T40N, R4E). It should be closed to protect Monument values.
- K; an eroding (photo LA-1-20) "road to nowhere" in Section 36 (T40N, R3E), it should be closed to protect Monument values.
- O; a little used (photo CB-1-3) travel way beginning off of BLM Route 1100 (T40N, R3E, Section 26) to access a steel tank in Section 35. The route should be closed to mechanized travel. Essential maintenance of the tank can be determined through the minimum requirement process.
- S-T; a little used (photo KC-32-13) "road to nowhere" in Section 26 (T40N, R3E). It should be closed to protect Monument values.
- E-E1; a redundant, eroding (photo DC-1-19) "road to nowhere" that runs parallel to BLM Route 1017. It should be closed to mechanized travel to protect Monument values.
- C-E; a redundant, little used (photo KC-46-11) travel way that impacts the steep slopes of Sections 25 and 36 (Coyote Buttes Quad; T41N, R3E). It should be closed to protect Monument values.
- B-D (Coyote Buttes/Poverty Flats); a redundant, eroding (photos DC-1-3,5) access to Paw Hole. Eroding, deep sand forces some users to select alternate routes (photo DC-1-1), compounding the negative impacts. The route should be closed to protect Monument values. Access to Paw Hole can be accomplished through the proposed cherry stem D-K.
- G-F-E; an eroding (photo KC-46-17), redundant travel way to the wildlife water catchment (Ladder Reservoir) in Section 36 (Coyote Buttes Quad; T41N, R3E). The route should be closed to mechanized travel to protect Monument values. Access to the wildlife catchment can be determined through the minimum requirement process.
- A-F; a little used (photo AA-7-12) travel way providing redundant access to the Ladder Reservoir wildlife catchment. The route should be closed to mechanized travel to protect Monument values. Access to the wildlife catchment can be determined through the minimum requirement process.
- J-K; a redundant shortcut to the Paw Hole-Cottonwood Cove junction, it should be closed to protect Monument values.

Wilderness Addition 2

- C-F-G; a redundant shortcut (photo LB-2-17) between Pine Tree Pockets (One Toe Ridge Quad; T40N, R4E, Section 27) and BLM Route 1081. It should be closed to mechanized travel to protect Monument values.

- F-A; a little used (photo LB-2-19), redundant route from travel way C-F-G to Red Pocket (Poverty Flats Quad; T40N, R3E, Section 5. It should be closed to mechanized travel to protect Monument values.
- BB1; a little used (photo KC-45-21) access to an illegal dump (photo KC-45-22). The dump should be cleaned up and the route closed to mechanized travel to protect Monument values.

Wilderness Addition 3

ZZ; a redundant, little used (photo LA-2-24), eroding (photo LA-2-22) travel way beginning at point Z (One Toe Ridge Quad, T40N, R5E, Section 30) and ending at travel way Y-X at BM6350 (The Big Knoll; T40N, R5E, Section 23). It should be closed to mechanized travel to protect Monument values.

N; a redundant, eroding (photo LA-2-17) travel way beginning at its junction with BLM Route 1105 (One Toe Ridge Quad, T40N, R4E, Section 36) and ending at its junction with cherry stem M near BM6590 in Section 25.

M1-M2; a redundant, little used (photo LA-2-12) travel way running parallel to cherry stem M in Section 25 (One Toe Ridge Quad; T40N, R4E, Section 25). It should be closed to mechanized travel to protect Monument values.

Z-C; a redundant, little used (photos LB-2-15,16) travel way. It should be closed to protect Monument values.

Wilderness Addition 5

- M (M1-M2); a redundant travel way in Sections 3 and 10 (Water Pockets Quad; T41N, R6E) that currently forms the existing wilderness boundary (photos KC-60-18,20). Travel way "N" is the primary route and contains less eroding section. AWC recommends closing travel way M and converting to a hiking trail.
- O-P; a redundant loop route in Sections 11,12,13 (Water Pockets Quad; T41N, R6E) and Section 18 (T41N, R7E). This route consist of eroding, loose sand (photo KC-60-21). A significant number of impacted camping sites occur along this rim road affecting Monument resources, including an undetermined number of archaeological sites. We recommend restoring the impacted sites to a natural condition and converting the route into a scenic hiking trail.
- "T"; a short "road to nowhere" in Section 31 (Water Pockets Quad; T42N, R7E) should be closed to mechanized use and restored to a natural condition to protect Monument values.
- "Q"; a travel way in Section 5 (Water Pockets Quad; T42N, R7E) providing access to the Paria Canyon-Vermilion Cliffs Wilderness. The proposed closure to mechanized travel would add about 0.5 miles to the existing wilderness trail, and it would provide additional protection to Monument resources.
- "W"; provides access to a water catchment in Section 4 (Water Pockets Quad; T42N, R7E). Closure to mechanized travel would protect Monument values. An agreement with the permittee to provide essential maintenance to the tank can be arranged under the minimum requirement process.
- C-D-E-G; a redundant travel way in Sections 13, 24 (Ferry Swale; T41N, R7E) and

Section 19 (T41N, R8E) has resulted in numerous impacts and follows an active wash for much of its length. It should be closed to protect monument values.

3) Cherry Stems

Wilderness Addition 1

- BLM Route 1093 (Bush Head Tank Road) provides access to the reservoir in Section 27 (Water Pockets Quad, T41N, R6E, Section 27).
- BLM Route 1017.
- Travel way "C" provides access from its junction with travel way A-N in Section 15 (Navajo Bridge, T40N, R6E) to corrals in Section 12 (Water Pockets). The routes depicted on the BLM map (USDI 2000) and the quads east of the corral provide no essential service and should be closed to mechanized travel to protect Monument values.
- Seven Mile Overlook, (travel way M-N-A-Q) beginning at BLM Route 1093 (The Big Knoll Quad, T40N, R6E, Section 20) and ending at the overlook at the Paria Canyon-Vermilion Cliffs Wilderness boundary at point "Q" (Navajo Bridge Quad, T40N, R6E, Section 25; see photo EC-1-18).
- Travel way F-G (One Toe Ridge Quad; T39N, R4E, Sections 13 and 23) provides access to a camping area and spectacular view of House Rock Valley. It is the boundary between Wilderness Addition 2 and Wilderness Addition 3.
- Travel way "A" provides access from Pine Tree Pockets to the corral and water pump in Section 6 (House Rock Springs Quad, T39N, R4E).
- Paw Hole Road (J-K) begins at the Paw Hole-Cottonwood Cove Road intersection (Poverty Flat Quad, T41N, R4E, Section 28) and terminates at Paw Hole trailhead (Coyote Buttes Quad; T41N, R3E, Section 25).

Wilderness Addition 5

P-R; an access route in Section 12 (Water Pockets Quad; T41N, R6E) and Section 18 (T41N, R7E) to a scenic overlook of the Paria Canyon-Vermilion Cliffs Wilderness (KC-60-24).

Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Pakoon Proposed Wilderness (43,801 acres; Quads: Pakoon Springs, Virgin Peak, Red Pockets, and St. Thomas Gap).

Summary:

The Arizona Wilderness Coalition recommends the 43,801-acre proposed Pakoon Wilderness for Wilderness designation. A review of the 1979 "Overthrust Belt accelerated intensive inventory" process indicates that agency's wilderness suitability criteria was not consistently and correctly applied to the unit. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The proposed Pakoon Wilderness consists of the former Cedar Wash Intensive Inventory Unit (1-115, 44,848 acres). This expansive wildland includes Cedar and Cottonwood Washes and numerous lava-capped plateaus. The area provides important wildlife values, including significant desert tortoise habitat.

B. Historical Review and Critique of the 1982 WSA Decision Process

In 1979, the Bureau of Land Management identified Pakoon (Cedar Wash) for further wilderness study (USDI, 1979, Decision Report). This process included the "Overthrust Belt accelerated intensive inventory" of 21 units from Grand Wash Cliffs to the Nevada state line (510,000 acres; USDI, BLM, 1979, Memo (8500[931])). The Overthrust Belt, a geologic formation, was thought to contain significant oil and gas reserves (USDI, BLM, 1980 Proposal Report, page 3). The agency intended the accelerated inventory to "determine which lands within the area may be dropped from further wilderness consideration, and thereby opened for oil and gas exploration" (USDI, BLM, 1979, Memo (8500[931])). As a result, and apparently without further public documentation of the unit's wilderness character, the BLM dropped the entire Pakoon (Cedar Wash, 1-115) from further wilderness evaluation (USDI, BLM, 1979, Memo (8500[931]), "Summary of Results").

The predictions of the Overthrust Belt's energy potential dissolved without any economically recoverable oil or gas deposits developed on the Arizona Strip. Since new information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria, a new wilderness analysis is warranted.

C. Preliminary AWC Recommendation

1) Mandatory Wilderness Characteristics (Wilderness Character)

a) Size

The proposed 43,801-acre Pakoon Proposed Wilderness meets the BLM (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]) size criteria of greater than 5,000 acres.

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammeled" (uncontrolled) by humans and their activities?

Regarding the proposed Pakoon Wilderness, the answer to both questions is a resounding yes (photo TP-14-8A). The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]). Its expansive grasslands, intricate drainages, and size creates a picturesque, rugged wilderness home to desert tortoise, raptors and other desert species.

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Pakoon's human imprints consist of primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). These consist of three abandoned travel ways (H-H1, U-V, and L-LL) and are in fact "substantially unnoticeable" (see discussion below; photo TP-14-20).

The principal proposed "road" closures within the proposed wilderness consist of four largely revegetated and little-used routes (E-D, E-F, GG-A and E1-E2). These travel ways should be closed to vehicular access and stabilized to protect Monument values. Agreements for essential maintenance of to the corral in along E-F (Section 8) can be developed under the minimum requirement process. One additional travel way proposed for closure is A-B-E1; a little-used travel way located outside of the proposed wilderness. AWC maintains that it is reasonable to assume past impacts created by these travel ways described below (see Travel Way Closures section) "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

In any event, the presence of a "road" does not disqualify an area for wilderness

designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation. Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c), provides a more permissive standard for designating a wilderness; a second definition, in section 4(c), provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Pakoon Wilderness' size, terrain variation contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation. Recent citizen's inventories demonstrate the area's outstanding wilderness experiential potential (photo TP-14-8). The AWC strongly urges the BLM reconsider the area's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

2) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]). The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Pakoon's "optional Wilderness Characteristics" and include:

a) 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.

b) A geological treasure, including

- fossils, including invertebrate fossils.
- portions of geologic faults

d) 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...numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, agricultural features, burial sites, caves, rockshelters, trails, and camps.
- Areas of importance to existing Indian tribes

e) 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...allowing wildlife movement and plant dispersal
- Giant Mojave Yucca cacti proliferating in undisturbed conditions throughout the monument
- Diverse wildlife
- Numerous threatened or endangered species including the desert tortoise (most of the proposed wilderness lies within the desert tortoise habitat; see USDI, BLM, 1998, Map 4).

1) Proposed Boundary

Beginning at the intersection of the Nevada-Arizona state line and State Route 101 (Virgin Peak Quad, T36N, R16W, Section 7); along 101 in an easterly direction (bypassing to the south and east Jacobs Ranch and corrals in Sections 9 and 4) to point "A1" in Section 4; then along segment A1-H-A2 to its junction with 101 at A2; then in a northeasterly direction along 101 to point "F1" in Section 23 (Red Pockets Quad; T37N, R16W); then along travel way F1-E1-R in an easterly direction to its junction with BLM Route 1027 in Section 20 (Red Pockets Quad; T37N, R15W); then along 1027 in a southerly direction to its junction with BLM Route 1007 in Section 23 (Cane Springs SE Quad; T36N, R15W); then along 1007 in a southerly then southwesterly direction to its junction with State Route 111 near Alan Well (Pakoon Springs Quad; T35N, R16W, Section 36); then along 111 in a northerly direction excluding Pakoon Springs private lands in Sections 24 and 25, and corrals in Section 2; then continuing in a northerly direction along 111 excluding the corral and steel tanks in Sections 26 and 27; then in a northwesterly direction along 111 to its intersection with the Nevada-Arizona state line in Section 18 (Virgin Peak Quad; T36N, R16W); then due north along the state line to its intersection with State Route 101 (Virgin Peak Quad, T36N, R16W, Section 7).

2) Travel Way Closures

- A-B-E1; a little-used travel way located outside of the proposed wilderness. The travel way begins off BLM Route 1027 in Section 19 (Red Pockets Quad, T37N, R15W; photo TP-13-19) and dead ends at a gate 0.9 miles later (Point "B", photo TP-13-20). Although depicted on the Pakoon Quad, the B-E1 portion could not be located. A-B-E1 is a little-used road to nowhere and should be closed to protect Monument values.
- E-D; continuation of cherry-stem C-E, this is a little used travel way that becomes severely eroded (photo TP-14-22; Section 17) approximately 0.9 miles from a corral in Section 9 (Red Pockets Quad, T36N, R15W). The eroded section should be stabilized with rock or log checks and the travel way closed to mechanized travel to protect monument values.
- H-H1; a travel way depicted on the Red Pockets Quad but not the BLM map (USDI 2000), begins as a faint two-track in Section 16 (photo TP-14-18) and appears little

used or abandoned (photo TP-14-20). The travel way should be closed to mechanized travel and returned to a natural condition to protect monument values.

- E-F; a travel way depicted on the Red Pockets Quad but not the BLM map (USDI 2000). It begins at a corral in Section 9 (photo TP-14-6; T36N, R15W) and climbs to Cottonwood Ridge (photo TP-14-7), continuing on to a corral in Section 14. The travel way follows a wash and is susceptible to erosion (photo TP-14-9). The route appears little used and could easily return to a natural condition (photos TP-14-6,7 and TP-15-4,5). Two short spurs depicted on the quad (E3-F3, photo TP-15-3; and E4-F6, photo TP-15-6) appear little used as well. Agreements for essential maintenance of to the corral in Section 6 can be developed under the minimum requirement process. The field staff could not locate the route depicted on the BLM map (2000) and the Pakoon Springs and Red Pockets Quads as following Cottonwood Ridge (beginning in Section 25 [Pakoon Springs Quad; T35N, R16W] in the southeast corner of the Pakoon Springs private sector; and ending near point "E2" in Section 8 (T36N, R15W) on the Red Pockets Quad). We assume it is abandoned and should be closed to protect monument values.
- GG-A; a travel way depicted on the BLM map (USDI 2000) and the Red Pockets and Pakoon Springs Quads. This is a little used travel way (photos TP-15-13,14,16) providing redundant access to the corral in Section 26 (Pakoon Springs Quad; T35N, R16W). It could easily return to a natural condition if closed to mechanized travel.
- U-V; the field staff could not discern a travel way depicted on the BLM map (USDI 2000) and the Pakoon Springs Quad as beginning in Section 2 (T35N, R16W) east of State Route 111 (just east of a corral) and continuing in an easterly then northerly direction into Sections 36 and 31 (R15W); then southerly to Section 17. This travel way should be removed from all maps.
- L-LL; the field staff could not discern a travel way depicted on the Red Pockets Quad as west of BLM Route 1007 (T36N, R15W, Section 22) and ending in the southwest corner of Section 28 (Pakoon Springs Quad). This travel way should be removed from all maps.
- E1-E2; a redundant, little-used travel way depicted on the BLM map (USDI 2000) and Red Pockets Quad as a jeep trail beginning in Section 25 (Red Pockets Quad, T37N, R16W) and continuing to Section 8 (T36N, R15W). The travel way should be closed to mechanized use to protect Monument values.

3) Cherry Stems

- C-E; 0.5-mile route off BLM Route 1027 to a corral in Section 9 (Red Pockets Quad, T36N, R15W).
- F-G (Cedar Wash); a two-mile route off State Route 101 near Cove Springs (Virgin Peak Quad, T36N, R16W, Section 3) and ending at the corral in Section 14 (Red Pockets Quad).
- Waynes Well; a 1.5-mile cherry stem beginning south of BLM Route 1027 in Section 22 (Red Pockets Quad; T36N, R15W) and ending at Waynes Well in Section 28).

Grand Canyon- Parashant National Monument Wilderness Recommendation

Unit: Parashant Proposed Wilderness (Quads: Amos Point, Castle Peak, Cold Spring, Grassy Mountain, Mt. Dellenbaugh, Poverty Springs, Poverty Knoll, Price Point, Travertine Rapids, Whitmore Point, Whitmore Point SE, Whitmore Point SW, Yellow John Mountain).

Summary:

The Arizona Wilderness Coalition recommends the (acre) Proposed Parashant Wilderness for Wilderness designation. A review of the 1979-82 WSA process demonstrates that agency wilderness suitability criteria for the unit was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory supports the conclusion that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The proposed Parashant Wilderness consists primarily of three previous BLM WSAs: Parashant, Grassy Mountain, and Andrus Canyon; and four National Park Service "Proposed Wilderness" units: Shivwits Plateau (Kelly Point, Unit 33; 83,890 acres), Whitmore Point (Unit 32, 32,215 acres), Lava (Unit 36; 10,710 acres), and Andrus Point (Unit 34; 14,905 acres). The proposed Wilderness contains the northern 12 miles of the spectacular Parashant Canyon, a major tributary to the Grand Canyon (photos TP-2-Neg-4; TP-#-Neg-11,19). The extensive canyon and its tributaries, including Andrus Canyon (photo TP-11-Neg-9), and Grassy and Yellow John Mountains, offer good examples of Mojave and Great Basin desert vegetation. Desert grasslands and dense stands of pinyon and juniper woodlands dominate the rimlands.

B. Historical Review and Critique of the 1982 WSA Decision Process

1. Parashant (Unit 1-93; 38,938 acres)

In 1982, the BLM glowingly described the Parashant WSA's wilderness characteristics:

*The dense pinyon-juniper woodland combined with its large acreage provides **outstanding opportunities for solitude** [emphasis added]. The canyon and its rim provide outstanding scenery for sightseeing, hiking, and photography (USDI, BLM, 1982, Briefing Paper).*

In a subsequent document, the agency stated

*[t]he unit has remained in a natural state, containing **outstanding opportunities for both solitude and primitive and unconfined recreation**.... [and although the] unit has 12 miles of trails, a wildlife catchment, and a reservoir...these imprints are **largely unnoticeable** and well dispersed throughout the unit (emphasis added; USDI, BLM, 1982, EIS:50).*

In addition, the agency noted that Parashant "contains recorded archaeological sites, and is of particular geologic and scientific interest" (USDI, BLM, 1982, Briefing Paper).

In spite of its compelling wilderness character, the BLM "proposed as nonsuitable for wilderness designation" the entire Parashant WSA (38,938 acres) "because the unit lacks superior wilderness characteristics" (USDI, BLM, 1982, EIS:18). Parashant's wilderness characteristics of "outstanding opportunities" for both solitude and a primitive and unconfined recreation, natural condition with imprints of man "largely [substantially] unnoticeable", and size met the mandatory requirements of the Wilderness Act, but not that of the local agency managers. While BLM's assessment of the Parashant WSA indicated lack of "superior" wilderness character, current BLM policy prohibits comparisons or numerical, alphabetical, or qualitative rating systems (USDI 2001 [H-6310-1, Section 13(B)(1), page 11). Parashant's past and current naturalness, size, and outstanding opportunities for solitude and a primitive and unconfined type of recreation support wilderness designation.

2. Andrus Canyon (1-96D; 48,288 acres)

In 1982, the BLM stated that the Andrus Canyon WSA "provides **outstanding opportunities for solitude and unconfined types of recreation**" (USDI, BLM, 1982, Briefing Paper).

The unit's few intrusions occur throughout the WSA and do not impact naturalness. The unit's deep canyons, washes, cliffs, and crags provide excellent topographic screening, and high plateau areas are covered with a pinyon-juniper woodland that provides vegetation screening...[t]he unit's large size also contributes to opportunities for solitude.... The WSA offers several types of primitive and unconfined recreation, including hiking, backpacking, horseback riding, hunting, photography, and rock climbing. The colorful rock formations and sheer cliffs. Small caves, and alcoves in Andrus and Dansil Canyons are a special attraction, as are the spectacular views across Andrus and Dansil Canyons into the outlying desert (USDI, BLM, 1982, EIS:50).

The agency noted that Andrus Canyon is

an integral portion of the lands and tributaries that adjoin the Grand Canyon ...[and] provides many viewpoints of the Grand Canyon and its esplanade which are valuable for photography and sightseeing. Supplemental values include geology, scenery, and recorded archaeological sites (USDI, BLM, 1982, Briefing Paper).

In spite of Andrus Canyon's obvious and substantial wilderness character (naturalness, size, and outstanding opportunities for solitude and unconfined types of recreation), the entire unit was recommended as nonsuitable for wilderness designation: "The unit's overall wilderness quality is not superior" (USDI, BLM, 1982, EIS:18). Since

current BLM policy prohibits comparisons or numerical, alphabetical, or qualitative rating systems (USDI 2001 [H-6310-1, Section .13(B)(1), page 11], and BLM's endorsement of wilderness character, the reference to lack of "superior" quality is unjustified.

Ignoring its own assessment of the areas extensive canyons and rugged topography (USDI, BLM, 1982, EIS:50), the agency stated "its outstanding wilderness characteristics are based on large expanses of pinyon and juniper woodland" (USDI, BLM, 1982, EIS:18). In any event, current policy requires outstanding opportunities for either solitude or primitive and unconfined type of recreation "somewhere in the area," not everywhere (USDI 2001 [H-6310-1, Section .13(B)(3), page 13]). The agency's evaluation of Andrus Canyon, "an integral portion of the lands and tributaries that adjoin the Grand Canyon," supported a strong wilderness endorsement. The area possesses the requisite wilderness character to justify wilderness designation.

3. Grassy Mountain (1-96C; 5,503 acres)

In 1982, the BLM stated that Grassy Mountain WSA's "vegetation and topography provide **outstanding opportunities for solitude**" (emphasis added; USDI, BLM, 1982, EIS:50). The unit

is natural in appearance, its only human imprints consisting of a half-mile length of fence [emphasis added]. The 1,000-foot elevation change and many broken ridges provide topographic screening. Juniper and pinyon trees provide thick vegetation screening (USDI, BLM, 1982, EIS:50).

The BLM proposed Grassy Mountain as unsuitable for wilderness designation (USDI, BLM, 1982, EIS:18): "The unit lacks superior wilderness characteristics, its opportunities for recreation are not outstanding, and it meets only minimum standards for size and solitude (USDI, BLM, 1982, EIS:18).

While the agency reported that Grassy Mountain "lacks superior wilderness characteristics" (USDI, BLM, 1982, EIS:18), current BLM policy prohibits comparisons or numerical, alphabetical, or qualitative rating systems (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]). The area met the Wilderness Act's "mandatory requirements" for naturalness and size, and current policy requires outstanding opportunities for either solitude or primitive and unconfined type of recreation, not both "somewhere in the area," not everywhere (USDI 2001 [H-6310-1, Section .13(B)(3), page 13]). Grassy Mountain met this "minimum standard" for experiential quality by providing "outstanding opportunities for solitude" (USDI, BLM, 1982, EIS:50). The AWC submits that the agency's 1982 conclusions should have supported, not precluded wilderness designation.

C. Preliminary AWC Recommendation

1) Proposed Boundary

Beginning in the northwest corner at the junction of BLM Routes 1018 and 1046 (Poverty Springs Quad; T35N, R12W, Section 34) and continuing along 1046 in a southerly direction to travel way K-L at point "K" (Wildcat Ranch Quad; T34N, R12W, Section 14); then along travel way K-L (east of 1046) to its junction with 1046 (point "L") in Section 24; then along 1046 in a southerly direction to its junction with travel way H5-G5-G in Section 29 (Grassy Mountain Quad; T34N, R11W); then along travel way H5-G5-G in a westerly then northerly direction to point "G" (Red Pond) in Section 25; then in a westerly direction along travel way T-G (excluding Red Pond) to point "T" (Section 24); then along travel way T-O-P in a westerly direction to its intersection with State Route 101 (point "P") in Section 31; then in a southerly direction along 101 to its junction with travel way "N" (T33N, R12W, Section 4); then in an easterly and then southerly direction along travel way "N" to its intersection with the private property boundary (Wildcat Ranch); then in an alternating easterly and southerly direction to exclude the entire private sections to travel way "R" (Castle Peak Quad; T33N, R12W, Section 36); then along travel way "R" in an easterly then southerly direction to its intersection with the private land in Section 1 (T32N, R12W); then in a easterly then southerly direction excluding the private property; then along the southern boundary of the private land in a westerly direction to its intersection with the R12W-R11W line; the due south along this line to its junction with the Lake Mead National Recreation (NRA) boundary at the northwest corner of Section 30 (T32N, R11W); then in an alternating southerly then westerly direction along the NRA boundary to its intersection with BLM Route 1019 (Mt. Dellenbaugh Quad; T31N, R12W, Section 5); then along 1019 in a southerly direction to the Twin Spring Canyon rim in Section 8); then in a generally easterly direction along the NRA and Grand Canyon National Park boundary to its intersection with the Mt. Logan Wilderness boundary in Section 17 (Mt. Logan Quad; T33N, R8W); then in a westerly direction along the NRA boundary to its intersection with the eastern rim of Parashant Canyon near BM 5375 in Section 18 (Cold Spring Quad; T33N, R9W); then in a northwesterly direction along the east rim of Parashant Canyon to Ivanpatch Wash (Grassy Mountain Quad; T34N, R11W, Section 14); then in a northeasterly direction along the east rim of Ivanpatch Wash to its intersection with BLM Route 1018 (Poverty Knoll Quad; T35N, R11W, Section 36); then along 1018 to its junction with BLM Route 1046 (Poverty Springs Quad; T35N, R12W, Section 34).

2) Mandatory Wilderness Characteristics (Wilderness Character)

a) Size

The proposed ???-acre Parashant Wilderness meets the BLM's wilderness size criteria of greater than 5,000 acres (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]).

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems

versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Parashant Wilderness, the answer to both questions is yes (see photos TP-2-Neg-4; TP-3-Neg-11,19; TP-11-Neg-9). The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]).

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Parashant's human imprints include a mechanically treated areas, but most consist primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). Most imprints, as noted by the BLM and verified through recent citizen's inventories, are substantially unnoticeable (see discussion below in Travel Way Closures). There are, however, travel ways meeting the "road" definition that require closure to mechanized access to protect monument values and well as conform to wilderness criteria. AWC maintains that it is reasonable to assume past impacts created by the travel ways described below "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

The principal proposed "road" closures contain evidences of construction, but the routes appears to serve no essential use (see the discussions presented below). The other proposed "road" closures to stock tanks allow for essential maintenance to occur under application of the minimum requirement process (again, see discussion presented below). Provisions can be developed for removal of the features in the event the permittee prefers a voluntary retirement of the grazing lease.

In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation. Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c), provides a more permissive standard for designating a wilderness; a second definition, in section

4(c), provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Parashant's size, terrain variation ranging from the undulating juniper and pinyon forests to rugged canyons and cliffs, to expansive grasslands contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation. The BLM's 1979-82 wilderness inventory describe in glowing terms the "outstanding opportunities" for solitude and an unconfined and primitive type or recreation. While the BLM unjustifiably dropped Parashant, Grassy Mountain, and Andrus Canyon from wilderness consideration in 1982, the recent citizen's inventory demonstrates the area's outstanding wilderness experiential potential (see photos TP-2-Neg-4; TP-3-Neg-11,19; TP-11-Neg-9). The AWC strongly urges the BLM reconsider the area's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

2) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]).

The agency emphasized that the area's "[s]upplemental values include geology, scenery, and recorded archaeological sites" (USDI, BLM, 1982, Briefing Paper). The BLM stated that the area composed

an integral portion of the lands and tributaries that adjoin the Grand Canyon ...[and] provides many viewpoints of the Grand Canyon and its esplanade which are valuable for photography and sightseeing (USDI, BLM, 1982, Briefing Paper).

The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Parashant's "optional Wilderness Characteristics" and include:

a) 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.

b) A geological treasure, including

- colorful, lava-capped Precambrian and Paleozoic strata against the highly faulted terrain
- recent sinkholes and breccia pipes
- fossils including invertebrate fossils.
- portions of geologic faults

c) Important watersheds for the Colorado River and the Grand Canyon....

d) 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, numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, agricultural features, burial sites, caves, rockshelters, trails, and camps. In fact, the agency earlier noted that Parashant "contains recorded archaeological sites, and is of particular geologic and scientific interest" (USDI, BLM, 1982, Briefing Paper).
- 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...ranch structures and corrals... 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.

e) 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
- Diverse wildlife
- Numerous threatened or endangered species including the Mexican spotted owl and the California condor.

3) Travel Way Closures

- A2-B2 (Lake Mead NRA); this little-used (photo TP-6-17) travel way appears on the Lake Mead NRA wilderness map (USDI, NPS, 2001) and begins at the Whitmore Road (BLM Route 1045) in Section 11 (Whitmore Rapids Quad; T32N, R9W (see photo TP-6-16) and provides access to a cabin in Section 15 (photo TP-6-18). The beyond the cabin the travel way creates serious erosional problems (photo TM-15) and appears abandoned (photo TM-14). It should be closed to mechanized travel to protect Monument values. Access to the cabin for essential maintenance can be

provided through the minimum requirement process.

- Paws Pocket (A4-B4; Lake Mead NRA); east of Paws Pocket cabin, is depicted on the Lake Mead NRA wilderness map (USDI, NPS, 2001). The travel way appears to provide only occasional access (photo TP-7-8 to the water tank in section 5 (photo TP-7-9). Beyond the tank, the travel way appears abandoned or very infrequently used (photos TP-7-10,11) and is closed at the Grand Canyon National Park boundary. This section should be closed to mechanized travel to protect Monument values. Access to the tank for essential maintenance can be provided through the minimum requirement process.
- A3-B3 (Lake Mead NRA); is depicted on the Lake Mead NRA wilderness map (USDI, NPS, 2001). It is an eroded (photo TP-7-3), little-used (photo TP-7-3) travel way to a stock tank. It should be closed to mechanized travel to protect Monument values. Access to the stock tank for essential maintenance can be provided through the minimum requirement process.
- A1-B1 (Lake Mead NRA); is depicted on the Lake Mead NRA wilderness map (USDI, NPS, 2001). It is an eroded (photo TP-6-14), little-used (photo TP-6-11,1,13) travel way to a stock tank. The travel way defines a non-wilderness area contiguous with the existing Mt. Logan Wilderness. A1-B1 should be closed to mechanized travel to protect Monument values. Access to the stock tank for essential maintenance can be provided through the minimum requirement process.
- Jeep Trail not on the BLM map (USDI, BLM, 2000) but depicted on the Grassy Mountain and Poverty Knoll quads as beginning off of BLM Route 1018 (Poverty Knoll Quad; T34N, R11W, Section 2) and ending in Section 10 (Grassy Mountain Quad). Field staff could not locate this travel way. It should be removed from the quads.
- AA3-BB3; an abandoned, generally revegetated (photo TP-12-16) travel way network depicted on the BLM map (USDI, BLM, 2000) and the Grassy Mountain Quad in Section 1 and 2 (T33N, R11W). It is severely eroded in sections which should be stabilized with water bars and primitive drainage berms. The travel way should be closed to all mechanized travel to protect monument values.
- GG-HH; this road to nowhere depicted on the BLM map (USDI, BLM, 2000) begins off of BLM Route 1046 (T34N, R11W, Section 27; photo TP-13-8). It is little used (photos TP-13-11), eroding (photo TP-13-13) and completely vanishes in Section 25 (photo TP-13-12). A short spur (JJ-KK) is also little used and abruptly ends (photo TP-13-15). These travel ways should be closed to mechanized travel and restored to a natural condition.
- AA-BB-AA2-BB2 (Grassy Springs); a little used (photos TP-12-1,9,12), eroding (photos TP-12-2,14) access to an abandoned cabin (photo TP-12-4) and the Grassy Springs catchment in Section 9 (Grassy Mountain Quad; T33N, R11W; photo TP-12-13). The route should be closed to mechanized travel to protect monument values. Access for essential maintenance to the spring catchment can be addressed through the minimum requirement process.
- CC-DD; an abandoned travel way (photos TP-12-17,18) depicted on the Grassy Mountain Quad but not the BLM map (USDI, BLM, 2000). It should be closed to mechanized use and restored to a natural condition to protect Monument values.

- EE-FF; an eroding (photo TP-13-5), little used or abandoned travel way (photos TP13-7,4) off of BLM Route 1046 beginning in Section 2 (Grassy Mountain Quad; T34N, R11W). It should be closed to mechanized travel to protect monument values.
- AA2-BB; an eroding (photo TP-12-7), redundant, little used travel way (photo TP-12-8) off of BLM Route 1048 (Grassy Mountain Quad; T33N, R11W, Section 12). It should be stabilized with water bars and primitive drainage features, and closed to mechanized travel to protect Monument values.
- W2-X2; an abandoned "road to nowhere" off of BLM Route 1048 that is substantially unnoticeable (photos TP-11-14,15). It should be closed to mechanized use to protect monument values.
- GF-H; a travel way to Andrus Spring beginning at a stock tank in Section 6 (Wildcat Quad; T33N, R11W; photo TP-8-9). The spring vicinity should be cleaned up (see photo TP-8-11). The travel way is little used (photo TP-8-10) and should be closed to protect Monument values. Permittee access for essential maintenance of the springs and pipeline can be arranged through the minimum requirement process.
- G1-H1; an eroding (photo TP-8-14), little used travel way to nowhere (photos TP-8-13-15) that should be closed to mechanize travel to protect Monument values.
- G2-H2; an eroding (photos TP-8-18,19,24) travel way to an abandoned corral in Section 16 (Grassy Mountain Quad; T33N, R11W; photo TP-8-20). The route directly impacts a known archeological site (photo TP-8-18). An abandoned spur descends to the Grassy Springs in Section 9. This travel way to nowhere (the corral is abandoned) should be stabilized with water bars and primitive drainage berms. It should be closed to mechanized travel to protect Monument values.
- I-J; an abandoned, largely revegetated (photos TP-9-8,9,10) travel way depicted on the BLM map (USDI, BLM, 2000). This travel way to nowhere should be closed to mechanized travel and allowed to continue natural restoration.

4) Cherry Stems

- Paws Pocket (Lake Mead NRA); a route to a cabin in State Section 36 (Whitmore Rapids Quad; T33N, R9W).
- Parashant Canyon-Dripping Springs; a route beginning at the eastern rim of Parashant Canyon (Cold Springs Quad; T34N, R10W, Section 35) and ending near Dripping Springs (Yellow John Mountain Quad; T32N, R10W, Section 20) with a spur route to "Copper Mountain Mine (Whitmore Point Quad, T32N, R10W, Section 14).
- G5-GF tank access in Section 31 (Wildcat Ranch Quad; T34N, R11W).
- BLM Route 1046; beginning in Section 29 at point "H5" (Grassy Mountain Quad, T34N, R11W) and extending into the Andrus Canyon overlooks and a stock tank in Lake Mead National Recreation Area.
- Kelly Point (Lake Mead National Recreation Area); an extension of State Route 103.

Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Pigeon Canyon Proposed Wilderness (Quads: Azure Ridge, Grand Gulch Bench, Gyp Hills, and Pakoon Springs).

Summary:

The Arizona Wilderness Coalition recommends the (acreage) Proposed Pigeon Canyon Wilderness for Wilderness designation. A review of the 1979-82 WSA process reveals wilderness suitability criteria for the unit was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's current wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The proposed Pigeon Canyon wilderness encompasses the former Pigeon Canyon WSA (1-109; 33,988 acres) and Little Arizona inventory unit (1-108 [labeled 106 on Map, USDI, BLM, 1979, September] 16,930 acres). Except for the eastern cliff and Grand Gulch Bench regions, both areas lie within the Pakoon ACEC, an area managed primarily for the recovery of desert tortoise (USDI, 1998, page 5 and Map 4).

Several distinct topographic areas including the Gyp Hills, desert plains, and washes, Pigeon and North Fork Canyons, the Grand Wash Cliffs and plateau regions. (USDI, BLM, 1982, Briefing Paper). Elevation ranges from 2,300 feet in the Gyp Hills and desert to 4,600 feet on the Grand Wash Cliffs.

An imposing topographic feature, the Grand Wash Cliffs, dominates the scenery. On top the vegetation consists predominately of blackbrush and pinyon-juniper. Pigeon Canyon itself cuts through the majestic cliffs six miles into the Grand Gulch Bench, revealing an extensive, scenic web of ten side canyons including North Fork Canyon (see USDI, BLM, 1982, Briefing Paper).

Beneath the Grand Wash Cliffs lies the Gyp Hills, an austere, intricate badlands of extensive microbiotic crusts, and fragile landforms of soft shale. It is also important desert tortoise habitat (USDI 1988, Mojave Desert Amendment, Map 4). Within the proposed wilderness are landscapes of desert plains and hills intricately broken by countless washes, providing habitats of creosotebush, Joshua trees, cacti, and grasses and other desert vegetation (USDI, BLM, 1982, EIS:51).

B. Historical Review and Critique of the 1982 WSA Decision Process

In 1982, the BLM stated that the former Pigeon Canyon WSA

provides outstanding opportunities for primitive and unconfined recreation, including opportunities to hike and explore the geology and biological communities of the desert, gyp hills, canyons, cliff, and bench [emphasis added]. From atop the bench a visitor can hike along the rim of the Lower Grand Wash

Cliffs to observe this major geologic fault and view the Pakoon Basin below, the Virgin Mountains to the north, and Lake Mead to the southwest [USDI, BLM, 1982, EIS:52].

The agency enthusiastically noted the region "provides excellent opportunities for solitude throughout" and:

*The badlands in the unit's western part are a maze of gypsum hills, mounds, and gullies in which one can avoid the sights and sounds of others. The desert plains and bajada around the gyp hills and below the cliffs offer a complex topography of rough hills and ravines and 22 square miles in which to experience solitude. Pigeon Canyon itself is a maze of nine side canyons that provide an **outstanding opportunity for solitude** [emphasis added]. From the Grand gulch Bench, the canyon extends six miles west through the Lower Grand Wash Cliffs. At this point the canyon is 1,400 feet deep. Pinyon-juniper provides effective screening in some locations on top of the bench and cliffs [USDI, BLM, 1982, EIS:51-2].*

In another related document, the BLM reiterated this assessment. Pigeon Canyon WSA

*Possesses **outstanding opportunities for solitude and unconfined types of recreation** [emphasis added]. The major impact to naturalness is uranium exploration in the southwest...the remaining portion retaining its naturalness and is exemplary of natural desert ecosystems. The major features such as Pigeon Canyon and the seven miles of Lower Grand Wash Cliffs provide a true feeling of wilderness...supplemental features are the same as the unit on its south side (105A) including geology, historical and cultural sites, wildlife species, and outstanding scenery (USDI, BLM, 1982, Briefing Paper).*

Under the Shivwits MFP Step I "Enhanced Wilderness" alternative, the BLM recommended 21,404 acres of Pigeon Canyon WSA as suitable for wilderness designation. The eastern portion of the unit in particular was

*recommended for designation because of its **outstanding wilderness characteristics** [emphasis added]. Wilderness designation would protect scenic values, threatened and endangered plants, and desert bighorn sheep and desert tortoise habitat. The western half is not recommended because of exploration impacts, existing trails, and 600 acres of state land (USDI, BLM, 1982, EIS:20; USDI, BLM, 1982, Briefing Paper).*

In spite of the agency's convincing argument for wilderness, at least for the eastern section, the Shivwits MFP Step II recommended the entire WSA as unsuitable for wilderness designation (USDI, BLM, 1982, EIS:20; USDI, BLM, 1982, Briefing Paper).

This WSA contains know energy mineralization. The unit's geological formations were identified in a 1980 Department of energy study as favorable for vein or breccia type deposits of mineral concentration. The unit has 53 mining claims and 640 acres of state land (USDI, BLM, 1982, EIS:51-2).

Step I of the MFP process concluded "...the western half not recommended due to the exploration impacts, existing trails, and 600 acres of state land " (USDI, BLM, 1982, EIS:20; USDI, BLM, 1982, Briefing Paper). The agency acknowledged acquisition [through exchange?] of states state land would "assure wilderness management" (USDI, BLM, 1982, EIS:20). While the area contained "...53 existing mining claims" and "640 acres of nonfederal mineral estate" (USDI, BLM, 1982, Briefing Paper), these claims ...? The agency continually stressed that

Numerous trails remaining from uranium exploration in the southwest portion present manageability problems that could present potential problems...The area was mechanically rehabilitated, however, rehabilitation by natural forces will take many years (USDI, BLM, 1982, Briefing Paper).

One of the five wilderness criteria supposedly considered in the earlier inventory process included "the unit's potential for returning to its natural condition if there had been human activity in the unit" USDI, BLM, 1979, Preliminary Findings, page 3). Current BLM policy recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Pigeon Canyon's human imprints consist of primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). After an additional twenty years of natural rehabilitation, these former "trails" are in fact "substantially unnoticeable." AWC maintains that it is reasonable to assume past impacts created by the travel ways described above "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]).

In addition, the BLM stated that

544,000 acres of similar country [location not disclosed] are already included in the National Wilderness Preservation System, and 938,000 more similar acres are included in administratively endorsed wilderness areas [Grand Canyon?]. One of the areas lies within 10 miles. Designating this WSA would neither add to the diversity of the system nor improve upon the distribution of wilderness areas within the system (USDI, BLM, 1982, EIS:20).

Current BLM policy stresses that each inventory unit must be assessed on its own merits or in combination with an adjacent wilderness area or wilderness study area (USDI

2001 [H-6310-1, Section .13(B)(3)(b), page 13]) including other federal agencies such as the NPS (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]). Proximity and similarity to other wilderness areas enhances, not detracts from, the unit's wilderness character. Current BLM policy prohibits comparisons, numerical, alphabetical, or qualitative rating systems. Even under the earlier criteria, the unit should have been recommended for wilderness designation and not dropped from wilderness consideration.

Little Arizona

The BLM described the "Little Arizona" inventory unit as "a broad alluvial plain cut by many washes and covered with creosote, cacti and related species" (USDI, BLM, 1979a). The agency also noted "the three roads were found to be ways" and committed to further study of the area's naturalness. During the "Intensive Wilderness Inventory," the agency dropped Little Arizona from wilderness consideration:

This unit does not exist in a natural condition. There are several roads that cross the unit....The imprint of man's activity is substantially noticeable throughout the unit, and the opportunities for solitude and primitive recreation were not determined to be outstanding, and several roads divide the unit into segments less than 5,000 acres.

The proposed Pigeon Canyon Wilderness, including the Little Arizona region, lies within the Pookoon Area of Critical Environmental Concern (ACEC), an area "managed primarily for recovery of the [desert] tortoise population" (USDI, BLM, 1998, page 5). It meets the "naturalness" criteria required by the BLM (see "Naturalness" discussion below). The proposed travel way closures (also discussed below) and eventual wilderness designation, will provide significant additional protection for the tortoise population, as well as other Monument values such as soil, microbiotic crusts, other wildlife, and native vegetation. In any event, the presence of a "road" does not necessarily preclude an area for wilderness designation (see "Naturalness" discussion below). BLM policy provides for wilderness consideration when it is reasonable to assume past impacts "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor," (USDI 2001 [H-6310-1, Section .13(D), page 17]).

Little Arizona contains a spring complex, including Whiskey, Buckhorn, Grapevine. Little Arizona and Black Willow Springs. Desert springs are likely biological "hot spots" providing "spatially rare habitats that support disproportionately high levels of species density and most of the regions rare and endemic species" (see Grand Canyon Wildlands Council, 1999, page 4; and Stevens and Burke, 2000, pages 24-32). Wilderness designation would afford additional significant protection for these Monument resources.

While the agency stated Little Arizona lacks outstanding opportunities for solitude or a primitive and unconfined type of recreation, recent citizen's inventories support the opposite conclusion. In any event, this unit is included with the Pigeon Canyon unit which unquestionable possesses the requisite qualities. The agency requires

outstanding opportunities for solitude or a primitive and unconfined type of recreation "somewhere in the area," not everywhere (USDI 2001 [H-6310-1, Section .13(B)(3), page 13]).

C. Preliminary AWC Recommendation

1) Proposed Boundary

The proposed wilderness begins at its northeastern corner at the junction of BLM Route 1050 with BLM Route 1002 (Grand Gulch Bench Quad; T34N, R14W, Section 10); continuing in a southerly direction along BLM Route 1002 and excluding the Grand Gulch Mine and landing strip in sections 21,22,27, and 28; continuing in an easterly direction along BLM Route 1012 (Mustang Point Quad, T34N, R14W, Section 36) and then along BLM Route 1012 in a westerly direction to its junction with an unnumbered route (Pigeon Canyon Road, marked "G" on the AWC master quad; Grand Gulch Bench Quad, T33N, R14W, Section 2); then continuing in a westerly direction along route "G" (excluding Savanic Mine) to its junction with the Lake Mead National Recreation Area boundary (Gyp Hills Quad, T33N, R15W, Section 9) where the route becomes NRA Route 153; continuing in a westerly then northerly direction to its junction with NRA Route 152B in Section 32 (T34N, R15W); then in a southerly direction to its junction with NRA Route 152A (T33N, R15W, Section 7); then in a westerly direction to its junction with NRA Route 150 (Azure Ridge Quad, T33N, R16W, Section 10); then in a northerly direction passed the Lake Mead National Recreation Boundary in Section 3 where the route becomes State Route 103; continuing in a northerly direction to the junction with State Route 111 (Azure Ridge Quad; T34N, R16W, Section 15); continuing in a northerly direction to the junction with BLM Route 1007 (Pakoon Springs Quad; T35N, R16W, Section 36); then continuing in an easterly direction to the junction with BLM Route 1050 (T35N, R15W, Section 31); then continuing in a easterly direction along BLM Route 1050 to the junction with BLM Route 1002.

2) Mandatory Wilderness Characteristics (Wilderness Character)

a) Size

The proposed Pigeon Canyon wilderness meets the BLM (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]) size criteria of greater than 5,000 acres.

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs the agency to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Pigeon Canyon Wilderness, the answer to both questions is yes (KC-48-24; KC-49-21, 22). The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]).

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Pigeon Canyon's human imprints consist of primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]) and are in fact "substantially unnoticeable." AWC maintains that it is reasonable to assume past impacts created by the travel ways described above "will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor" (USDI 2001 [H-6310-1, Section .13(D), page 17]). The principal proposed "road" closures lie within the "Little Arizona" region and are necessary to protect wildlife (including desert tortoise), native vegetation, soils and microbiotic crust and perhaps the most significant desert spring complex in the Mohave desert portion of the Monument.

In any event, the presence of a "road" does not disqualify an area for wilderness designation. The Wilderness legislative history supports closure and restoration of roads, even paved roads, to qualify areas for wilderness designation. For another example, Congress designated the Grand Wash Cliffs WSA (also recommended by the BLM as nonsuitable for wilderness designation; USDI, BLM, 1982, EIS:20) as wilderness in 1984 and included the eight-mile "road" separating the former Grand Wash Cliffs WSA from Last Chance WSA. That road is now a hiking trail.

Scholars point out that the Wilderness Act embodies two distinct standards. One definition, in section 2(c), provides a more permissive standard for designating a wilderness; a second definition, in section 4(c), provides strict standards for managing wilderness once designated (Turner 2001:25-26; Stankey 1990: 116-117). Section 4(c)'s prohibition against permanent roads in wilderness applies to designated wilderness. There is nothing in the Act prohibiting the designation of areas containing roads, only that once designated those roads must be restored to a non-mechanized trail or a natural condition (see Scott 2001:31; and Turner 2001:25).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Pigeon Canyon Wilderness size, terrain variation ranging from the Gyp Hills' softly undulating badlands to rugged canyons and the imposing Grand Wash Cliffs contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation.

The BLM requires evaluation of the area's "outstanding opportunities for solitude or a primitive and unconfined type of recreation" as specified by Section 2(c) of the Wilderness Act. The agency states the area need not provide outstanding opportunities for both solitude and wilderness recreation, it "has only to possess one or the other"(USDI 2001 [H-6310-1, Section .22(A)(1)(b), page 21]). The BLM stresses that each inventory unit must be assessed on its own merits or in combination with an adjacent wilderness area or wilderness study area (USDI 2001 [H-6310-1, Section .13(B)(3)(b), page 13]). Comparisons are not permitted nor are numerical, alphabetical, or qualitative rating systems. Note that the agency requires outstanding opportunities for solitude or a primitive and unconfined type of recreation "somewhere in the area," not everywhere (USDI 2001 [H-6310-1, Section .13(B)(3), page 13]).

The BLM stressed Pigeons Canyon's "outstanding opportunities" for solitude and a primitive and unconfined type of recreation [USDI, BLM, 1982, EIS:51-2; USDI, BLM, 1982, Briefing Paper]. Those qualities exist today (KC-48-24; KC-49-21,22).

3) *Optional Wilderness Characteristics*

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]).

The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Pigeon Canyon's "optional Wilderness Characteristics" and include:

a) 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.

b) A geological treasure, including

- colorful, lava-capped Precambrian and Paleozoic strata against the highly faulted terrain
- recent sinkholes and breccia pipes
- fossils including invertebrate fossils.
- portions of geologic faults, including...the Grand Wash fault.

c) Important watersheds for the Colorado River and the Grand Canyon....

d) 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, numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, 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...ranch structures and corrals... 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.

e) 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
- Numerous threatened or endangered species including the Mexican spotted owl, the California condor, the desert tortoise (most of the proposed wilderness lies within the desert tortoise habitat; see USDI, BLM, 1998, Map 4).

4) Proposed Travel Way Closures

- D-D1, a 4.9 mile travel way presented on the BLM map (USDI 2000) begins at its junction with Pigeon Canyon Road (Route "G"; Gyp Hills Quad, T33N, R15W, Section 10; see photo KC-48-13), and completely fades out in Section 25 (T34N, R15W; Grand Gulch Bench Quad; see photo KC-48-23). The fielded staff could not locate its depicted northern terminus at BLM Route 1050. This "road to nowhere" contains numerous eroded sections (see photos KC-48- 14, 16, and 19) and should be closed to protect monument values.
- E-F (Grand Gulch Bench Quad; T34N, R14W, Sections 24,26, 27) is a little used (photo KC-31-1,2), eroding (photo KC-31-5) 1.8-mile travel way that is largely revegetated. This "road to nowhere" should be closed to mechanized travel to protect monument values.
- II-III (Whiskey Springs travel way; Gyp Hills Quad) is a 3.2-mile, little-used travel way that begins off travel way "J-I" in Section 32 (T34N, R15W; photo KC-49-5) and ends at the Whiskey Springs-Buckhorn Springs escarpment in Section 26 (T34N, R16W; photo KC-49-6). The continuation of the travel way descends in an apparently abandoned, eroding series of switchbacks entering Grand Wash (photos KC-C1-16,17). This little-used "road to nowhere" impacts critical tortoise habitat.

desert vegetation and soils, and poses a serious erosional problem at the escarpment. It should be closed to mechanized use, stabilized with drainage ditches, stone or log checks and waterbars, and restored to a natural condition.

- AA-BB (Upper Grapevine Springs travel way; Gyp Hills Quad) is a 3.5-mile, little-used travel way that begins off travel way "J-I" in Section 21 (T34N, R15W; photo KC-49-10) and ends in a steep, eroding (photo KC-C1-5) section dead ending east of Grapevine Springs (T34N, R16W, Section 26; photo KC-C1-9). This little-used "road to nowhere" impacts critical tortoise habitat, desert vegetation and soils, and poses a significant erosional problem at the escarpment. It should be closed to mechanized use and restored to a natural condition.
- YY-ZZ (Upper Black Willow Springs travel way; Gyp Hills Quad) is a three-mile, little-used travel way that begins off travel way "J-I" in Section 21 (T34N, R15W; photo KC-49-16). The travel way ends at the bottom of an eroding (photo KC-50-14) in a fragile bottomland near Black Willow Spring (T34N, R15W, Section 13; photo KC-50-13). This little-used "road to nowhere" impacts critical tortoise habitat, desert vegetation and soils, and poses a significant erosional problem at the escarpment and in the bottomlands. It should be closed to mechanized use and restored to a natural condition.
- J-I is a 10.5-mile travel way bisecting the proposed Pigeon Canyon Wilderness into roughly what was once the Little Arizona and Pigeon Canyon WSA's. J-K is a lightly used (see photos KC-49-11,19) travel way with numerous eroding sections (photos KC-49-8,15) and numerous bypass routes (photos KC-49-15,18). The route begins in near the junction of NRA Routes 150 and 153 (T34N, R15W, Section 32; Gyp Hills Quad) and continues to its junction with BLM Route 1050 (photo KC-44-21; Grand Gulch Bench Quad; T34N, R14W, Section 5). This travel way provides a short cut to BLM Route 1050, but serves no other purpose. It impacts a significant amount of critical tortoise habitat (USDI, BLM, 1998, Map 4). Closure to mechanical travel of J-K would also resolve the impact issues related to travel ways II-III, AA-BB, and YY-ZZ, including soil, vegetation, archeological resources, and other native wildlife. This travel way network should be allowed to return to a natural condition.
- GG-G1G1 (Lower Black Willow Springs) is a 2.4-mile travel way consisting of numerous short bypasses (KC-50-4,5) and vehicle-associated impacts, and several significant erosional problems (photos KC-50-6,12). The travel way provides access to Black Willow Springs, an important Mohave desert water source heavily impact by cattle and burro grazing (photos KC-50-8,9,10,11,13). It begins at the junction of Cottonwood and Black Wash (Gyp Hills Quad; T34N, R16W, Section 27; photo KC-50-1) and continues on a sandy substrate up to a desert bench and ending near the springs in Section 13. The field staff could not locate the continuation of the route depicted on the BLM map (USDI, BLM, 2000) to its junction with BLM Route 1050 (T34N, R15W, Section 5); nor the "jeep trail" presented in Sections 14 and 15 (T34N, R16W). Closure to mechanical travel of GG-G1G1 would provide protection and refuge to a wide variety of native desert wildlife dependant on Black Willow, Little Arizona, Grapevine, Buckhorn, and Whiskey Springs. Closure would further protect important monument values, including critical desert tortoise habitat, soil, vegetation, and archeological resources.

These proposed road closures would provide significant additional protection for desert tortoise and other native wildlife species, as well as native vegetation and soils. In addition, the closures would enhance the refuge qualities of the "Little Arizona" spring complex. Desert springs are likely biological "hot spots" providing "spatially rare habitats that support disproportionately high levels of species density and most of the regions rare and endemic species" (see Grand Canyon Wildlands Council, 1999, page 4; and Stevens and Burke, 2000, pages 24-32). Wilderness designation would afford additional significant protection for these important Monument resources.

Grand Canyon- Parashant National Monument Wilderness Recommendation

Unit: Proposed Tank Canyon Wilderness (9,659 acres; Quads: Olaf Knolls, Pakoon Springs, Gyp Hills, and Grand Gulch Bench).

Summary:

The Arizona Wilderness Coalition recommends the 9,659-acre proposed Tank Canyon Wilderness for Wilderness designation. A review of the 1979 "Overthrust Belt accelerated intensive inventory" process indicates that agency's wilderness suitability criteria was not consistently and correctly applied to the unit. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

Tank Canyon consists of gently undulating plains cut by washes. Vegetation consists of Joshua trees, creosote and grasses. The entire unit consists of significant desert tortoise habitat (USDI, BLM, 1998, Map 4).

B. Historical Review and Critique of the 1982 WSA Decision Process

In 1979, the Bureau of Land Management identified Tank Canyon (southern Olaf Knolls Unit 1-113) for further wilderness study (USDI, 1979, Decision Report). This process included the "Overthrust Belt accelerated intensive inventory" of 21 units from Grand Wash Cliffs to the Nevada state line (510,000 acres; USDI, BLM, 1979, Memo (8500[931])). The Overthrust Belt, a geologic formation, was thought to contain significant oil and gas reserves (USDI, BLM, 1980 Proposal Report, page 3). The agency intended the accelerated inventory to "determine which lands within the area may be dropped from further wilderness consideration, and thereby opened for oil and gas exploration" (USDI, BLM, 1979, Memo (8500[931])). As a result, and apparently without further public documentation of the unit's wilderness character, the BLM dropped the entire Olaf Knolls inventory unit (including Tank Canyon) from further wilderness evaluation (USDI, BLM, 1979, Memo (8500[931]), "Summary of Results").

The predictions of the Overthrust Belt's energy potential dissolved without any development of economically recoverable oil or gas deposits on the Arizona Strip. Since new information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria, a new wilderness analysis is warranted.

C. Preliminary AWC Recommendation

1) Mandatory Wilderness Characteristics (Wilderness Character)

a) Size

The proposed 9,659 -acre Tank Canyon Wilderness meets the BLM (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]) size criteria of greater than 5,000 acres.

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity

as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Tank Canyon Wilderness, the answer to both questions is a resounding yes. The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]; see photos HH-1,3). It's expansive grasslands, intricate drainages, and size creates a picturesque, rugged wilderness home to desert tortoise, raptors and other desert species.

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Tank Canyon's only cherry stem accesses a well and corral off of BLM Route 1050 in the lower reaches of Tank Canyon Wash (Gyp Hills Quad; T34N, R15W, Section 5).

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Tank Canyon Wilderness' size, terrain variation contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation. While much of the area consists of gently rolling grasslands, current BLM policy instructs agency staff to "avoid using lack of terrain variation or vegetation, or size as disqualifying conditions for outstanding opportunities for solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(2)]). The evaluator should not assume that "simply because an area or portion of an area is flat and/or unvegetated, it automatically lacks an outstanding opportunity for solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]). Policy instructs management to "give consideration to the interrelationship between size, screening, configuration, and other factors that influence solitude" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]). Finally, consideration must be given to "factors or elements influencing solitude including size, natural screening, and the ability of the user to find a secluded spot" (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(c)], page 15).

Recent citizen's inventories demonstrate the area's outstanding wilderness

experiential potential, including opportunities for solitude, based on all the factors presented above. The AWC strongly urges the BLM to reconsider Tank Canyon's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

2) *Optional Wilderness Characteristics*

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]). The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Tank Canyon's "optional Wilderness Characteristics" and include:

a) 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.

b) A geological treasure, including

- fossils, including invertebrate fossils.
- portions of geologic faults

d) 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...numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites... quarries, agricultural features, burial sites, rockshelters, trails, and camps.
- Areas of importance to existing Indian tribes

e) 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...allowing wildlife movement and plant dispersal
- Giant Mojave Yucca cacti proliferating in undisturbed conditions
- Diverse wildlife
- Numerous threatened or endangered species including the desert tortoise (the proposed wilderness lies within desert tortoise habitat; see USDI, BLM, 1998, Map 4).

3) *Proposed Boundary*

Beginning in the northwest corner at the junction of BLM Route 1007 with road

segment AA-D-E (Pakoon Springs Quad; T35N, R15W, Section 16); along AA-D-E in an easterly direction to its junction with BLM Route 1061 at "E" (Olaf Knolls Quad; T35N, R14W, Section 30); then along 1061 in a southerly direction to its junction with BLM Route 1050 (Olaf Knolls; T34N, R15W, Section 1); then along 1050 in a westerly direction to its junction with BLM Route 1007 (Pakoon Springs Quad; T35N, R15W, Section 31); then along 1007 to its junction with road segment AA-D-E (Pakoon Springs Quad; T35N, R15W, Section 16).

4) *Cherry Stems*

Tank Canyon's only cherry stem road is a 0.5-mile route to a well and corral structure located in lower Tank Canyon wash (Gyp Hills Quad; T34N, R15W, Section 5).

Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Proposed Tom and Cull Wilderness (6,723 acres; Quads: Jacobs Well and Red Pockets).

Summary:

The Arizona Wilderness Coalition recommends the 6,723-acre proposed Tom and Cull Wilderness for Wilderness designation. A review of the 1979 "Overthrust Belt accelerated intensive inventory" process indicates that agency's wilderness suitability criteria was not consistently and correctly applied to the unit. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The proposed Tom and Cull Wilderness consists of the former Jacobs Intensive Inventory Unit (1-122; 5,706 acres). This scenic region consists of narrow plateaus of pinyon and juniper forest and other native desert vegetation. The area provides important wildlife values, including deer, mountain lion, raptors and other desert species.

B. Historical Review and Critique of the 1982 WSA Decision Process

In 1979, the Bureau of Land Management identified Tom and Cull (Jacobs) for further wilderness study (USDI, 1979, Decision Report). This process included the "Overthrust Belt accelerated intensive inventory" of 21 units from Grand Wash Cliffs to the Nevada state line (510,000 acres; USDI, BLM, 1979, Memo (8500[931])). The Overthrust Belt, a geologic formation, was thought to contain significant oil and gas reserves (USDI, BLM, 1980 Proposal Report, page 3). The agency intended the accelerated inventory to "determine which lands within the area may be dropped from further wilderness consideration, and thereby opened for oil and gas exploration" (USDI, BLM, 1979, Memo (8500[931])). As a result, and apparently without further public documentation of the unit's wilderness character, the BLM dropped the entire Tom and Cull (Jacobs) unit from further wilderness evaluation (USDI, BLM, 1979, Memo (8500[931]), "Summary of Results").

The predictions of the Overthrust Belt's energy potential dissolved without any economically recoverable oil or gas deposits developed on the Arizona Strip. Since new information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria, a new wilderness analysis is warranted.

C. Preliminary AWC Recommendation

1) Proposed Boundary

Beginning in the unit's southwest corner at the junction of State Route 101 with BLM Route 1041 (Red Pockets Quad; T37N, R16W, Section 13); continue in a northerly direction along 1041 to its junction with route "R" in Section 10 (Jacobs Well; T38N, R15W) approximately 0.4 miles south of 1041's junction with BLM Route 1004; then along route "R" in an easterly direction to its junction with 1004; then along 1004 in a

southerly direction to its junction with State Route 101 in Section 28 near Jacobs Well; then along 101 in a southerly then westerly direction to its junction with BLM Route 1041 (Red Pockets Quad; T37N, R16W, Section 13).

2) Mandatory Wilderness Characteristics (Wilderness Character)

a) Size

The proposed 6,723-acre Tom and Cull Wilderness meets the BLM (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]) size criteria of greater than 5,000 acres.

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Tom and Cull Wilderness, the answer to both questions is a resounding yes (photo). The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]). Its intricate drainages, cliffs and plateau and size creates a picturesque, rugged wilderness home to mule deer, mountain lions, raptors and other desert species.

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Tom and Cull's human imprints consist of primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). The "jeep trails" depicted as entering Tom and Cull Wash on the Red Pockets Quad (T37N, R15W, Section 7) but not on the BLM map (USDI 2000), ended immediately beyond the cherry-stemmed access ("K") to the tank (photo KC-50-18). The "Pack Trail" depicted on BLM map (USDI 2000) and the Jacobs Well Quad (T38N, R15W, Sections 28 and 33)

should remain closed to mechanized travel.

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Tom and Cull Wilderness' size, terrain variation contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation. Recent citizen's inventories demonstrate the area's outstanding wilderness experiential potential. The AWC strongly urges the BLM reconsider the area's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

3) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]). The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Tom and Culls "optional Wilderness Characteristics" and include:

a) 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.

b) A geological treasure, including

- fossils, including invertebrate fossils.
- portions of geologic faults

d) 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...numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, agricultural features, burial sites, caves, rockshelters, trails, and camps.
- Areas of importance to existing Indian tribes

e) 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...allowing wildlife movement and plant dispersal
- Giant Mojave Yucca cacti proliferating in undisturbed conditions
- Diverse wildlife

4) Cherry Stem

Route "K"; a 0.5 miles access to a tank and corral just off of BLM Route 1041 in Section 7 (Red Pockets Quad; T37N, R15W).

Grand Canyon- Parashant National Monument Wilderness Recommendation
Unit: Proposed Tom and Cull Wilderness (6,723 acres; Quads: Jacobs Well and Red Pockets).

Summary:

The Arizona Wilderness Coalition recommends the 6,723-acre proposed Tom and Cull Wilderness for Wilderness designation. A review of the 1979 "Overthrust Belt accelerated intensive inventory" process indicates that agency's wilderness suitability criteria was not consistently and correctly applied to the unit. New information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The proposed Tom and Cull Wilderness consists of the former Jacobs Intensive Inventory Unit (1-122; 5,706 acres). This scenic region consists of narrow plateaus of pinyon and juniper forest and other native desert vegetation. The area provides important wildlife values, including deer, mountain lion, raptors and other desert species.

B. Historical Review and Critique of the 1982 WSA Decision Process

In 1979, the Bureau of Land Management identified Tom and Cull (Jacobs) for further wilderness study (USDI, 1979, Decision Report). This process included the "Overthrust Belt accelerated intensive inventory" of 21 units from Grand Wash Cliffs to the Nevada state line (510,000 acres; USDI, BLM, 1979, Memo (8500[931])). The Overthrust Belt, a geologic formation, was thought to contain significant oil and gas reserves (USDI, BLM, 1980 Proposal Report, page 3). The agency intended the accelerated inventory to "determine which lands within the area may be dropped from further wilderness consideration, and thereby opened for oil and gas exploration" (USDI, BLM, 1979, Memo (8500[931])). As a result, and apparently without further public documentation of the unit's wilderness character, the BLM dropped the entire Tom and Cull (Jacobs) unit from further wilderness evaluation (USDI, BLM, 1979, Memo (8500[931]), "Summary of Results").

The predictions of the Overthrust Belt's energy potential dissolved without any economically recoverable oil or gas deposits developed on the Arizona Strip. Since new information derived from a recent citizen's inventory demonstrates that the area meets the agency's wilderness suitability criteria, a new wilderness analysis is warranted.

C. Preliminary AWC Recommendation

1) Proposed Boundary

Beginning in the unit's southwest corner at the junction of State Route 101 with BLM Route 1041 (Red Pockets Quad; T37N, R16W, Section 13); continue in a northerly direction along 1041 to its junction with route "R" in Section 10 (Jacobs Well; T38N, R15W) approximately 0.4 miles south of 1041's junction with BLM Route 1004; then along route "R" in an easterly direction to its junction with 1004; then along 1004 in a

southerly direction to its junction with State Route 101 in Section 28 near Jacobs Well; then along 101 in a southerly then westerly direction to its junction with BLM Route 1041 (Red Pockets Quad; T37N, R16W, Section 13).

2) Mandatory Wilderness Characteristics (Wilderness Character)

a) Size

The proposed 6,723-acre Tom and Cull Wilderness meets the BLM (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]) size criteria of greater than 5,000 acres.

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammeled" (uncontrolled) by humans and their activities?

Regarding the proposed Tom and Cull Wilderness, the answer to both questions is a resounding yes (photo). The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]. It's intricate drainages, cliffs and plateau and size creates a picturesque, rugged wilderness home to mule deer, mountain lions, raptors and other desert species.

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as those imprints are 'substantially unnoticeable'" (USDI 2001 [H-6310-1, Section .22(A)(1)(a)(1), page 20]). Tom and Cull's human imprints consist of primarily of abandoned or little-use travel ways not meeting the BLM's road definition criteria, i.e., "improved and maintained by mechanical means to insure relatively regular and continuous use" (USDI 2001 [H-6310-1, Section .13(A)(1), page 9]). The "jeep trails" depicted as entering Tom and Cull Wash on the Red Pockets Quad (T37N, R15W, Section 7) but not on the BLM map (USDI 2000), ended immediately beyond the cherry-stemmed access ("K") to the tank (photo KC-50-18). The "Pack Trail" depicted on BLM map (USDI 2000) and the Jacobs Well Quad (T38N, R15W, Sections 28 and 33)

should remain closed to mechanized travel.

c) Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

The proposed Tom and Cull Wilderness' size, terrain variation contribute to outstanding opportunities for both solitude and a primitive and unconfined type of recreation. Recent citizen's inventories demonstrate the area's outstanding wilderness experiential potential. The AWC strongly urges the BLM reconsider the area's outstanding opportunities for solitude and a primitive and unconfined type of recreation.

3) Optional Wilderness Characteristics

Section 2(c) of the Wilderness Act states that wilderness areas "...may also contain ecological, geological, or other features of scientific, educational, scenic or historical values." While these characteristics are not required by the Act, the BLM states that the presence of special wildlife values or geological features may provide additional rationale for WSA designation (USDI 2001 [H-6310-1, Section .2(A), page 22]). The objects identified in the Grand Canyon-Parashant Proclamation provide a compelling list of Tom and Culls "optional Wilderness Characteristics" and include:

a) 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.

b) A geological treasure, including

- fossils, including invertebrate fossils.
- portions of geologic faults

d) 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...numerous archaic period archeological sites, ancestral Puebloan sites, Southern Paiute sites, irreplaceable rock art images, quarries, agricultural features, burial sites, caves, rockshelters, trails, and camps.
- Areas of importance to existing Indian tribes

e) 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...allowing wildlife movement and plant dispersal
- Giant Mojave Yucca cacti proliferating in undisturbed conditions
- Diverse wildlife

4) Cherry Stem

Route "K"; a 0.5 miles access to a tank and corral just off of BLM Route 1041 in Section 7 (Red Pockets Quad; T37N, R15W).

Grand Canyon- Parashant National Monument Wilderness Recommendation

Unit: Toroweap (6,182 acres)

Summary The Arizona Wilderness Coalition recommends the Proposed 6,182-acre Toroweap Wilderness for Wilderness designation. A review of the 1979-82 WSA process demonstrates that the agency's wilderness suitability criteria for the unit was inconsistently and incorrectly applied. New information derived from a recent citizen's inventory supports the conclusion that the area meets the agency's wilderness suitability criteria under the 2001 BLM Wilderness Inventory and Study Procedures.

A. Description

The Proposed Toroweap Wilderness is a scenic arena of cinder cones, lava flows, and Great Basin desert scrub and grasses, and volcanic features of the Uinkaret Mountains. The area is contiguous to the 1.2 million-acre Grand Canyon National Park.

B. Historical Review and Critique of the 1982 WSA Decision Process

In its 1982 wilderness review, the BLM recommended Toroweap WSA as nonsuitable for wilderness designation:

Only the western half offers seclusion. A few wooded hills and drainages provide vegetation and topographic screening for solitude. The eastern half offers less opportunity for solitude than the western half. The eastern half lacks a diversity of landforms and vegetation and has little potential for quality primitive recreation (USDI, BLM, 1982, EIS:17).... Toroweap WSA provides no outstanding opportunities for solitude. Cinder cones, washes, and woodlands in the unit's western part provide limited screening, but this portion involves less than four square miles (USDI, BLM, 1982, EIS:48).

Current policy states either solitude or outstanding opportunities are present "somewhere in the area," not everywhere (USDI 2001 [H-6310-1, Section .13(B)(3), page 13]), and that the area need not provide outstanding opportunities for both solitude and wilderness recreation, it "has only to possess one or the other"(USDI 2001 [H-6310-1, Section .22(A)(1)(b), page 21].

The its 1982 assessment, the BLM also stated

Because of its small size (5,312) and narrow configuration, this unit's area of wilderness character would be difficult to make manageable (USDI, BLM, 1982, EIS:17). Narrow unit configuration constricts backcountry use and limits opportunities for long hikes and backpack trips (USDI, BLM, 1982, EIS:48

Current policy cautions the agency staff against concluding

that simply because an area is relatively small, it does not have an outstanding

opportunity for solitude. Consideration must be given to the interrelationship between size, screening, configuration, and other factors that influence solitude (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(1)(b), page 14]).

In any event, the current policy requires the agency to evaluate wilderness character "in combination with an adjacent wilderness area or WSA," in this case the 1.2 million-acre Grand Canyon Proposed Wilderness.

In its early review, the BLM also stated that "the eastern portion of the unit slopes gently and lacks any form of vegetation or topographic screening" (USDI, BLM, 1982, EIS:48). Current policy states:

Avoid using lack of terrain variation or vegetation, or size as disqualifying conditions for outstanding opportunities for solitude (USDI 2001 [H-6310-1, Section .13(B)(3)(c)(2)])... Do not assume that simply because an area or portion of an area is flat and/or unvegetated, it automatically lacks an outstanding opportunity for solitude (USDI 2001 [H-6310-1, Section 13(B)(3)(c)(1)(b), page 14]).

The BLM's 1982 review stated:

This unit offers many types of primitive and unconfined recreation, including hiking, backpacking, hunting, and sightseeing. These opportunities, though, are not outstanding or better than others of their kind (USDI, BLM, 1982, EIS:48). The unit provides opportunities for hunting, photography, and short sightseeing trips, but these are not regionally unique or better than others of their kind (USDI, BLM, 1982, EIS:17).

Current policy states that:

Comparisons are not permitted nor are numerical, alphabetical, or qualitative rating systems....[e]ach inventory area must be assessed on its own merits or in combination with an adjacent wilderness area or WSA as to whether an outstanding opportunity exists. There must be no comparison among areas [H-6310-1, Section .13(B)(3)(b), page 13]).

C. AWC Recommendation Toroweaps wilderness characteristics of "outstanding opportunities" for both solitude and a primitive and unconfined recreation, natural condition with imprints of man "largely [substantially] unnoticeable", and size meet the mandatory requirements of the Wilderness Act. The current naturalness, size, and outstanding opportunities for solitude and a primitive and unconfined type of recreation support wilderness designation.

1) Proposed Boundary Beginning at the proposed unit's northwestern corner at "Point 3" along BLM Route 1028 (Mt. Trumbull SE Quad; T34N, R8W); the in a southeasterly

direction along aqueduct "3-4" travel way to its intersection with Section 16 (T3N, R7W); then in a southerly direction along Sections 16 , 21 and 28's western boundary (excluding the private 1/8 section in Section 20) to the boundary's intersection with travel way C-D in Section 29; then in a southwesterly direction along travel way C-D to its intersection with state Section 32 (Toroweap landing strip); then heading due west along the northern boundary of Sections 32 and 31 to its intersection with Grand Canyon National Park (T34N, R8W, Section 25); then along the Park boundary in a northerly then westerly direction to its intersection with the private 1/2 section in Section 22 Mt. Logan Quad, T34N, R8W); then in due north along the eastern boundary of the private 1/2 section to BLM Route 1028 in Section 15; then in a northeasterly direction along 1028 to "Point 3).

2) Mandatory Wilderness Characteristics (Wilderness Character)

a) Size

The proposed Toroweap Wilderness meets the BLM's wilderness size criteria of greater than 5,000 acres (USDI 2001 [H-6310-1, Section .13(B)(1), page 11]).

b) Naturalness

The BLM distinguishes between "natural integrity" and "apparent naturalness" (USDI 2001 [H-6310-1, Section .13(B)(2)(b)(1), page 12]). The agency defines natural integrity as the presence or absence of ecosystems that are relatively unaffected by human's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus human-affected ecosystems. The BLM directs agency staff to assess the latter, namely, "do the works of humans appear to be substantially unnoticeable to the average visitor?" This approach is consistent with the wilderness "entry" criteria discussed in the literature (see Turner 2001; and Scott 2001). Based within this context, the relevant questions regarding an area's naturalness are

- does the area appear to have been primarily affected by the forces of nature with humankind's works substantially unnoticeable?
- does the area retains its "primeval character," that is, does the earth and its community of life remain "untrammelled" (uncontrolled) by humans and their activities?

Regarding the proposed Toroweap Wilderness, the answer to both questions is yes. The area "...generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable," as required by Section 2(c) of the Wilderness Act (USDI 2001 [H-6310-1, Section .13(B)(2), page 12]). Although the BLM noted in 1982 that the WSA has 3 miles of ways and one wildlife catchment, the agency stated these impacts "are effectively screened by the topography and vegetation" (USDI, BLM, 1982, EIS:48).

The BLM recognizes that the Wilderness Act "makes clear that areas may be designated as wilderness...which may contain some imprints of human use, so long as



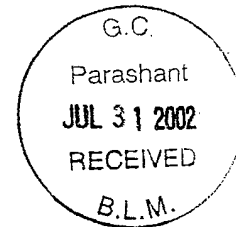
SOCIETY FOR AMERICAN ARCHAEOLOGY

BUREAU OF LAND MANAGEMENT
ARIZONA STRIP FIELD OFFICE

JUL 29 2002

July 19, 2002

Mr. Dennis Curtis
Bureau of Land Management
Arizona Strip Field Office
345 E. Riverside Drive
St. George, UT 84790



Dear Mr. Curtis:

I am writing as President of the Society for American Archaeology to comment on the issues to be considered in preparing a Resource Management Plan for the Grand Canyon-Parashant and Vermillion Cliffs National Monuments in Arizona. SAA is an international organization that, since its founding in 1934, has been dedicated to the research, interpretation, and protection of the archaeological heritage of the Americas. Its 6800 members include professional, student, and avocational archaeologists in colleges, universities, museums around the world as well as in U.S. government agencies and the private consulting sector; numerous members of the general public also belong to the Society and support its goals. In addition to publishing two scholarly journals and hosting a large annual conference where research results are presented, the SAA is heavily engaged in promoting and facilitating public education and public involvement in archaeology.

The "Notice of Intent to Prepare a Resource Management Plan" for the Monuments (Federal Register, April 24, 2002) invites comments on "issue themes" to be addressed in the plan. I strongly urge you to see that the plans include provisions for appropriate access to the Monument by qualified researchers and educators in a variety of fields of science and history. The Grand Canyon-Parashant and Vermillion Cliffs Monuments were established under the Antiquities Act as areas having significant "historic and scientific" values. Both the Antiquities Act and the President's proclamation demonstrate that research and public education were important reasons for establishing the monument. These activities should be considered in managing it as well.


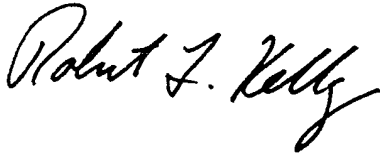
I am of course most concerned about archaeological research and public education in the Monuments. It is essential that the Resource Management Plans be structured to ensure that the American public continues to benefit 1) from appropriate archaeological research and 2) well-designed educational programs focused on the archaeology of the area.

In addition to a general consideration of archaeological research and education, the RMPs should make reasonable provisions for suitable problem-oriented, "investigator-initiated" archaeological research. Although the majority of archaeological investigations today are done as part of compliance with federal preservation and environmental statutes, investigator-initiated research remains an essential and productive contributor to our understanding of past cultures and is an essential contributor to public education programs.

The Resource Management Plan for the Escalante-Grand Staircase National Monument has been approved and thus can serve as a model for the other BLM monuments that are in the planning process. The Escalante-Grand Staircase RMP includes research and education in archaeology and other fields as important management goals, thus setting an appropriate precedent. I urge you to adopt this approach as you develop a management plan for your monument.

In conclusion, let me wish you well as you begin to design a management plan for these outstanding new National Monuments. I believe that explicit consideration of archaeological research and public education can only strengthen the planning effort and contribute to the BLM's ability to manage the Monument in the public interest. The Society for American Archaeology stands prepared to assist in any way it can with the development of the new management plans.

Sincerely,


President

Peter Ladis

(b) (6)

Planners, A2 Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

7/23/02

BUREAU OF LAND MANAGEMENT
ARIZONA STRIP FIELD OFFICE

JUL 29 2002

Dear BLM

I urge The BLM to prioritize the protection of biodiversity and ecosystem and landscape values of The new National Monuments, Vermillion Cliffs and Grand Canyon-Parashant.

These are valuable public lands that belong to all Americans.

All wilderness quality lands in The Monuments must be designated as Wilderness Study Areas.

All unnecessary or ecologically harmful roads, trails and routes must be closed and restored.

All off-road vehicles must be limited to designated routes and regulated.

The biological richness; The wilderness qualities of these lands must be protected and preserved in The management plans of these new Monuments.



Mr. Peter Ladis

Sincerely
P. Ladis

DOI-2020-04 01192

ASRMP003569

Subj: Input to Arizona Strip Planning
Date: Saturday, July 27, 2002 12:47:26 PM
From: Bomanstgeorge
To: arizona_strip@blm.gov

BUREAU OF LAND MANAGEMENT
ARIZONA STRIP FIELD OFFICE

08-01-2002 0810

JUL 30 2002

BLM and NPS Arizona Strip Planning:

In management of these lands I see two goals which have to be balanced against each other. One is preservation of the resources. We want to keep the lands in their natural state and preserve them. This would mean minimizing structures, roads, campgrounds, accessibility, and any type of facilities. Basically protect the land from people and their enterprises. The other goal is to make the land available for the enjoyment, recreation, and education of people. My recommendation is that you actively work on ways to maximize this experience for the people (customers?), with preservation to the extent practical. If there were no people at all, preservation would be perfect, but these are human endeavors, for humans.

Some specifics better describe my view. Always put yourself in the shoes of a visitor who will be in the area for a day or a few days.

- +Having good maps with clearly marked trails and roads available is a must.
- +Don't pave roads. I think that dirt roads will get you there, are part of a wilderness experience and will slow people down so they see more.
- +Don't close any of the existing roads. Why would we want to reduce the present accessibility? I make this a very strong point.
- +If large numbers of people will effect a fragile area, you must have a system to limit the number. Passes like Coyote Butte or off limits or something. Never, never, control access by limiting information and knowledge.
- +Make information available; maps, trails, advice, visitor centers, field rangers, good pamphlets on where to go and what to see, for a day trip or for a longer hike, etc.
- +Give people a large number of choices on where to go and what to see so a few areas are not overused.
- +Make efforts to increase peoples' knowledge and educate them. Open up some archaeological, paleontological or cultural sites to people, with

appropriate controls and good descriptive information from pamphlets, visitor centers, guided tours, etc.

+ Open some camping other than carry out, dry camping. A few camping areas are not going to ruin a million acres.

The benefits of logging, mining and cattle do not contribute much to the two goals you should try to meet. Do what you can to minimize these enterprises within the practical and political limits which exist.

Please add my name to the mailing list if it isn't there.

(b) (6)





08-01-2002 0811

brionsab@aol.com

**BUREAU OF LAND MANAGEMENT
ARIZONA STRIP FIELD OFFICE**

July 27, 2002

JUL 29 2002

Arizona Strip Planning Team
345 East Riverside Drive
St, George, UT 84790

Subject: Arizona Strip Comments

Dear Sir or Madam:

The Arizona Strip is a geographically diverse area. To complicate matters, it also encompasses a large amount of land. As a landowner, residing in close proximity to the Arizona Strip, I am making the following comments.

To me the area represents beauty, history, and recreation. A majority of the area is under utilized and rarely visited by individuals. If one was to travel within the area, and did a little research, they would discover the importance of preserving the history and artifacts of the early settlers and Native Americans. While some groups claim the best way to preserve an area is to declare it a Wilderness Area and shut off normal modes of access, I disagree. I believe these are public lands, and therefore should be accessible to all citizens.

The area contains many dirt roads, some graded, some not. While I am an avid hiker, I cannot always devote the amount of time it would take to hike to the hiking destination. Furthermore, the area can be extremely inhospitable; preparedness must be practiced whenever venturing into the Arizona Strip.

The best way to access the Areas are by utilizing the dirt roads. It allows a visitor to get to their destination in a reasonable amount of time and bring along the necessary items for survival. I have been fortunate enough to drive and hike to destinations that I would have never experienced, if it were not for the dirt roads. I have been able to bring senior citizens and handicapped individuals along. If roads are closed, the government would be taking something very special away from many of its citizens – access to this beautiful area. I have also run into sections of roads closed because of a wilderness area, making it impossible to access the open road on the other side without backtracking for hours and miles. This is both frustrating and ludicrous. It is not like these are heavily traveled roadways. I never want to see this happen anywhere in the Arizona Strip Area.

In several years, as I grow older, I may not be able to hike as far into these areas. I may have to rely on my vehicle to transport me to these areas. I hope the Federal Government realizes this fact and keeps the dirt roads open. So I, and others can experience the Area from White Rock Valley to Shivwits Plateau.

Sincerely,

[Redacted signature]

BUREAU OF LAND MANAGEMENT
ARIZONA STRIP FIELD OFFICE

08-01-2002 0812

July 27, 2002

JUL 29 2002

Diana Hawks
Bureau of Land Management
Arizona Strip Field Office
345 E. Riverside Drive
St. George, Utah 84790



re: Management plans for Grand Canyon Parashant and Vermilion Cliffs National Monuments

Dear Diana,

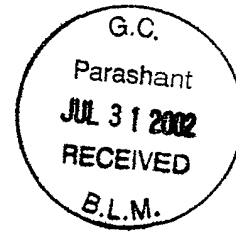
I am writing with my strongest possible support for BLM's management planning for our national monuments on the wild, remote Arizona Strip. Overall, through these management plans, the BLM has an historic opportunity to demonstrate leadership in re-inventing the agency as a leader with a focus on long-term protection of highly significant ecosystems as the Bureau of Landscape Monuments. As you well know, cattle ranching and other historic uses of BLM lands are becoming a legacy of the past; the BLM has an opportunity to emphasize the future of the Arizona Strip. In the process you will be ensuring long-term resource protection plus setting the stage for national-model restoration in what is clearly some of the most important and remote country in the lower 48 contiguous United States. Such vision will benefit the land and the Bureau of Land Management. It is important to keep in mind that off road vehicles are a major threat in this area and your agency must plan and act to do everything to stop and minimize this threat.

The Grand Canyon Parashant and Vermilion Cliffs National Monuments should be managed with healthy, restored ecosystems as the overriding goal of new management plans. This should include a healthy, sustained dose of funding for scientific research on ecosystem and species indicators of the health of both monuments. Because these national lands are amongst the most remote places in America, they should be actively managed as such with an aggressive program to keep them remote. The proclamations establishing these national monuments specifically preclude off road vehicle use. Through your management plans, these restrictions should be vigorously upheld; through your on-the-ground management and educational programs these crucial restrictions must be steadfastly enforced.

Moreover, research efforts I reference above should focus first on inventory of existing wildlife and wildlife habitats within the Grand Canyon Parashant and Vermilion Cliffs National Monuments. These inventories should extend to include adjacent lands, since all we know about ecosystem science tells us that bigger is better. Namely, the bigger an area studied and protected, the more robust, effective and long lasting ecosystem conservation and restoration efforts will be. Again, the creation of these monuments was also specifically intended to elevate your agency's role to that of restoration and protection of natural resources on a landscape-level scale. Perhaps nowhere else in America is this opportunity more ripe than on the Arizona Strip.

Subj: Planning for the Arizona Strip
Date: Sunday, July 28, 2002 2:51:03 PM
To: arizona_strip@blm.gov

08-01-2002 0813



Comments on Planning for the Arizona Strip

I especially value the Arizona Strip for its beauty and remoteness, and want to maintain these attributes by keeping the area as it is now while granting the access to the public that they currently have.

All Three Areas

No paved roads.

No road closures. (I recently visited the Grand Staircase Escalante National Monument and saw a perfectly good road closed, with the only explanation being, "We decided which roads should be left open, and that wasn't one of them.") The Grand Canyon is also closing roads, most recently Tuckup Road at Toroweap and a new closure further down river. People need ways to access areas which can provide them with a semi-wilderness experience, such as Whitmore Canyon, Twin Points, and Hidden Hills. Don't protect visitors from themselves.

Make available adequate public information as to roads (the AZ Strip map is excellent), trails and safety practices.

Produce a great geological chart of the AZ Strip.

Have one major visitor center for all three AZ Strip areas located in St. George, UT.

Provide brochures and displays on geology, paleontology, archaeology, culture, and history in the center. Include Ancestral Pueblo people, Paiutes, Mormons, Powell's travels, etc.

Cooperate with the Arizona Strip Interpretive Association; eg: Brown Bag presentations, staff education.

Establish an information base for the eastern half of the Strip and the Vermilion Cliffs National Monument at the Fredonia Visitor Center.

Have limited information for all three areas available at: Kanab BLM, Kane County Visitor Center, Paria contact Station, Fredonia and Jacob Lake North Kaibab Forest centers, Grand Canyon and Lake Mead NRA visitor centers and GSENM centers.

No admission charges, fee-demonstration programs (other than those already in existence), or other charges.

Keep motorized vehicles on existing roads, trails, and dry washes.

Use volunteers to help with monitoring, education, etc.

Grand Canyon-Parashant National Monument:

Establish an ongoing excavation at the Uinkaret archaeological site with demonstrations, presentations, field work opportunities open to the public. Open at least one other excavation-in-progress.

A few more public rock art sites.

Open other scientific and cultural projects to the public.

Pit toilet at Mt. Trumbull trailhead. Limit the amount of construction in Mt. Trumbull area.

Perhaps provide public access to the Black Rock administrative site so visitors can see the views.

No established campgrounds other than Cedar Pockets.

Require permits for group camping and limits on group size. Perhaps, limits

also on group size for ATV day trips and vehicle caravans.

Clear trails in the Paiute Wilderness and provide a good map for the area.

Vermilion Cliffs National Monument

Retain present system for managing Paria Canyon, Buckskin Gulch, Wire Pass, Coyote Buttes.

Increase law enforcement in Coyote Buttes.

Establish a few public archaeological and rock art sites.

Remainder of Arizona Strip

Establish a few more public archaeological and rock art sites.

Retain Little Black Mountain Petroglyph Site, Paiute Cave, and Witch's Pool as public sites.

More explicit information and better signage for historic trails.

Clear trails in the Paiute Wilderness and provide a good map for the area.

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

Date 7/25/02

ROUTING AND TRANSMITTAL SLIP

TO: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. <u>Diana Hawks</u>	<u>AZ010</u>	
2.	<u>Strip</u>	
3.		
4.		
5.		

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS

A phone call External Affairs took comment on National Monument Planning Effort. For your files -
Came

PHONE MESSAGE

TO	FROM	DATE	TIME
<u>Carrie Sengler</u>	<u>Annette Ruote</u>	<u>6/4</u>	<u>10:37</u> <u>AM</u>
OF		CELL ()	FAX ()
<p><i>re National Monument comments</i> <i>Don't do anything, don't disturb, no</i> <i>buildings, don't even expand. We</i> <i>expansion, let even Bitter & Biggs</i></p>			
E-MAIL ADDRESS		SIGNED <u>AR</u>	

☒ CALLED
☐ BACK
☐ RETURNED
☐ WANTS TO SEE YOU
☐ WILL CALL AGAIN
☐ WAS IN URGENT

DO NOT use this form as a RECORD of approvals, concurrences, disposals, or other actions.

(b)(6)

5041-102

☆ U.S.G.P.O. 1992 312-070/60005

Prescribed by GSA

FPMR (41 CFR) 101-11.206

08-01-2002 0814

BUREAU OF LAND MANAGEMENT
ARIZONA STRIP FIELD OFFICE

JUL 30 2002

DOI-2020-04 01200

ASRMP003577

Sharon and Ken Wyberg

(b) (6)

July 29, 2002

08-01-2002 0815

Diana Hawks, BLM
Arizona Strip Office
345 E. Riverside Drive
St. George, UT 84790
Fax (435) 688-3388

Dear Ms. Hawks and other Decision Makers:

Thank you for this opportunity to provide comments to the management planning process for the Grand Canyon-Parashant and Vermilion Cliffs National Monuments. Please consider these our formal comments to be included in the public comment period. We are excited to play a part in the shaping of the management decisions for this very beautiful region of our Nation's Public Lands legacy.

This area of Arizona is so incredibly beautiful that there is no question as to its value to future generations preserved as it is. We have visited and brought our children here in the past. We feel personally committed to seeing it preserved in its natural state for our children's children to visit some day in the future.

In general, our comments are to request that the management plans must protect the remote and undeveloped character of these magnificent places, including their natural and cultural resources. These Monuments must be protected from the threats to their wilderness character implicit in energy development, off-road vehicle use, grazing, and the inappropriate placement of visitor services.

As President Clinton declared in the proclamations establishing these monuments, these Landscape scale monuments are set aside to preserve the wild character and the environmental resources of these nationally important lands. The Bureau of Land Management must provide for the protection of the wonderful new Grand Canyon-Parashant and Vermilion Cliffs National Monuments within this management planning process.

We would also like to offer the following specific points to be considered during the monument management planning process:

- ** Ensure that the management plans protect and restore the natural systems and native species of these beautiful and awe-inspiring landscapes, safeguarding the remoteness and undeveloped character of these monuments.
- ** Inventory and submit recommendations to Congress for protection of lands qualifying for wilderness designation -- the strongest existing form of multi-species protection -- and protect these lands from any degradation until Congress acts.
- ** Protect areas with "substantial significance," such as significant historic, cultural, or scenic values, rare or relic plant communities, important wildlife habitat, or special riparian and wetland areas.
- ** Protect and restore springs and seeps, biological hot spots that are critical sources of water and wildlife in the arid climate characteristic of these two monuments.

Sharon and Ken Wyberg

(b) (6)

- ** Please restore all areas and watersheds damaged by off-road vehicle use, and help in their recovery from ATV, grazing or other extractive industry damage.
- ** Designate a transportation network that is consistent with the preservation purposes for which the monuments were created, retaining the minimum routes needed to provide reasonable access, and closing extraneous or little-used routes. The outcome of this plan should be a definite reduction in the number of routes remaining in use.
- ** Establish strict regulations against any off-road vehicle traffic within the boundaries of these monuments.
- ** Preclude domestic livestock grazing in riparian and other environmentally sensitive areas.
- ** Assess the negative impacts of grazing, especially within the Mojave Desert regions (desert tortoise habitats), and develop appropriate management steps including the buy-out of grazing leases.
- ** Provide better protection for archaeological resources, which are threatened by illegal pot and artifact hunters and off-road vehicle use, which must be ended. An inventory of archaeological resources should be conducted.
- ** Curb unrestrained recreational use and development, specifying that all visitor services must be developed outside of the boundaries of the monuments.
- ** We also support the BLM efforts to leave the Toroweap Road unpaved.
- ** Specific to the management plan for Vermilion Cliffs NM, we urge the BLM to ensure that the plan protects and restores native fish species, which are threatened by the invasion of non-native species and the impacts of Glen Canyon Dam.

Please incorporate these comments, and solutions for these concerns, into the final Management plans for these two outstanding National Monuments. The Grand Canyon-Parashant and Vermilion Cliffs National Monuments are fine additions to the protection of the outstanding natural landscapes and environmental resources of the Arizona Strip region. These truly are nationally significant lands deserving of the highest protection and preservation for future generations.

Thank-you,

08-01-2002 0816



Diana Hawks@BLM

05/16/2002 12:24 PM
MDT

To: Shirley Kodele/PARA/NPS@NPS
CC:
Subject: Arizona Strip Resource

First Email comment we have received

Diana Hawks
Arizona Strip BLM
345 East Riverside Drive
St. George, UT 84790
(435) 688-3266 FAX (435) 688-3388

----- Forwarded by Diana Hawks/ASFO/AZ/BLM/DOI on 05/16/2002 12:24 PM -----

(b) (6)

To: Diana_Hawks@blm.gov
CC:
Subject: Arizona Strip Resource

05/14/2002 09:15 PM

Dear Ms. Hawks,

Thank you for your letter of 6 May, 2002, regarding the effort to revise the Arizona Strip Resource Management Plan. Yes, please add me to the list to receive information on this effort. I also wish to restate my concern that the Bureau of Land Management, and its parent the Department of the Interior, must do everything in its power to protect wildlife and the environment. All living things depend on the health of our environment and each of us must strive to protect it. From the Department of the Interior's own mission statement:

The Department's mission is (1) to encourage and provide for the appropriate management, preservation, and operation of the Nation's public lands and natural resources for use and enjoyment both now and in the future; (2) to carry out related scientific research and investigations in support of these objectives; (3) to develop and use resources in an environmentally sound manner, and provide an equitable return on these resources to the American taxpayer; and (4) to carry out trust responsibilities of the U.S. Government with respect to American Indians and Alaska Natives.

I would like to stress the statements on preservation now and in the future and being environmentally sound in its actions. At times I wonder if Secretary Norton has ever read this mission statement.

Thank you again.

(b) (6)

Send and receive Hotmail on your mobile device: <http://mobile.msn.com>



[REDACTED]
<rjhuber@redrock.net

>

To: <arizona_strip@blm.gov>
cc: "DIANA HAWKS" <Diana_Hawks@blm.gov>
Subject: Plans for The Arizona Strip

07/30/2002 05:52 PM

1. WHAT DO YOU VALUE ABOUT THESE PUBLIC LANDS AND WHY?

We have only known the Arizona Strip for about 8 years, we say known because when you visit the Strip you receive a feeling of being a part of it. When you talk to the people, the ranchers who have spent years on the Strip or go to "The Evening On The Arizona Strip" that ASIA sponsors you get this same feeling, a deep pride, love of the land, love for the people of the land, the history of the land and the people(historic and pre-historic.) The Strip is a place where you can go all day and drive or hike for miles and not see another human being, you can see the great mountains of the Strip, the rolling hills, the vast desert, the flora and fauna, there are great valleys and when it rains the rivers large and small come rushing down a dry wash. We have deep pride in our hearts to be able to be a small part of the Arizona Strip---we are part of a volunteer group, The Arizona Site Steward Program, there are approximately 75 stewards who contribute many hundreds of hours each year in protecting pre-historic and historic sites on the Strip--when you talk to our volunteers you can see and feel the pride in them---we all feel we are helping to protect a great land.

2. WHAT ACTIVITIES OR USES ON THESE PUBLIC LANDS ARE IMPORTANT TO YOU AND WHY?

We would like to see all of the Arizona Strip stay much as it is. New roads are not needed, though some of the existing roads could be maintained better, but NOT paved. Please DO NOT open any areas to ATV'S unless it is for emergency purposes only. We have seen terrible damage of pre-historic and historic sites by people on ATV'S, they drive right through a pristine area on their machines with little or no care for the land or what is on the land.

3. HOW WOULD YOU LIKE TO SEE THE SCIENTIFIC, TRADITIONAL, RECREATIONAL, CULTURAL AND NATURAL RESOURCES OF THESE AREAS MANAGED?

We would like to see more interest put forth in the pre-historic and historic cultural resources, they are a disappearing and a non-renewable resource, work needs to be done to save these sites, we are losing the information they have to give---better public education perhaps would help. The vandalism and pothunting at some of the ancient sites is horrifying, we have seen shotgunned and paintballed petroglyphs, 1,000 year old walls pushed over, human bones dug up and strewn around, etc. We would like to see the ranchers be able to keep their grazing rights in most of the areas. We need to keep an open mind in the use of our natural resources, issue permits for these resources but charge more for the permit and keep a closer eye on the permit holder to be sure he is following the rules.

4. IS THERE ANYTHING ELSE YOU WANT TO TELL US?

Thank you for letting us be a part of this program and asking for our comments. We understand the need for controlling the use of the Arizona Strip, all the cultural and natural resources are being depleted and need to be managed. Manage with tolerance and a watchful eye as well. Please do not pave any of the roads----it would be terrible to go to Toroweap and find big buildings and 500 people.

Thank you

(b) (6)



08-01-2002 0818



[REDACTED]
<Kawnoweap@infowest.com>

To: <Diana_Hawks@blm.gov>
cc:
Subject: Re: comments

07/30/2002 04:52 PM

Hi Diana,

I know that Roger will be sending you his two cents worth - here's mine.

ATV's are my particular sources of annoyance. I think that they tear up the land, are nasty sources of noise pollution, and generally bad for the environment. I would like to see them strictly confined to "sacrifice" areas where they won't infringe on the physical and cultural attributes of the national monument. The drivers do not seem to have respect for anything in their path and certainly do not care about peace and quiet. Restrict them!

On the other hand, I think that the secondary roads should be left as they are - maybe not maintained but there for us "old people" to use to access the more far-reaching areas. I like the idea of wilderness areas but am beyond being able to backpack into them. I would still, however, like to enjoy the country.

The Arizona Strip is no place for cows - it's cruel to expect them to survive out there. Send them to California where they will be happy!

You, of course, know that I am in favor of doing whatever it takes to protect the cultural resources. Again, maybe some sacrifice sites are necessary, although I don't have any good ideas on new ones.

These are probably not popular feelings around here, but I know that you want honesty. Good luck dealing with all of this!

[REDACTED]

08-01-2002 0819



[REDACTED]
<Kawnoweap@infowest.com>

07/30/2002 07:09 PM

To: <arizona_strip@blm.gov>
cc: "Diana" <Diana_Hawks@blm.gov>
Subject: Comments on use of the national monuments

To whom it may concern:

I am a local resident and consider myself very familiar with the Arizona Strip, which includes the Grand Canyon-Parashant NM and the Vermillion Cliffs NM. I have hiked over and camped on much of it. The following are my opinions regarding use of those lands.

1. Grazing should be phased out. More than 287 million U.S. citizens own the Arizona Strip; yet only a small handful of people have been allowed to sacrifice the *entire* area for an environment most suitable to cows by digging ponds, altering natural springs to fill cow ponds, chaining woodlands, changing the natural vegetation, cutting roads, and killing predators (mountain lions and coyotes).

I have been told by members of ranching families and by a local accountant that ranchers don't make any money from the enterprise. They do it as a hobby, or out of a sense of pioneer tradition, or as a "way of life," or as a tax break. I think that these are insufficient reasons for the damage being done to the fauna and flora of public lands. Things change. Other areas of the country are more suited to cattle raising.

The other very sad impact of ranching is on the cultural resources that the Strip is rich in. Grazing, roads, etc have ruined many archaeological sites on the Strip. There are laws to protect such sites from looters but not from cows!

2. I don't believe new roads should be cut for public access, but I also don't want to see existing roads closed. Some two-track roads might be allowed to 'close themselves' through lack of maintenance. Basically I don't think that only hardy backpackers should have access to the land. There are already Wilderness areas restricting vehicular access.

3. I do not favor creating new attractions or services to draw more people. I would not further develop some of the current "public use sites." Such additions should come about only if public use increases on its own to warrant them.

4. Obviously no mining operations.

5. ATV's need to be severely restricted due to the bad behavior of many riders who have no respect for the land or other people, going off road and causing noise and damage to vegetation and land. This is already evident in many areas. ATV's are also being used to access remote archaeological sites for the purpose of looting.

6. More law enforcement people are needed, not only to enforce the law but to aid public safety as the number of visitors increases.

Basically, given the fact that the country making up the national monuments is already open and drawing more and more visitors, I believe it's time to allow those lands to regenerate their fauna and flora *as much as possible* to a natural state without closing them off completely. Cultural resources need much more protection.

Respectfully submitted, [REDACTED]

Monuments Comments

08-01-2002 0820

Subject: Monuments Comments**Date:** Sun, 28 Jul 2002 19:10:59 -0700**From:** [REDACTED] <chap7mm@qwest.net> (b) (6)**To:** arizonastrip@blm.gov, billgow@earthlink.net, (b) (6)

Diana Hawks
BLM
Az. Strip Field Office
345 E. Riverside Dr.
St. George, Utah


Diana:

Please keep hunting and wildlife conservation foremost in the BLM Plans on the Az. Strip. Many thousands of dollars are placed into the local economies up there due to hunting and fishing. The area boasts a wide diverse wildlife ecosystem that only functions at it's optimum with the cooperative efforts of the hunting and fishing folks as well as the Az. Game & Fish Dept and the BLM and other land management agencies. I am adamantly opposed to the end of hunting and fishing within the Monuments as some of the radical environmentalists wish to have happen. Sportsmen and women are the true conservationists as has been demonstrated in the past, with the countless hours of volunteer work on behalf of desert bighorn sheep, muledeer and other animals in the Monument areas. I hope you and the BLM will join me and all hunters and anglers in ensuring the proliferation of hunting and wildlife recreation opportunities for our children and their children in years to come in the Az. Strip area. Please do not let yourself or BLM fall victim to the shrill cries of the very radical and vocal environmentalists who will sooner or later demand that all human recreation be banned from the Az. Strip area and the Monuments.

Thank You very much for your time,

[REDACTED] -President Southern Az. Wildlife Callers Tucson, AZ.
Member Rocky Mtn. Elk Foundation, Member Az. Predator Callers, Member
Ted Nugent United Sportsmen of America

08-01-2002 0821


July 26, 2002

→ Diana Hawks
Bureau of Land Management
Arizona Strip Field Office
345 East Riverside Drive
St. George, Utah 84790
phone: (435) 688-3266
→ fax: (435) 688-3388
E-mail: arizona_strip@blm.gov

Subject: Management Plan for the Grand Canyon – Parashant and Vermillion Cliffs National Monuments in the Arizona Strip

Dear Diana Hawks:

This letter is to urge you to include the items below in the management plan for the National Monuments in the Arizona Strip. Monument proclamations mandate protection of specific natural features and objects including objects of scientific and historic interest. It is especially important to preserve the remote character of these monuments.

(1) Please designate a transportation network with preservation foremost in mind that would provide a minimum number of routes for reasonable access, and to close extraneous routes and routes that disrupt or harm wildlife, plant life, archaeological and other cultural features. Remember that the proclamations designating the Grand Canyon-Parashant and Vermilion Cliffs National Monuments specifically prohibit all motorized and mechanized off-road use.

(2) Please protect and restore wildlife, plant life, and habitat in both National Monuments. Remember your obligations to conduct inventories and protect lands that qualify for wilderness designation, to restore natural water distribution and the flow of seeps and springs, to seek and implement creative solutions to grazing impacts (solutions that include retiring grazing allotments), and to protect and restore native fish populations impacted by dams from grazing water impoundments. The BLM's overriding duty is to protect and restore land in these National Monuments.

(3) Please protect cultural and historical sites and artifacts.

Many people are concerned about these National Monuments, but I am one of the few who has taken time to write. Please reassure me that you have carefully taken my comments into consideration. Thank you for reading this letter.

Sincerely,

Jean Bennett

Jean Bennett



City of Hurricane



Bureau of Land Management
Arizona Strip Planning Team
345 E Riverside Drive
St. George, Utah 84790

Clark R Fawcett
City Manager

Thomas B Hirschi
Mayor

David L Sanders
Ethelynn Humphries
John W Bramall
Danny G Campbell
Glenwood Humphries
Council Members

BUREAU OF LAND MANAGEMENT
ARIZONA STRIP FIELD OFFICE

JUL 27 2002

Dear Planning Team:

The City of Hurricane, Utah submits the following comments to the Planning Team for the Arizona Strip and those planning for the Dixie Resource area of Utah land that is managed by the Bureau of Land Management.

As a close neighbor, the City of Hurricane urges that this planning process being undertaken by the BLM strictly recognize the concept of true Multiple Use for the Arizona Strip. It is imperative that traditional uses such as recreation and ranching be preserved. Of necessity, this will include provisions to insure the greatest possible access to this vast area. Many of our residents have a vital interest in this area's future and want it to be managed for the greatest public good.

The City is currently in the process of designating travel routes for Off-Highway Vehicles (OHV'S) within the City limits to accommodate motorized recreation users. Many users currently utilize the services available and it is expected that this will increase, especially with the continued development of the Sand Hollow Reservoir and Sand Mountain areas. The City is also trying to identify travel routes in the area that can be recommended to those choosing to recreate in this area. In the future, the BLM may be asked to formally designate these routes into a formal, designated trail system.

It is requested that the following provisions be included in the planning process to help the City with respect to our motorized recreation objectives:

- a. Formally inventory and recognize all existing travel routes so that they can be properly considered for inclusion into a planned recreation trail system. The inclusion of citizen users in this process would be most meaningful.
- b. Plan to achieve consistency with the existing management plan for travel and OHV use in the BLM Dixie Resource Area of which Hurricane City is a part. (Dixie Resource Area – Proposed Resource Management Plan and Final Environmental Impact Statement, September, 1998, pp. 2.46-2.51)
- c. Identify "special recreation/open" areas where trailheads could be developed.
- d. Where desirable or necessary because of special land designations such as Areas of Critical Environmental Concern (ACEC), provide for route designations to be made in a timely manner.
- e. Specifically define "Off-Road Use" as used in the Proclamations for the Vermilion Cliffs and the Grand Canyon-Parashant National Monuments to conform to its present Resource Management Plan definition; "off existing roads and trails" which is intended to prohibit cross-country travel. Identify the traditional recreation uses in the Monuments as "valid and existing" rights.

Respectfully Submitted,

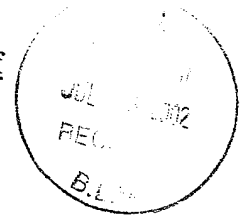
Thomas B Hirschi
Hurricane City Mayor

Cc: Fish & Wildlife
Washington County Water Conservancy Dist.
Dixie National Forest Service

BUREAU OF LAND MANAGEMENT
ARIZONA STRIP FIELD OFFICE
JUL 27 2002

08-01-2002 0823

Comments for consideration reference the management of
Parashant National Monument



Preservation through protection are elements identified in the Proclamation establishing the Parashant National Monument.

Protection takes different forms and one such form is law enforcement. Since the Proclamation does address cooperative management, it does not address jurisdictional differences between BLM and NPS lands within the boundaries of the Monument. Due to this situation, Special Regulations may need to address the inconsistencies found between the two agencies responsible for protecting this resource.

Another thought is Zones. May be the NPS portion of the Monument is a designated zone that continues to follow traditional NPS values while the BLM zone allows activities traditionally practiced on BLM Public Lands.

An example is target shooting. The BLM allows target shooting while the NPS does not. So is the BLM portion of the Monument a zone where that activity is allowed and the NPS portion a zone closed to target shooting. Or is a Special Regulation established that restricts target shooting throughout the Monument, or are there specific target shooting areas established. I don't think the NPS will consider relaxing the target shooting regulation due to overall public safety.

Another subject that needs direction is the use of All-Terrain Vehicles (ATV). The vast network of routes within the Monument includes County maintained roads, Federally maintained roads and roads that have never been maintained. ATV's are a useful means of transportation for the variety of purposes, ie- land managers, like ranchers, game wardens, protection rangers; and recreationalist, like game hunters and general sightseers.

In my opinion, these vehicles should be allowed. Allowed to be operated on established routes that are designated, to include specific routes that create loops routes and certain scenic/historic destinations, similar to the Paiute Trail, in South-Central Utah.

The State of Arizona has requirements for vehicles, including ATV's operated within the State. The vehicles are manufactured to be durable and provide many safety features but if operated on State/County maintained roads must meet certain vehicle codes and operators must poses a valid driver's license. The specific loop routes could allow ATV's not meeting the codes to still be operated and a driver's license optional. A Special Regulation could identify a minimum age, like 16 and accompanied by an adult.

With the designation of the Monument, the public has an expectation. One such expectation is increased information. One aspect is directional and regulatory signage and wayside exhibits. Yes the Monument is remote and the Proclamation references keeping remote. Agreed. I don't think additional directional signs will change the character. It will

help guide the public and eventually assist getting them on their way safely. The current signage is not adequate. I've been told that, "if they had their Arizona Strip map, they'd have no need for more signs". This may be true, but many do not stop at the Interagency Visitor Center and the weekend explorer finds the doors to that Visitor Center closed.

I like the concept Lake Mead NRA has with free handout maps. Not the detail for serious explorers, but enough to get them home at the end of the day. The Monument could be divided into sections, like Lake Mead did and maps generated at reasonable cost to be handed out. The back side has invaluable information, too.

Please add my name to the mailing list.



Raymond Klein



Planning Worksheet

0824



Consider the following questions, then write down your thoughts about the future management of the Arizona Strip.

We invite you to comment on all geographic areas: Grand Canyon-Parashant National Monument, Vermilion Cliffs National Monument, or the non-monument lands which are all managed by the Arizona Strip Field Office.

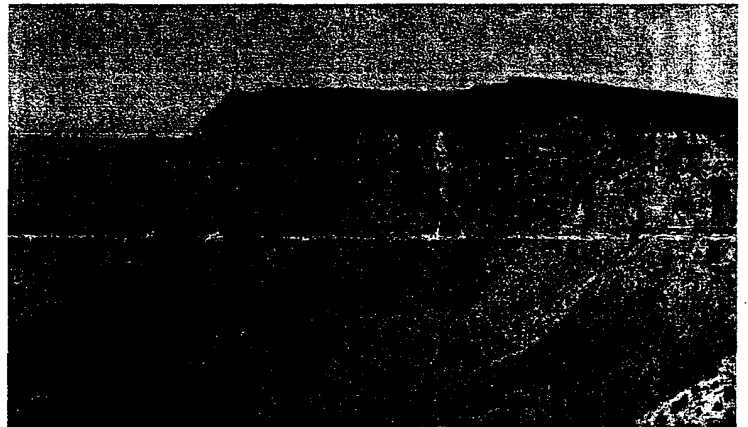
When submitting your comments, please specify the area. This is important because stand-alone plans will be completed for each unit. Attach additional pages if necessary. Once you have completed the worksheet, fold, tape, and mail by July 31, 2002.

Public comments, including names and street addresses of respondents, will be available for public review at the Arizona Strip Field Office, 345 East Riverside Drive, St. George, Utah 84790, during regular business hours (7:45 a.m. to 5:00 p.m.), Monday through Friday, except holidays.

Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently at the end of your comments. Such requests will be honored to the extent allowed by law. All organizations or businesses will be made available for public inspection in their entirety.

1. What do you value about these public lands and why?

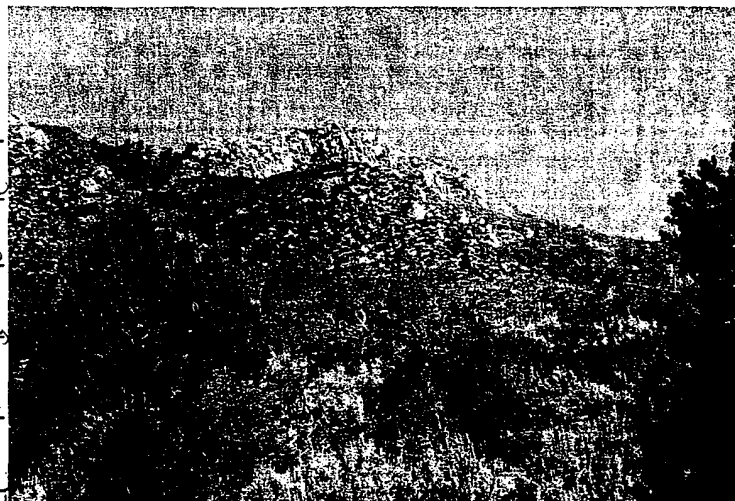
I value #1 on both monuments and BLM lands in between is the Solitude. I can go up there at anytime (especially to Grand



Canyon-Parashant area & have complete Solitude from people and noise. The scenery to me is spectacular, some spectacular, the vistas of the points are breathtaking which include all the lands up there. I value the history of all these areas. The old ranch houses, the Mormon history of these areas, the mining history of these areas, the ranching history of these areas. I have read about all these histories among these monuments.

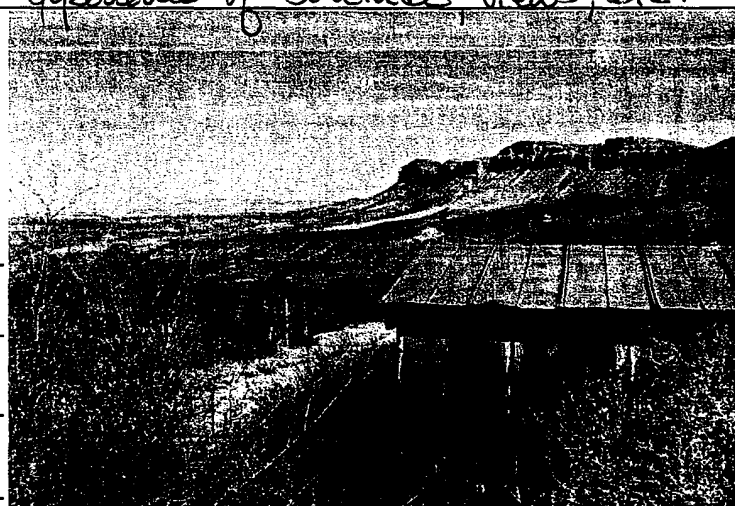
I value the prehistory of these areas. I have liked the old Indian routes up through the Vermilion cliffs, I've been to ancient sites in the Paria Plateau, the Grand Canyon-Parashant country and lands in between. and I value the people out there today on the old homestead & ranches that are descendants from the pioneers. These people are friendly, talkative, they welcome you into their homes. DOI-2002-04-01-1213 that.

2. What activities or uses on these public lands are important to you and why?



Hiking #1, ^{for all areas} exploring and back road driving would be #2. I like to have destinations to my places which might be: An old mine, a slot canyon, a view point, an indian ruin, an old road or trail. Hiking is my passion.

I feel when I walk to art. Peak that I can feel the mt. through my feet & into my being, such as Trumbull, Logan, Dellenbaugh, Emma, etc. The view at the end of a mt. hike where you are on the trail all to yourself is awe inspiring. I love to ^(pk) camp at view pts, such as Whitmore, Kelly, Twin Pts, Snap, Knab, etc, and I am a back road 4-wheel drive pu driver just for the experience of solitude, views, etc.



3. How would you like to see the scientific, traditional, recreational, cultural and natural resources of these areas managed? ^{for all areas}

Scientific; I would like to see science close off trails & back roads due to a plant or tree or something.

Traditional; needs to be respected

& thought over. To me tradition carries alot of weight. Allow the traditions to go on if they are not destructive.

Rec: I would like to see the Hiking & 4 wheel drive roads open as they are today. From what I have seen south of St. George there is not enough Rangers patrolling the area to keep the ATV roads on existing roads. He witnessed them cutting new trails, etc.

Cultural; Of course needs to be protected, but there has to be access to these known areas.

Nat. Res: kept from development, no mining, no abuse ^{of the cattle} ^{land} ^{lines}

4. Is there anything else you want to tell

us?

I think there needs to be put on
all these new & old peoples to these
areas to keep it clean. Pack your
trash out, no new fire rings or to
take them down. No new Quad Roads



there needs to be a respect for the lands

from all of us. Respect means its a priveledge to go here, I will take
care of this land. I've seen areas when more people come, guess
what? (You people know) More Trash. Today people do not respect
the land, they want to go there and camp but they do not have
enough respect for it to keep it clean, Right? Because where they
come from: Las Vegas, Phoenix, SLIC, are trash pits, throw it out
the window. I love these areas up there & want to keep them clean

& want to keep the solitude & the trails & roads open. We need more
To make comments electronically, please email us at arizona_strip@blm.gov Blay Rangers
For more information on the Arizona Strip visit our web site at www.az.blm.gov or
www.nps.gov/para

Thank you for your interest in planning for the future of the Arizona Strip.

Please complete the following:

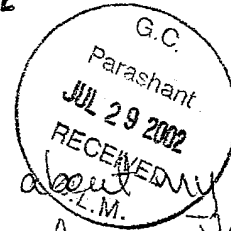
Name: Tom Flerchinger

Address: PO Box 1622, Arizona City, AZ. 85223

Email address: flash@casabrande.com

- ☒ Add my name to the mailing list.
- ☐ Note corrections to my name or address.
- ☐ Remove my name from the mailing list.
- ☐ Withhold my name and address from public review.

JUL 27 2002



7-24-02

Aiana Hawks,

Hello I'm writing this to you about my concerns related to the two new National Monuments on the Arizona Strip. I was not able to make the meetings in Page, AZ. for I do not live there but I do travel there for work and picked up a local paper with your information in it.

I would like to tell you a little about myself first and the relation I have to these two areas. I am an avid hiker, backpacker, car-camper, explorer. I've done hiked a lot of the known peaks south of St. George area such as: Mt. Dellenbaugh, Mt. Trumbull, Mt. Logan, Lava Falls Trail, the narrows of Parashant Canyon below the Copper Mt. mine area, Truckee Trail, Pearce Canyon area, Mt. Banks, Hack Canyon area, Grand Gulch mine area, I've driven out to and car camped in areas such as: Whitmore Pt., Kelly Pt., Twin Pts., Snap Pt., the pto., viewing into Knab Creek area, also in the Marble Canyon area in House Rock Valley. I've hiked up thru the Sand Hills Crack and the route up through Hancock Spring. So I have been around the area over the last 30 years or so and I still have many more years of exploring up there.

My concern is that the access to some of these areas will be blocked off and make it impossible to reach these areas. The Paria Plateau is so vast that to reach Powell's Monument or the White Pocket areas there has to be vehicle access. The Grand Canyon-Parashant area is so vast and very dry most of the time that the hard to get to areas need vehicle access to. Such as the 4 wheel drive route down Trail Canyon off of Mule Pt. 2026-54 012186 of mt.

②

Trumbull schoolhouse). which gives vehicle access down thru Parashant Canyon out to the Copper mt. mine area and then hiking access to the canyon narrows below the mine and down through the Parashant narrows. Its around 15 driving miles out there. One of only three areas you can drive into Grand Canyon National Park, the other two are Whitmore wash (which should be kept open) and on the South side at Peach Springs Canyon.

Now that our government has put fancy titles on these areas people around the world want to see whats behind the name. I've been as I mentioned in a out of these areas for over 30 years before it was just called the Arizona Strip area. I do agree that the National Monument status does give these areas more protection against mining, grazing & development which I will support you 100% on. I will not agree if we have to start closing all the 4 wheel access areas. Granted I'm sure there are some routes to water tanks (cows) that might be obsolete now.

I have alot of respect for these areas and cherish every chance I get to explore up there. I also have alot of respect for your office there in St. George. I also take time to stop in and share information with MAX (Mad Max) out at the info counter. I've been to areas he has not been and he has been to areas I have not. Your office has always been good to me and very respectful.

This fall I hope to spend a couple weeks alone on the Paria Plateau, I have not done much up there and want to see what I can, for I know not what the future holds.

Please don't be in a hurry to make decisions that might

affect us in the wrong way.

Maybe you have some current info available to use from these meetings in Lake, AZ. Is it possible for you to send me some. Thank you for your time to read this.

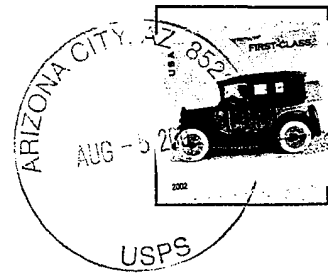
Sincerely,

Tom Haerchinger

(b) (6)



F Tom & Jacquie
Floerchinger



**Arizona Strip Planning Team
345 East Riverside Drive
St. George, UT 84790**

84790+

DOI-2020-04 01219

ASRMP003596

**Restore and Protect
the Greater Grand Canyon Region**

MR. TAYLOR:

NAME Eddie Bicket 20 JUL 2002

ADDRESS [REDACTED]

CITY/STATE/ZIP [REDACTED]

☐ Please send me information on the Arizona Strip Resource Management Plan.

DEAR MR. TAYLOR:

Northern Arizona's new national monuments — Grand Canyon Parashant and Vermilion Cliffs — more than double protected lands in the greater Grand Canyon region. Known as the Arizona Strip, this remote area of canyons, deserts and forests north of the Colorado River is home to pronghorn, bighorn sheep, mountain lion, spotted owl, desert tortoise and the endangered California condor, North America's largest bird.

Protect wild lands, animals and cultural resources — keep the greater Grand Canyon region wild. Please create an Arizona Strip Resource Management Plan that promotes restoration of over-grazed grasslands and prevents off-road vehicle damage.

Sincerely, Eddie Bicket

G.C.
Parashant
JUL 29 2002
RECEIVED
B.L.M.
ROGER TAYLOR
FIELD MANAGER
BLM ARIZONA STRIP FIELD OFFICE
345 E. RIVERSIDE DRIVE
ST. GEORGE UT 84790-9000

USA 2c
Red-tailed Woodpecker
USA 21

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

Land of this type is not being created; it is being overtaken by civilization. If we don't save what we have, we will soon be without a treasure such as this.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health. To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,

[REDACTED]

USA



(b) (6)

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>

cc:

Subject: Scoping Comments, Grand Canyon-Parashant and Vermilion Cliffs NMs

07/02/2002 07:55 PM

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

I do not think there are any better words to follow to protect the Ecosystem of our land as the ones handed down by the native american ancestors: Protect Mother earth, and Mother Earth will protect You.
Fred Leslie

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM , the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health.

To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,

[REDACTED]
USA



(b) (6)

To: "Planning Team Arizona Strip" <arizona_strip@blm.gov>

cc:

Subject: Scoping Comments, Grand Canyon-Parashant and Vermilion Cliffs NMs

07/02/2002 07:50 PM

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

The Grand Canyon-Parashant and Vermilion Cliffs National Monuments must be preserved for many reasons. These areas serve as a legacy for our children, and we must maintain their existence as as pristine examples of the beauty and solitude that exists in the wilderness. Thus, we must do our part to further this ecosystem protection.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health. To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]

USA

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

There are fewer and fewer places to get away from noise and pollution. Please keep dirty, noisy off-road vehicles out of our national monuments.
Thank you

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health.
To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,

Matthew Nesbit

[REDACTED]

USA

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

Allowing dirt bikes and off road vehicles into the Grand Canyon-Parashant and Vermilion Cliffs National Monument areas would completely change and destroy the peaceful beauty of these places as well as adversely affecting the health of the ecosystems there. Please do not allow this to happen.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health.

To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,

Joyce Day


USA

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

our parks and monuments need to be protected for our children

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health. To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,

valerie lee


USA

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

What happen to hiking??? and the quiet stillness of the forests.....I feel these off road machines should be prohibited. Lets get back to hiking again.....

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM , the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health. To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,

Annie Bennici

[REDACTED]
[REDACTED]
USA

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

It's time to stop talking and take action to preserve these national treasures.

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health. To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping process.

Sincerely,

Sincerely,

Judith Weinstein

[REDACTED]

USA

July 2, 2002

Planners, AZ Strip
Bureau of Land Management
345 East Riverside Drive
St. George, Utah 84790

Dear Planning Team Arizona Strip,

I feel that it is so important that we as Americans, do something to protect our national parks and their surroundings. When our ancestors were here hundreds of years ago, our environment was a much better place. Our wildlife was free to roam, without living in constant fear. I'm not saying that our wilderness is not beautiful today, but when our ancestors lived here, it was spectacular! They had fresh, clean drinking water, they didn't have to worry about pollution and other harmful things. That is why it is important that we preserve the beauty of our wilderness!

Thank you for letting me comment on the Grand Canyon-Parashant and Vermilion Cliffs National Monuments as part of the scoping process.

I am excited that these two monuments are part of the new system of protected lands being managed by the BLM, the National Landscape Conservation System. As planners for these places, you should consider each planning step within the broader context of the NLCS and what it was created to do.

I also ask that scoping, and indeed all aspects of planning for the Monuments, protect all the resources and objects that the Presidential Proclamations mention for protection. In fact, the agency should develop specific, measurable goals for the protection of these resources.

It's critical that the monuments' planning process emphasize the protection of biodiversity and ecosystem and landscape health. To that end, the BLM should:

- Assess the wilderness values of the Monuments and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.

- Determine a maximum carrying capacity that ensures natural resource sustainability within Grand Canyon-Parashant and Vermilion National Monuments.

- Designate a transportation system with a primary goal of protecting the monument's resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.

- Prohibit cross-country motorized travel as required by the Presidential Proclamations to protect the monuments' landscape and natural features. Further, off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.

In general, all decisions that may degrade National Monument values must be justified through comprehensive environmental analysis and public review and comment.

Thank you for considering my comments as part of the scoping

process.

Sincerely,

Sincerely,

Dorah Carpenter

(b) (6)

